



19 Sept 2021

Members of Community & Protective Services Committee
London

We at London ACORN are extremely disappointed with the recently released staff report on the review of residential rental licensing bylaw.

London ACORN launched the campaign for landlord licensing last year primarily because scores of tenants are living under substandard conditions that is deeply impacting their physical and mental well-being. ACORN members are dismayed by the report of the city staff that outrightly rejects the expansion of the landlord licensing to multi-residential apartments and townhomes.

The report is not based on a thorough understanding of landlord licensing and how it has helped protect tenants' rights in several other cities.

- London ACORN questions using return on investment as the sole basis to limit the rental licensing regime in 2008 and again maintaining the status quo in 2021 based on the same reason.
- Having a healthy home is a human right which everyone should have access to. It's the city's responsibility to ensure that tenants' human rights are protected. Moreover, it makes complete economic sense to have landlord licensing because a healthy home will prevent the city's funds from going into making homes liveable. It will also prevent homelessness as there is a direct link between a tenant living in substandard conditions and being evicted/ losing their home because they cannot continue living in that unit and as a result end being homeless owing to lack of an alternate home.
- It is important to realize that there are far more apartment buildings now and there are more and more apartment buildings underway. The phenomenon of financialization of housing has been growing rapidly whereby corporate landlords such as CAPREIT, Starlight Investments and many others are taking over multi-residential apartments and many of those apartments are currently in disrepair. The staff themselves state that there are 47,000 rental units in townhouse and apartment structures. It gives us the very reason why landlord licensing is required in the first place.
- We would also like to clarify that Landlord Licensing does not require yearly inspections for each individual unit. The Landlord's Licensing fee would be based upon the number of units in each building or the number of townhomes in each complex. Each property would have an annual audit of common areas, checking for cleanliness and pest control. Only when an issue arises during this audit would a more in-depth inspection be required. During this enhanced inspection, there would be an opportunity for tenant input and an opportunity for individual unit inspection. Further, if the apartment building/townhouse has received previous complaints, this would also trigger an enhanced inspection.

- Investing in landlord licensing means more inspectors but even if the city pays into it, a cost recovery model based on the Rent Safe program in Toronto can make sure that the landlords are paying their fair share. In the Toronto Rent Safe program, the city requires landlords to register and the registration fee is \$11.24 per unit annually. Most multi-residential apartments and townhome complexes are owned by landlords who can easily afford this. Even if landlord licensing is not in place, the city will still need new inspection staff given the increase in the number of apartment buildings.
- There is this claim that landlord licensing will increase the rent. There are provincial laws which set clear rules about what is allowed to be passed on to tenants. The landlords are claiming rents will go up if they are licensed, but ACORN members know rents go up every year anyways. Landlords also apply for above guideline rent increases all the time and win them for no good reason. Licensing Landlords is going to ensure that we at least get clean and healthy homes for the rents we already pay.
- Good landlords will benefit from this, because they can advertise that they have a clean healthy building. The slumlords that abuse tenants with horrible conditions will finally be held accountable to their tenants. We need proactive inspections of rental housing of all forms. We don't only inspect restaurants that are known to be bad – all restaurants get inspected regardless of anything else. Rental housing should be held accountable to the same health standards, the only way to know if the landlords are not keeping them up to standards is through proactive inspections.
- The current system is purely complaint based. Complaint based inspections don't work for many reasons: tenants don't know about the bylaw, tenants don't know their rights, tenants are afraid of landlords and eviction, there are language issues and even if some are aware about the process of filing a complaint, there is little or no enforcement. Hence, tenants eventually become unwilling to sacrifice their time and energy complaining when the city doesn't get results. The onus must move from the tenant to the city.
- Many members of ACORN have reported that their complaints have either not been taken seriously by the city, the inspection officer has refused to do physical inspection, or that fines are low enough that it is economically viable for landlords to simply pay these punitive fines and not resolve the issue. Furthermore, we have seen numerous times that the way the property standards bylaw enforcement system is structured, it creates disproportionate hardship for tenants.

The establishment of a Landlord and Tenant taskforce can never replace the objective of landlord licensing. The issues that tenants face are much beyond a communications issue between landlords and tenants and needs to be treated as such.

As a citywide group of low-and-moderate income tenants, we sincerely hope that the city will stand with tenants and protect the right to affordable and healthy housing for everyone.

Yours sincerely,
London ACORN