

# Stop COVID Evictions! Rent Relief Now!

A demand for social justice and public health



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Keep Your Rent Toronto  
[www.landlordsoftoronto.com](http://www.landlordsoftoronto.com)

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# CONTENTS

Executive Summary	1
I. The Eviction Crisis in Toronto Under COVID-19: Context and Causes	3
Large landlords have caused the crisis	7
II. Responding to the Crisis: Tenants, Landlords and Government	11
Government on the side of large landlords	13
III. The Need for a Different Emergency Response From Government	16
Emergency Action Now	19
1. Stop COVID evictions	20
2. Rent relief now	21
Conclusion: A Unique Opportunity for Advancing Social Justice	22
Endnotes	23

# Executive Summary

## Who should pay for the crisis?

This policy report was written in support of the renters' movements across the Greater Toronto Area. Tenants have been organizing to fight evictions to ensure that working-class and racialized people remain housed, so as to protect themselves and their communities during the COVID-19 global pandemic. It is imperative that elected and appointed officials address the growing eviction crisis as a public health crisis. They must use their emergency powers to take drastic measures that would immediately alleviate these crises and improve the lives of renters who are facing homelessness, while also curbing the spread of COVID-19.

As COVID-19 cases hit record levels and the healthcare system is challenged once again, the Province of Ontario has imposed a new 28-day lockdown starting November 23, 2020. The Mayor of the City of Toronto and its Chief Medical Health Officer have emphasized the importance of staying at home. At a time when our public health response to the pandemic rests so heavily on people's ability to shelter in place, no person should be at risk of losing their home.

Despite that, thousands of working-class Torontonians are being thrown out of their homes by the Landlord and Tenant Board, the sheriffs, and the Toronto Police Services. In October

alone, the Landlord and Tenant Board held over 2,900 hearings, most of them pertaining to non-payment of rent. The virus and lockdowns have led to increased job losses and economic insecurity among tenants, forcing them to choose between costs like food and paying the rent.

Yet, housing in Toronto was unaffordable long before the COVID-19 crisis began, in great part because large landlords who monopolize ownership of shelter have enriched themselves through price gouging and profiteering. Working-class tenants should not pay for a crisis that results directly from more than three decades of government policies that have systematically benefited the real estate industry and large landlords.

Indeed, large landlords's astonishingly high profits have remained unaffected by the COVID-19 crisis. They should pay for it.

The COVID-19 response measures taken by different levels of government have benefited landlords at the expense of tenants, either saddling tenants with even more debt or using public funds to subsidize the private profiteering of landlords. These measures show that authorities are more willing to protect landlords' rights to private profit, including through police force, rather than the human right to housing.

Governments must follow the lead of tenant struggles and concretely champion emergency measures to keep working-class people housed. This entails:

## 1. Stopping COVID Evictions:

- The Province of Ontario should impose an evictions moratorium that is indefinite and co-extensive with the complete end of COVID-19 and associated economic disruption. An evictions ban should be retroactive to August 1, 2020, and evicted tenants should be let back into their units or landlords should pay them damages.
- If the provincial government is unable or unwilling, then the City of Toronto's officials - the Chief Medical Health Officer and the Mayor - should use their duly constituted emergency powers to impose such an evictions moratorium immediately and without delay.
- The City of Toronto should immediately and without delay amend its bylaws that criminalize living on City public property. These include parks bylaws that criminalize camping and building of structures. People who have been compelled to join encampments due to the abhorrent state of overcrowded shelters should not be penalized with even more instability.

## 2. COVID Rent Relief:

- Tenants who have been unable to pay rents should have their arrears forgiven, and the rents of those who are unable to pay on an ongoing basis should also be forgiven.
- Landlords should absorb 100% of the costs of forgiving arrears and suspended rents out of their already substantial profits, and not out of public funds.
- Public rental subsidies should only be used to pay the rents of "mom and pop" small rental owners (i.e., those who own less than five rental units).

The COVID-19 pandemic offers the unique opportunity for government authorities to undertake unprecedented action in beginning to address long standing injustices. As the city faces the full weight of the second wave of COVID-19 and case numbers rising to record levels, the task of ensuring decent, stable, secure and affordable housing for all must be a fundamental priority for public health agencies and government authorities.



# I. The Eviction Crisis in Toronto Under COVID-19: Context & Causes

Toronto is facing an unprecedented and looming eviction crisis — landlords are evicting thousands of tenants from their homes because of their inability to pay rent due to unemployment and economic insecurity under COVID-19. The evictions crisis requires an urgent response from the City of Toronto and Province of Ontario. Mayor John Tory and Chief Medical Health Officer Dr. Eileen de Villa have encouraged Toronto residents to stay at home as much as possible in order to address the unprecedented increases in COVID-19 cases in the city, indicating that homes are the frontlines of defence against COVID-19. They have even invoked the Medical Health Officer's powers under the *Health Protection and Promotion Act* to keep restaurants, bars and other

indoor venues closed for a 28-day period.

The Province of Ontario has followed their lead to impose a new lockdown starting November 23, 2020. But governmental silence and inaction on thousands of working-class tenants who are currently being evicted from their homes<sup>1</sup> directly contradicts any public health measures necessary to prevent the further spread of COVID-19. In the

neighbouring United States, evictions have been linked to hundreds of thousands of cases and over 10,000 excess deaths. With the massive wave of evictions taking place in Ontario, government authorities risk causing a similar disaster here.<sup>2</sup>

Prior to the pandemic, the City of Toronto had recognized that the crisis of unaffordable housing meant that working-class and racialized tenants were already struggling to make ends meet due to skyrocketing rental costs.<sup>3</sup> As of 2016, 47% of Toronto renters lived in unaffordable housing, spending 30% or more of their income on shelter costs,<sup>4</sup> while over 40% of Ontario's tenant households had less than one month's savings at any given time in case of emergency.<sup>5</sup> Those most likely to be evicted in any given year in Toronto belong to Black and racialized working-class communities — according

to a recent report, "census tracts with 36 per cent Black renter households have twice the eviction filing rates compared to census tracts with 2 per cent Black households."<sup>6</sup>

The economic impacts of the COVID-19 pandemic have intensified the stresses faced by working-class tenants. The unemployment rate in the Toronto Census Metropolitan Area has nearly doubled since February 2020 from 5.5% to 10.7% in October 2020; while the absolute number of unemployed has more than doubled from 206,100 to 417,100.<sup>7</sup> The second wave and new lockdown will likely entail tens if not hundreds of thousands additional jobs lost in the Greater Toronto Area.<sup>8</sup> Corporate landlords as well as private dynasties that own large residential towers have responded by filing for evictions for non-payment of rent in the thousands. From March 17 to the end

### *COVID-19, job losses and rent: S's story*

*"With only \$887 remaining each month, my family struggled a lot to survive. Paying rent (\$930.88) became virtually impossible without jeopardizing my family's basic health and well-being. I literally had to choose between basic essentials for my family and rent between April and August. To make ends meet, I drained whatever little savings I had and fell into massive credit card debt."*

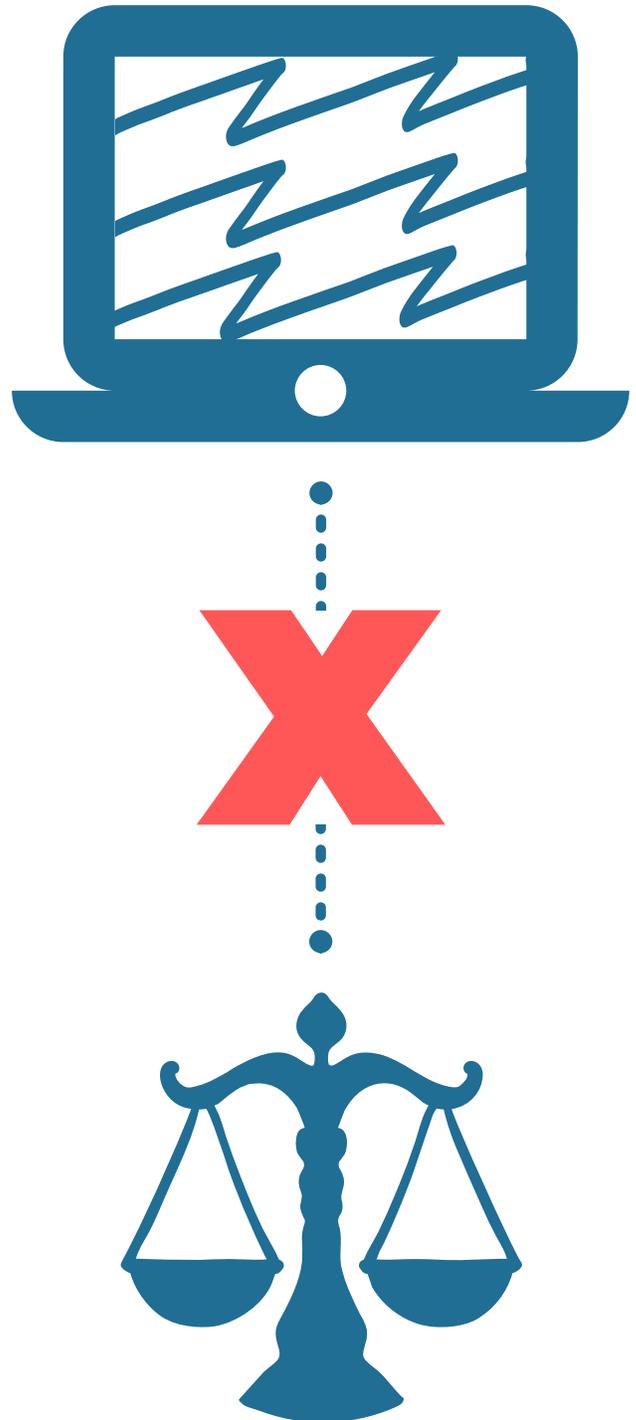
S is a tenant in East York facing an impending eviction hearing. Before the pandemic, he worked a full-time job and a part-time job, which resulted in \$2,000 and \$1,200 in earnings, respectively, after taxes. He lost his full-time job when the economy shut down but was able to keep his part-time job. Since he was still working a part-time job and making \$1,200 a month, he was not eligible for CERB. As the sole income earner for a family of four, including two young children, \$1,200 a month was not enough to survive on. He was also paying off student loans, so \$313 was automatically withdrawn from his account each month as repayment throughout the pandemic, leaving him with \$887 to spend per month.

of August, the Landlord and Tenant Board (LTB) has received 8,323 evictions applications:

[The Landlord and Tenant Board has] processed 668 applications to evict tenants for unpaid rent from March 17 to 31; 1,407 applications in April; 1,711 in May; 1,415 in June and 1,414 in July — plus 1,708 in August, after the moratorium ended.<sup>9</sup>

Some of the LTB adjudicators are not trained in law but are political appointees who have histories as or representing landlords: for example, Randy Aulbrook, a former real estate broker; Alex Brkic, a former manager at Zoran Properties — a property management company that represents landlords; Dawn King, a former police officer who also ran a property management company; and John Mazzilli, also a former property manager and a landlord.<sup>10</sup>

Eviction hearings are taking place online, with considerable technical difficulty and a shortage of duty counsel to provide legal advice to tenants. Evictions have been fast-tracked because many tenants have not received notices of their hearings. In many instances, tenants fearful of eviction have signed rent repayment plans with their landlords that can put them at greater risk of having *ex parte* eviction orders executed against them in case



they are even “one day late or one dollar short” in making a payment. *Ex parte* means there will be no hearing before the LTB to determine whether and why the tenant may have been short in payment.

For working-class renters, losing their homes will mean losing their ability to follow public health guidelines, such as physical distancing measures, resulting in a greater risk of infection and community transmission.

Many households will be forced to seek refuge in an overcrowded and underfunded shelter system, where the risk of infection is very high. Others will move into shared residences (e.g. multiple family or multiple generation units), where it will be difficult to maintain physical distance and, if necessary, self-isolate from friends and family. Some may live on the streets. According to the Encampment Support Network (ESN), there were nearly 200 tents alone in the six encampments where they provide humanitarian support, in November 2020.

The lack of housing will also take a heavy toll on people’s physical and mental health. Housing insecurity and homelessness lead to chronic stress and illness, including higher rates of depression, addiction, suicide, domestic violence, heart disease, and death.<sup>11, 12</sup>

The implications are broad and serious: rising economic insecurity in combination with a lack of tenant protections poses a threat not only to individual and community health, but also to the ability of public health agencies to effectively control the global COVID-19 pandemic.

Instead of treating the evictions crisis as a public health emergency, it would appear that government authorities are favouring large landlords by making working-class renters pay for the crisis of unaffordable housing exacerbated by the economic impacts of COVID-19.





# *Large landlords have caused the crisis*

It is important to note that low-income housing represented a crisis of both unaffordability and of public health long before the COVID-19 outbreak, and that this is a direct consequence of the price gouging and profiteering behaviour of large landlords. These firms operate with the goal of increasing the value of their portfolios and the payouts to their investors — treating apartments as investment products, rather than as homes and sites of community building.

Large landlords maximize their profits by keeping operating costs low at the expense of the health of tenants thanks

to lax enforcement of municipal and provincial housing codes, while they maximize rents by taking advantage of loopholes in provincial law to charge unfair prices for housing that are raised significantly year-over-year.

Large landlords come in two shades: Government deregulation has allowed rental housing stock to become increasingly concentrated in the hands of financial investors, through real estate investment trusts (REITs) and other financial vehicles that pool together investors' money to purchase ever more real estate.<sup>13</sup> Meanwhile private landlord dynasties often

Photos taken by tenants in the East York neighbourhoods of Crescent Town and Goodwood Park.



Bed bug and bed bug bites in a tenant's unit.



Lineup of tenants, leading out the lobby doors, waiting for repairs on broken elevators.



Washroom ceiling missing ventilation in a tenant's unit.



Cockroach traps in a tenant's unit.

continue registering their substantial holdings under untransparent shell companies, and adopt similar business strategies as 'financialized' landlords.

The drive to minimize operating costs can incentivize these 'financialized' and large private landlords to preside over aging rental housing with unsafe conditions, leave units in disrepair, and neglect even their most basic obligations to tenants — with minimal accountability. As a result of this long-standing problem, working-class families that are stably housed still face the prospect of having to shelter in hazardous living conditions where they risk encountering a wide range of harmful exposures including mould, bed bugs, inadequate ventilation, overcrowding, lead pipes, asbestos, and more.<sup>14</sup>

Working-class tenants have long borne the cost of this landlord neglect in the form of negative health outcomes, including asthma, respiratory distress, depression, hypertension, cancer, and other adverse physical and mental health conditions - all of which exacerbate underlying health problems and place individuals at further risk of COVID-19 infection and mortality.<sup>15</sup>

Meanwhile, large landlords maximize their revenues through price gouging, defined by the Province of Ontario as

charging “unfair prices” or “raising prices significantly” for necessary goods.<sup>16</sup> Large landlords can raise prices unfairly because they monopolize a basic necessity: shelter. The high rental prices that they charge are the basis of astonishingly high net operating income (profit) margins — their total revenues from rents and other tenant fees minus their total operating costs — that hover at or well above 60% (see Table 1).

Landlords can raise rents significantly despite the provincial rent control guidelines (which sets a maximum limit on how much landlords may increase rents) through two legal loopholes.

The first legal loophole is “vacancy decontrol,” legislated by the provincial government in 1997, which means there is no legal limit to how much a landlord can increase rent between tenancies. Landlords can extract even more value from a vacant unit by “repositioning,” meaning they renovate suites to capture bigger rent increases, particularly in areas experiencing gentrification.

Killam REIT, for example, increased rents by 5.6% in 2020 across its portfolio from regular turnovers alone, while raising rents 28.2% in suites where units were “repositioned.”<sup>17</sup> Vacancy decontrol incentivizes evicting current tenants to raise rents above guidelines. Repositioning incentivizes renting to higher-income tenants, thus driving working-class tenants out.

The second legal loophole is above guideline increases (AGIs), which allow landlords to finance repairs, renovations, and even cosmetic makeovers by increasing rental rates by up to 3% per year above the rent control guideline (e.g., 2.2% in 2020 plus 3% = 5.2%) over a period of three years. These increased rates remain part of the tenants’ subsequent rental bill and result in substantially higher rents.

CAPREIT, for example, explicitly identified AGIs as a strategy to “raise monthly rents on lease renewals.”<sup>18</sup> As of September 30, 2020, it had a total

Table 1: Stabilized Net Operating Income (Profit) Margins of Major Landlords as at September 30, 2020

Landlord	CAPREIT	Boardwalk	Killam	InterRent	Minto	Morguard
NOI margin (%)	65.0	59.6	63.6	65.0	62.3	55.7

Table source: Various reports of financial results, available on company websites.

of 8,107 AGI applications outstanding, representing over 34% of its total portfolio of 23,498 residential suites in Ontario, with 819 approved. Their approach is to apply for AGIs in an apparently indiscriminate fashion, not driven by the goal of improving the conditions of tenants' buildings, but

rather as a strategy to hike up average monthly rents, and company revenues.

Indeed, CAPREIT, like other large landlords, cites "significant rental increases on turnover" and "increases on renewals due to AGI" as the prime drivers of its profits.<sup>19</sup>

In sum, the price gouging and profiteering of large landlords has produced not only a crisis of affordable housing but also a crisis of public health — both of which existed long before the COVID-19 pandemic, and which the pandemic has merely exposed, in a brutal fashion. The current evictions crisis exacerbates these longstanding problems.



## II. Responding to the Crisis: Tenants, Landlords and Government



Tenants across the city have come together in associations and unions in order to prioritize their duties to themselves, their families and their neighbours. They have made principled demands in different neighbourhoods, responding to the particular issues represented by different landlords.

The Crescent Town Tenant's Union,

part of the East Danforth Tenants' Union in East York, is one such example. They have called for the main landlord, Pinedale Properties, to negotiate rent repayment plans that involve substantial relief and that seek to prevent evictions. These negotiations, moreover, should happen collectively through the union rather than individually.

The importance of collective negotiation is clear from the intimidation tactics that Pinedale has exercised. In late April, a Pinedale representative went door-to-door harassing tenants, serving them with N4 forms that threaten eviction, compelling them to pay rent on the spot. "This COVID is nothing," the representative told one family who had lost family members to the disease.<sup>20</sup>

Rather than negotiating in good faith with unions, individual tenants have often been served with rent repayment plans drawn up by landlords that demand exorbitant sums to be paid upfront or on a monthly basis. For example, one repayment plan that Pinedale offered entailed repayment of four months of arrears (\$7,000) over 12 monthly instalments — an extra \$583 per month. After difficult negotiation the company offered a 10% discount if the tenant repaid \$3,500 upfront.

In the neighbouring Teesdale neighbourhood, Princess Management included a clause in their repayment plans that the tenant would update the landlord in respect of applications for financial assistance, "including, without limitation, all correspondence received from or addressed to any governmental or quasi-governmental agencies." The repayment plan required that a portion of these assistance funds be paid to the landlord in addition to monthly rent (\$1445.71 in this case) and the extra

monthly payment (\$474.12) scheduled for lockdown arrears.

Perversely, not only has Princess Management sought to legitimize a gross violation of privacy but the company is seeking to remove any autonomy that a working-class tenant may have in deciding how to spend from their own limited access to funds. The exorbitant sums demanded make it inevitable that tenants will fall behind on payments — and that appears to be the point, to make it easier for landlords to evict tenants at will using ex parte eviction orders.

The formation of unions whereby tenants stand by their neighbours is a threat to the landlords' abilities to intimidate, price gouge and profiteer from working-class tenants. For this reason, many landlords have hired high-priced legal firms and leaned on local Toronto Police Service divisions to press against tenants. The question is not one of financial loss — since the tenants who have not paid rents are relatively few, and these landlords are spending far more on legal fees — but one of power.

Tenant organizations and alliances have also pressed their demands at the City and Provincial level, and here, too, it is clear that government authorities are not neutral, but are bending over to the immense pressure of large landlords.

# *Government on the side of large landlords*

The emergency responses adopted by different levels of government have continued to reward large landlords at the expense of working-class tenants. For many of the latter, the situation has often gotten worse.

The residential housing evictions moratorium that the Province implemented from March 19 to July 31 2020 proved itself to be a loan against the future: as tenants found themselves out of jobs and unable to pay the rent, their arrears piled up. When the moratorium was lifted, many people found themselves on the hook for several thousands of dollars, and landlords immediately filed thousands of eviction applications.

**“If you have a choice between putting food on your table or paying rent, you’re putting food on your table. The government of Ontario will make sure that no one gets evicted. We stand by that and we’re gonna make sure we take care of those people.”**

Premier  
Doug Ford,  
March 26,  
2020



## *CERB is not enough: R's story*

*"My life was turned upside down with the onset of the COVID-19 pandemic in March. As a construction worker who builds restaurants, my industry was decimated entirely. I was laid off from my job ... in March. I began receiving CERB payments in April (\$1,600 after taxes), which was a significant dip in income compared to what I was making while employed full-time (\$2,628 per month). To make matters worse, my roommate moved out at the end of March—leaving me to shoulder rent on my own. Due to COVID-19 concerns, I have been unable to find a new roommate.*

*"I found it impossible to pay my rent (\$1424) in full on top of purchasing necessities for survival, including PPE, sanitizer, groceries (which became very expensive), phone and internet bills. I lived frugally during the pandemic. For instance, I changed my diet to eat only the cheapest food. I saved as much of my CERB as possible to make payments towards my arrears where possible.*

*"I stopped receiving income at the end of September when CERB ended. Since September, I have been applying for Employment Insurance (EI) but am facing a delay due to missing paperwork in the mail. I have sent my record of employment (ROE) to the EI office, and I am currently waiting for EI to confirm receipt of my ROE and approve my application."*

The rent freeze the Province will implement from January 1, 2021 to December 31, 2021 is of no benefit to tenants facing evictions — it does nothing to ensure that they continue to be housed. Moreover, the rent freeze does not restrict above guideline increases or vacancy decontrol, further incentivizing evictions when market rental prices begin to pick up again.

Instead of siding with working-class tenants, the provincial government rammed through Bill 184, the *Protecting Community and Strengthening Community Housing Act* at the end of July, which (despite its name), made it easier for landlords to evict tenants.

Financial subsidies like the CERB (Canada Emergency Response Benefit) have also been inadequate. Several working-class tenants did not meet the eligibility requirements despite losing substantial parts of their income. For others, the after-tax CERB amount would have left them with barely any spending money after paying rent. Perversely, when CERB was used to pay rent, it meant public monies were being used to subsidize the private profits of already profitable landlords — not to support the survival needs of working-class people during a pandemic.

Instead of support, working-class tenants have seen the Toronto Police Services show up in numbers to forcibly evict tenants and otherwise support large landlords. In one such case in the East York neighbourhood of Crescent Town, at least five police officers showed up to a unit at the behest of the

building owner, Pinedale Properties, at 1:30AM on October 4 2020 to enforce an illegal eviction<sup>21</sup> by kicking at the door until the single, Black, immigrant working-class tenant opened it. Similar images of police showing up in considerable numbers have been seen in their enforcement of other evictions.

The sum total of these inadequate measures and the police response demonstrate that government authorities are more willing to protect and subsidize landlords' rights to private profit, including through the use of physical force, rather than the human right to housing.



Pictured left: one of the five police officers captured on video enforcing an illegal eviction in Crescent Town. Pictured below: police officers in the East York neighbourhood of Goodwood Park, responding to the call of the building owner Raneer Management over a disputed eviction.



# III. The Need for a Different Emergency Response from Government



As the city faces the full weight of the second wave of COVID-19 and case numbers rising to record levels, the task of ensuring decent, stable, secure and affordable housing for all must be a fundamental priority for public health agencies and government authorities. Yet, it has become clear that big businesses that monopolize housing are being rewarded through governmental inaction while small businesses and working-class people are being made to pay the cost of the crisis.

Working-class tenants should not pay for a crisis that results directly from more than three decades of government policies that have systematically benefited the real estate industry and large landlords. Unlike small "mom and pop" landlords (i.e., those with less than five units) who may rely on rental income to pay their bills and residential mortgages, large landlords who monopolize shelter have enriched themselves through price gouging and profiteering.

## *Stand with working-class tenants: S's story*

*"I am a single mother with two young children, two years old and a newborn. Prior to COVID, I was working and then on maternity leave. Now, I am receiving Ontario Works, amounting to \$1,150 per month. I am also receiving a child benefit for my children, which goes toward child rearing – including diapers, food, clothing and other essentials.*

*"Prior to the pandemic, I was receiving additional financial support from my children's father to help pay for my rent (\$1,400). When the pandemic struck, my children's father lost his job and was unable to help support me any longer. I was also receiving some monetary support from my sister, but she also lost her job.*

*"I struggled immensely during the economic shutdown that occurred as a result of COVID-19. My low income was spent on essentials, such as PPE, rising grocery costs, medication, and my insurance for my car so that I could get around safely without bringing my children onto the TTC. I was also sending a small \$100 a month to my retired mother in Eritrea, who is also struggling during this pandemic.*

*"As a result, I have been unable to pay my rent for May, June, July, August, September and October. Now that my children's father and sister are back on their feet, I will be able to start making rent payments for November going forward. I hope that Rane Management will be able to understand my situation."*

Although the City of Toronto's gross domestic product (GDP) is expected to contract 4.5% in 2020 and hundreds of thousands of jobs have been lost,<sup>22</sup> large landlords' bottom lines have basically remained unaffected by the pandemic. CAPREIT, one of the biggest landlords in Canada, reported that 99% of rents have been collected so far in 2020,<sup>23</sup> and its stabilized net operating incomes increased from \$353,397,000 as of September 30, 2019 to \$367,952,000 as of September 30, 2020 — an increase of 4.1%. (CAPREIT's total profits reached \$429,525,000).<sup>24</sup> Killam REIT, Canada's ninth biggest landlord, similarly reported 99.5% rent collection from apartment units, while

Boardwalk REIT, the third largest landlord, reported rental collections "inline with pre-COVID levels."<sup>25</sup>

In fact, in a submission for the 2020 Ontario Budget, the Federation of Rental-housing Providers of Ontario (FRPO), which represents large landlords, has noted that they are ready to absorb between 25 to 33% in unpaid rents, if the balance of lost rents is covered by struggling tenants and government subsidies.<sup>26</sup>

Yet, many are refusing to offer those same terms to tenants negotiating through tenant unions, even though by their own admission large landlords can easily absorb losing a small

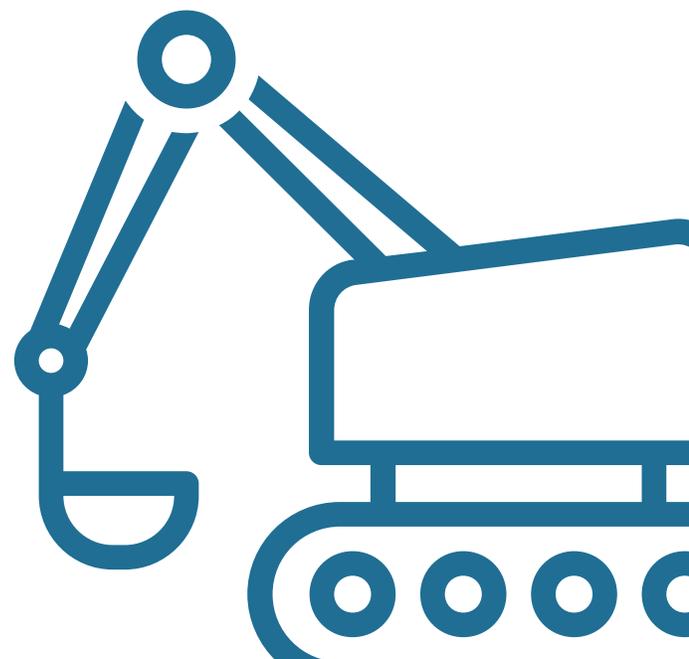
portion of their rental income while still being profitable. If small landlords are losing out, surely they can be covered by their larger, more profitable counterparts. There is no reason public funds should go to subsidize already profitable large landlords. They should pay for the crisis.

The renters' movement has long called on Mayor John Tory to use his emergency powers to implement an evictions moratorium in the absence of provincial action, something he has declined to do by referring to the legal advice of the City Solicitor. Yet, the 28-day closures of indoor businesses announced on November 10, 2020 by Chief Medical Officer Dr. Eileen de Villa with the full support of the Mayor were also undertaken against the legal advice of the City Solicitor. This glaring double-standard makes it clear that the stopping point in challenging large landlords is primarily political and not legal.

Meanwhile, people who have been

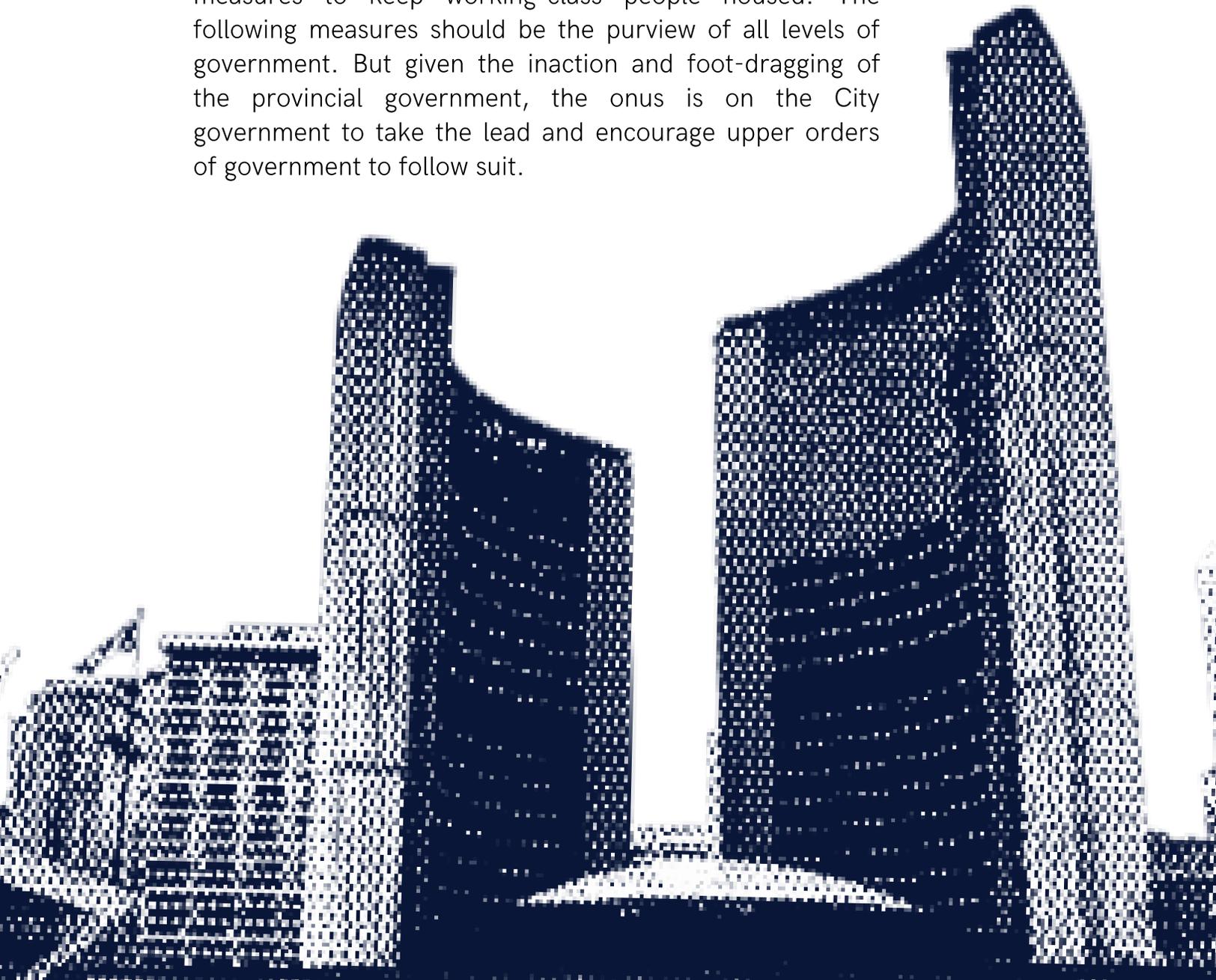
compelled to form encampments in City parks due to being unhoused and due to the abysmal and dangerous conditions of City shelters have often been harassed and evicted from their tents. The City has gone to the trouble of defending in court its authority to evict the unhoused from their homes in these parks.<sup>27</sup>

If people dining indoors is a public health emergency, then people getting evicted from their homes is also, and arguably more so.



# ***Emergency Action Now***

It is high time that elected representatives take the lead of tenant struggles and concretely champion emergency measures to keep working-class people housed. The following measures should be the purview of all levels of government. But given the inaction and foot-dragging of the provincial government, the onus is on the City government to take the lead and encourage upper orders of government to follow suit.





# Stop COVID Evictions

- The Province of Ontario should immediately impose an evictions moratorium, and impose a retroactive evictions ban that reverses any evictions that have been enforced since August 1, 2020. Landlords must let tenants back into units, or in the event that the unit has been re-rented, pay damages to the evicted tenant.
- In the absence of provincial action, the City of Toronto's Chief Medical Officer's should use her authority under Section 22 of the *Health Protection and Promotion Act*, and the Mayor should use his authority under the Emergency Management and Civil Protection Act, to impose an immediate moratorium on evictions in the City of Toronto.
- Any moratorium on evictions should be indefinite and co-extensive with the complete end of COVID-19 and associated economic uncertainty.
- Severe penalties should be imposed on landlords who violate the moratorium.
- The City of Toronto should immediately amend its bylaws that criminalize living on City public property. These include parks bylaws that criminalize camping and building of structures.



# Rent Relief Now

- Tenants who have been unable to pay rents should have their arrears forgiven, and the rents of those who are unable to pay on an ongoing basis should also be forgiven.
- Landlords should absorb the costs of forgiving arrears and suspended rents out of their already substantial profits, and not out of public funds.
- Public rental subsidies should only be used to pay the rents of “mom and pop” small rental owners (that is, those who own less than five rental units).

These measures, it should be noted, are initial emergency measures that should not preclude more substantial and far-reaching changes to the way housing is supplied and its ownership is organized in the City and the country at large.

Additional immediate measures governments can take keeping in mind both the economic and public health emergency, and the context of large landlords’ price gouging and profiteering include: suspension of rents for the duration of the crisis<sup>28</sup> and new forms of revenue generation that target large landlords without passing costs onto tenants.



**Conclusion:  
A Unique Opportunity for  
Advancing Social Justice**



It has long been clear that the City of Toronto's runaway housing costs are contrary to the goals of social justice and, it should be noted, racial justice, as those most likely to face eviction are working-class and Black or belonging to other racialized communities. These working-class tenants have long been living in housing conditions that are detrimental to public health.

Unaffordable and substandard housing is a direct consequence of the price gouging and profiteering behaviour of large landlords. The currently unfolding evictions crisis only exacerbates economic insecurity and the threat it poses to the public's health.

The COVID-19 pandemic offers the unique opportunity for government authorities to undertake unprecedented action in beginning to address long standing injustices. The oft-heard refrain that imposing greater regulations on landlords will prevent them from building new purpose-built rental housing stock is belied by the fact that the latter is almost exclusively targeted at high-income renters. The free market will simply not bring down rental costs for Toronto's working-class tenants to an adequate level.

This is no time for tepidity. It is imperative that government and public health authorities follow the lead of working-class tenants struggling to remain housed and do whatever it takes to ensure that renters can stay safe in their homes.

## Endnotes

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