RE: Bill 60, Fighting Delays, Building Faster Act, 2025

The 519, Canada's largest 2SLGBTQ+ organization, wishes to express deep concerns about Bill 60 and its impact on tenants and renters of Ontario.

As a proud City of Toronto Agency and community centre, The 519 has advocated for equitable access to homelessness services and supports for decades: supporting community consultations related to the experiences of 2SLGBTQ+ people in shelters and housing in 2002, 2022 and 2025; offering 2SLGBTQ+ inclusion training to shelter and housing providers for over 20 years; and providing housing supports to community in various forms over 20+ years.

2SLGBTQ+ people are disproportionately overrepresented in experiences of homelessness and housing precarity. They are more likely to enter homelessness at younger ages; more likely to experience chronic homelessness; are twice as likely to report mental health issues as a reason for housing loss; and have higher rates of acute health service interaction (e.g. ER visits, hospital stays), as compared to non-2SLGBTQ+ people experiencing homelessness[i].
2SLGBTQ+ people face discrimination in shelters, supportive housing, social housing, and amongst landlords, neighbours and the larger community. Discrimination and exclusion are key contributing factors to 2SLGBTQ+ homelessness and housing precarity,[ii] and the current housing affordability crisis exacerbates an already urgent situation. In one cross-Canada survey, 69% of gender-diverse people reported being unable to find or maintain housing due to affordability issues; 41% admitted to cutting back on basic necessities in order to make ends meet; and 43% reported experiencing discrimination from their landlords due to their gender identity,[iii]. By eroding tenant rights to review LTB orders and access tenant hearings, Bill 60 opens the door to further exacerbate instances of landlord discrimination and unjust evictions against 2SLGBTQ+ tenants.

The housing vulnerability that 2SLGBTQ+ people and others face is deeply affected by stagnant social assistance rates, the loosening or removal of key tenant protections, and the continued failures of conflict resolution mechanisms like the Landlord and Tenant Board to protect tenants. **Bill 60 threatens to deepen these cuts and leave low-income renters and tenants without rights or recourse**. This is in direct contravention to the internationally recognized Right to Housing approach. What's more, the Ontario Regulatory Registry's analysis of Bill 60's regulatory impact **only states the bill's impact on landlords**. This stark absence of consideration for tenants further erodes public confidence in the LTB as a credible body that can competently protect renters and preside over landlord-tenant matters in an unbiased and equitable manner.

We kindly request a fulsome analysis of Bill 60's impact on tenants before the bill is considered at the Legislative Assembly. We also call out the motion put forward by MPP Steven Clark to restrict the debating period for Bill 60 among others, and push forward, despite clear objections from renters, tenants, legal clinics, concerned MPPs and community members across Ontario, as articulated by housing advocates at No Demovictions and the Encampment Justice Coalition and over 100 other partner organizations. We urge the Provincial government to slow down and carefully consider the dire consequences Bill 60 will have on vulnerable tenants.

THE 519
SPACE FOR CHANGE

Comments on Bill 60's Proposed Amendments:

Proposed Amendments to Shorten the Rent Arrears Eviction Notice Period

This amendment to enable landlords to expedite evictions is deeply concerning and threatens to further exacerbate an already urgent homelessness crisis, in a time when low-income renters are stretched to their thinnest.

By shortening the notice period from 14 days to 7 days, this amendment would make it near impossible for vulnerable tenants to access the legal and financial resources (e.g. Rent Bank) to keep their tenancy. Further, the bill restricts consideration for a tenant's circumstances, and makes it easier for landlords to evict tenants without a hearing.

Proposed Amendments to the Rules Related to Tenants Raising New Issues at a Landlord and Tenant Board (LTB) Rent Arrears Hearing

LTB wait times for tenant-initiated requests are 2-3 times longer than landlord applications. In common instances where bad faith landlords have ignored their legal responsibilities, tenants have used rent arrears as a last defense to gain a hearing at the LTB to compel landlords to fulfill their legal duties. This includes illegal matters such as: landlord harassment and discrimination; illegal charges or deposits; illegal entry into the rental unit; and failing to maintain units to an adequate health and safety standard (e.g. mold, pests, heat and more).

This amendment restricts tenant rights to raise issues unless they meet specific and time-sensitive requirements, including paying 50% of rent presumably owed. This presumes that the tenant is in arrears before a hearing to determine if they are in arrears. In other words, it assumes a landlord's version of the story prior to hearing from the tenant.

As landlords have a clear position of power in relation to tenants, this amendment creates inequitable conditions to further bolster landlord powers at the expense of tenant rights. Eviction policies must centre tenants - by lowering barriers to participation, ensuring tenant rights are adequately communicated, and giving fair and equitable access to Landlord Tenant Board hearings.

Proposed Amendment to the Residential Tenancies Act, 2006 (RTA) to Shorten the Period of Time Available to Request a Review of an LTB order

Under the current LTB Rules of Procedure, a tenant is given 30 days to request review of an order. This provision accounts for the time it reasonably takes for a vulnerable tenant to understand the implications of an LTB order, seek legal advice, identify and articulate their rationale for review, and file the appropriate paperwork. This can include events such as unjust evictions, voluntary evictions (in which a landlord manipulates a tenant to leave without filing the proper N12 or N13 forms), or where tenants were not able to participate in a proceeding.

The process is already overly burdensome for tenants, who may not understand their rights to a review and must navigate both administrative and financial system barriers to file a request. Shortening this time period unfairly impedes on a tenant's right to challenge landlord orders, and again, tilts the LTB in favour of landlords, at the expense of tenants' rights to justice.

Proposed Amendments to the Compensation Requirements for Landlord's Own Use Evictions
The use of N12 forms to evict tenants has risen 85% across Ontario. Bad faith landlords have been known to use N12 evictions as a means of circumventing security of tenure rent control to raise rents. This amendment threatens to make these bad faith and illegal actions even easier for landlords, pushing the financial burden of relocation onto tenants. Renters rely on the compensation currently provided to pay their rental deposit on their new homes and cover their moving expenses. A landlord has a responsibility to provide tenants with fair compensation, if the tenant is forced to leave through no fault of their own.

Additional Recommendation for Amendment
The 519 urges the provincial government to reinstate options for in-person LTB hearings. The transition to virtual-only LTB hearings presents numerous barriers for vulnerable tenants who may not have the digital literacy or technology to equitably participate in proceedings. Tenants have a right to a fair and accessible hearing, and should therefore have the opportunity to choose the format that best suits their needs and abilities. Additionally, in-person support centres and clear language informational resources must be made available to ensure that tenants have equitable access to all LTB proceedings and their rights therein.

Taken together, these amendments impede tenant's access to justice at the LTB, and threatens to increase rates of eviction, displacement, housing precarity and homelessness.

Canada must move towards an internationally-recognized Right to Housing approach. Federal and municipal governments have already recognized the urgency of our affordable housing crisis and the need for a rights-based approach through the development of the Federal Housing Advocate and Ombudsman Toronto's Housing Unit.

We urge the Provincial Government to demonstrate meaningful action towards addressing the needs of low-income renters by enacting greater tenant protections, fixing the LTB to competently uphold tenant rights, increasing funding for tenant legal education and services, reinstating rent and vacancy control, and creating a rights-based provincial housing body to ensure accountability.
All levels of government must work together towards progressive realization of our right to housing by protecting renters from rent hikes, renovictions and bad faith landlords, while also investing in social, supportive and deeply affordable housing.

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[i] Identifying 2SLGBTQ+ individuals experiencing homelessness using Point-in-Time counts: Evidence from the 2021 Toronto Street Needs Assessment survey | PLOS ONE
2SLGBTQ+ Peoples' Experiences of Homelessness in Toronto: Analysis of the 2021 Street Needs Assessment Survey: City of Toronto.

[ii] Women's National Housing & Homelessness Network. (n.d.). Research Brief: Preliminary Portrait of Housing Need & Barriers amongst Gender-Diverse Persons. (p. 14). https://womenshomelessness.ca/wp-content/uploads/Research-Brief-on-Housing-Need-Homelessness-amongst-Gender-Diverse-Persons.pdf

[iii] Women's National Housing & Homelessness Network. (n.d.). Research Brief: Preliminary Portrait of Housing Need & Barriers amongst Gender-Diverse Persons. (p. 12). https://womenshomelessness.ca/wp-content/uploads/Research-Brief-on-Housing-Need-Homelessness-amongst-Gender-Diverse-Persons.pdf