

April 19, 2023

Emergency & Community Services Committee  
Hamilton City Hall  
1<sup>st</sup> Floor - 71 Main Street West  
Hamilton, Ontario L8P 4Y5

**RE: Renovictions Stakeholder Consultation (HSC23023) (City Wide)**

The Hamilton and District Apartment Association (HDAA) wishes to provide our thoughts on the Renovictions issue up for discussion at the April 20, 2023 Emergency & Community Services Committee meeting.

Firstly we are happy to see that the main recommendation is to increase funds into the Tenant Defence Fund, we do believe that there should be resources and protections in place for bad faith renovictions. With that in mind we do want to note that even though there is a negative connotation towards renovictions, renovictions in many cases are necessary.

Our rental stock in Hamilton is very old, with the majority being built around 50 years ago, and are in desperate need of repairs and renovations. Many of these repairs are large projects that would necessitate the need to have empty units. Once repairs and renovations are completed, tenants are able to move back into those accommodations that are now much more comfortable and, as the *Residential Tenancies Act* allows, at the same rent as they paid previously. Renovictions are essentially a big win for tenants who end up with a better home and at the same rent they were paying before. The City should be encouraging such improvements to rental properties and further to that it should be a priority for the City, in regards to their CityHousing stock, and the private sector to keep housing stock to a good standard.

Renovictions have been increasing and will continue to increase as the rental stock continues to get older and work can no longer be delayed. As we know this does come with significant financial investments. Although for tenants it can be a big win, renovictions do create a significant financial burden on housing providers in regards to recovering costs and in that sense it is much more determinantal to the housing provider. Renovations are costly and losing rental income during them is even more costly. Although it is easier to do renovations on a vacant property many would prefer to continue to receive the revenue. With this in mind it would be beneficial if the City also provided a program for housing providers to assist with these costs to ensure tenants are able to reap the benefits. The City is very aware through their own battles with CityHousing repairs, with a recent announcement that the City would require \$5.6 million in funds to repair 476 of their units, of the financial investments that are required by housing providers.

We do think it prudent to point out that the resources the City spent to look into a renovictions by-law, which as we saw with the New Westminster bylaw, is not within the municipalities jurisdiction to do so, could more wisely have been spent improving their own housing stock.

We are happy to see there is a recommendation to provide more supports around tenant education. The *Residential Tenancies Act* has many protections for tenants already and with Bill 97 those protections have been extensively enhanced. Should tenants know their rights and the protections provided to them under the Act, we would hope the negative connotation towards renovictions would slowly cease.

There were many mentions of the rental licensing program in the report. As we have expressed many times in the past the HDAA does not support the rental licensing program as it will ultimately result in higher rents and/or loss in rental supply. We are already dealing with a very difficult rental market for tenants, with low supply and high rents, aging rental supply that will need improvements and rental supply slowly dwindling. It would be unwise for the City to continue, and to add, measures regarding the rental housing industry that would only see these issues be further exacerbated.

Respectfully yours,

**Hamilton and District Apartment Association**