





**CITY OF HAMILTON**  
**PLANNING AND ECONOMIC DEVELOPMENT DEPARTMENT**  
**Licensing and By-law Services Division**  
**and**  
**CORPORATE SERVICES DEPARTMENT**  
**Legal and Risk Management Services Division**

<b>TO:</b>	Chair and Members Planning Committee
<b>COMMITTEE DATE:</b>	August 10, 2021
<b>SUBJECT/REPORT NO:</b>	License Rental Housing (PED21097/LS21022) (Wards 1, 8 and parts of Ward 14) <b>(Outstanding Business List Item)</b>
<b>WARD(S) AFFECTED:</b>	Wards 1, 8 and parts of Ward 14
<b>PREPARED BY:</b>	Monica Ciriello (905) 546-2424 Ext. 5809 Leanne Fioravanti (905) 546-2424 Ext. 4423
<b>SUBMITTED BY:</b>	Monica Ciriello Director, Licensing and By-law Services Planning and Economic Development Department
<b>SIGNATURE:</b>	
<b>SUBMITTED BY:</b>	Stephen Spracklin City Solicitor Legal and Risk Management Services
<b>SIGNATURE:</b>	

**Discussion of Appendix "C" to report PED21097/LS21022 in Closed Session is subject to the following requirement(s) of the City of Hamilton's Procedural By-law and the Ontario Municipal Act, 2001:**

- Advice that is subject to solicitor-client privilege, including communications necessary for that purpose.

**RECOMMENDATIONS**

- (a) That consideration for a Rental Housing Licensing pilot project for Wards 1, 8 and parts of Ward 14 be postponed to Q1 2023;

- (b) That Staff report back to Planning Committee in Q1 2023 with an Information Report that includes the following:
  - i. updated information on average market rents and vacancy rates post-COVID;
  - ii. number of secondary dwelling units created and number of secondary dwelling units legalized following the City's recent adoption of the new secondary dwelling unit zoning changes; and
  - iii. complaints and enforcement activity with respect to the expanded property standards & vital services for rental housing under City of Hamilton Property Standards By-law 10-221.
- (c) That Staff be directed to re-engage with stakeholders in 2022 to re-assess and re-confirm comments and perspectives with respect to rental housing licensing post-COVID;
- (d) That the contents of Appendix "C" to Report PED21097/LS21022 remain confidential under solicitor-client privilege; and,
- (e) That the matter respecting this item, Item 2 of Planning Committee Report 18-015, be identified as complete and removed from the Planning Committee be removed from the Outstanding Business List.

## **EXECUTIVE SUMMARY**

Through Planning Committee Report 18-015, Staff were directed to "bring forward a draft Licensing By-law for rental business operators to contemplate the implementation of a Rental Housing Licensing pilot project in Wards 1 and 8." The requested By-law amendment, which would have the affect of creating a rental housing licensing pilot program for Wards 1, 8 and parts of Ward 14, is included as Appendix "A" to Report PED21097/LS21022. The estimated total cost to the City of Hamilton (the City) to implement, administer and enforce a two-year pilot project would be approximately \$2,014,992 and the total estimated (max) revenues of a two-year pilot would be \$1,684,100 for an estimated total net levy impact of \$330,892.

Staff are recommending that this amending By-law not be enacted at this time, and that consideration of the Rental Housing Licensing pilot project (the pilot project) be postponed to Q1 2023.

Since the approval of Planning Committee Report 18-015, the rental market landscape has shifted considerably, most notably during the COVID-19 pandemic. The COVID-19 pandemic has significantly increased the pressure on the City's rental market and the housing system in general. For tenants, rents for new units are increasing, vacancy

rates are down especially for the most affordable units, and there is potential for high levels of displacement following the ending of the provincial moratorium on evictions. Introducing a rental housing licensing regime at this time could have a further destabilizing affect on the rental housing market.

Furthermore, the City has recently undertaken two significant initiatives whose impact on the quality and quantity of rental housing should be assessed prior to making a decision regarding rental housing licensing. The first is the new secondary dwelling unit zoning initiative, which is anticipated to provide opportunities for new rental units, as well as remove barriers to the legalization of existing units. The second is the amendments to the City of Hamilton Property Standards By-law 10-221 that were requested by Council to expand the scope of the Property Standards By-law to address some long-standing concerns of tenants including good repair of appliances, cleanliness of common areas, ventilation systems, fixtures and faucets. These two initiatives may have an impact on the need for, and/or scope of a future rental housing licensing program.

#### **Alternatives for Consideration – See Page 11**

#### **FINANCIAL – STAFFING – LEGAL IMPLICATIONS**

**Financial:** There are no financial implications associated with the Staff recommendation. The financial implications should Council wish to adopt the Amending By-law (Schedule 31 – Rental Housing Units) included as Appendix “A” to Report PED21097/LS21022 are discussed in the Alternatives for Consideration section.

**Staffing:** There are no Staffing implications associated with the Staff recommendation. The Staffing implications should Council wish to adopt the Amending By-law (Schedule 31 – Rental Housing Units) included as Appendix “A” to Report PED21097/LS21022 are discussed in the Alternatives for Consideration section.

**Legal:** Please see Appendix “C” to Report PED21097/LS21022 – Confidential Legal Memo for detailed legal implications.

#### **HISTORICAL BACKGROUND**

City Council established a Rental Housing Sub-Committee to assist in the implementation of an approach to enforce and legalize rental housing. The Sub-Committee was in effect from 2014 – 2018 and reported to the Planning Committee. The Sub-Committee obtained information that Wards 1, 8 and parts of Ward 14 had the majority of complaints regarding “illegal dwelling units” and “absentee landlords”.

Furthermore, the City also received numerous property standards and yard maintenance complaints from these Wards.

Based on the information shared with the Sub-Committee between 2014 – 2018, the Sub-Committee recommended that Wards 1 and 8 (and now parts of Ward 14) should be the focus of a Rental Housing Licensing pilot project.

In approving Planning Committee Report 18-015, City Council on December 19, 2018, directed:

- (a) That Staff in consultation with Legal Services, bring forward a draft Licensing By-law for rental business operators to contemplate the implementation of a rental licensing pilot project in Wards 1 and 8;
- (b) That a report respecting the implementation of a Rental Licensing pilot project in Wards 1 and 8 be brought to a future meeting of the Planning Committee, and include:
  - (i) An education component for landlords and tenants;
  - (ii) Consideration of financial off-sets for tenants impacted by a rental increase due to the licensing; and,
- (c) That Staff be directed to include a review of all affordable housing issues related to the implementation of a rental licensing project in Wards 1 and 8.

## **POLICY IMPLICATIONS AND LEGISLATED REQUIREMENTS**

Municipal By-laws: Licensing, Property Standards, and Zoning By-laws.

Provincial Legislation:

- *Planning Act*, R.S.O. 1990, c.P.13
- *Fire Protection and Prevention Act*, 1997, S.O. 1997, c. 4
- *Residential Tenancies Act*, 2006, S.O. 2006, c.17
- *Municipal Act*, 2001, S.O. 2001, c.25
- *Ontario Building Code Act*, 1992, S.O. 1992, c.23.

## **RELEVANT CONSULTATION**

### **Internal Consultation**

Staff in the Licensing and By-law Services Division consulted with Staff in the Legal Services Division, Financial Planning, Planning Division, Housing Services Division, Licensing and By-law Services (LBS), Building Division and Fire Department.

### **External Consultation**

Staff consulted with the following stakeholder groups: Hamilton Help Housing Centre, Acorn, Neighbourhood Associations in the pilot project areas, Mohawk Students Association, McMaster Students Association, Hamilton and District Apartment Association, Realtors Association of Hamilton- Burlington, and the Hamilton Community Legal Clinic.

Comments raised during the stakeholder consultation included the scope of the By-law, concerns regarding fees and costs that would be passed down to tenants in already high rent markets, and the need for a licence versus utilizing the City's property standards By-law.

It is important to note that external consultation commenced in 2018 and ended in 2020 prior to COVID-19. Since these consultations, the rental market landscape has shifted considerably, most notably during the COVID-19 pandemic and Staff have been unable to re-engage with stakeholders during this time. As a result of the pandemic, there has been significant increased pressure on the City's rental market and housing system and as a result; stakeholder comments, including tenants and landlords, may have changed.

### **ANALYSIS AND RATIONALE FOR RECOMMENDATION**

Staff are recommending that a pilot project to license rental housing not be enacted at this time.

### **Rental Housing Market Uncertainties Post-COVID**

The Provincial Government has instituted many changes to rental housing legislation since the onset of the COVID-19 pandemic, including:

- three moratoriums on evictions (March 20, 2020- August 1, 2020, January 13, 2021- February 16, 2021, April 8, 2021- June 2, 2021) that have backlogged eviction hearings which are now only done by remote online hearings;
- a rent freeze at 2020 rent levels for persons residing in their units since November 2018; and,
- the introduction of Bill 184 with a number of amendments to the *Residential Tenancies Act, 2006 (RTA)* and *Housing Service Act, 2011* including new provisions for evictions.

Despite the moratoriums on evictions, property owners were still permitted to file applications to the Landlord and Tenant Board to evict tenants over non-payment. A

review of Hamilton addresses during the first moratorium disclosed 323 eviction applications were filed (6% of all applications in the Province). In the three months following the first moratorium, 230 further eviction applications were filed.

The impacts of these legislative changes have created a number of uncertainties in the rental housing market immediately post-COVID. Introducing a new licensing regime at the same time, could add to these uncertainties as it has the potential to impact costs as well as supply of units.

The additional costs to property owners of rental housing licensing is likely to affect rents, which could potentially make rental housing less affordable and may result in displacement.

The costs of the rental housing licensing program outlined in Appendix “A” to Report PED21097/LS21022 includes the following:

- City license - \$215.00
- Licensing administration fee - \$77.00
- Electrical safety inspection fee - \$350- \$550
- Zoning verification fee - \$254
- Fire inspection fee -\$81-\$680
  - The owner would incur the following inspection costs based on the type of building occupancy being applied for (2021 fees):
    - Residential buildings with 1 dwelling - \$81.05
    - Student housing, Lodging house - \$308.10
    - Residential buildings with 2 dwellings - \$389.15
    - Less than 4 stories and more than 2 dwelling units - \$680.90

In addition to the direct costs of the licensing program, a licensing regime may result in additional costs associated with property improvements. It is unclear how many buildings would require building upgrades to meet compliance.

The City of Hamilton’s Housing Services Division has recommended that consideration of a rental housing licence program not proceed until the pandemic has ended and the rental market and household incomes have stabilized.

The Housing Services Division expressed additional concerns with licensing of landlords of smaller rental properties, particularly when tenants, landlords, and the rental market are experiencing high levels of instability and uncertainty due to the pandemic. Any market disruption created by the implementation of a licensing regime at this time such as tenant displacement and loss of rental housing stock, would have a greater impact than during a more stable time. The pandemic has also placed extreme

strain on the system of housing services supports, which has less capacity at this time to support tenants negatively impacted by the implementation of a new licensing regime.

From 2017 to 2020, Hamilton has experienced a stagnation in the amount of private rental housing stock, as shown by the CMHC Rental Market Survey. This is particularly challenging for bachelor and one-bedroom units, which increased by only 240 units, a 1.3% increase.

During this same period, there have been significant rent increases particularly for bachelor and one-bedroom units. The CMHC average market rent for bachelor units increased from \$632 in October 2017 to \$866 in October 2020, and for one-bedroom apartments increased from \$845 to \$1,033. The CMHC average market rent for this market segment has increased a minimum of 5% annually over this time period with a peak of 7% in 2019 for bachelor apartments. Note that CMHC average market rent is based on existing tenancies, a large proportion of which are rent controlled so, are substantially lower than the rent for a new tenancy.

There is particular concern regarding licensing negatively impacting small landlords whose principal income is from rental housing and who may be facing personal financial hardship at this time. There is a heightened risk of units being taken out of the rental stock by small landlords unable to absorb the cost of licensing and potential renovations to bring their units into code compliance. The CMHC rental housing stock data is released annually, Staff will report back to Committee in Q1 2023 the post- COVID 2022- year end data.

### **Existing By-laws and Regulations**

The City has a number of existing By-laws which can address many of the problems and concerns frequently heard regarding rental housing units:

- the Property Standards By-law (10-221), as amended;
- the Noise By-law (11-285);
- the Parking By-law (01-218);
- the Property Maintenance (Yards) By-law No. 10-118;
- the Snow and Ice By-law No. 03-296;
- the By-law Respecting the Prohibition and Inspection of Marijuana Grow Operations (By-law 07-244); and,
- the By-law to Prohibit and Regulate Fortification and Protective Elements of Land (By-law 10-122).

At its meeting of March 31, 2021, Council approved Item 4 of Planning Committee Report 21-004 directing Staff to bring forward a By-law to amend the City's Property

Standards By-law to expand its scope to include a number of common areas of concern of tenants, namely:

- Intercoms and Security Locking;
- Appliances Kept in Good Repair;
- Mail Collection Areas;
- Common Area/Hallways Cleanliness;
- Garbage Chutes - Washed and Disinfected;
- Ventilation Systems Cleaned;
- Floors/Walls Similar Finishes Upon Repair;
- Cupboards/Fixtures/Faucets in Good Repair; and,
- Pest and Vermin Control.

Expanding the scope of the Property Standards By-law may positively impact some of the same areas of concern that some stakeholders were seeking to address through rental housing licensing. Therefore, there is merit in postponing the consideration of rental housing licensing until the impact of these Property Standards By-law improvements can be assessed.

### **Secondary Dwelling Units Zoning Initiative**

One of the common concerns frequently expressed about rental housing licensing is that it could remove accessory apartment rental stock from the market, if it is cost-prohibitive for existing property owners to bring these rental units into compliance. It has also been suggested that one of the barriers to landlords improving their rental units is the need to acquire a Building Permit, which first requires that their rental units be zoning compliant.

The City of Hamilton made a significant step forward in this regard in early 2021 with the approval of new zoning standards for secondary dwelling units which establishes as-of-right permissions for one “attached” secondary dwelling unit and one “detached” secondary dwelling unit city-wide, subject to various standards. A reduced minor variance fee was also established.

These new zoning permissions are expected to encourage existing landlords to legalize and improve their units, and also encourage the creation of new units. Therefore, there is merit in postponing the consideration of rental housing licensing until the impact of these new zoning permissions on the quantity and quality of rental housing stock can be assessed.



**Cost, Administration and Enforceability of a Licensing Program**

If Council were to approve the Alternative for Consideration of a two-year pilot project to licence the approximate 2,000 rental houses in Wards 1, 8 and parts of Ward 14, there would be additional demands on various City departments to administer the Rental Housing Licensing pilot project. This includes Licensing and By-law Services, Building, Zoning, and Fire, as well as the Housing Services Division to support tenants potentially displaced by the pilot project.

A two-year pilot project would require an additional 10 FTES. 3 FTES in Licensing and By-law Services at a cost of \$707,804 for two-years, 3 FTES in Building at a cost of \$536,730 for two-years, and 4 FTES in the Fire Department at a cost of \$770,458 for two-years, for a total cost of approximately \$2,014,992 for a two-year pilot. Total estimated (max) revenues of the two-year pilot is \$1,684,100 for an estimated total net levy impact of \$330,892.

The three Building FTES would consist of full-time temporary zoning Staff to provide administrative input to the licensing application, pull and scan microfilm and complete the required zoning reviews for the zoning verifications.

The four Fire Department FTES would consist of full-time temporary fire inspectors to complete inspections before a licence may be issued. It should be noted that under the current collective agreement language, Local 288 does not have temporary positions. As such, the Fire Department would need to negotiate a memorandum of understanding to hire temporary fire inspectors for a two-year pilot.

The three LBS FTES would consist of one full-time temporary Licensing Administrator to issue rental housing licences and two full-time temporary Licensing Compliance Officers to proactively and reactively inspect the rental units.

A pilot would also require new internal licence processes and materials for licensees and tenants.

Prior to the implementation of a two-year pilot project, the following would be required:

- operating databases (AMANDA) would need to be updated and enhanced;
- creation of printed materials (for tenant and property owner education);
- implementation of tracking and reporting of enforcement statistics and financial data requiring additional support from Finance and Administration; and,
- online resources and training programs for tenants and licensees (see Appendices “D” & “D2” to Report PED21097/LS21022).

It is important to note that entry to rental units may pose a challenge during COVID-19. Officers would require permission from the tenant to enter the residence for inspection and investigation. From the onset of the COVID-19 pandemic, many people have expressed concerns and stated that they do not wish persons from outside their households to enter their houses. Some municipalities with Rental Licensing By-laws such as the City of London, have suspended inspections altogether during the pandemic for safety reasons.

### **Revocation of Licences**

One of the concerns regarding a Rental Housing Licensing pilot project is the potential for tenant displacement if the licensee fails to renew the licence with the City, or if a violation of the Rental Housing By-law causes a license to be suspended or revoked (e.g. if certain safety standards may not be met).

The Ontario Human Rights Commission (OHRC) recommends that municipalities consider the impact on tenants of any decisions to shut down their rental unit and work to make sure that tenants are not displaced without recourse or assistance. With low vacancy rates throughout the City, and strained resources for housing supports during the COVID-19 pandemic, it may be difficult to help find alternative housing for people who are displaced.

The rental housing By-law attached as Appendix “A” to Report PED21097/LS21022 does give the Director of Licensing and By-law Services some guidance before recommending the revocation or suspension of a licence. Namely, the Director shall consider:

- the impact of any such licence revocation or suspension of tenants; and,
- impose terms and conditions on any such licence revocation or suspension that would minimize the adverse impact on any Tenants, including the possibility of providing a reasonable time period before the licence revocation or suspension takes place to permit tenants to find new housing or to seek relief in a court or before the Ontario Landlord and Tenant Board.

### **Licensing and Renovictions**

Staff have become aware of the issue of renovictions within the City. Since this report and draft By-law concentrates on a pilot project in Wards 1, 8 and parts of 14 and would only regulate dwelling units with 4 or less units, “renovictions” would be better addressed in a more fulsome report that could analyze the comprehensive city-wide challenges.

At the April 8, 2021 Emergency and Community Services (E&CS) meeting, housing services Staff were directed to report back to E&CS with a framework, including timeline and resources to develop a comprehensive renovictions strategy for the City. It is to include: the evaluation of the tenant defence fund, proactive tenant education options, a review of the governing legislation regarding the *Residential Tenancies Act*, 2006, S.O. 2006, c.17 and consideration of a licensing and By-law regime.

Staff are reviewing the New Westminster case from British Columbia where a licensing By-law that deals with “renovictions” was challenged in the courts. New Westminster’s By-law requires any landlord who is doing renovations to obtain every building permit, plumbing permit, development permit, special development permit or heritage alteration permit required. Additionally, the landlord must also enter into a new tenancy agreement with the tenant on the same terms or better for a comparable rental unit in the same building. If they are unable to accommodate in the same building, they must make other arrangements in writing for the tenants’ temporary accommodation during the renovation. Central to the New Westminster licensing By-law is the premise that tenants should be able to reside within their unit during renovations and subsequent accommodations are to be made to address their needs within the unit or building during the renovations. The onus is on the landlord to apply to the City in the circumstances when this is not feasible.

### **Jurisdictional Scan**

A review of best practices across Ontario municipalities reveal that 10 out of 15 of the municipalities reviewed did not have a rental housing licensing By-law (see Appendix “B” to Report PED21097/LS21022). The City of North Bay, City of Waterloo, City of Oshawa, City of Peterborough and City of London have enacted residential rental housing By-laws.

### **ALTERNATIVES FOR CONSIDERATION**

The following direction can be given, should Council wish to proceed with a rental housing licensing by-law now, for Wards 1, 8 and part of Ward 14.

- (a) That the draft By-law “Rental Housing Units” (Schedule 31) attached as Appendix “A” to Report PED21097/LS21022, which has been prepared in a form satisfactory to the City Solicitor be brought back to a future Planning Committee meeting to satisfy the public notice requirement;
- (b) That Staff be authorized to create 10 temporary FTEs as follows: three full-time temporary zoning Staff to be partially funded from zoning verification fees; four full-time temporary Fire Inspectors to be partially funded from inspection fees; and one full-time temporary Licensing Administrator and two full-time temporary

Licensing Compliance Officers to be partially funded from licensing fees, to implement the 2 year- pilot project in Wards 1, 8, and parts of Ward 14 at a total cost of \$2,014,992 and a total estimated (max) revenue of \$1,684,100 for an estimated total net levy impact of \$330,892; and,

- (c) That Staff report back to Planning Committee after the “Rental Housing Units” (Schedule 31) has been enacted for 18 months with an update on the pilot project.

### **Scope of the By-law**

The types of rental housing units that would be subject to a rental housing license would include buildings identified under the zoning verification as having a recognized use of single-family dwelling, two-family dwelling, three-family dwelling, semi-detached dwelling and multiple dwellings containing four dwelling units. All secondary dwelling units existing or created in the pilot project area that are for rental purposes will also be included. The rationale behind this approach is that buildings with a larger number of dwelling units are generally subject to site plan control and also have additional safety construction requirements as part of the Building Code and the Fire Code.

### **Cost of Pilot Project**

The pilot area in Wards 1, 8 and parts of Ward 14 has approximately 2,000 rental properties that would be subject to the licensing By-law. To successfully license this number of properties within the first year of the two-year pilot project, it would require an additional 3 FTEs in Licensing and By-law Services at a cost of \$707,804 for two-years, 3 FTEs in Building at a cost of \$536,730 for two-years, and 4 FTEs in the Fire Department at a cost of \$770, 458 for two-years at a total cost of approximately \$2,014,992 for the two-year pilot. These costs include non-staffing costs, vehicles, cell phones, uniforms etc.

User fees generated by the paid inspections will offset some of the costs associated with hiring temporary FTEs. Total estimated (max) revenues of the two-year pilot is \$1,684,100 for an estimated total net levy impact of \$330,892.

### **Enforcement Strategy for Pilot Project**

The enforcement strategy for the pilot project would focus on proactive education and awareness, and reactive enforcement responding to public/tenant complaints.

The primary focus will be to encourage voluntary compliance by educating the public and seeking voluntary compliance from property owners. Enforcement efforts will follow

the progressive enforcement approach and be respectful of tenant rights that occupy the rental unit.

Applications and renewals will require a pre-inspection by an Officer to ensure that the rental units comply with federal, provincial and the City's By-laws. During the COVID-19 pandemic, this may be problematic as many people have expressed concern and stated that they do not wish persons from outside their households to enter their houses. This may result in the delay of issuing rental housing licences. Throughout the pilot project, audits will be completed of the licensed rental units to ensure ongoing compliance.

### **Implementation**

Upon the approval of Recommendation (a), accompanying the By-law will be a detailed Staff report outlining; specific costs, the By-law enactment date, education and enforcement timelines, taking into account time to develop materials, recruit, hire and train additional Staff.

Upon the enactment of the By-law, Staff would begin a phased implementation plan. In addition to the information provided above regarding the internal administration changes that would be required. Staff would also need to:

- publish information and guidelines for applications on the City of Hamilton website;
- begin a public awareness campaign to explain rules to applicants, tenants and the public and encourage compliance;
- accept and review applications submission remotely; and,
- work remotely with landlords and property managers to process their applications for registrations.

Enforcement would occur following the initial education and intake phase. Staff would:

- issue licenses to eligible applicants;
- educate property owners about what they need to do to become compliant; and,
- enforce the new regulations on a case-by-case basis, including identification and investigation of illicit rentals based on public complaints (i.e. reactive enforcement).

### **Monitoring and Performance Measurement**

Staff would monitor rental housing activity within the pilot areas to assess the overall impacts and the effectiveness of the By-law. This information would be presented to Council at the end of the two-year pilot project.

Key metrics considered for assessment include:

- The number and location of rentals;
- Compliance rates for municipal By-laws, Building/Fire Code, Public Health and safety concerns;
- Impacts on housing availability and affordability, where possible;
- Number of licence revocations;
- The resulting revenue and staffing implications; and,
- Budget and service impacts for expanding the program City-wide.

### **Options After Pilot Project**

Following the two-year pilot project, if Council were to decide to discontinue the licensing program, Staff would work with the communications department to advise the community that City licenses would no longer be provided.

If Council were to expand the program City-wide, there would be significant cost implications. Staff would have to assess at that time the resources that would be necessary to implement rental housing licensing city-wide.

### **ALIGNMENT TO THE 2016 – 2025 STRATEGIC PLAN**

#### **Economic Prosperity and Growth**

Hamilton has a prosperous and diverse local economy where people have opportunities to grow and develop.

#### **Healthy and Safe Communities**

Hamilton is a safe and supportive City where people are active, healthy, and have a high quality of life.

### **APPENDICES AND SCHEDULES ATTACHED**

Appendix A to Report PED21097/LS21022 – Amending By-law (Schedule 31 – Rental Housing Units)

Appendix B to Report PED21097/LS21022 – Jurisdictional Scan

Appendix C to Report PED21097/LS21022 – Confidential Legal Memo

Appendices D & D2 to Report PED21097/LS21022 – Educational Pieces Pamphlets / Guidelines

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