I am writing on behalf of Neighbourhood Information Post (NIP) to urge the government to reconsider some of the provisions in Bill 184. Neighbourhood Information Post (NIP) delivers the Rent Bank Program which supports the economic stability of low-income tenants by providing assistance through interest-free repayable loans to cover rental arrears and prevent eviction. We have provided this service since 1998.

Funded by the City of Toronto, it is one of the most effective homelessness prevention programs in the province. Since Jan. 2015, 4,091 households (consisting of 8,549 individuals) in Toronto have been able to avoid eviction, and landlords are saved from a lengthy and expensive eviction process.

Our clients are primarily the “working poor”—people whose income slightly exceeds the social assistance threshold so that the majority of their income is spent on rent. Ultimately, they are at high risk of losing their tenancies should they encounter any type of short-term financial difficulty.

The economic shut down resulting from COVID 19 has placed many tenants in a precarious financial situation. With massive unemployment, pay cuts or reduction in work hours, a large number of tenants in Ontario are struggling to make their rent payments. In the last three months, the Toronto Rent Bank Program has seen a significant increase in inquiries and applications from tenants in arrears directly related to the income disruption caused by COVID 19. For many tenants, especially those in Toronto, an expensive city to reside in, government supports such as CERB and EI are simply not sufficient to cover rent payments. As the number of tenants falling into arrears continues to climb, we are concerned that some of the recently announced measures in Bill 184 would have an adverse impact on low-income tenants, resulting in a soaring number of evictions and displaced tenants (including children), leading to increased poverty and aggravating the current housing and homelessness crisis that we face in Ontario.

Peace of mind and stable housing is a key social determinant of health. The loss of housing means a deepening spiral into poverty that is more difficult to overcome, including the negative impacts on mental and physical health, as well as the detrimental effects on the development of children.

We are concerned that the proposed new measure allowing repayment agreements to be made outside of the Landlord and Tenant Board (LTB) hearing process, and immediate eviction taking place without a hearing when an arrears repayment is missed would invariably “fast track” evictions. This new measure can jeopardize the tenancies of many vulnerable low-income tenants, especially now, during the current economic downturn when most low-income tenants are still without employment income and have depleted their savings. Keeping the repayment agreement within the LTB process will preserve the right of tenants to receive guidance from a duty counsel lawyer as well as the Board mediator, providing better protection for tenants from immediate evictions.

I can share an example of one of our clients, Louis, a single father who had been employed in the food industry as a cook. He is out of work due to the economic shut down. He is totally reliant on CERB as used up all his savings. He is in the position of trying to keep abreast of household expenses, bill payments and providing for his two young children. He found it difficult to pay his monthly rent of $1,650 in full, so arranged a repayment plan with his landlord. However, with CERB due to expire soon and the prospect of prolonged unemployment, he fears he may fall further into arrears, which will lead to an immediate eviction for him and his two young children. As someone who has never received government assistance and never dreamt that he would be faced with the threat of being homeless, he is in a state of panic. He cannot imagine being homeless or homeless with young children. All he asks for is flexibility and time to get his finances back on track and catch up on his repayments. This would be beneficial for tenants. Removing this proposed measure will better protect tenants from evictions. As the province begins its recovery efforts, tenants should be able to work out their financial issues without having to worry about losing their homes. They should not have to choose between rent, food or general expenses.

NIP is also concerned with the new requirement for tenants who appear before the LTB for non-payment of rent to provide advanced notice of additional issues in an eviction at the LTB hearing. This will create a barrier for marginalized tenants, including those who do not speak English as their primary language; those with mental health issues, disabilities, low literacy levels, and seniors. The new procedural burden will hinder their ability to provide the LTB with a full picture when new issues emerge, further disfranchising these tenants and limiting their ability to challenge rental arrears in units that are increasingly not well-maintained or fail to meet safety standards.

Another example I would like to share is about an elderly couple, Mr. and Mrs. M who fell through the safety net. Mr. M is in his 80s, and Mrs. M is illiterate. English is not their first language. Prior to receiving support, they had been living with their daughter who had organized the rent. She relocated to another area and left it to her parents to organize the rent. They had no idea on how to deal with the rent. Eventually the eviction process happened, and due to his cognitive issues and her inability to read, they failed to realize they had to attend the Hearing. The Tribunal hearing occurred, they were evicted, and have been living in a shelter for the last several months. Hypothetically, we would have been able to assist and get them on track with rent payments if they came to our program earlier. Our concern is that the new procedural burden proposed in the bill will further expose the vulnerability of people like Mr. and Mrs. M. Many of them may be forced to remain in rental units that are in unlivable conditions, jeopardizing their physical and emotional well-being. It may also lead to many unnecessary immediate evictions.

We applaud the excellent leadership the government has provided for Ontarians as we cope with the various impacts of this unprecedented pandemic. As the province prepares to reopen its economy, we ask that the government not leave tenants behind and maintain housing protection for them in these complicated economic times. It is in the best interest of us all to ensure tenants are able to maintain their housing. Increased homelessness and poverty affects all Ontarians. We urge the government to reconsider the above- stated proposed measures in Bill 184 to prevent a full-blown housing and homelessness crisis in Ontario.