



# Towards Balance

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Recommendations to Protect Tenants and  
Prevent Bad-Faith Renovations in Ottawa

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# Letter From OREB Leadership

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Ottawa is approaching an important policy decision on “renovictions,” with city staff expected to bring forward recommendations this spring. Where bad-faith renovictions occur, the impacts on tenants can be significant, particularly for households that face difficulty finding affordable replacement housing. At the same time, Ottawa’s rental housing system depends on ongoing reinvestment to ensure homes remain safe, habitable, and well maintained. Any policy response must deter bad-faith behaviour while allowing legitimate renovations and necessary repairs to proceed.

The Ottawa Real Estate Board (“OREB”) has drafted this policy report to support a balanced, evidence based conversation that considers impact on tenants and housing providers alike. In Ottawa, rental housing is delivered through a mix of purpose-built rental and secondary rental supply. This supply is supported by small-scale housing providers who own and operate a substantial share of rental housing through condominium units, secondary suites, and small multiplexes. Recognising the distinct roles these segments play is important for policy design, as regulatory approaches may have different impacts across the rental housing system. Small-scale rental housing providers rely on predictable and workable processes to complete repairs, address building condition issues, and reinvest in aging housing stock. Policies that are overly complex, expensive to administer, or difficult to enforce risk unintended consequences. These include discouraging legitimate reinvestment, responsible compliance, and shifting behaviour into less transparent channels.

This paper is solutions-focused. It draws on evidence from the City of Ottawa and comparator jurisdictions, and it identifies policy approaches that can strengthen tenant protections without creating fragmented rules across Ontario. OREB believes the most effective path forward is to prioritize province-wide safeguards, especially through the implementation of Bill 97, while strengthening tenant-facing information and support pathways that improve tenant access to rights and remedies in practice. If the city proceeds with a municipal by-law, this paper also outlines design principles to support fairness, enforceability, and proportionality.

Our work aligns with OREB’s broader housing priorities, as set out in “More Homes for Ottawa: OREB’s 2026 Municipal Housing Platform,” which emphasizes practical actions to increase housing supply, protect residents, and support a strong housing system. Ottawa needs policies that protect tenants from bad-faith conduct while supporting legitimate reinvestment required to preserve rental housing affordability, quality, and supply over the long term. We hope this paper contributes constructively to that shared goal.

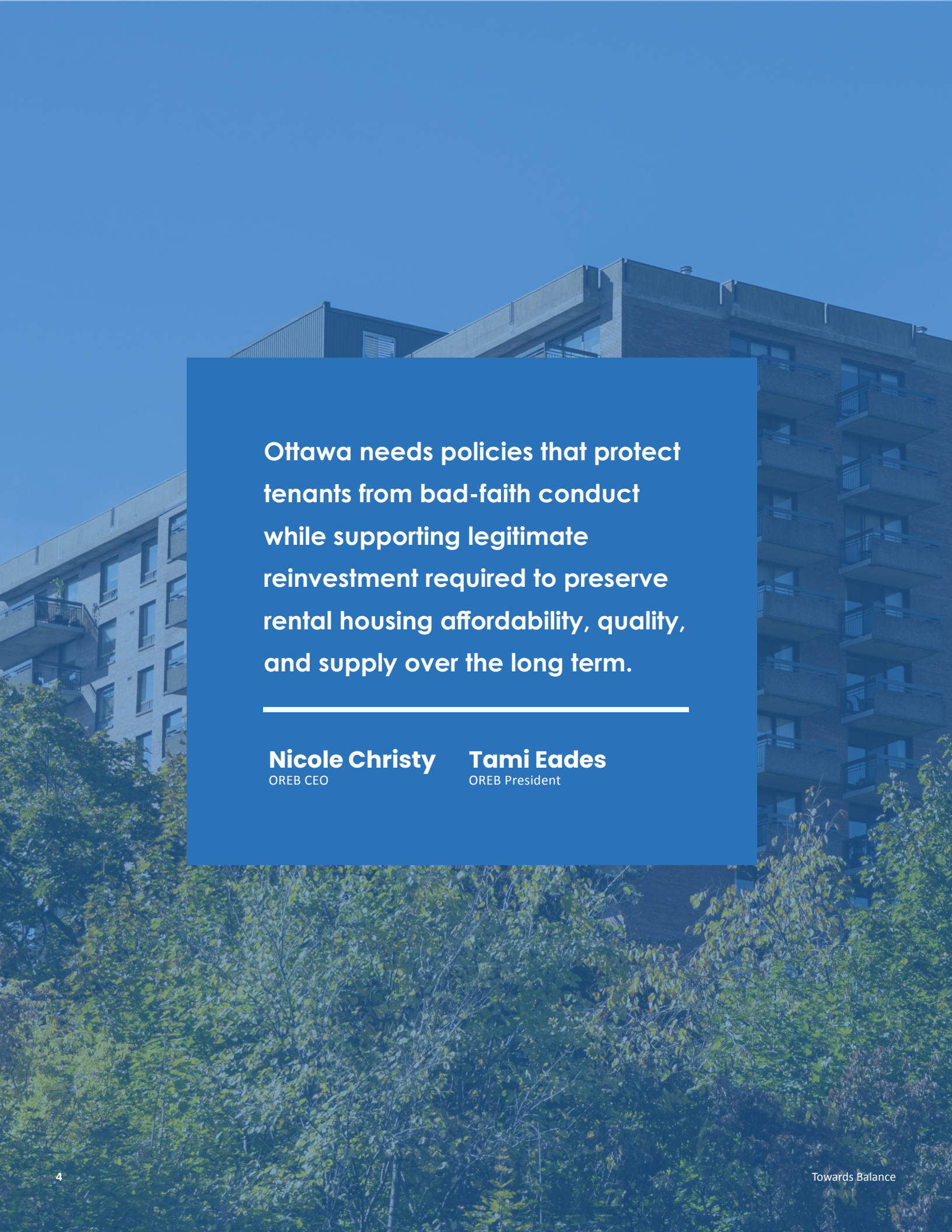
Sincerely,



**Nicole Christy**  
OREB CEO



**Tami Eades**  
OREB President



**Ottawa needs policies that protect tenants from bad-faith conduct while supporting legitimate reinvestment required to preserve rental housing affordability, quality, and supply over the long term.**

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**Nicole Christy**  
OREB CEO

**Tami Eades**  
OREB President

# Executive Summary

The City of Ottawa is considering a municipal “renovictions” by-law as part of a broader effort to address tenant displacement linked to major renovations and repairs. “Renovictions” is a commonly used term that can describe both legitimate renovation-related displacement and bad-faith behaviour where renovation processes are used improperly or strategically to remove tenants. This paper presents a policy analysis informed by available research, data, and jurisdictional comparisons, with a focus on bad-faith “renovictions” and an assessment of whether a municipal licensing approach is warranted and appropriately designed in Ottawa’s context.

This paper draws on a review of publicly available data and policy materials, including municipal by-laws and program documents from Ontario and selected North American jurisdictions, provincial legislation (including Bill 97), and housing market data from sources such as the Canada Mortgage and Housing Corporation (CMHC), Statistics Canada, the Landlord and Tenant Board (LTB), as well as the City of Ottawa. Additionally, a jurisdictional scan was used to conduct a targeted review of comparator municipalities in order to understand how renoviction-related policies are structured, implemented, and enforced in practice.

## Ottawa Context and What the Data Can (and Cannot) Tell Us

Ottawa’s rental market conditions remain uneven. Overall vacancy has increased modestly, but availability remains limited in lower-rent segments which can make displacement particularly disruptive, especially for low-income households, seniors, and new immigrants who are most likely to occupy lower-rent units and least able to secure comparable replacement housing if displaced<sup>1</sup>. Ottawa also has a significant stock of older housing and renters are more likely than owners to live in dwellings requiring major repairs, highlighting the importance of enabling legitimate reinvestment to keep rental homes safe and habitable.

N13 trends provide partial context but are an imperfect proxy for quantifying bad-faith behaviour. N13 notices can relate to renovations, demolitions, and conversions, do not indicate intent, and datasets do not capture informal displacement where tenants leave outside formal channels. N13 activity in Ottawa represents a very small share of Ottawa’s overall rental dwelling ecosystem in a given year (less than 1% annually)<sup>2</sup>.

1. 2025, Ontario Renoviction Report, ACORN
2. See section “Ottawa in Context: Low Incidence Relative to Total Rental Dwellings” for further analysis.



## Key Findings from the Jurisdictional Scan

Ontario municipalities that have implemented “renovictions” licensing regimes (i.e., Toronto, Hamilton, and London) generally rely on a municipal licence as a checkpoint before renovation-related tenant displacement proceeds, supported by documentation requirements, tenant information measures, and enforcement tools. Early experience indicates that these programs can be costly to operate and often see low licence volumes relative to operating budgets, raising cost recovery and “sunk cost” concerns. Comparable approaches in Canada and the United States often operate through development- or permit-linked tenant protection frameworks (e.g., tenant relocation plans and standardised tenant information), but many rely on legal authorities that differ from Ontario’s framework.

## OREB’s Recommended Policy Direction

OREB supports safeguards against bad-faith “renovictions,” but the emphasis should be on policy solutions that improve real-world outcomes without creating an expensive municipal system that may be difficult to enforce and discourages legitimate reinvestment. The best approach for the City of Ottawa is to advocate for consistent, province-wide protections, while also working to strengthen tenant education, awareness and system integrity without relying on a new municipal licensing regime.

This approach is recommended for several key reasons:

- **Effectiveness and consistency:**  
The Province is best positioned to implement uniform, enforceable protections across Ontario, avoiding a patchwork of municipal rules that can create confusion for tenants and housing providers.
- **Alignment with emerging provincial direction:**  
Proposed provincial reforms through *Bill 97, Helping Homeowners, Protecting Tenants Act, 2023*, are intended to address many of the same concerns and offer a more consistent and scalable solution than a municipal “renoviction” by-law.
- **Administrative feasibility and cost:**  
Evidence from other municipalities indicates that licensing frameworks can be costly to operate, difficult to fully recover through fees, and resource-intensive to enforce.
- **Data limitations and proportionality:**  
Available data does not clearly distinguish bad-faith activity from legitimate renovation-related notices, and N13 activity represents a very small share of the overall rental housing system.
- **Support for legitimate reinvestment:**  
Overly complex or burdensome municipal requirements may delay necessary repairs and renovations (particularly for small-scale housing providers) risk discouraging reinvestment in aging rental housing stock, and may drive bad-faith “renoviction” activity out of formal processes entirely, making it harder to detect and address.

Ottawa has already introduced measures through its Rental Housing Property Management By-law, including requirements related to certain tenant information and communication. This underscores the importance of ensuring that any additional municipal measures avoid duplication, remain proportionate, and do not introduce unnecessary complexity for tenants or housing providers.



## OREB Recommendations

**Instead of pursuing a renovictions by-law, OREB is recommending that the City of Ottawa:**

- 1** Advocate to the province to proclaim and implement Bill 97 and its supporting regulations relevant to renovation-related evictions, and work through the Association of Municipalities of Ontario (AMO) to align and strengthen advocacy.
- 2** Advocate for strengthened LTB accessibility, plain-language guidance, and enforcement capacity.
- 3** Implement targeted municipal landlord and tenant education and navigation supports aligned with provincial processes.
- 4** Use existing municipal authority to support safe and habitable housing through permits, inspections, and property standards enforcement.
- 5** Establish a monitoring framework and evidence threshold to guide future reassessment of the need for a municipal by-law.

**If the city proceeds with a “renovictions” by-law, OREB recommends the City of Ottawa:**

- 1** Define a clear, narrow scope and trigger focused on bad-faith risk, with explicit exclusions for minor/emergency repairs.
- 2** Set practical evidence standards, including permit confirmation where required, while avoiding requirements for formal expert reports or additional licensing layers to validate legitimate renovation activity.
- 3** Front-load tenant communications and education through standardised rights information and referral pathways.
- 4** Ensure proportional enforcement and transparent compliance verification.
- 5** Set fees transparently.
- 6** Embed evaluation metrics and a mandatory review/sunset mechanism, particularly in light of potential Bill 97 implementation.



# Introduction

Ottawa is approaching a key policy decision on “renovictions,” following council direction from January 22, 2025, to review the potential development of a municipal by-law, pending provincial timelines for Bill 97, and to report back in the second quarter of 2026. “Renovictions” generally refer to situations where tenants are displaced in connection with renovations or repairs. This paper is specifically focused on bad-faith renovictions, where renovation-related processes (e.g., the N13 notice) are used improperly or strategically to remove tenants rather than to conduct genuine, necessary work. The targets for renovictions are often long-term tenants paying below-market rent, and once the unit is vacated, it is often re-rented at a higher market rate, effectively allowing landlords to circumvent rent-control protections that would otherwise limit increase for existing tenants. While Ottawa’s overall vacancy rate has risen to 2.9% in 2025, this figure masks a more uneven picture. Specifically, vacancy is concentrated in newly built units, while lower-rent units remain in very limited supply. For tenants displaced through renovation, finding a comparable replacement unit can be difficult, even where overall vacancy conditions may fluctuate year to year.

OREB has prepared this paper to help Ottawa City Council and housing stakeholders make a balanced, evidence-informed choice—one that protects tenants from bad-faith practices while ensuring legitimate renovation and reinvestment can move forward, especially for small-scale landlords who contribute significantly to the supply of rental housing, particularly in the secondary rental market. The stakes are highest for tenants who are least able to absorb displacement, particularly low-income households and seniors on fixed incomes, who are more likely to be long-term tenants paying below-market rent, and who face the greatest barriers to finding comparable replacement housing in a constrained market. It is also intended to inform discussion with the Province of Ontario, recognising that eviction rules and tenant protections are set provincially through the Residential Tenancies Act, 2006 (RTA)

**Vacancy in Ottawa is concentrated in newly built units, while lower rent units remain in very limited supply.**

and administered through the Landlord and Tenant Board (LTB). The central question this paper considers is straightforward: What approach best addresses concerns about bad-faith “renovictions” in Ottawa without creating unintended consequences that reduce investment in aging rental stock or discourage rental housing supply?

OREB’s focus is on practical outcomes. If a policy is costly to run, difficult to enforce, or can be avoided through alternative approaches, it may not effectively deter bad-faith “renovictions.” At the same time, if requirements of the policy are overly burdensome, they may create delays or barriers for responsible housing providers, particularly small-scale landlords who need to complete legitimate repairs and renovations and may be discouraged from even keeping the property if there are added risks and costs. This concern is not hypothetical—small-scale landlords in Ottawa are already navigating a growing layer of regulatory obligations. Recent municipal measures, including the Rental Housing Management By-law and updated garbage collection restrictions, have introduced compliance requirements that, in practice, land more heavily on small-scale landlords than on large, institutionally managed housing units. Any approach must therefore balance the protection of tenants in a constrained rental market and remain workable for lawful reinvestment.

Ottawa’s rental context underscores the need for that balance. Available data indicates that Ottawa has approximately 83,061 primary (purpose-built) rental units, and 8,495 secondary rental units, representing the core of the formal rental housing stock<sup>4</sup>. However, broader Census-based estimates suggest that the total number of rental dwellings is 147,030, reflecting the full scope of rental housing across the city<sup>5</sup>.

<b>Location</b>	<b>Vacancy Rate (%)</b>	<b>Average Rent (\$)</b>	<b>% Change in Avg Rents (2024)</b>
Barrie	4.2	1,697	4
Brantford	3.2	1,549	N/A
Chatham-Kent	4.4	1,294	8.8
Cobourg	3.2	1,433	N/A
Collingwood	4.5	1,519	6.8
Greater Sudbury / Grand Sudbury	1.1	1,482	7.8
Guelph	2.9	1,759	5.1
Huntsville T	1.9	1,647	4.6
Kingston	2.4	1,713	2.6
Kitchener - Cambridge - Waterloo	4.0	1,716	3.3
London	3.8	1,551	4.6
North Bay	2.7	1,294	N/A
Orillia	3.2	1,501	N/A
Oshawa	3.6	1,748	N/A
Ottawa	2.9	1,743	3.9
Owen Sound	2.3	1,267	4.3
Peterborough	3.3	1,422	N/A
Sarnia	4.9	1,407	2.6
Sault Ste. Marie	2.5	1,331	5.6
St. Catharines - Niagara	3.8	1,445	5.3
Stratford	4.1	1,599	5
Thunder Bay	3.9	1,395	6.8
Timmins	3.7	1,269	10.3
Toronto	3.0	1,917	3.2
Windsor	3.6	1,293	4.7
Ontario	3.2	1,730	3.8

The Canada Mortgage and Housing Corporation (CMHC) reported an overall vacancy rate of 2.4% in 2024, rising to approximately 3% in 2025, indicating a modest easing at the market level<sup>6</sup>. However, availability is uneven across the market and vacancy is higher in newly built units (reported at 6.7%) while lower-rent units remain scarce (reported at under 1%), limiting mobility for households seeking more affordable options<sup>7</sup>. In parallel, Ottawa’s housing stock includes a significant share of older dwellings and within this stock<sup>8</sup>, renters are more likely than owners to live in units requiring major repairs, reinforcing

the importance of enabling legitimate reinvestment to maintain safe and habitable rental housing. In this environment, policy should protect tenants from bad-faith displacement while maintaining a workable pathway for necessary repairs and renovations that supports long-term housing quality and supply.

3. 2025, CMHC Rental Market Report
4. 2025, Housing Needs Assessment, City of Ottawa Report for Federal Government
5. Statistics Canada, 2021 Census of Population, (Table 98-316-X2021001)
6. 2025, CMHC Rental Market Report
7. 2025, CMHC Rental Market Report
8. 2025, Housing Needs Assessment, City of Ottawa, Report for Federal Government and Statistics Canada, 2021 Census of Population (Table 98-316-X2021001).



# Problem Definition

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## Introduction

Under Ontario’s RTA, a landlord may end a tenancy only for specific reasons set out in provincial law. These include, among other grounds, non-payment of rent, substantial interference with others, the landlord or an immediate family member requiring the unit for personal use, and the need to demolish, convert, or undertake major renovations that require the unit to be vacant. Where a landlord asserts that major repairs or renovations require vacant possession, the process is initiated through the issuance of a N13 notice. The N13 framework is intended to apply only where the work is significant and cannot reasonably be completed with the tenant in place. The N13 process is accompanied by procedural safeguards, including but not limited to notice requirements, compensation obligations, and, for renovations (as opposed to demolition), a right of first refusal for tenants who wish to return once work is complete. If a tenant does not agree to vacate, an eviction cannot proceed unless the landlord obtains an order from the LTB.

In this context, the term “renoviction” is commonly used to describe tenant displacement connected to repairs or renovations. The term is used both to describe lawful, good-faith renovation processes and to describe bad-faith “renovictions,” where renovation-related processes are used improperly or strategically to remove tenants and units are subsequently re-rented at higher market rates. Concerns raised in Ontario increasingly focus on situations where the legal protections under the RTA do not consistently translate into the level of housing security tenants experience in practice, including where tenants vacate without accessing formal dispute resolution or without being able to meaningfully exercise rights such as return-to-unit. This paper focuses on the policy challenge associated with bad-faith “renovictions,” while recognising that legitimate reinvestment and necessary renovations are essential to maintaining safe, habitable rental housing over the long term.

## Ottawa’s Rental Housing Market

Understanding the structure and pressures within the City of Ottawa’s rental housing market is essential to contextualise “renovictions” concerns and assess the appropriateness of potential policy responses. While renovation-related displacement is often discussed in isolation, it occurs within a broader housing system shaped by affordability pressures and an aging rental stock.

### Scale and Composition of the Rental Market

Ottawa has a substantial and diverse rental housing sector. Available data indicates that the city has approximately 83,061 purpose-built rental units and 8,495 secondary rental units<sup>9</sup>, representing the core of the more formal rental housing stock. However, broader Census-based estimates indicate that there are approximately 147,030 rental dwellings across the city<sup>10</sup>, capturing the full scope of rental housing. With most renters (64%) located in low-rise and high-rise apartment buildings, 36% of renter households were distributed across other dwelling types, including single-detached homes, semi-detached homes, row housing, duplexes, and other forms of housing<sup>11</sup>. This distribution underscores the importance of the broader rental ecosystem, including secondary and non-purpose-built rental units. A significant portion of renters rely on these housing forms, which are often owned and operated by small-scale landlords.

### Rental Demand, Vacancy, and Affordability Pressures

Ottawa’s rental market continues to experience sustained demand driven by population growth, immigration, and affordability challenges in the ownership market. According to CMHC data, vacancy rates for rental housing has remained low, generally in the range of 2% to 3% in recent years, with even tighter conditions for lower-rent units (around 1% vacancy rate).<sup>12</sup> This range is typically considered the threshold for a balanced rental market, suggesting that Ottawa’s rental system remains under sustained pressure, particularly in more affordable segments.

9. 2025, Housing Needs Assessment, City of Ottawa Report for Federal Government  
10. 2025, Housing Needs Assessment, City of Ottawa, Report for Federal Government and Statistics Canada, 2021 Census of Population (Table 98-316-X2021001)  
11. 2024, Housing Needs Assessment, City of Ottawa  
12. 2025, CMHC Rental Market Report

At the same time, rents have continued to increase. Data from the City of Ottawa’s 2024 Housing Needs Assessment indicates that median monthly rents increased by 61.3% between 2014 and 2024, rising from \$992 to \$1,600.<sup>13</sup> This increase has significantly outpaced income growth, with median household incomes rising by 43.6% over a longer period (2006 to 2021).<sup>14</sup>

This divergence between rent and income has contributed to a notable shift in housing affordability.

The proportion of renter households paying \$2,000 or more per month increased to 17% in 2021, while the availability of lower-cost housing has declined significantly.<sup>15</sup> These pressures are felt most acutely by low-income households, new immigrants, and seniors. For these tenants, displacement is not simply an inconvenience, it can mean a permanent loss of affordable housing, separation from established support networks, and, in some cases, proximity to essential medical or community services they depend on. As a result, affordability challenges have become more widespread across the rental market.

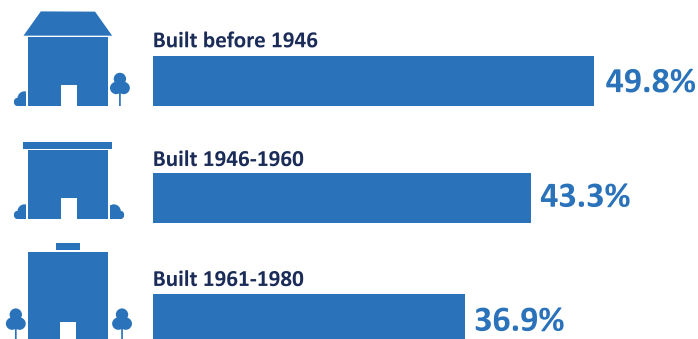
## Housing Condition and the Need for Reinvestment

A defining feature of Ottawa’s rental market is the age of a significant portion of its rental housing stock. Census data indicates that approximately 71% of occupied private dwellings in Ottawa were constructed before 2000<sup>16</sup>. Of this 71%, a substantial share was built prior to 1980 (62%).<sup>17</sup> The age profile of the housing stock has important implications for both housing quality and system sustainability. Older structures are more likely to require ongoing capital investment to maintain housing conditions,

address safety requirements, and ensure habitability standards are met. For small-scale landlords, these reinvestments may be more challenging to manage due to more limited financial capacity. Where regulatory approaches introduce uncertainty, delay, or disproportionate costs, there is a risk that necessary repairs may be deferred or that small-scale landlords may be discouraged from reinvesting. Over time, this can affect both housing quality and the long-term sustainability of the rental supply.

Year	Total Rental Units	Units Needing Major Repairs	Units Needing Minor Repairs	Total Units Requiring Repairs	% of Rental Units Requiring Repairs
2006	109,250	10,950	30,410	41,360	37.9%
2011	115,635	10,830	31,450	42,280	36.6%
2016	128,285	10,545	34,410	44,955	35.0%
2021	147,030	11,510	35,610	47,120	32.0%

## AGING RENTAL HOUSE STOCK: SHARE OF UNITS NEEDING REPAIRS (MAJOR+MINOR)



**Older rental buildings face the greatest reinvestment pressures**

13. 2024, Housing Needs Assessment, City of Ottawa  
 14. 2024, Housing Needs Assessment, City of Ottawa  
 15. 2024, Housing Needs Assessment, City of Ottawa  
 16. Statistics Canada, 2021 Census of Population (Table 98-316-X2021001)  
 17. Statistics Canada, 2021 Census of Population (Table 98-316-X2021001)

Ottawa’s rental housing stock has expanded significantly over the past 15 years, growing from 109,250 units in 2006 to 147,030 units in 2021.<sup>18</sup> While the share of units requiring repairs declined from 37.9% to 32.0% over that period, the total number of rental homes needing repairs actually increased from 41,360 to 47,120 units. Most notably, more than 11,500 rental units still required major repairs in 2021.<sup>19</sup> While the share of units requiring repairs declined from 37.9% to 32.0% over that period, the total number of rental homes needing repairs actually increased from 41,360 to 47,120 units. Most notably, more than 11,500 rental units still required major repairs in 2021. This indicates that although new construction has improved the overall condition of the rental stock, Ottawa continues to face a substantial backlog of aging rental housing in need of reinvestment and rehabilitation. In the context of OREB’s policy recommendations, these figures underscore the importance of policies that encourage rental renewal, streamline approvals, and support the modernization of existing buildings alongside new supply creation.

The challenge is especially concentrated in older purpose-built rental housing constructed before 1980, which forms a critical part of Ottawa’s affordable rental inventory. Of the 82,200 renter households living in units built before 1980, fully 32,915 (40%) lived in homes requiring repairs in 2021<sup>19</sup>. Repair needs are highest in the oldest buildings with 49.8% of units built before 1946 and 43.3% of units built between 1946 and 1960 requiring repairs<sup>20</sup>. These buildings represent some of Ottawa’s most attainable rental housing, but they are increasingly reaching the stage where significant capital upgrades are unavoidable. Give the state of Ottawa’s rental housing stock, **enabling legitimate renovations, redevelopment, and reinvestment in aging rental stock to preserve long-term affordability and livability is critical to the well-being of tenants.**

18. CMHC, Housing Portal, Ottawa CMA rental housing repair data, 2006–2021  
 19. CMHC, Housing Portal, Ottawa CMA rental housing by building age and repair need  
 20. CMHC, Housing Portal, Ottawa CMA rental housing repair data, 1946–1980

Building Age	Total Rental Units	Need Major Repairs	Need Minor Repairs	Total Need Repairs	% Need Repairs (Major + Minor)
Built before 1946	12,510	1,965	4,260	6,225	49.80%
Built 1946–1960	15,310	1,945	4,685	6,630	43.30%
Built 1961–1980	54,380	4,970	15,090	20,060	36.90%

**Given the state of Ottawa’s rental housing stock, enabling legitimate renovations, redevelopment, and reinvestment to preserve long-term affordability and livability is critical to the health, safety and well-being of tenants.**

# Ontario's Residential Tenancies Act, 2006: The Primary Framework

The RTA is the primary provincial legislative framework governing landlord-tenant relationships in Ontario, including eviction procedures, rent rules, and dispute resolution. For renovation-related terminations, the RTA establishes a defined legal process and limits the circumstances in which a landlord may require a tenant to vacate due to repairs or renovations. The intent of the framework is to balance two objectives: enabling necessary building work to proceed, while protecting tenants from unfair displacement, and ensuring access to remedies when rules are not followed.

## The N13 Process for Major Repairs or Renovations

Where a landlord asserts that major repairs or renovations require a unit to be vacant, the landlord generally relies on the N13 notice process. An N13 is not intended for minor upgrades or routine maintenance; it is tied to work that is extensive enough that vacant possession is required. The legal process requires proper notice and, where applicable, tenant compensation and information about rights. If a tenant does not voluntarily move out, the landlord must apply to the LTB for an eviction order.

The N13 framework includes several protections intended to reduce the risk of unfair displacement. Tenants may be entitled to compensation, or another suitable unit, and, in renovation (non-demolition) situations, tenants may have the right of first refusal to return to the unit after the work is completed at the same rent, subject to lawful increases, provided the tenant has notified the landlord in writing of their intention to return. The landlord's obligations include providing the required notice, acting in good faith, complying with compensation requirements, and, where the right of return applies, offering the unit back to the tenant once the renovation is complete.



## THE N13 PROCESS FOR MAJOR REPAIRS OR RENOVATIONS



Tenants may be entitled to compensation, or a right of first refusal to return to the unit after renovations at the same rent, subject to lawful increases.

## The Landlord and Tenant Board's Role

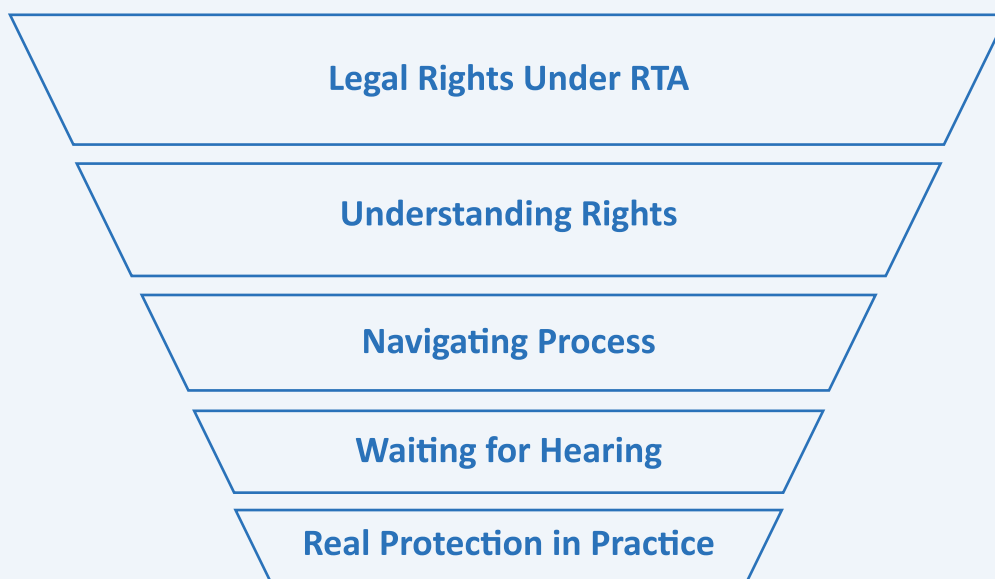
The LTB is the adjudicative body responsible for resolving disputes and issuing eviction orders under the RTA. The LTB determines whether an eviction can proceed, including whether renovation-related termination notices meet statutory requirements and whether an eviction should be granted. The Board also provides remedies where bad faith is found, including compensation and other orders available under provincial law. Importantly, municipalities do not determine whether a renovation-related eviction is lawful under the RTA, nor do they issue eviction orders. These determinations remain within provincial jurisdiction. In practice, however, the protections available under the RTA rely on tenants being able to access and use the LTB process. Where hearings are delayed or the process is difficult to navigate, some tenants may decide to move out rather than wait for a decision, even if they have the right to challenge the eviction, which can result in displacement despite the protections set out in the RTA.

## Municipal Roles: Building Safety, Permits, and Property Standards

Municipal responsibilities intersect with renovation-related tenancy issues in a more limited and indirect way. Municipalities are responsible for matters related to the health and safety of dwelling units, including the issuance of building permits, inspections, and enforcement of property standards and applicable building requirements. These roles support the broader objective of ensuring residential housing is safe and habitable and that renovation work is completed in compliance with applicable codes and standards. Municipal enforcement does not extend to administering tenant rights under the RTA or adjudicating eviction disputes, which remain provincial responsibilities.

## WHERE THE GAP EXISTS

*From Legal Rights to Real Protection*



**Tenant protection gap = rights on paper vs. outcomes in practice.**

## Overlapping Frameworks and “Renoviction” By-law Policy Implications

Since eviction procedures and tenant rights are governed provincially, municipal “renovictions” by-laws operate, where adopted, as supplementary administrative frameworks rather than replacements for the RTA. This raises practical policy considerations. A municipal by-law can add procedural requirements and local oversight mechanisms, but it cannot change the underlying provincial test for eviction, nor can it substitute the LTB’s decision-making role. This overlap can create duplication risks and enforcement coordination challenges, particularly where municipal requirements depend on information that is already part of the provincial process, or where the trigger for municipal oversight is difficult to identify without tenant reporting or landlord self-disclosure (e.g., undertaking major renovations without a building permit). It can also create clarity challenges for tenants and landlords attempting to understand which requirements apply and which agency is responsible for enforcement.

### How Renovictions Became a Policy Concern

“Renovictions” may have become a more prominent policy issue in Ontario as rental market pressures increased through the early 2020s and rent differentials widened between long-term tenancies and current market rents. In this environment, displacement (whether lawful or not) can have serious and lasting consequences for tenants who may have limited ability to secure comparable housing, particularly when vacancy is low in lower-rent segments. For these households, losing a long-term tenancy in a lower-rent unit can mean being priced out of their neighbourhood entirely, with ripple effects on access to employment, community supports, and, for older tenants, proximity to medical care and family networks.

While public attention on “renovictions” intensified in 2022 and into 2023, consistent up-to-date public data is limited, which makes it difficult to confirm whether the underlying dynamics have materially eased since that period. This underscores the importance



## WHY MUNICIPAL BY-LAWS EMERGED



### Rental Pressure + Low Vacancy

High demand and limited supply increase competition for rental housing.



### Fear of Bad-Faith Displacement

Concerns that some landlords may use renovations as a pretext to remove tenants and increase rents.



### Tenant Protection Gap

Provincial protections exist, but barriers in access, awareness, and enforcement leave tenants vulnerable in practice.



### Municipal By-law Response (2025)

Municipalities adopt by-laws to introduce local checkpoints, improve transparency, and strengthen compliance before displacement occurs.



Municipal renoviction by-laws emerged as a response to market pressure and perceived enforcement gaps.

21. 2025, Ontario Renoviction Report, ACORN

of proportionality and evidence in policy design, including careful consideration of whether broad municipal licensing approaches are warranted relative to the scale of the problem and the risk of unintended impacts.

At the same time, many rental buildings require ongoing capital reinvestment, and renovation activity is often necessary to maintain health and safety, modernise aging systems, and preserve housing over the long term. The policy challenge is therefore not whether “renovictions” should occur, as they often must, but how to ensure the legal framework that currently exists functions as intended in practice--protecting tenants from bad-faith displacement while allowing legitimate renovation and reinvestment to proceed in a timely and workable manner.

## **Municipal Authority and the Policy Rationale for “Renovictions” By-laws**

Beginning in 2025, Ontario municipal “renovictions” by-laws emerged as a local policy response to concerns that provincial protections, while clear in law, do not always translate into the level of housing security tenants experience in practice: There is a tenant protection gap that exists, and to which the “renovictions” by-laws are seeking to fill. The practical application of the RTA depends on tenants being able to understand, access, and use formal processes and remedies. Where tenants face barriers navigating the system, or where displacement occurs outside formal channels, municipalities have sought tools that can introduce earlier safeguards, improve transparency, and strengthen compliance at the point where renovation-related displacement begins.

Within the limits of municipal authority, a typical renovictions by-law is designed to create a local checkpoint before renovation-related tenant displacement proceeds. These by-laws generally operate as licensing or permit-linked systems that require a landlord to obtain a municipal licence or approval before proceeding with renovations that would require a tenant to vacate. In practice, this often involves confirming that required building permits are in place, requiring documentation, such as assessments from qualified professionals,

demonstrating that vacant possession is necessary, and requiring that tenants receive clear information about their rights and available supports. Many municipal frameworks also require landlords to submit an accommodation and/or compensation plan that sets expectations for how displacement will be managed, sometimes exceeding the minimum provincial requirements. The intent is not to replace provincial law, but to introduce additional procedural safeguards and verification steps that can deter misuse and make compliance more visible and enforceable.

### **Municipalities pursuing these tools commonly cite several interrelated policy objectives:**

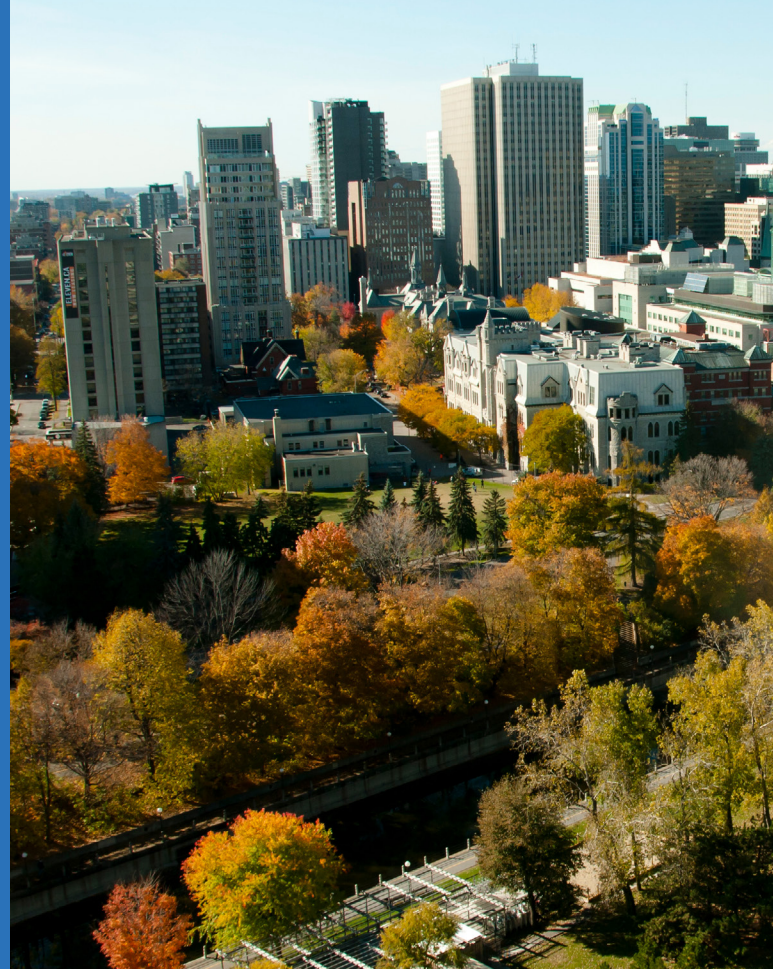
- 1** Prevent bad-faith eviction practices by increasing scrutiny over whether renovations truly require vacant possession and whether landlords are acting in good faith.
- 2** Improve tenant awareness by ensuring tenants receive standardised, plain-language information about their rights and options, including the ability to challenge an eviction through the LTB and the right-to-return after renovations.
- 3** Maintain access to affordable rental housing by reducing the likelihood that long-term tenants are displacement from lower-rent units through improper use of renovation-related eviction processes.

At the same time, “renovictions” by-laws raise important trade-offs that decision-makers must weigh. From an administrative perspective, licensing regimes require sustained staffing capacity, document review, complaint intake, inspections, enforcement, and ongoing monitoring. These costs can be significant, even where the number of applications is low. By-law effectiveness also depends on practical enforceability: If the city cannot readily identify when a renovation is linked to a tenant displacement event, or if compliance is primarily complaint-driven, enforcement can be resource-intensive, reactive, and uneven. Fee-based cost recovery is often limited because a substantial portion of work occurs before a licence is issued (including investigations and file

review), and those sunk costs are difficult to recover through application fees alone.

There are also potential compliance and market implications. If requirements are overly complex or costly, responsible housing providers (particularly small-scale landlords who own and operate a limited number of rental units) may face delays or uncertainty when undertaking legitimate repairs and renovations. This can have unintended consequences, including discouraging timely reinvestment in aging rental housing or shifting renovation activity toward information approaches that are less transparent and hard to regulate. However, if the licensing threshold is easy to avoid, or if bad-faith actors can achieve displacement through alternative legal pathways or informal pressure, the by-law may have limited deterrent effect relative to its administrative cost. These trade-offs reinforce the importance of assessing local conditions and selecting policy tools that are proportionate, enforceable, and aligned with provincial reforms, particularly where the province has the primary jurisdiction and capacity to establish consistent tenant protections across Ontario.

It is also important to situate municipal by-laws within the province’s evolving legislative direction. Bill 97, Helping Homebuyers, Protecting Tenants Act, 2023 (“Bill 97”) received Royal Assent in June 2023 and includes, through Schedule 8, a set of amendments to the RTA that are directly relevant to renovation-related displacement. The most significant of these for the renovations context are: a requirement that N13 notices for major repairs or renovations be accompanied by a report from a qualified professional confirming that vacant possession is genuinely required, with failure to include the report rendering the notice void; strengthened right-of-return protections requiring landlords to provide tenants with timely notice of unit readiness; an extended limitation period for former tenants to bring applications where a right of first refusal was not afforded; and a significant increase in maximum fines for RTA violations. However, Schedule 7 of Bill 97 will come into force on a day to be named by proclamation of the Lieutenant Governor, and as of the day of this paper, it has not been proclaimed. This is a critical gap. The strengthened right-of-return



## 1. EXISTING PROTECTIONS ALREADY IN PLACE

### ONTARIO ALREADY HAS STRONG PROTECTIONS:

**N13**

#### N13 legal process

Landlord must serve an N13 notice.



#### LTB hearing required

Eviction is not automatic; the tenant can challenge it.



#### Compensation rules

Tenants are entitled to compensation under the RTA.



#### Right to return

Tenants have the right to return once renovations are complete.



#### Bad-faith remedies

Tenants can seek remedies for bad-faith evictions.



#### Bill 97 reforms pending

Stronger verification, right-to-return and penalty provisions are approved.



### Why duplicate an existing provincial system?

provisions, and the enhanced penalty framework (the measures most directly relevant to deterring bad-faith renovations) remain legally enacted, but practically inoperative. Tenants do not yet benefit from these protections, and landlords are not yet subject to the stronger procedural requirements and penalties Bill 97 would impose.

This unproclaimed status directly shapes Ottawa's policy options. If the province moves to proclaim Schedule 7 and implements the associated regulations, it could address several of the same gaps that municipal licensing by-laws are intended to fill and do so consistently across Ontario. In that scenario, the policy rationale for a municipal renovations by-law would be substantially reduced. Conversely, continued delay in proclamation leaves tenants without the stronger provincial protections Parliament has already approved, and places pressures on municipalities to act locally in the interim, at the risk of building administrative systems that may need to be redesigned or dismantled once provincial rules come into force, as occurred in New Westminster, British Columbia ("B.C.").

The City of New Westminster repealed Part 6 of its Business Regulations and Licensing (rental units) By-law after the province introduced 2021 reforms that strengthened protections under B.C.'s Residential Tenancy Act, and, in effect, rendered the municipal provisions in Part 6 inoperable. The experience highlights a key consideration for Ontario municipalities, including the City of Ottawa: Local by-laws may function as interim measures in the absence of provincial action, but may become unnecessary once stronger provincial safeguards are implemented.

For municipalities, Bill 97, and the example of New Westminster, functions both as a policy signal and as an alternative pathway: Province-wide rules offer consistency, reduce patchwork requirements across Ontario, and lessen the need for municipalities to build new administrative systems where local incidence is low.

This dynamic sits at the heart of the provincial alignment criterion. A municipal by-law introduced while Schedule 7 remains unproclaimed must be designed with explicit awareness that the provincial framework is intended to complement may change materially, and that requirements built into a municipal framework today may duplicate, conflict with, or be rendered redundant by the very provincial measures that province has already legislated.



## 2. LAYERS OF BUREAUCRACY



Landlord needs major repairs



Existing Provincial Process (N13 + LTB)

PLUS Municipal Licence

PLUS Reviews

PLUS Fees

PLUS Inspections

PLUS Delays

More time. More cost. More uncertainty.



Additional layers may slow legitimate renovations without improving outcomes.

## Evaluation Criteria

To support a practical and proportionate decision, this paper sets out evaluation criteria that the City of Ottawa should apply when determining whether a municipal “renovictions” by-law is warranted and how such a by-law should be designed. These criteria provide a basis for assessing whether there is a demonstrated local need for a new municipal framework, whether a by-law is an appropriate tool given provincial jurisdiction over evictions and tenant protections, and what trade-offs may arise if the city introduces a licensing regime that operates alongside the RTA and LTB processes.

The criteria are as follows:

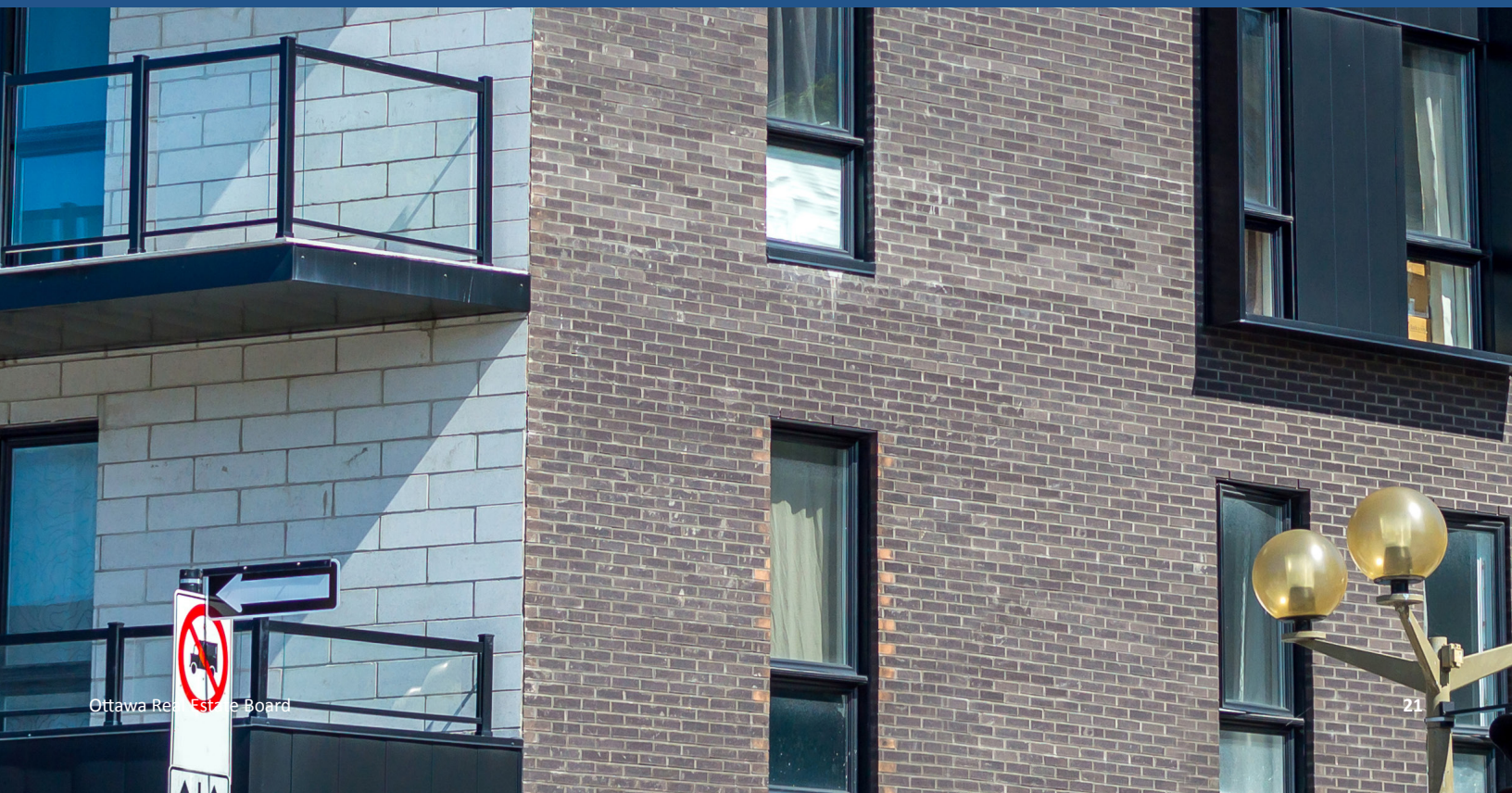
- 1 Administrative feasibility:** Considers whether the city can implement and sustain a licensing program in practice, including the operational steps required to receive and assess applications, verify documentation, respond to inquiries, conduct inspections, and carry out compliance and enforcement activities. This criterion also considers whether the city can reliably identify when renovation activity is connected to tenant displacement, and whether program effectiveness would depend primarily on complaints or self-reporting.
- 2 Cost and resource requirements:** Considers the staffing, training, legal support, communications (including public education campaigns), and technology resources required to operate a by-law over time, as well as the extent to which costs can reasonably be recovered through application fees. In particular, it considers that a substantial portion of administrative work may occur before a licence is issued, such as file review, investigations, and inspections, which can limit cost recovery when fees are established.
- 3 Potential impacts on housing supply and investment:** Considers whether the by-law could affect the feasibility or timing of legitimate renovations and reinvestment, particularly in older rental housing stock, and whether compliance requirements could create uncertainty or disincentives for small-scale rental housing providers or purpose-built rental investors. This criterion recognises that maintaining safe and habitable housing requires ongoing reinvestment, and that policy design should avoid unintended barriers to necessary work.
- 4 Alignment with provincial legislation and enforcement mechanisms:** Considers whether the by-law complements the provincial framework or creates duplication and role confusion. This includes assessing how municipal requirements interact with the N13 process and LTB adjudication, and how the city would coordinate with provincial mechanisms, including future provincial reforms such as Bill 97, which may address some of the same objectives through province-wide requirements.
- 5 Likelihood that a by-law would meaningfully address bad-faith “renovictions:”** Considers whether a municipal licensing regime is likely to deter bad-faith “renovictions” in the City of Ottawa’s context, given available data and enforcement realities. This includes assessing whether the by-law would be able to capture informal displacement dynamics, whether bad-faith actors could pursue workarounds, and whether the benefits of additional municipal safeguards are proportionate to the administrative complexity and cost of implementation.

Together, these criteria provide a structured basis for evaluating whether municipal action is justified, and for distinguishing between approaches that are primarily symbolic and those that are likely to produce practical, measurable improvements in tenant protection and system integrity.



# Jurisdictional Scan:

## Comparative Municipal Approaches



## Introduction

To inform the City of Ottawa’s forthcoming report, this section provides a structured scan of how other jurisdictions have responded to “renovictions” concerns. The scan is organised in three layers.

First, it summarises Ontario municipalities that have implemented “renovictions” by-laws and highlights common design features, operating models, and early implementation realities. Second, it reviews selected Canadian and U.S. jurisdictions with tenant protection frameworks connected to renovations or redevelopment-related displacement, with the aim of identifying design elements that may be transferable to the City of Ottawa’s context (and those that are not). Finally, it synthesises cross-jurisdictional lessons and patterns relevant to policy design, enforceability, and proportionality.

## Ontario Municipal By-laws (Core Comparators)

Ontario’s municipal responses to “renovictions” have largely taken the form of licensing or permit-linked checkpoints that operate alongside the provincial N13 process, due to the critical gap that is left by the unproclaimed elements of Bill 97. These frameworks aim to add earlier safeguards and improve transparency at the point where renovation-related displacement begins. The core Ontario comparators are Toronto, Hamilton, and London, which have each implemented a municipal framework, with differences in scope, staffing model, and tenant support features. This section also discusses the City of Waterloo’s recent introduction (in January 2026) of a rental renovation licence as an emerging comparator.

## Common Structure and Triggering Conditions of By-law

Across the Ontario models, the by-law is generally triggered when a landlord intends to proceed with major repairs or renovations requiring vacant possession and issues an N13. The licensing regime then requires an application to be submitted within a defined timeframe (often within seven days) and supported by documentation such as a building permit and a qualified professional’s report confirming that vacancy is required.

The general steps described across Ontario regimes include: obtaining a building permit; issuing an N13; submitting a licence application within a set timeframe; providing required documentation (including professional verification); ensuring tenants receive rights information; submitting any required accommodation/compensation plan; and complying with licence conditions and timelines.

## Program Scale, Staffing, and Annual Operating Costs

Available municipal reporting indicates that “renovictions” licensing programs require meaningful staffing and ongoing operating budgets, even where application volumes are low.

Toronto’s program (implemented July 31, 2025) reported staffing of eight Toronto building staff and six inspectors, with a cost estimate of \$1,438,000 (noted as a projected 2025 half-year cost).<sup>22</sup> Toronto will have a licence fee of \$728 (effective



July 31, 2026), which will provide limited cost recovery relative to the program’s staffing and operating costs.<sup>23</sup>

Hamilton’s program (implemented January 1, 2025) is reported with a staffing model that includes two licensing administrators and one project/policy assistant, with program costs of approximately \$328,000.<sup>24</sup> With a licence fee of \$715 and an annual renewal fee of \$125, early uptake shows seven applications received and one licence issued.

London’s program (implemented March 1, 2025) is reported with six staff (two enforcement officers, two customer service, and two program support), annual operating costs of approximately \$581,000, and early update showing seven applications received and seven licences issued.

The City of London notes a \$600 fee, and a requirement for a licensed architect/engineer report verifying that vacancy is required.

These figures are directly relevant to the cost and resource requirements criterion. Across all three programs, a substantial share of staff works occurs before a license is issued (e.g., file review, investigations, and inspections), making cost recovery through application fees structurally limited. Toronto’s projected half-year cost of \$1,438,000 against a licence fee of \$728, and Hamilton’s program cost of approximately \$328,000 against early uptake of one licence issued, illustrate the gap between operating costs and recoverable revenue that Ottawa should expect to replicate.

22. 2025, Town of Ajax Report CS-2025-19 and 2026, City of Oshawa Report SF-26-06  
 23. 2025, City of Ottawa, Feasibility Assessment – Development of a Renovation Licence and Relocation By-law  
 24. 2025, Town of Ajax Report CS-2025-19 and 2026, City of Osawa Report SF-26-06



## ONTARIO RENOVATION BY-LAW PROGRAMS: HIGH COST, LOW VOLUME TO DATE

Early comparator data shows meaningful costs and staffing, even with low application volumes.

CITY	ANNUAL COST	STAFF	APPLICATIONS/LICENCES
TORONTO	\$1.438M*	14	EARLY IMPLEMENTATION
HAMILTON	\$328K	3	7 APPS / 1 LICENCE
LONDON	\$581K	6	7 APPS / 7 LICENCES



### Significant staffing and costs, even with low application volumes.

Early experience from comparator municipalities suggests limited cost recovery and resource intensity relative to low uptake.

\* Toronto cost is a projected 2025 half-year cost.  
 Source: Municipal reports and public updates as of late 2025.

## Tenant Supports and Compensation Requirements

Ontario by-laws vary in the extent to which they require supports beyond the base provincial framework. Hamilton's model is more expansive, incorporating a rent-gap concert tied to the difference between a tenant's current rent and current-year annual average market rents for the same size unit in the Hamilton Census Metropolitan Area, using CMHC data, alongside requirements to provide tenant information materials. London's approach is narrower and more process-focused, emphasising documentation and compliance rather than enhanced compensation requirements beyond provincial minimums.

## Enforcement Tools, Penalties, and Compliance Challenges

Licensing models depend on the city's ability to detect and respond to renovation-related displacement events. Ottawa's feasibility review notes that Hamilton expected enforcement to operate largely on a reactive basis because the system depends on the city receiving notice of an N13 from either a landlord or tenant.<sup>25</sup> This highlights a recurring compliance challenge: Licensing regimes can be difficult to enforce where detection relies on tenant reporting, landlord disclosure, or complaint-driven processes. Assessed against the administrative feasibility criterion established earlier in this paper, the experience of Ontario comparators raises significant concerns. Ottawa's own feasibility review notes that enforcement may operate largely on a reactive bases, dependent on landlords or tenants notifying the city. This detection models limits the City's ability to reliably identify when renovation activity is connected to tenant displacement, and that risks uneven enforcement where compliance is highest among responsible housing providers and lowest where oversight is most needed.

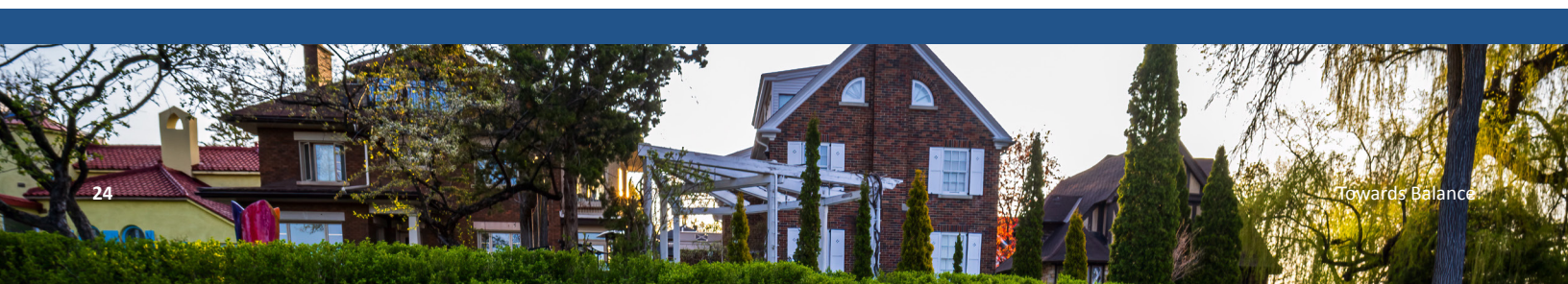
In practice, these limitations create several operational risks. First, tenants may not always be aware of their rights or of the existence of a municipal licensing requirement and may vacate a unit without reporting the situation to the city. Second, municipalities may not consistently receive notification of relevant activity, particularly where requirements are perceived as complex, costly, or duplicative of existing provincial processes. This can create uncertainty and an administrative burden for housing providers undertaking legitimate renovation work.

These detection challenges can result in uneven enforcement, where compliance is highest among responsible housing providers and lowest in situations where oversight is most needed. In such cases, the by-law may have limited impact on bad-faith behaviour while still imposing administrative requirements on compliant landlords. This dynamic can also increase reliance on complaint-driven enforcement models, which can be resource-intensive for municipalities and may produce inconsistent outcomes across different neighbourhoods or tenant populations.

Enforcement tools and penalties are only effective where non-compliance can be identified and substantiated. Without reliable detection mechanisms, the city may have challenges in building cases, applying penalties consistently, and demonstrating overall program effectiveness.

Taken together, these considerations suggest that a licensing framework's effectiveness is closely tied to practical enforceability. Where detection is limited and enforcement is largely reactive, the city may incur ongoing administrative costs without achieving a corresponding level of deterrence or improved outcomes for tenants.

25. 2025, City of Ottawa, Feasibility Assessment – Development of a Renovation Licence and Relocation By-law



## Observed Impacts on Renovation Activity

### What the Evidence Shows

At this stage, observable evidence of program impacts is limited, primarily due to the recency of implementation in Ontario and the low volume of licence applications relative to program budgets. In Hamilton, seven applications were received and one licence was issued in the program's early period. In London, seven applications were received and seven licences were issued. These figures represent a small fraction of overall rental activity in each city, and it is too early to draw firm conclusions about program effectiveness from them alone.

There is also limited evidence, at this stage, that licensing regimes have materially improved outcomes for tenants at a system level. Given the short implementation timelines and low application volumes, it is not yet possible to determine whether these by-laws are changing bad-faith "renovictions" behaviour in a sustained way, improving compliance rates, or affecting how and when renovation-related displacement occurs.

### Plausible Risks that Warrant Monitoring

Low application volumes are open to more than one interpretation, and the data alone cannot resolve which explanation is correct. One possibility is that fewer renovation-related evictions are proceeding through formal channels, which could reflect a deterrent effect. Another possibility is that low uptake reflects the difficulty of detection: If enforcement depends primarily on tenant complaints, some renovation-related displacement activity may simply not be entering the licensing system at all. A third possibility, which cannot be ruled out on current evidence, is that some housing providers are referring or restructuring legitimate renovation activity in response to licensing requirements, rather than proceeding through the formal process.



From a housing investment perspective, there is a plausible risk that complex or uncertain licensing processes could delay or discourage necessary reinvestment in aging rental stock, particularly for small-scale housing providers with limited administrative capacity. This is a concern worth monitoring as municipal programs mature, though it has not been definitively established in available reporting to date.

This speaks directly to the housing supply and investment criterion: Where licensing requirements create uncertainty or administrative burden for small-scale landlords undertaking legitimate renovation work, the risk is deferred reinvestment in aging rental stock. Which is an outcome that undermines housing quality and long-term supply.

## OREB's Assessment

OREB's position is that the current evidence base does not support the conclusion that municipal licensing regimes are achieving their intended objectives at a meaningful scale. The combination of low application volumes, limited implementation timelines, and the inherent difficulty of distinguishing deterrence from displacement or deferral makes it difficult to assess program effectiveness without confidence. In Ottawa's context, where N13 activity is already low relative to the overall rental dwelling stock, this uncertainty reinforces OREB's view that a costly and administratively demanding licensing regime is difficult to justify at this time, and that provincial reform and targeted local supports represent a more proportionate and effective path forward.

### City of Waterloo (Emerging Ontario Comparator)

In January 2026, Waterloo City Council approved the creation of a Rental Renovation Licensing program, requiring landlords to obtain a licence when issuing an N13 for renovations requiring vacant possession. The city's program design may include application requirements such as proof of delivery of a Tenant and Landlord Rights and Obligations information package, copies of building permits, and professional confirmation that vacant possession is required, along with an investigation function and a Tenant Support Liaison role.

The city also approved a \$20,000 annual Tenant Support Fund to assist tenants experiencing financial hardship who require legal guidance or advocacy related to eviction. The city has indicated the program will be funded from the Tax Rate Stabilisation Reserve, with staff expected to bring forward a permanent funding request through the 2027 budget cycle, which suggests that implementation will be phased as the program is established and resourced. Staff had urged council not to proceed at that time due to concerns about administrative feasibility, cost, and enforceability.



## OTTAWA RISKS REPLICATING THE SAME CHALLENGES

Evidence from comparator municipalities suggests significant implementation risks.



### OTHER CITIES EXPERIENCE



#### Staffing burden

Meaningful staff resources required, even with low application volumes.



#### Ongoing operating costs

Annual costs are substantial and largely fixed.



#### Low licence volume

Early data shows very few applications and licences issued.



#### Complaint-driven enforcement

Cities rely on landlord disclosure or tenant complaints to trigger action.



#### Limited fee recovery

Licence fees recover only a small portion of program costs.



#### Ottawa Likely Faces the Same Challenges

Adopting a similar by-law may result in high costs, low impact, and limited effectiveness.

## Canada and the United States (Selected Comparable Jurisdictions)

Across Canada and the United States, several municipalities have introduced tenant protection frameworks connected to redevelopment or renovation-related displacement. While these frameworks differ based on local legal authority, they frequently share a common design approach: introducing an earlier checkpoint in the renovation or redevelopment process that requires documentation, tenant notice, and relocation supports before displacement occurs.

### Canadian Approaches: Development-Linked Tenant Protection and Relocation Frameworks

Several Canadian frameworks are structured through planning and development approvals and focus on redevelopment-related displacement:

- The City of Vancouver’s Tenant Relocation and Protection Policy is embedded in rezoning and development permit processes and includes requirements for tenant relocation supports and administrative oversight.
- The City of Burnaby’s Tenant Assistance Policy similarly establishes standards and supports for tenants facing displacement due to redevelopment.
- The City of Victoria has adopted a tenant protection during redevelopment by-law and guides which outline a tenant relocation process and tenant assistance plan expectations.
- The District of North Vancouver has a Residential Tenant Relocation Assistance By-law tied to development applications involving demolition of multiple rental units.

There are fewer clear municipal “renoviction licensing” by-laws in other provinces. Rather, they tend to have provincial-level measures (e.g., Prince Edward Island had a renoviction moratorium that ended on November 1, 2023, replaced by a provincial approval process and safeguards), or program/policy approaches (e.g., housing providers’ internal relocation policies, rather than municipal licensing systems tied to renovations). Outside of B.C., the most developed municipal “renovictions” licensing approaches are currently concentrated in Ontario. As a result, these models provide transferable design concepts (e.g., standardised tenant relocation planning and approval-linked oversight) but many are more directly tied to redevelopment approvals than to day-to-day renovation activity, which limits direct comparability to Ontario’s N13 context.



## United States Approaches: Relocation Assistance and Temporary Displacement Rules

In the United States (U.S.), some tenant protection tools operate through relocation assistance requirements or regulated process for temporary displacement:

- In Oregon, the City of Portland’s Renter Relocation Assistance requires standardised relocation payments in specified displacement circumstances (e.g., rent increase of 10% or more over a 12-month period).
- In California, the City of Los Angeles requires relocation assistance in certain no-fault scenarios (e.g., the landlord evicts a tenant for their own occupancy) and in some cases requires filing with the housing department, creating an administrative checkpoint.
- In California, the City of San Francisco provides a regulated process for temporary eviction due to capital improvements, including notice requirements and disclosure of relocation payment rights.
- In Washington, the City of Seattle’s Tenant Relocation Assistance Ordinance addresses displacement tied to redevelopment and major development activity.
- In New York, the City of New York’s tenant protection is supported through a broader anti-harassment and anti-displacement framework. This includes a targeted Certification of No Harassment requirement for certain buildings before covered construction permits can proceed, as well as city-funded legal assistance and tenant support services.

Many U.S. examples are rooted in local rent regulation and just-cause frameworks that differ materially from Ontario’s legal environment. For the City of Ottawa, their relevance is primarily in identifying design features (checkpoints, standardised tenant information, relocation assistance structures) rather than replicating the legal model.



### MOST JURISDICTIONS OUTSIDE ONTARIO USE NARROWER MODELS

Most comparator jurisdictions outside Ontario focus on redevelopment, relocation assistance, rent regulation, or anti-harassment measures—not licensing routine renovations under Ontario’s N13 framework.

JURISDICTION	MAIN FOCUS OF FRAMEWORK
VANCOUVER (BC)	<b>Redevelopment Relocation Requirements</b> Requirements tied to rezoning and redevelopment approvals involving demolition or redevelopment of rental buildings.
BURNABY (BC)	<b>Redevelopment Assistance</b> Tenant relocation assistance and standards linked to redevelopment projects.
VICTORIA (BC)	<b>Redevelopment Tenant Protection</b> Redevelopment-related by-law and guidelines with tenant relocation plan expectations.
PORTLAND (OR)	<b>Rent Increase Relocation</b> Relocation payments triggered by significant rent increases (e.g., 10%+ over 12 months).
LOS ANGELES (CA)	<b>No-Fault Eviction Payments</b> Relocation assistance in specified no-fault eviction scenarios (e.g., owner move-in) with filing requirements.
SAN FRANCISCO (CA)	<b>Temporary Eviction for Capital Improvements</b> Regulated process for temporary displacement due to capital improvements, with notice and relocation payment rights.
SEATTLE (WA)	<b>Relocation Assistance</b> Relocation assistance requirements tied to redevelopment and major development activity.
NEW YORK CITY (NY)	<b>Anti-Harassment and Tenant Support</b> Certification of No Harassment for certain permits, plus city-funded legal assistance and tenant support services.



Most jurisdictions outside Ontario regulate redevelopment or displacement outcomes—not routine renovation licensing tied to tenant eviction notices.

## Transferable Design Features to the City of Ottawa

Across these Canadian and U.S. approaches, several design features appear most relevant:

- 1 Standardised tenant information and rights disclosure
- 2 Relocation assistance or structured displacement planning
- 3 Right-to-return alignment with legitimate reinvestment objectives.

However, the City of Ottawa's ability to adopt these features is constrained by Ontario's provincial jurisdiction over evictions.

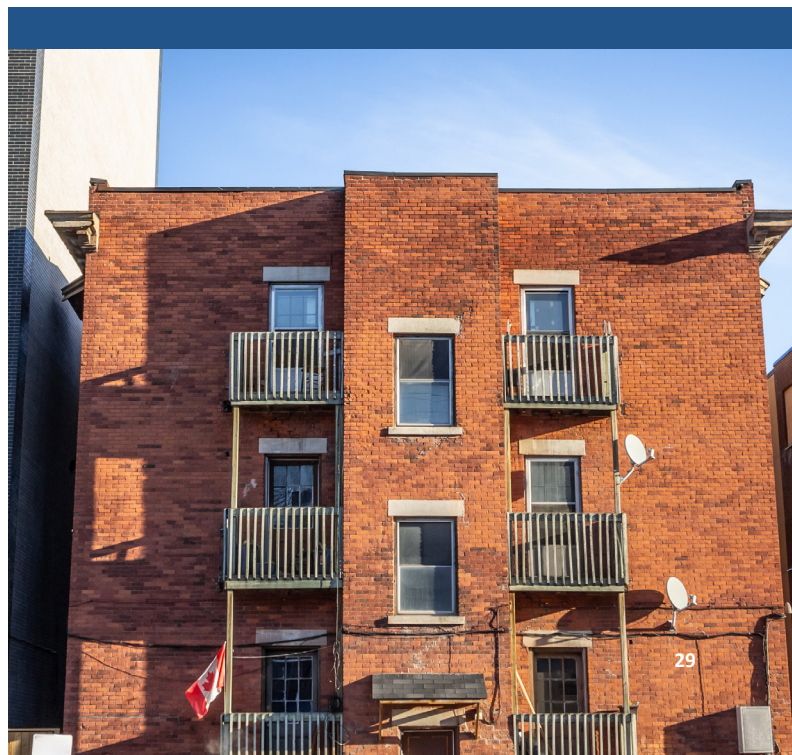
### Lessons and Patterns

Several consistent patterns emerge across Ontario and broader comparators:

- **Process Controls.** Municipal "renovictions" frameworks generally function as process controls rather than substitutes for provincial adjudication due to jurisdictional responsibility. They focus on front-end conditions (licensing, documentation, tenant information, and compliance requirements) while leaving eviction decisions to provincial mechanisms.
- **Administratively Demanding.** These programs are administratively demanding and frequently operate with limited cost recovery, particularly because staff work occurs before a licence is issued (application review, investigations, inspections, and enforcement preparation). These sunk costs can be substantial and difficult to recover through fees along, especially where application volumes are low or where a licence is not ultimately issued.

- **Licence Volumes Low.** Early Ontario experience suggests licence volumes may be low relative to the scale of annual operating budgets, creating a "sunk cost" concern: Municipalities must fund the program to maintain credibility and enforcement capacity, but application volumes may not be sufficient to demonstrate broad program reach or materially offset costs.
- **Effectiveness Depends on Enforceability and Detection.** Particularly since informal displacement may not be captured through licensing triggers. The City of Ottawa's own feasibility review notes that enforcement may be largely reactive in practice because detection can depend on landlords or tenants notifying the city.<sup>26</sup> This creates a risk of uneven enforcement and potential workarounds.
- **Interim Response Pending Provincial Action.** Many jurisdictions treat municipal by-laws for "renovictions" as an interim response while awaiting Bill 97 to be enabled. This reinforces a central consideration for the City of Ottawa that any municipal approach should be assessed in light of potential provincial reforms that could reduce the need for local duplication, require redesign, or render certain local provisions inoperable once province-wide rules are in force.

26. 2025, City of Ottawa, Feasibility Assessment – Development of a Renovation Licence and Relocation By-law





# N13 Trends

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## Introduction

Administrative data on N13 notices can help contextualise renovation-related termination activity, but it is an imperfect proxy for bad-faith “renovictions.” An N13 is the provincial notice used when a landlord seeks to end a tenancy to demolish, repair, or convert a rental unit<sup>27</sup>, and it therefore captures multiple scenarios beyond renovations alone. As a result, N13 figures should be interpreted as an indicator of renovation/demolition/conversion-related termination activity, not as a direct count of bad-faith conduct.

### Ottawa in Context: Low Incidence Relative to Total Rental Dwellings

Using the Ottawa comparator values (147,030 rental dwellings)<sup>28</sup> and ACORN-period<sup>29</sup> averages (2017 to August 2023)<sup>30</sup>, Ottawa’s N13 activity represents a very small share of the overall rental dwelling ecosystem. Ottawa’s average of about 28 N13s per year represents less than 1% of Ottawa’s 147,030 rental dwellings annually, meaning that, even at its average level, N13 activity affects only a very small share of the overall rental housing stock each year.

This perspective also aligns with the experience observed in other municipalities that have assessed “need” through the lens of incidence relative to stock. For example, the City of Oshawa’s report noted that low N13 volumes, did not support implementing a licensing system, particularly because available data could not establish that N13 filings reflected bad-faith activity.

Looking across other cities, Ottawa’s N13 trend is not unusual. In the ACORN comparison, every municipality in the top 10 list has a very small number of N13 filings when you compare it to the total number of rental homes. In other words, even in cities with the most N13s, the N13 rate is still well under one-tenth of 1% of rental dwellings per year. Ottawa’s rate (0.019%) is similar to Toronto (0.026%) and Mississauga (0.015%), and lower than places like Hamilton (0.068%), Windsor (0.074%), and Kitchener (0.052%). This suggests Ottawa is not an outlier, and it reinforces that N13 counts on their own should be treated as a limited indicator, especially since an N13 can relate to legitimate renovations, demolition, or conversion, and does not by itself show bad-faith activity.



## 1 OTTAWA N13 RATE IS VERY LOW

Based on 2017-August 2023 ACORN averages and 147,030 rental dwellings in Ottawa



OTTAWA AVERAGE  
N13 RATE:

**0.019%**  
of total rental dwellings



Equivalent to roughly

**28**

notices annually



More than

**99.98%**

of rental homes are  
not affected annually

Measured against Ottawa’s rental housing stock, observed N13 activity appears very limited.

28. Statistics Canada, 2021 Census of the Population

29. Note: ACORN data is used in order to compare across jurisdictions. N13 data sourced by the City of Ottawa is used later in the analysis.

30. 2025, Ontario Renoviction Report, ACORN

Looking across other cities, Ottawa’s N13 trend is not unusual. In the ACORN comparison, every municipality in the top 10 list has a very small number of N13 filings when you compare it to the total number of rental homes. In other words, even in cities with the most N13s, the N13 rate is still well under one-tenth of 1% of rental dwellings per year. Ottawa’s rate (0.019%) is similar to Toronto (0.026%) and Mississauga (0.015%), and lower than places like Hamilton (0.068%), Windsor (0.074%), and Kitchener (0.052%). This suggests Ottawa is not an outlier, and it reinforces that N13 counts on their own should be treated as a limited indicator, especially since an N13 can relate to legitimate renovations, demolition, or conversion, and does not by itself show bad-faith activity.

### The City of Ottawa-Specific LTB Notice Trends: Increases in Recent Years, but Still an Incomplete Measure of “Need”

Ottawa’s internal analysis, based on LTB-issued notice data requested by the city, reports that N13 activity has increased over time and notes a marked rise after 2019<sup>31</sup>. The city’s summary states that N13s were relatively stable between 2017 and 2019, and then increased sharply between 2019 and 2022, which may be due to rental market pressures that occurred during this time.

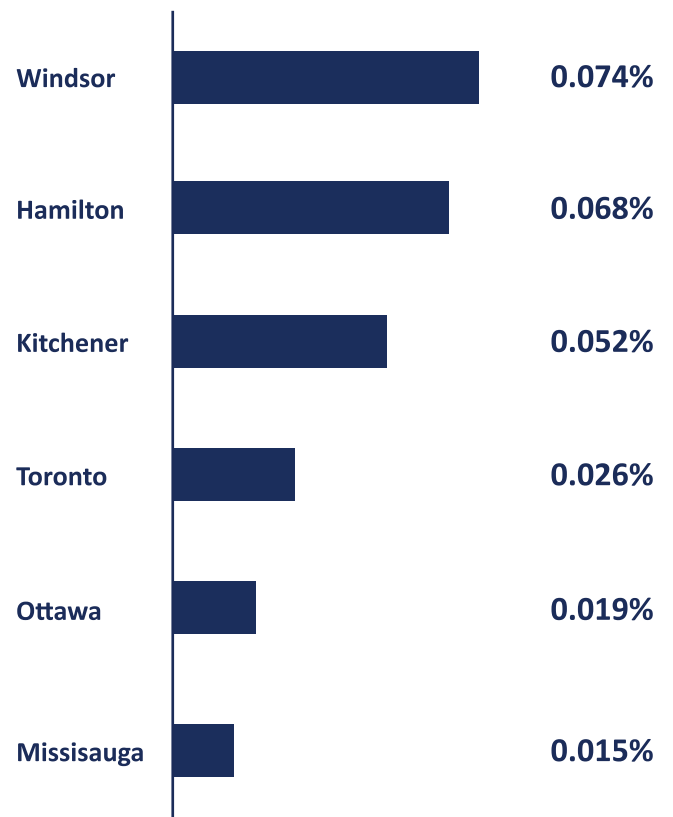
While that trend is relevant, it should be treated as context rather than proof of a local bad-faith “renovictions” problem for two reasons. First, the N13 category includes demolition, repairs, and conversion activity. Second, the city’s own reporting recognises that broader system factors (including COVID-19 pandemic-era impacts on the eviction system and other economic conditions) may influence observed notice patterns. This limits the ability to draw definitive conclusions about causes from these trendlines alone.

31. 2024, Issuance of N5, N12, N13, and AGIs at the Landlord Tenant Board in Ottawa

City	N13 Rate (% of Rental Housing Stock)
Windsor	0.074%
Hamilton	0.068%
Kitchener	0.052%
Toronto	0.026%
Ottawa	0.019%
Mississauga	0.015%

## 2 OTTAWA IS NOT AN OUTLIER

N13 Rate as a % of Total Rental Housing Stock (2017-August 2023 Averages)



 Ottawa’s N13 rate is below several comparator municipalities

## Key Limitations for Interpretation (and Why they Matter for By-law Evaluation)

This analysis treats N13 trends as one input into a proportionality assessment, but several limitations should be stated explicitly:

- 1** Notice data does not equal outcomes. Not every notice results in an eviction order; matters may be withdrawn, resolved informally, or determined differently through adjudication.
- 2** Administrative datasets may not capture informal displacement. Tenants may leave due to misinformation, pressure, or perceived inevitability, without a full legal process unfolding, meaning “need” cannot be measured using N13 figures alone.
- 3** By-law outcomes cannot be evaluated solely through changes in N13 volumes. A municipal licensing system might affect reporting behaviour or shift the channel of displacement rather than reduce displacement itself, making it necessary to consider additional indicators (e.g., complaints, tenant-support caseloads).

## Implications for “Need” and for Proportional Policy Design in the City of Ottawa

Taken together, the available data supports a cautious conclusion: Ottawa’s observed N13 activity, when expressed as a proportion of total rental dwellings, appears low, and N13 trendlines alone do not establish the scale of bad-faith renovictions in the community that municipal “renovictions” by-law are attempting to address. This suggests that any municipal response should be calibrated to demonstrated local conditions and enforcement realities and should be assessed against lower-burden alternatives and evolving provincial reforms (i.e., Bill 97). In other words, where the measurable incidence of N13 activity is low relative to the rental dwelling ecosystem, and where the data cannot isolate bad faith, there is a strong policy rationale for a proportional approach that prioritises tenant information and monitoring over a costly licensing regime.

Applying the fifth evaluation criterion directly (i.e., whether a municipal licensing framework is likely to meaningfully deter bad-faith “renovictions” in Ottawa’s context) the N13 evidence base presents a significant challenge because available data cannot isolate bad-faith intent from legitimate renovation activity. Additionally, informal displacement falls outside formal licensing triggers entirely, and the low incidence of N13 activity relative to Ottawa’s overall rental stock makes it difficult to establish the scale of the problem that a licensing framework would be designed to address.

### 3 N13 DOES NOT EQUAL RENOVICATION

#### N13 Notices Include



Repairs



Renovations



Demolition



Conversion



#### NOT ALL NOTICES PROCEED.

Not every N13 results in an eviction order.



#### NOT ALL INVOLVE BAD FAITH.

Many notices relate to legitimate renovations, demolition, or conversions.



#### N13 COUNTS CANNOT BE TREATED AS RENOVICATION TOTALS.

They are an imperfect proxy for bad-faith displacement.

**N13 notices are an imperfect proxy for bad-faith displacement.**



# Options & Recommendations

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## Why Some Municipalities Have Pursued Municipal “Renovictions” By-laws/Licensing Frameworks

Municipalities that have introduced “renovictions” by-laws have generally done so in response to a common concern—that the protections available to tenants under the RTA do not consistently translate into the level of housing security tenants experience in practice. Even where the legal framework is clear, tenants may vacate without fully understanding their rights, without accessing the LTB process, or without being able to meaningfully exercise protections such as the right of return. In high-pressure rental markets where the gap between long-term rents and current market rents is significant, the incentive for bad-faith displacement is real, and the consequences for displaced tenants can be severe.

In this context, municipalities like Toronto, Hamilton, and London have concluded that introducing an earlier, local checkpoint adds a layer of practical protection that the provincial framework alone does not consistently deliver.

## Why OREB Reaches a Different Conclusion for Ottawa

OREB shares the underlying concern that motivates municipal licensing: Tenants should be protected from bad-faith displacement, and the legal protections that exist on paper should be accessible and meaningful in practice. However, when the five evaluation criteria are applied to Ottawa’s specific context, the case for a municipal licensing framework does not hold up as clearly as it might in higher-incidence jurisdictions.

Ottawa’s N13 activity is low relative to its overall rental dwelling stock (less than 1% annually) and available data makes it difficult to establish that this activity reflects bad-faith conduct rather than legitimate renovation and demolition activity. The experience of Ontario comparators indicates that licensing frameworks are administratively demanding, difficult to fully fund through fees, and dependent on complaint-driven enforcement models that may not capture the informal displacement they are most

intended to address. At the same time, the province has already established, through Schedule 7 of Bill 97, a set of stronger procedural requirements and penalties for renovation-related evictions that, once proclaimed, would address many of the same gaps at an Ontario-wide level and without the cost and complexity of a municipal by-law or licensing layer.

In Ottawa’s context, OREB’s assessment is that the administrative cost, enforcement limitations, and risk of discouraging legitimate reinvestment are not justified by the available evidence of local need. The following recommendations reflect that conclusion. They identify the approaches OREB considers most likely to deliver meaningful, practical improvements for tenants and housing providers alike, without the costs and risks that a municipal licensing framework would introduce.



# Options and Recommendations

The evidence assembled in this paper points to a policy issue that is real but difficult to measure precisely. “Renovictions” concerns are most acute when tenants experience displacement connected to renovations and are unable to meaningfully access the protections built into Ontario’s RTA (including the ability to challenge a N13 at the LTB, secure compensation, or return to the unit where

applicable). At the same time, the available data is an imperfect proxy for bad-faith behaviour. N13 notices capture legitimate demolitions, conversions, and major repairs, but do not distinguish intent or outcome. Taken together, this suggests Ottawa should prioritise policy responses that (a) target known points of vulnerability in the system (e.g., tenant awareness), (b) remain workable for legitimate renovations and reinvestment, and (c) avoid an expensive municipal system whose effectiveness depends on detection challenges and complaint-driven enforcement.



## A BETTER PATH FORWARD FOR OTTAWA

Targeted, effective solutions can protect tenants and support responsible housing providers—without creating a costly new municipal bureaucracy.

### NEW LICENSING BUREAUCRACY

#### NEW MUNICIPAL LICENCE SYSTEM

Creates a new layer of administration and complex requirements.

#### FEES / STAFFING / DELAYS

Imposes ongoing costs, requires additional staff, and slows down legitimate renovations.

#### DUPLICATE PROVINCIAL PROCESS

Overlaps with existing RTA and LTB processes and adds little additional protection.

### WHAT OTTAWA SHOULD PRIORITIZE

#### BILL 97 IMPLEMENTATION

Support timely proclamation and full implementation of stronger provincial protections for tenants.

#### FASTER LTB ACCESS

Advocate for shorter wait times and more resources at the LTB so tenants can get timely resolutions.

#### PLAIN-LANGUAGE TENANT RIGHTS INFO

Invest in clear, easy-to-understand information so tenants know their rights and options.

#### STRONG ENFORCEMENT OF BAD FAITH

Promote consistent enforcement of bad-faith provisions and meaningful penalties through the LTB.

#### MUNICIPAL PERMITS / PROPERTY STANDARDS

Focus on permits and property standards to support safe, well-maintained rental housing.

### PROTECT TENANTS WITHOUT CREATING A NEW MUNICIPAL BUREAUCRACY.

Focus on practical, proportionate solutions that deliver real benefits for tenants and housing providers.

Within that framing, the City of Ottawa’s decision is not simply whether “something should be done,” but which tool is most likely to improve real-world outcomes for tenants without creating unintended impacts for responsible housing providers, particularly small-scale landlords, who need practical, timely pathways to maintain housing quality.

Taken together, these considerations point toward a more targeted and proportionate policy response than a stand-alone municipal licensing framework. Based on the evidence reviewed, OREB recommends that the City of Ottawa prioritise approaches that strengthen real-world outcomes for tenants without introducing a new municipal licensing framework. This preferred direction is grounded in several key considerations:

- 1** Evidence from other municipalities indicates that licensing frameworks can be complex to administer, challenging to enforce, and may not meaningfully improve tenant outcomes at a system level.
- 2** There is a risk that introducing additional municipal requirements could discourage or delay legitimate reinvestment in existing rental housing, particularly for small-scale landlords, at a time when maintaining and improving aging housing stock is critical.
- 3** Emerging provincial reforms, including Bill 97, signal a more consistent, province-wide pathway to address many of the concerns that municipal by-laws are intended to resolve.

In this context, OREB supports an approach that focuses on strengthening tenant awareness and advocating for effective provincial implementation, while avoiding the creation of a duplicative and resource-intensive municipal by-law approach.



## Recommended Alternatives Beyond a Municipal By-Law Approach (OREB Preferred Direction)

Based on the evidence reviewed, particularly the administrative complexity and cost recovery challenges observed in comparator municipalities, the limitations of N13 data as a proxy for bad faith, and the province's ability to implement consistent province-wide safeguards, OREB's preferred direction is to prioritise targeted policy approaches that strengthen protections, do not hinder reinvestment, and do not overly burden small-scale landlords, without building a new municipal licensing regime.

## Provincial Policy and Administrative Reforms

**Advocate for the province to bring Bill 97 tenant protection measures into force and implement supporting regulations.**

OREB recommends that the City of Ottawa advocate to the Province of Ontario to proclaim and implement the Bill 97 measures relevant to renovation-related evictions and tenant protections. Bill 97 provides a province-wide pathway to address several of the same issues municipal "renovictions" by-laws are intended to manage. Particularly, improving process integrity and ensuring tenants receive clear, standardised information about their rights. Province-wide implementation would promote consistency across Ontario and reduce the need for a patchwork of municipal licensing regimes.

**Advocate for strengthened LTB accessibility, enforcement capacity, and plain-language guidance.**

OREB recommends that the city advocate for targeted provincial investments to improve tenant access to the LTB process and strengthen timely enforcement against bad-faith conduct. In practice, improved access could include measures such as continuing to reduce hearing wait times for N13-related applications, expanding access to tenant legal support at key points in the LTB process, and enhancing the point-of-notice moment by requiring landlords to provide standardised, plain-language information to tenants when an N13 notice issued.

While the prescribed N13 form includes basic information about tenant rights, it does not currently require landlords to provide a comprehensive, plain-language information package that supports tenants in understanding or navigating the process at the time the notice is issued. Embedding this requirement within the provincial framework would promote consistency across Ontario while improving tenant awareness at a critical decision point.

Strengthening enforcement capacity, particularly the ability to investigate and respond to bad-faith eviction findings in a timely manner, would further reinforce the integrity of the existing provincial framework. Improving provincial capacity supports tenant protection across Ontario, without requiring municipalities to fund parallel administrative programs or duplicative licensing systems.



## Practical Options that Support Tenant Understanding and Fair Compliance Without Creating a New Municipal Licensing System

**Expand municipal education and navigation approach, aligned with provincial processes.**

OREB recommends that the City of Ottawa build on its existing tenant-facing information and navigation supports by developing targeted, plain-language resources specific to N13 notices, rather than introducing a new licensing framework. While the city already provides resources for tenants' rights and responsibilities, there is an opportunity to close a more specific information gap by creating materials that clearly explain the N13 process,

including tenant rights of return, compensation requirements, timelines, and how to challenge a notice through the N13.

**Use existing municipal authority to reinforce housing quality and safe renovation activity.**

OREB recommends that Ottawa focus on municipal efforts where its jurisdiction is clearest: building permits, inspections, and property standards enforcement to support safe and habitable housing. This includes ensuring permit processes and property standards enforcement are well-coordinated and accessible, and that landlords and tenants understand the municipal role in health and safety, without conflating municipal enforcement with eviction adjudication under the RTA.

## OREB RECOMMENDED ACTION PLAN

Practical, proportionate steps that protect tenants, support responsible housing providers, and avoid unnecessary municipal bureaucracy.

<b>PROVINCIAL ACTIONS</b> Leverage province-wide tools for stronger, consistent protection.	<b>CITY OF OTTAWA ACTIONS</b> Take targeted local steps that deliver real benefits.	<b>IF BY-LAW PROCEEDS</b> If Council chooses to adopt a by-law, it should be carefully limited and time-bound.
<b>PROCLAIM BILL 97</b> Implement Schedule 7 to strengthen protections and penalties for renovation-related evictions.	<b>N13 EDUCATION TOOLS</b> Create easy-to-understand resources about N13 notices, rights, and next steps.	<b>NARROW SCOPE</b> Limit the by-law to true bad-faith renovations with clear, evidence-based triggers and exemptions.
<b>IMPROVE LT WAIT TIMES</b> Invest in the Landlord and Tenant Board to ensure timely access to justice for tenants and landlords.	<b>TENANT NAVIGATION SUPPORTS</b> Increase access to legal information, intake services, and housing help for tenants.	<b>REVIEW AFTER 2 YEARS</b> Require a formal, independent review after two years to assess effectiveness, costs, and impacts.
<b>STANDARDIZED TENANT NOTICES</b> Develop clear, plain-language, province-wide notice templates to improve understanding of tenant rights.	<b>FOCUS ON PERMITS / INSPECTIONS</b> Strengthen building permits and property standards to support safe, well-maintained rental housing.	<b>NARROW SCOPE</b> Include a sunset clause (eg. 3 years) unless renewed by Council based on demonstrated local need and effectiveness.

These actions focus on education, access, and enforcement-delivering meaningful results without creating a new municipal licensing regime.

## Ideal “Renovictions” By-law Design Principles

### Municipal Implementation Considerations (If a Licensing By-law is Pursued)

OREB’s preferred direction is to prioritise provincial action (including implementation of Bill 97) and targeted local supports over a stand-alone municipal licensing regime. However, if Ottawa proceeds with a municipal “renovictions” licensing framework, the following implementation considerations should be made explicit at the outset. These factors significantly influence both effectiveness and the risk of unintended consequences.

### Implementation Considerations

#### Administrative Capacity and Staffing Requirements

A licensing regime requires sustained capacity beyond policy development. At a minimum, Ottawa would need resources for: intake and triage of applications; document verification (permits, professional assessments, tenant package confirmation); proactive and complaint-driven investigations; enforcement; and a public-facing function to respond to inquiries. Comparable municipalities have funded multi-position teams and inspection capacity. Ottawa should assume that credible enforcement requires dedicated staff and clear internal service-level expectations, rather than reliance on incremental capacity.

#### Program Operating Costs and Fee Structures

Experience from Ontario comparators indicates that operating costs can be significant and difficult to recover through licensing fees. A key structural challenge is that much of the work occurs before a licence is issued (file review, investigation, compliance discussions, inspections).

Those costs are “sunk” regardless of whether a licence is granted and are hard to recover through application fees. Ottawa should evaluate whether fee levels needed for cost recovery would discourage compliance, create incentives for workarounds, or reduce the by-laws’ practical reach.

#### Coordination with Provincial Enforcement Mechanisms

Since the eviction framework is provincial, a municipal regime must be designed to complement, not duplicate or conflict with, the RTA/LTB system. Ottawa should clarify how municipal requirements relate to the N13 process, what the city expects landlords to do before and after an N13 is issued, and how municipal compliance findings interact with LTB adjudication (recognising the City cannot determine whether an eviction is lawful under the RTA).

#### Monitoring, Reporting, and Evaluation Mechanisms

A licensing framework should not be launched without an evaluation plan. Ottawa should establish baseline indicators and commit to reporting on:

- Applications received
- Licenses issued/denied/revoked
- Time-to-decision
- Enforcement actions
- Compliance rates
- Tenant inquiries/support referrals
- Landlord inquiries
- (cautiously) Changes in N13 patterns (noting limitations)

The city should set a reporting cadence and define triggers for adjustment (e.g., low uptake, high enforcement burden, evidence of workarounds, or provincial reforms that reduce duplication). A sunset or mandatory review would support proportional governance.



## OREB Renovation By-law Design Recommendations

OREB's preferred direction is to avoid a stand-alone municipal licensing regime and to prioritise provincial action and targeted local supports. However, if council chooses to proceed with a municipal "renovictions" by-law, OREB recommends that it be designed in a way that is narrowly targeted, operationally workable, and aligned with provincial processes. A by-law that is unclear, overly complex, or difficult to enforce risks producing limited deterrence while increasing administrative costs, compliance burden, and delays to legitimate renovation and reinvestment, particularly for small-scale landlords.

In that context, OREB does not support a broad licensing model or requirements for costly third-party expert reports to validate whether renovations require vacant possession. These elements may operate less as safeguards than as barriers to lawful renovation activity already permitted under the RTA. Where municipal requirements are overly burdensome, they risk discouraging timely repairs and reinvestment in aging rental housing stock and may, in practice, constrain a provincially authorised process rather than improve tenant outcomes.

If the city proceeds, the focus should therefore be on design features that improve clarity, transparency, and fairness, without creating unnecessary procedural barriers. The following principles reflect the types of measures OREB considers most appropriate for the city's context.

### 1 Clear scope and trigger definitions

A by-law should be tightly scoped to the specific problem it is intended to address: bad-faith "renovictions." The trigger should be defined clearly for landlords and tenants and administratively workable for the city, such as being tied to an N13 issued for major repairs or renovations requiring vacant possession. The by-law should also clearly define what is excluded, including minor repairs, emergency repairs, and work that can proceed safely with a tenant in place. Clarity in triggers reduces compliance confusion, improves fairness, and limits unnecessary administrative burden.

### 2 Minimum evidence standards that are strong but practical

OREB supports evidence requirements that promote integrity without creating unnecessary barriers to legitimate work. At a minimum, the city should require proof of a relevant building permit (where required) and proof that tenants received standardised rights information. Evidence requirements should be calibrated so that they deter misuse, not create a 'paper burden' that delays legitimate projects or disadvantages small-scale housing providers who do not have specialised administrative capacity.

### 3 Tenant communications and education as a central safeguard

If Ottawa proceeds with a by-law, tenant-facing protections should be front-loaded. A standardised, plain-language tenant information package should be mandatory and delivered at defined points, with clear referrals to supports (e.g., legal clinics, tenant help services). This is one of the most practical protections, particularly where tenants may otherwise vacate without understanding their rights or the steps available to challenge an N13 notice through provincial processes.



## 4 Compliance verification and proportional enforcement

A by-law will only be credible if it can be enforced consistently. Ottawa should be transparent about whether enforcement is proactive, complaint-drive, or a hybrid, and should focus on enforcement on meaningful non-compliance (e.g., proceeding without a licence, misrepresentation, failure to provide required notices, or failure to meet licence conditions). Penalties should be scalable and proportionate, with a clear escalation pathway. OREB also recommends that Ottawa include an explicit compliance approach that recognises the difference between administrative errors and deliberate bad-faith conduct, to avoid penalising responsible housing providers for technical issues.

## 5 Fee design and cost-recovery realities

OREB recommends that Ottawa avoid designing a program that relies on full cost recovery through fees unless the city can demonstrate stable application volumes and a defensible fee rationale. Comparable jurisdictions indicate that much of the work occurs before a licence is issued (file review, investigations, inspections), limiting recoverability through fees. Excessive licence fees risk discouraging compliance, increasing incentives for workarounds, and reducing the by-law's practical reach.

## 6 Alignment with provincial reforms, including Bill 97

OREB recommends that any by-law be designed to align with provincial processes and to remain adaptable if provincial reforms are implemented. Given the province's ability to establish consistent, Ontario-wide protections through Bill 97, Ottawa should avoid building a permanent municipal program that duplicates measures likely to be addressed provincially. The by-law should include a mechanism to adjust requirements if provincial rules change, and it should be evaluated against whether it remains necessary once provincial measures are in force.

## 7 Evaluation metrics and sunset/review mechanisms

If a municipal by-law proceeds, Ottawa should embed an evaluation framework from the outset. This should include baseline measures and annual reporting on program volume (applications, licences issued/denied), processing timelines, enforcement activity, complaint patterns, tenant support usage, and compliance outcomes. Changes in N13 patterns should be interpreted cautiously, due to data limitations, but can still be monitored as one indicator among many. OREB recommends a mandatory review within two years of implementation, with clear decision triggers for modification or discontinuation, particularly if uptake is low relative to cost, enforcement is uneven, workarounds are evident, or provincial reforms (i.e., Bill 97) reduce the need for municipal duplication.





# Conclusion



Bad-faith “renovictions” are a serious concern. Where tenants—particularly low-income, new immigrants, and seniors on fixed incomes—are displaced through the improper use of renovation-related processes and are unable to meaningfully access the protections the RTA is intended to provide, the consequences can be severe and lasting. This paper takes that harm seriously, and OREB’s recommendations are grounded in a genuine commitment to ensuring tenants are protected in practice, not just in law.

At the same time, the evidence reviewed reinforces that policy responses must be proportionate, enforceable, and carefully designed to avoid unintended consequences. In a housing system where many rental buildings require ongoing reinvestment to remain safe and habitable, and where small-scale landlords play a critical role in supplying rental housing across Ottawa, measures that are overly complex, costly to administer or difficult to enforce risk undermining both housing quality and the long-term stability tenants depend on.

The evidence does not support the conclusion that a municipal licensing framework is the most effective path forward for Ottawa. Application volumes in comparator municipalities have been low relative to program costs, enforcement depends heavily on complaint-drive detection, and the province has already enacted (but not yet proclaimed) measures through Bill 97 that would address many of the same gaps more consistently and at scale. Building a permanent municipal administrative system in this context risks creating duplication, compliance burden, and sunk costs that do not translate into meaningfully better outcomes for tenants.

Ottawa should prioritise enforceable provincial reform and targeted local supports. The city’s most impactful near-term actions are to advocate for proclamation of Bill 97’s Schedule 7 provisions, strengthen tenant-facing information and navigation supports, and use existing municipal authority to promote safe and habitable housing through permits, inspections, and property standards enforcement. These are tools most likely to produce real, measurable improvements for the tenants who need protection most.





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