



HOW TENANTS ARE PAYING FOR CLIMATE CHANGE THROUGH ABOVE GUIDELINE RENT INCREASES

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Introduction

Climate change is having devastating impacts on communities across the globe. Canada is witnessing increasing intensity and frequency of extreme worsening effects climate weather events with of change. This is disproportionately impacting low-to-moderate income tenants who are not only bearing the burden of the housing crisis but also the climate crisis. Buildings are the second largest emitting sector in Ontario, contributing to 25% of the province's greenhouse gas (GHG) emissions. Having insufficient no or cooling/heating, lack of adequate ventilation, drafty windows, mould and more all these conditions impact the wellbeing of tenants and lead to higher emissions.

Data from Efficiency Canada (2023) shows that nationally, compared to homeowners, renters are more likely to have lower incomes, live in older housing stock and use inefficient heating equipment:

- 62% of low-income Canadians are renters.
- 72% of renters live in housing built before 1990, when energy efficiency was not a feature of Canada's building codes.

In Ontario, according to their 2011 census, 57 percent of the entire housing stock was built before 1980. More specifically, approximately 85 percent of the apartments were built before 1980. Low-income and other vulnerable tenants are therefore stuck in housing that's least energy efficient.

Inefficient rental housing leads to energy poverty, meaning higher utility bills, higher rents for tenants, greater discomfort and increased health issues, especially during extreme heat events. The BC Coroner's report (2022) revealed that during the extreme heat event in BC which led to more than 600 deaths, 98 percent of deaths happened indoors in homes without adequate cooling.

Given that apartment buildings are a significant contributor to greenhouse gas emissions, retrofitting existing buildings is key to achieving carbon reduction targets set by governments. A recent report by Pembina Institute (2024) states that deep retrofits are no-regret solutions that provide resilience to escalating climate change impacts while also lowering Canada's emissions. They are a key pathway to ensuring that housing is healthier, safer, more resilient to extreme weather, and more affordable to heat and cool . Deep retrofitting requires an investment of \$10-15 billion per year for 20 years to deep retrofit our homes and buildings.

Introduction

All of this is happening amidst a massive **housing affordability** crisis. Canadian tenants are increasingly living in wildly unaffordable housing. According to Rentals.ca's May 2025 Rent Report:

- Ontario cities take 6 of the top 10 spots for municipalities with the highest average rents.
- Average listed rent in Ontario was \$2,335 nearly \$200 more than the national average.
- To afford the average listed rent for a 2 bedroom apartment in Ontario (\$2,553) a household would have to earn \$102,120 annually. However, according to the Canadian Rental Housing Index the median renter household income in Ontario is \$58,800.

It is imperative that the steps we take to address the dual crises of housing and climate change do not exacerbate the other. For example, achieving the goal of decarbonization can have adverse impacts if it does not include adequate tenant protections against major rent increases. A siloed approach can result in those with the least, both in terms of resources and responsibility for our current climate emergency, footing the bill to make housing more energy efficient.

Currently in Ontario, landlords can apply to the Landlord and Tenant Board (LTB) to increase rents above the annual guideline (AGI) if they have made energy and water conservation upgrades to the building. But is it really low and moderate income tenants who should be paying for green retrofits?

It is in this context that ACORN undertook this research to understand how landlords are passing energy efficiency related costs onto tenants through AGIs. This report will conclude with actions that the provincial government can take to ensure that the goal of climate justice goes hand in hand with housing justice.

What is **ACORN** (9)

ACORN (Association of Community Organizations for Reform Now) Canada is a multi-issue, membership-based community union of low- and moderate-income people. We believe that social and economic justice can best be achieved by building community power for change. We have 185,000+ members across 6 provinces. Our local and national boards are elected directly from our membership.

ACORN members are low- and moderate income tenants who are bearing the brunt of the housing and climate crises.



Ontario has partial rent control, meaning...

- Landlords are allowed to raise the rent annually within the provincial rent control guideline. Currently, the rent control guideline stands at 2.5%.
- Residential units occupied for the first time after November 15th 2018 are exempt from rent control. This means that landlords can increase rents by an unlimited amount in newer apartments.
- Even in the case of apartment buildings that are rent controlled, Section 126 of the Residential Tenancies Act (RTA) allows landlords to raise the rent above the provincial rent control guideline by applying to the LTB for an Above-Guideline-Increase also known as an AGI. The following are the reasons for which AGIs are allowed:
- 1. Major capital expenditures
- 2. Operating costs of security service costs
- 3. Extraordinary increase in the cost for municipal taxes

This report focuses on AGIs for capital expenditures as this is the primary method by which landlords pass the cost of climate upgrades onto tenants. Further, as per Section 126 (7), a capital expenditure is considered eligible if:

a. It is necessary to protect or restore the physical integrity of the building

b. It is necessary to comply with repair and maintenance standards under the RTA (LTB or municipal bylaws)

c. Is necessary to maintain the provision of a plumbing, heating, mechanical, electrical, ventilation or air conditioning system

- d. Provides access for persons with disabilities
- e. Promotes energy or water conservation
- f. Maintains or improves the security of the residential complex

Through Section 126 (7) e, landlords can pass on the costs of energy efficiency related capital improvements onto tenants.

The maximum annual increase allowed in an AGI application based on capital expenditures is 3% above the guideline. If the rent increase exceeds 3%, the rent is increased by 3% in the first year and any remaining increase takes place in subsequent years, to a maximum of two additional years at 3% each year.

Repeated AGIs can lead to extreme rent increases as these are cumulative. A tenant can end up paying a 9% increase in rent over 3 years plus each year's annual rent control guideline. Here's an example of how this can dramatically increase rents: *Looking at the below example, lets say starting rent is* \$1,500/month...

YEAR	RENT CONTROL GUIDELINE (%)	RENT INCREASE AT RENT CONTROL GUIDELINE (\$)	AGI (%)	AGI (\$)	TOTAL RENT INCREASE (GUIDELINE + AGI %)	TOTAL RENT INCREASE (GUIDELINE + AGI \$)	TOTAL RENT AFTER INCREASES
2023		\$37.50		\$45.00		\$82.50	\$1582.50
2024	2.5%	\$39.60	3%	\$47.50	5.5%	\$87.10	\$1669.60
2025		\$41.70		\$50.10		\$91.80	\$1761.40

Rent with vs without AGI

YEAR	Monthly Rent, - NO AGI	Rent Paid for the Year - NO AGI	Monthly Rent, including AGI	Rent Paid for the Year, Including AGI
2023	\$1537.50	\$18,450.00	\$1582.50	\$18,990.00
2024	\$1575.90	\$18,910.80	\$1669.60	\$20,035.20
2025	\$1615.30	\$19,383.60	\$1761.40	\$21,136.80
TOTAL		\$56,744.40		\$60,162.00

In this scenario, after 3 years a \$1,500/month unit with a 9% AGI has increased by \$261.4/month. This means that during the first 3 years of the AGI it will have cost a tenant \$3,417.6 in additional rent.

This is significantly more than if the rent had only increased by the annual rent control guideline. Premier Doug Ford has maintained the annual rent cap at 2.5% for three years though in the last 10 years 1–2% more typical.

While it is not common knowledge, AGIs expire after they have reached the end of their useful life. This is generally after 10 to 25 years. ACORN is not aware of any tenants who have received rent reductions after an AGI. The end result is tens of thousands of dollars in wealth transfer from low to moderate income tenants to big corporate landlords who make up 78% of AGI applications.

According to the CCPA, the deeply flawed formula for calculating an AGI allows landlords to recoup costs, as well as make a significant profit. Due to the impact of compound rent increases, assumed interest costs that ignore landlord's actual financing, and the fact that AGIs allow landlords to claim the total rather than additional renovation costs, tenants wind up paying a lot more than the actual cost of the building improvements.

This is pushing thousands into unaffordable housing. Nearly 40% of renters are living in housing that costs more than 30% of their income, while 15% are paying more than half of their income on rent. Moreover, we are losing affordable housing at an alarming rate. Between 2006 and 2016, Ontario saw a 26% decline in units that rent for less than \$1000. This further decreased by 36% between 2016 and 2021. This decline in affordable housing coincides with the rise of AGIs which have increased by 107% over the past two decades.



Section 126 (7) e AGIs allow corporate landlords to turn a profit on making their tenants pay for green retrofits. But is that really who should be paying the cost for climate change?

CO2 emissions are greatest among the highest earning income groups. Lowmoderate income tenants have much smaller carbon footprints compared to Real Estate Investment Trusts (REITs) and the corporate executives running their buildings. Tenants are more likely to use public transit than a car, fly less often or not at all, their apartments consume less heat and electricity compared to large single family homes, and their overall consumption of goods and services is way lower. We all need to do our part to fight climate change. But our current system of AGIs punishes individuals who have contributed the least to our climate crisis.

The next section will examine AGIs from ACORN members to give real life examples of tenants paying for green retrofits.



AGI Applications Collected from ACORN Members

ACORN has been working on the issue of AGIs for many years - doing deep tenant organizing in buildings, knocking on doors, educating tenants on their rights and building strong tenant unions to fight back. ACORN spoke to tenant leaders across the province over the phone, by email and at chapter meetings to ask if they had received a notice of rent increase above the guideline.

If the member responded 'yes', an ACORN organizer followed up with one-onone conversations to understand if the AGI mentioned energy efficiency related capital expenditures. If they did, detailed documentation such as the notice of hearing, supporting documents etc. was obtained. For this report, ACORN selected only those AGI applications where the landlord said that the specific capital expenditure promotes energy conservation and efficiency.

- As the table on pg. 10 reveals, there are a number of items for which landlords have claimed AGIs. These include windows and doors, boiler replacement, light fixtures, automation systems and HVAC retrofits among others.
- Retrofits are expensive. Some of these range from \$200,000 to \$1 million.
- Given that the RTA allows landlords to replace equipment if they promote energy efficiency, many landlords are using AGIs to replace equipment such as boilers after they have reached their useful life.



#	Building	City	AGI Amount	Type of Capital Expenditure	How is this Promoting Energy Savings?	2 Other potential Energy Savings	Did the landlord receive financial assistance?
	437 Jarvis St.	Toronto	\$33,929.66	New Toilets	There had not previously been any high-efficiency toilets within the residential complex.	Needs further Investigation	Not listed
1			\$43,064.30	New breaker panels	Promotes safety and energy conservation by eliminating overloading of fuse boxes.		
	2880 Carling Ave	Ottawa	\$17,939.88	Reline domestic hot water tanks	The domestic water tanks needed relining or replacement to maintain their operation and to promote energy efficiency.	Needs	Not listed
2			\$111,788.31	Temperature monitoring and control system	The baseboard units throughout the building were retrofitted with sensors and automatic controls to optimize the energy use in the complex.	further Investigation	

For all items in this column the landlords marked in the AGI application that the expenditure is eligible because it promotes energy conservation. In many cases, the landlord also added the repairs were needed to maintain the building.

2 These are additional expenditures the landlords listed in their AGI applications that are justified for reasons other than energy conservation, but have the potential to contribute to greater energy efficiency.

#	Building	City	AGI Amount	۲ Type of Capital Expenditure	How is this Promoting Energy Savings?	2 Other potential Energy Savings	Did the landlord receive financial assistance?
3	3045 Queen Fredericka Dr	Mississauga	\$45,346	Lighting retrofit	LED lighting installed to boost lighting and conserve energy.	Needs further investigation	\$4,936 - Independent Electricity System Operator (IESO)
	200	399 larkham Toronto Rd	\$375,641	Windows and Doors/Balcony repairs	Main floor windows and doors were beyond repair. Replaced with units that promote energy conservation.	Needs further investigation	Not Listed
4	Markham		\$168,365	Boiler replacement	Domestic hot water and heating boilers were past their useful life expectancy and beyond repair. Replaced with high efficiency boilers to promote energy efficiency.		
5	1203-1211 Huron St	London	\$25,086	Stairwell Window replacement	Stairwell windows were original with window frames that had large gaping holes, repairs were no longer feasible.	Needs further investigation	Not Listed

#	Building	City	AGI Amount	Type of Capital Expenditure	How is this Promoting Energy Savings?	2 Other potential Energy Savings	Did the landlord receive financial assistance?
6	180 Kent St	Ottawa	\$125,573.30	Windows and Doors	Necessary to restore physical integrity of components of the residential complex, necessary to comply with subsection 20 (1) and promotes energy conservation	Needs further investigation	Not Listed
			\$58,808.72	Water fixtures	New water efficient toilets and shower head replacements throughout the complex to replace inefficient fixtures.		
			\$115,300.68	Boiler and exhaust fan replacement	Boiler and exhaust fans at end of useful life, replacement to promote energy efficiency and removal of obsolete incinerator and oil tank		
7	1170 Fennell Ave E	Hamilton	\$232,472.28	Common area renovations - Lighting replacement, Radiator replacement	Entry system and doors for tenant safety, lighting replacement to promote energy efficiency, laundry venting for energy efficiency, radiator replacement for energy efficiency and at the end of useful life.	Needs further investigation	Not Listed

#	Building	City	AGI Amount	۱ Type of Capital Expenditure	How is this Promoting Energy Savings?	2 Other potential Energy Savings	Did the landlord receive financial assistance?
8	1980 Fowler Dr.	Mississauga	\$106, 7 90	Voltage harmonization	Voltage controls installed to regulate energy fluctuations and reduce usage.	Needs further investigation	Not Listed
9	1465 Lawrence Ave W	Toronto	\$24,589	Building automation system	Installed to promote energy conservation.	Roof repair	Not Listed
		t Hamilton	\$5,576.99	Install variable frequency drives on booster pumps	Necessary to maintain the provision of the mechanical system and to promote energy conservation.	Window replacement and lighting	\$500 government rebate
10) 187 Park St		\$33,335	Replace boiler venting	Existing heating system had to be manually monitored. Installing an automated system improved energy conservation.	Needs further investigation	Not Listed
11	149 St. George St.	Toronto	\$34,465	Building automation System	To control boiler system remotely and improve energy efficiency	Needs further investigation	Not Listed
12	44 Stubbs Dr	Toronto	\$943,477.34	HVAC System retrofit	Air conditioning mechanical equipment, pumps, dehumidification system, and electrical components had end of life and replaced with more energy efficient automated equipment.	Needs further investigation	Not Listed

#	Building	City	AGI Amount	Type of Capital Expenditure	How is this Promoting Energy Savings?	Other ² potential Energy Savings	Did the landlord receive financial assistance?
13	4340 Bloor St	Toronto	\$82,579.47	Energy Conservation project	Sensor Suite Inc - Wireless heat controllers to reduce electricity consumption through utilizing real-tie data from electric baseboard heaters to packaged terminal AC units	Needs further investigation	Not Listed
			\$276,964.14	Common area renovations	New battery backup, LED lights, deadbolts, key, passage handles, remove mixed wiring, carpet, painting, MDF work, electrical panel	Needs further investigation	Not Listed
14	98 Woodridge Cres	Woodridge Ottawa	\$80,024.63	New Boilers	Boilers for 7 of the buildings had reached the end of their useful lives and replaced with new, more energy efficient residential high efficient boilers	Needs further investigation	Not Listed
			\$21,621.42	Windows and Patio Doors	Between Oct 2021 and Aug 2022, windows and patio doors in 4 units had failed, replacing with new, and more energy efficient windows and patio doors.	Roof repair	Not Listed

#	Building	City	AGI Amount	Type of ¹ Capital Expenditure	How is this Promoting Energy Savings?	Other 2 potential Energy Savings	Did the landlord receive financial assistance?
			\$575,033.26	Boiler room retrofit	Current boiler system is very old and inefficient and has reached the end of its useful life.	Needs further investigation.	\$26,000 from Enbridge
15	200 Bay St S	Hamilton	\$99,654.70	Automation system upgrade	Automation systems needed to be upgraded to take advantage of the new boilers. This will improve operational efficiency.	Needs further investigation.	Not Listed
16	30 Tullamore Rd	Brampton	\$154,007	Boiler replacement	The boiler system was original in construction, was inefficient and had reached the end of the service with frequent performance issues, new higher efficiency boiler systems installed.	Roof repair	\$8,329.19 from Enbridge

Out of the 16 AGI applications ACORN reviewed, only 4 landlords openly admitted to receiving some financial assistance. The funds ranged from covering 5% to 11% of the total expenditure. It is unclear if these savings are being subtracted from the AGI passed onto tenants.

Alternatives to AGIs for Funding Retrofits

AGIs are not the only way we can fund retrofits in apartment buildings! There are several government programs that provide funding to enable green retrofits, however, there are many limitations and improvements are desperately needed.

As evidenced by Efficiency Canada, currently, there is a mismatch between the retrofit programs at the federal level and what low-income tenants need. The federal Greener Homes Program was limited to home owners and payment of up-front costs was a major barrier in accessing the program. The \$250 million federal Oil to Heat Pump Affordability Program aimed to help Canadians with incomes under the Low-Income Measure to convert from oil to heat pumps, also had limited impact because most low-income households heat with natural gas or electricity. Further, most other federal programs support affordable housing upgrades but very few low-income tenants live in affordable housing apartments. Most tenants live in private market rentals that are not covered under the current government funding.

The federal government announced the Canada Greener Homes Affordability Program (CGHAP) in Budget 2024 which builds on the former Canada Greener Homes Grant Program. While the amount of funding is too limited, it is a good opportunity for the federal government to embed tenant protections as it finalizes the details of the program and rolls it out.

Until recently, the Canada Infrastructure Bank (CIB) offered low cost financing to landlords to do green retrofits without any affordability conditions. It was only after ACORN Canada's 250 person action at CIB's downtown Toronto headquarters that they changed their policy to ensure new agreements included affordability and anti-eviction covenants.



Alternatives to AGIs for Funding Retrofits

Some provinces and cities such as Nova Scotia, Toronto, Ottawa and Vancouver among others have retrofit financing programs but again they are limited in scope and reach. Some of these programs have included tenant protections such as Better Homes Ottawa Loan program and Energy Efficiency Nova Scotia but many don't. ACORN has heard repeatedly from experts that the uptake of these programs by private landlords remains low, however, to our knowledge no public data exists.

Here is a summary of the limitations with current retrofit programs:

- Limited number of programs exist that cover private rental housing.
- Many programs are restricted to homeowners or affordable housing providers.
- Programs open to private landlords often have size restrictions. For example, the Better Homes Ottawa Loan program only provides funding to landlords whose buildings are 3 stories or less.
- Funding levels for these programs are low.

There are a few non-governmental programs such as the one offered by Enbridge but their limitations are similar.

The 'split incentive' is another explanation for why uptake for these programs could be low. Tenants pay for poor energy efficiency through higher energy bills or rent, but have little to no ability to upgrade buildings because they don't own the property. Landlords on the other hand are less likely these days to pay utilities (the tenants pay) and can pass on these costs of energy inefficiency to tenants. Thus, corporate landlords have little motivation to apply for low-cost financing or grants to make the building more livable and energy efficient.

This is in contrast to the ease of applying for AGIs. So long as the landlord can provide evidence that they have paid for the improvements, they are almost always approved. For example, a CBC article showed that out of 2,253 completed AGIs released by the LTB since 2017, 88 per cent were approved.

Alternatives to AGIs for Funding Retrofits

Couple this with the difficulties tenants face when challenging an AGI:

- Many ACORN members shared that they didn't get a notice of hearing and learned only after the fact that the AGI was approved.
- Many community legal clinics that provide free legal services to low income households do not offer legal representation for tenants challenging an AGI. This is largely due to provincial funding cuts. Also - the amount of time required to review evidence and build a case is much higher than a tenants' chance of winning at the LTB.
- All LTB hearings were moved online during the pandemic and now this has been made permanent. While these remote hearings were happening over video, now, many AGI hearings are happening in written form putting a lot of onus on tenants to collect all the evidence and send it all in a written document – a huge barrier for many tenants, especially those with language barriers or disabilities.



Tenants Testimonials

In addition to collecting AGI applications from tenants, tenant testimonials were collected to understand in more detail the extent of benefits that accrue to tenants as a result of energy efficiency repairs as well as the extent to which tenants are engaged in the retrofit process.

The testimonials clearly demonstrate that in none of the cases (5 multiresidential apartment buildings privately owned) was there any tenant engagement during the retrofit process. Barring a notice with limited information, there was no real engagement of tenants. Instead, tenants reported being unable to afford the increase in rent and that their landlords refused to do the retrofits and repairs that were a priority for tenants. Improvements to tenant comfort and reducing energy poverty, which are expected co-benefits of retrofits if done well, were not mentioned.



KATHLEEN, OTTAWA

I have lived in this townhouse complex for three years now. My utilities are outside of the rent that I pay which is \$2,200 per month for a 3 bedroom unit. But with the AGIs, the rent will be much more. My landlord, Fergulsea, has a lot of units in this complex. In terms of repairs, they definitely did the roof which didn't need replacing but they didn't do anything such as boilers etc.. I asked them to replace the AC in my unit because it's too old but they wouldn't replace it. Because it's so inefficient, it has to be kept running all the time and I end up paying a much higher hydro bill.

There is also this old air smell for which they put some filters but I don't think that has made much difference. We got an AGI of 5.5% last year and now again 3.2% this year. They should change the AC unit but they won't and it's extremely hot with repeated heat waves.

Tenants Testimonials

CHRISTINE, HAMILTON

I have lived in this building for more than 8 years now. The elevator is 50 years old. Our landlord, Homestead, needs to understand the cost of doing business. They are just scraping the bottom of the barrel. I am not aware of any of the energy efficiency related repairs they did. They keep shutting the water off, people who are working evening shifts don't get water if they have to take a shower.

There are 400 tenants in this building. Utilities are included in the rent, but for tenants who have rented in the last couple of years, they are paying them in addition to the rent. Winters are cold in all the units. The higher up in the building you are, it's colder in winters and hotter in summers. It's not great but I can't afford to move. The rent for a one bedroom unit today is \$1700-2000 per month.



GABOR, TORONTO

I have a complaint filed against my landlord, CAPREIT, which has had 9 hearings up until now. In the AGI, they are claiming a number of expenses but none of them are legitimate. We just got a notice a few years ago saying that the work is going to start in a couple of days and will take about 9 months and that's it. They didn't say what kind of work. All this work was conducted without a building permit and none of the work listed was completed on time for the AGI application. We had two full months without any heating. They said they replaced the system but then the air conditioning stopped working.

I have been living in this building since 2013, the first five years were fine but then things changed. In 2019, we found out that our AC units have mould but the management didn't want to accept that. The health department confirmed it. My wife was immunocompromised, she developed liver cancer and died – they didn't do anything.

One night, I heard a loud noise, rushed to the kitchen and saw the upper kitchen cabinets had collapsed, everything broke. 1 filed for compensation, no response. I am 81 years old, on a pension. The AGI supporting documentation shows that CAPREIT received a government grant of \$6000 for this work, but they don't mention it in the application.

Tenants Testimonials

OLENKA, TORONTO

I moved into this apartment ten years ago. Half of the tenants in this building have their utilities included in the rent, half don't. We got an AGI and our landlord wanted the max – 9%. We had a hearing at the LTB and we tried fighting back and got it down to 7.5% but it's still very high. The landlord put new balconies and wanted to squeeze as much as possible from the tenants for those. But the balconies are now smaller after they renovated them, so how does that help?

We weren't informed about any of the repairs that were being done. They just walked into our apartments, installed the sensors to monitor how much electricity we are using. But because of the plug they installed, my TV got damaged and they replaced it with a crappy one. Some tenants refused to get these sensors installed. When I initially moved in, I was told I would have an AC but I had to buy my own.

The appliances are quite old, if a fridge stops working, they will swap it with another older one. Recently, they redid the roof and windows – just the same windows but another colour! So, we are expecting another AGI. When it poured heavily recently, there was flooding. The elevator was out for 2 weeks. They get repairs done but they don't hire professionals.

MOE, BRAMPTON

This building is very old, probably built 60-70 years ago. The boiler this building had was the original one, so obviously extremely inefficient and had several issues. They replaced the original boiler and filed an AGI application to recoup the costs for it. This is a failure of the past for which tenants are paying. They just put a notice in the lobby saying they are doing something on the roof and boiler and that's it.

There was a leak from upstairs in our only bathroom. It was too much to clean it up, we didn't know where the water came from. This happened twice. Somebody came, just did a touch up paint job which was very shoddy.The ceiling is still bubbled. The landlord didn't give any compensation. There was no communication from them saying what they were doing. We have an outside parking lot which is falling apart - it's in such bad shape that it was shut down. Now we are facing an AGI for that.



ACORN's Demands

AGIs are the most regressive way to fund green retrofits in rental housing. Even with improvements to government retrofit programs, AGIs will always be seen as more attractive to corporate landlords. AGIs allow landlords to pass down the full cost of energy and water conservation upgrades onto tenants and make a profit. AGIs are a deterrent to low-cost financing and grants provided by the government.

ACORN members agree these retrofits are needed and at a much greater scale. However, it shouldn't be low-income tenants paying the bill so we can achieve our climate goals. If private landlords won't pay for them, then the government should.

ACORN is demanding the Ontario government:

- 1. Make green retrofits and expenditures aimed at energy efficiency ineligible for AGIs.
- 2.Landlords must prove in their AGI applications that they are not eligible for any rebates/funding programs.
- 3. These immediate measures must ultimately lead to a ban on AGIs.

In addition, we need greater funding for retrofits in rental buildings from all levels of government. Government funding programs must include:

- 1. Affordability and anti-eviction covenants
- 2.All rental types (townhomes to high-rises)
- 3.Signed agreements from the landlord made transparent to the tenants in the building
- 4.Formal tenant participation where independent tenant unions existing in the community and building receive resources to support tenants participating

Finally, governments must create and implement Building Efficiency Performance Standards with protections to ensure costs aren't passed on to tenants. Design the program so that private landlords are forced to use government rebates and subsidies to do these energy efficiency improvements.



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