



Diocese of Toronto

Anglican Church of Canada

Provincial Pre-budget Submission

to the Standing Committee on Finance & Economic Affairs

From Bishop Andrew J. Asbil and the Social Justice & Advocacy Committee

Anglican Diocese of Toronto

135 Adelaide St. E., Toronto, Ontario M5C 1L8

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Summary of Recommendations for Ontario's 2024 Budget

The Anglican Diocese of Toronto is made up of some 200 parishes in communities across 26,000 square kilometres of south-central Ontario, extending beyond the City of Toronto to include communities such as Bolton, Collingwood, Penetanguishene, Haliburton and Brighton. As we continue to serve the spiritual and physical needs of hundreds of thousands of Ontarians, we also add our voice in support of public policies and investments that we believe will contribute to the flourishing of our communities and the land on which we all depend.

Here are our budget and policy recommendations for 2024:

- 1. Bring social assistance rates (both OW and ODSP) into alignment with the Market Basket Measure (MBM) for each community, and index OW, as well as ODSP, to inflation, so that people on social assistance are able to meet their basic needs.**
- 2. Remove the artificial separation of social assistance benefits into basic needs and housing benefits.**
- 3. Over the next four years, continue to raise the minimum wage until it approximates the average living wage in Ontario, and index it to inflation.**
- 4. Require employers to pay part-time, temporary and casual workers the same rate as their permanent, full-time employees doing the same work.**
- 5. Require employers to provide employees with 10 paid sick days per year on a permanent basis, with an additional 14 paid sick days during public health emergencies.**
- 6. Remove the cap on the number of provincially-funded Overdose Prevention Sites and the pause on new sites, and expand them to every community that needs them.**
- 7. Implement rent control for all residential rental units in Ontario, including units built or converted since 2018, and end vacancy decontrol.**
- 8. Ensure regulations regarding municipal rental replacement by-laws do not weaken existing municipal by-law requirements, but protect tenants' access to adequate, affordable, and secure housing.**
- 9. Enact changes to the Development Charges Act so that development charge exemptions apply only to the creation of housing that is affordable to low-income households, as defined by the Housing Needs Assessment Test.**
- 10. Continue and increase investments in community housing and homelessness prevention initiatives, as well as supporting supportive housing and shelter services in municipalities.**
- 11. Cancel the development of the 413 mega-highway and Bradford Bypass and invest those dollars in expanding and improving public and regional transit.**
- 12. Significantly expand investment in renewable energy sources instead of ramping up gas-powered and nuclear power generation.**

Introduction

The Anglican Diocese of Toronto includes some 200 parishes within an area extending over 26,000 square kilometres of south-central Ontario, from Mississauga to Collingwood to Haliburton and south to Brighton. Our boundaries include not only the City of Toronto but the regions of Peel, York, and Durham as well as the cities of Barrie, Orillia, Peterborough, Cobourg and many smaller communities.

Our faith calls us to serve the world God loves – to respond not only to spiritual needs but also the physical needs of the most vulnerable and marginalized members of our communities, and to advocate for policies that will address the challenges they face. Our social justice priorities include poverty reduction, working to end homelessness by creating affordable housing, and safeguarding the integrity of the land, water and air that sustains us all. We believe that our efforts as individuals and parish communities must be supplemented by public investment and policy measures to address the systemic issues affecting Ontarians.

Poverty Reduction

The cost of living continues to rise, leaving Ontarians on low incomes still further behind. More and more Ontarians are turning to food banks to help them survive through the month – data shows a 36% increase in first-time visits over this time last year, and a shocking 101% increase from pre-pandemic levels, the largest single-year increase ever recorded.¹ Over 800,000 Ontarians – a population greater than the city of Hamilton – now rely on food banks to feed themselves and their families, representing a 38% increase over the previous year. In specific communities, it is often worse: the food bank at St. Paul’s on the Hill, Pickering, has seen visits more than double from 2022 to 2023. Food banks themselves are struggling to keep up with demand, and a majority worry that they will not be able to sustain this level of service.

Social Assistance: Meanwhile, social assistance rates lag far below the poverty line, with a single person on Ontario Works (OW) receiving less than half of what is considered a “deep poverty” income. With OW rates having remained unchanged since 2018 despite rapidly rising inflation, recipients’ already meagre incomes have taken a steep decline and are now, in real terms, the lowest they have been in over 30 years.² A program meant to be a springboard to help Ontarians get back on their feet has become a doorway to destitution. While this government raised Ontario Disability Support Program (ODSP) rates by 5% in 2022 and has indexed ODSP to inflation, this rate still leaves Ontarians with disabilities receiving a mere 57% of the poverty line as defined by the Market Basket Measure, which does not even account for the extra costs of living with a disability. With the increasing cost of living, Ontarians with disabilities face increased food and housing insecurity, and are forced to make difficult choices around needed medications and other disability aids.

In 2023, 123 parishes in our Diocese passed a motion calling for this government to double social assistance rates, both OW and ODSP, and index OW as well as ODSP to inflation. We cannot afford to let Ontarians in poverty fall further behind.

We urge this government to bring both OW and ODSP rates into alignment with the Market Basket Measure so that people in need of assistance are at the poverty line, instead of far below it. We also

¹ https://feedontario.ca/wp-content/uploads/2023/11/FEED_OntarioHungerReport23.pdf

² <https://maytree.com/changing-systems/data-measuring/welfare-in-canada/ontario/>

reiterate our call to combine basic needs and shelter allowances into a single flat rate that is consistent regardless of living situation.

Decent Work: This government has repeatedly said that the best pathway out of poverty is a job; however, this can only be true if the job pays enough to lift workers out of poverty. More than one in six Ontarians using food banks have their primary source of income from employment, a 37% increase over the previous year.³ We were heartened to see Ontario's minimum wage increase to \$16.55 per hour on October 1, 2023. However, there is still no part of Ontario in which a person working full-time on minimum wage can make ends meet. The Ontario Living Wage Network estimates that a living wage in Ontario ranges from \$18.65 in southwestern Ontario to \$25.05 in the Greater Toronto Area.⁴ The rising cost of living impacts those at the low end of the wage spectrum the most, as they have the least capacity to absorb price increases and are at the greatest risk of food and housing insecurity. To ensure that a job is indeed a pathway out of poverty, **the provincial minimum wage should be brought into line with the average living wage in Ontario and indexed to inflation.**

Another way in which low-income workers fall behind is that there is no legal provision preventing employers from paying part-time, temporary, or contract workers a lower hourly rate than full-time workers doing similar work. To redress this imbalance, Bill 149, the Working For Workers Four Act, should include a **provision that employees working less than full-time hours should be paid at the same rate of hourly compensation as full-time workers.**

As we approach the fourth anniversary of the COVID-19 pandemic, the ongoing high rates of COVID-19, flu, and RSV transmission in the province are a reminder that paid sick days are a public health necessity. **We reiterate our call for legislation requiring employers provide 10 paid sick days per year for all workers, with 14 extra days in case of public health emergencies.**

Public Health - Addressing the Overdose Crisis: Between January 2016 and September 2022 almost 35,000 Canadians died from opioid overdose. 36 percent of them were Ontarians.⁵ The number of overdose deaths skyrocketed during the COVID-19 pandemic due to social isolation, restricted direct access to services and supports, negative mental-health impacts and an increasingly toxic drug supply. In 2018 this government announced an arbitrary cap of 21 on the number of provincially-funded overdose prevention sites. Despite demonstrated need in communities across Ontario, and the exacerbation of the overdose crisis by the pandemic, this number has not been increased, with only 17 sites currently operating, and indeed the government has announced a pause on planned openings and future approvals of such sites. We believe not only drug users, but whole communities, are safer for the presence of supervised consumption/overdose prevention sites. We join with the Registered Nurses' Association of Ontario and other health care providers in calling on your government **to allow already approved overdose prevention sites to open and to expand them in every community in need across the province.**

³ https://feedontario.ca/wp-content/uploads/2023/11/FEED_OntarioHungerReport23.pdf

⁴ <https://www.ontariolivingwage.ca/rates>

⁵ <https://rmao.ca/policy/issues/opioid-overdose> Opioid Overdose Political Action Bulletin_May 2023_0.pdf

Affordable Housing

We are encouraged that this government recognizes the need for increased housing supply and is taking steps to increase that supply. However, we continue to stress that supply-side measures alone are not sufficient to ensure that everyone in Ontario is able to obtain adequate and affordable housing.

Rent Control: The lack of rent control on newly built or converted rental units, as well as a lack of vacancy control, have contributed to a situation in which the increase in average asking rents across the province is outstripping even the current high rate of inflation, resulting in a net loss of affordable housing – by approximately 20,000 units per year.⁶ This alarming trend undermines Ontario’s efforts to create more housing. It also means more and more Ontarians being pushed into core housing need, and at risk of being made homeless, which ends up costing our communities far more.

In addition, while vacancy decontrol continues to exist in Ontario, there will continue to be an incentive for landlords to terminate tenancies in bad-faith and deny tenants the right of first refusal to occupy a renovated unit. We appreciate steps your government has taken to address bad-faith evictions through Bill 97, the *Helping Homebuyers, Protecting Tenants Act, 2023*. However, the elimination of vacancy decontrol would significantly decrease the possibility of bad-faith evictions by removing the incentive to displace tenants.

We therefore reiterate our call for this government to implement rent control on all rental housing units in the province, including units built or converted to rental use since 2018, and to eliminate vacancy decontrol.

Rental Replacement Regulations: As yet, no regulations respecting municipal rental replacement bylaws have been enacted under Bill 23, meaning that such bylaws continue to be in force in municipalities (such as Toronto) that have them. In the city of Toronto alone this tool has already preserved 5,000 rental units, a significant proportion of which have been affordable units.⁷ As communities across the province seek to create more housing sustainably through intensifying density, the number of rental units subject to demolition and renovation will increase. Without a robust framework, this has the potential for displacing thousands of tenants from older affordable units into unaffordable new rentals, and potentially into homelessness. We join with the Canadian Centre for Housing Rights in calling for a framework around municipal rental replacement bylaws that protects and enhances the affected tenants’ rights to housing, as well as giving municipalities sufficient flexibility to adopt bylaws that meet local housing need.⁸ At minimum, the framework should not undercut the requirements of existing bylaws in those municipalities which have already enacted them.

The framework should provide for tenants’ right to return to the replaced unit at a rent that is not more than what they were previously paying plus whatever increases have been prescribed by the provincial rent increase guidelines during the period. Replacement units should include the same number of bedrooms and bathrooms as the original unit, and municipalities should not be restricted from imposing minimum size requirements on replacement units. In addition, the framework should provide for

⁶ <https://maytree.com/publications/a-fully-housed-toronto/>

⁷ <https://www.toronto.ca/legdocs/mmis/2023/cc/bgrd/backgroundfile-236401.pdf>

⁸ <https://housingrightscanada.com/wp-content/uploads/2023/05/CCHR-Submission-Ontario-Rental-Replacement-Regulations-19.5.2023.pdf>

compensation not only for tenants' moving costs (both to a temporary unit and the replacement unit) but also the increase in rent the tenant is likely to have to pay for a temporary unit during the period of demolition and renovation.

We call on this government to ensure regulations regarding municipal rental replacement by-laws do not weaken existing municipal by-law requirements, but protect tenants' access to adequate, affordable, and secure housing.

Development Charge Exemptions for Affordable Housing: In 2022, Bill 23 introduced development charge exemptions for developers creating new "affordable" housing. Bill 134, the Affordable Homes and Good Jobs Act, 2023, which received Royal Assent in December 2023, defines what is considered "affordable" for the purpose of such development charge exemptions. This is the lower of 100% of market rent and a rent that is affordable (30% of gross annual income) to households at the 60th percentile of gross annual incomes for renter households in each municipality. We are happy to see an income-based measure being used as a criterion of affordability. However, setting the affordability measure based on incomes at the 60th percentile of gross annual renter incomes means that these projects will continue to be unaffordable to the vast majority of Ontarians who need it. 76% of Ontarians in core housing need have "low" and "very low" incomes as defined by the Housing Needs Assessment Tool (HNAT), yet would be unable to access the "affordable" housing being incentivized by Bill 134.⁹ We maintain that public incentives such as development charge exemptions are most effective when directed at housing developments which address Ontarians in core housing need. By weakening the definition of affordability, Bill 134 reduces the effectiveness of development charge exemptions as a means of addressing the real need for affordable and adequate housing in this province, while depriving municipalities of a key source of revenue to address homelessness and housing need.

Therefore, we urge this government to base the definition of "affordable" housing in the Development Charges Act as housing which is affordable to low income households, as defined in the Housing Needs Assessment Test.

Social Housing, Supportive Housing and Homelessness Prevention: The province has a key role to play in helping municipalities address core housing needs in their communities, through initiatives like the Canada-Ontario Community Housing Initiative, the Ontario Priorities Housing Initiative, and the Canada-Ontario Housing Benefit. These programs help maintain and expand Ontario's social housing supply, fund needed repairs, and keep Ontario households from falling into homelessness. We urge your government to **continue, and indeed expand, investments in community housing and homelessness prevention programs to address areas of core housing need.**

As well, the province must continue to expand investment in supportive housing and homelessness programs. Homelessness is exploding all over the province, with over 10,000 people experiencing homelessness at any given night in the City of Toronto, to homeless encampments springing up in smaller centres such as Barrie, Peterborough, and Cobourg. Municipalities are hard-pressed to be able to offer adequate shelter, much less supportive housing options, to those experiencing homelessness in their communities. They depend on the province for an assured source of revenue to be able to address the needs of those without shelter. **Multi-year funding arrangements with local governments at the**

⁹ <https://housingrightscanada.com/wp-content/uploads/2023/10/CCHR-Submission-Ontario-Bill-134-definition-of-affordability-Oct.27.2023.pdf>

regional, county, or municipal level would help alleviate uncertainty and allow local authorities to allocate resources effectively.

In this vein, we were particularly glad to see that the provincial government has come forward with an offer of \$600,000 to the City of Toronto over three years for shelter and housing programs, although that offer has been made contingent on federal funding for shelter and housing for refugees and asylum-seekers. Our office, together with Anglicans across our Diocese, have been vocal in calling on the federal government to pay their share. Still, **we urge this government to continue to honour its funding commitment, regardless of the federal government's contribution. We also urge you to increase investment in supportive housing programs, which over the long term, offer better housing at a lower cost than emergency shelter services.**

Environmental Issues

Stop the Mega-Highways: Given widespread opposition to the removal of land from the Greenbelt under Bill 23, we were particularly pleased to hear that this government has reversed course and returned the affected parcels of land to the Greenbelt. However, the government has not yet reversed course on the construction Highway 413 and the Bradford Bypass. These mega-highways will pave over some of Ontario's best farmland, exacerbate urban sprawl, and lead to higher levels of air pollution and greenhouse gas emissions, without easing traffic congestion long-term.¹⁰ This is especially misguided considering our need to do all we can to lower our contribution to climate change and avoid even more catastrophic climate impacts. Investing in public transit at the local and regional levels instead would help ease congestion and reduce our environmental impact. **We therefore reiterate our call to cancel the development of Highway 413 and the Bradford Bypass and invest those dollars in expanding and improving public and regional transit.**

Clean Energy: We welcomed the news that this government has announced new procurement targets for 5,000 megawatts (MW) of renewable energy over the next four to six years, after cancelling 750 renewable energy projects in 2018. However, we recognize that much of this target could be achieved by the renewal of existing wind and solar power contracts, with as little as 850 MW coming from new supply. Meanwhile, the province is looking to ramp up gas-fired power generation capacity by an additional 1,500 MW despite 35 Ontario communities (representing 60 percent of the province's population) having called for the phase-out of gas-fired power, federal Clean Electricity Regulations set to take effect in 2035, and the worldwide need to triple renewable energy generation capacity. Solar and wind power generation is also more cost-effective than either gas-fired or nuclear generation, without the climate impacts or radioactive waste storage concerns. We therefore call on this government to **significantly expand investment in renewable energy sources instead of ramping up gas-powered and nuclear power generation.**

¹⁰ <https://www.theglobeandmail.com/politics/article-highway-413-environmental-impact-ontario/?login=true>

Conclusion:

Our recommendations are not new, but the need for them across our province is greater than ever. We urge your government to include these recommendations in preparing the upcoming provincial Budget. The time to act is now.

Respectfully submitted,

A handwritten signature in blue ink that reads "+ Andrew Toronto". The signature is written in a cursive, flowing style.

The Rt. Rev. Andrew J. Asbil, Bishop of Toronto

and

The Social Justice & Advocacy Committee, Anglican Diocese of Toronto