

April 20, 2023

City of Edmonton 2nd Floor, City Hall 1 Sir Winston Churchill Square Edmonton, AB T5J 2R7

Attention: Mayor & City Council

Andre Corbould, City Manager

Dear Sirs/Madams:

RE: LICENSING OF LANDLORDS AND REGISTRY

On behalf of the Multi-Family Residential Industry Sector, which the Alberta Residential Landlord Association (ARLA) represents, we are writing to you today in response to the City of Edmonton Council's decision to proceed with further investigation by administration to provide a detailed plan and budget for dealing with problem Landlords' business licenses and a Landlord registry.

Motions were made by the Community and Public Services Committee on March 20, 2023 and brought to City Council for approval on April 4, 2023. As this is an extremely important issue for us, we are asking, as a stakeholder, to have input. We have reviewed the report and make comments below.

It was disappointing to read the numerous references to tenants, however, the landlord's voice was noticeably absent. Any issues identified that are problematic for tenants have a mirror problem for landlords.

The best solutions to any problems should involve the landlord community. We note, specifically, that not all landlords are problematic, but this is how the entire group seems to have been conceived. Landlords should be engaged in such discussions as landlords experience regulatory impacts that can have resulting impacts for tenants. For example, needless regulation can have limited impact for tenants but cause significant increases in costs for landlords which are by necessity passed down to tenants.

Business License: We would like the opportunity to have input regarding the Business License Review; we are concerned it is heading in a direction that it could become a dispute resolution venue between landlords and tenants. We are of the view the city currently has the regulatory framework to achieve its objectives and would like to discuss that further.

Landlord Registry: The purpose of the registry is unclear. If there are consistent breaches of bylaws or safety code requirements by a landlord, it is not clear that a registry will change that, and we view it as an indication that existing policies and procedures should be reviewed.

It is unclear why the City is proposing further restrictions on landlords, especially during a time of high demand for housing. While the intention of the proposal may be to protect renters, it could have unintended consequences. Unfair targeting of landlords could result in significant financial losses, and discouraged landlords could make it even more challenging for renters to find housing.

We have a developing situation where there will be overregulation of landlords and management companies. It will lead to confusion, unnecessary penalties, lack of investment, and possibly a shortage of housing. We have an existing regulatory structure that works, and we would like the opportunity to discuss that as a stakeholder.

Our members are proud to serve the community by providing quality housing to Edmontonians. We understand and acknowledge that not all landlords are good actors, however, this is the case in any population. We are hopeful that once we have discussed this matter with you, we can help you to understand how the concerns which are driving this further study can be addressed in existing regulatory structures.

We look forward to discussing this further with your team. Any questions can be directed to Donna Monkhouse, Executive Director at donna@albertalandlord.org or by calling 780-413-9773.

Sincerely,

Alberta Residential Landlord Association

per: Kate Brisson

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President