

A Bed Bug Prevention and Control Strategy for Ontario

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Submission to the Government of Ontario



Federation of Rental Housing Providers of Ontario

20 Upjohn Road, Suite 105 Toronto, Ontario M3B 2V9

Phone: 416-385-1100 Toll free: 1-877-688-1960 Fax: 416-385-7112 Email: info@frpo.org

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EXECUTIVE SUMMARY

The rental housing industry is interested in working with the province of Ontario to help eradicate bed bugs in North America once again. We accept our responsibility to treat rental buildings and will do our part.

However, bed bugs currently affect all real estate types. We are concerned that a politically expedient focus on the rental housing industry (because we are politically easy targets) will result in policies that ultimately do not address this important problem.

This paper highlights the following information about bed bugs from the perspective of the rental housing industry:

Bed bugs are a global phenomenon. Bed bugs are a problem around the world. Because of this, and because of international travel, a bed bug strategy is going to require coordination between governments around the world. This means that the federal government needs to be involved in solutions.

Bed bugs are not just a rental housing issue. Experience in Ontario and in other jurisdictions tells us that bed bugs are a problem in all real estate types, not just rental housing. They are in single family homes, condominiums, hotels, motels, hostels, offices, transit systems, theatres, etc. Therefore, if strategies to deal with bed bugs focus solely on rental housing, the strategies will fail. To eradicate bed bugs, a comprehensive approach is needed.

The rental housing industry already regulated. With respect to bed bugs, the rental housing industry is already regulated. Under the *Residential Tenancies Act*, rental housing owners and managers are already responsible for building pest control treatments. Tenants can apply to the Landlord and Tenant Board if an owner/manager fails to live up to their obligations under the law. Remedies include fines and rent abatements. Similarly, public health officials can also charge owners/managers for failing to act responsibly under local health by-laws.

Recent proposals not recommended. There have been two recent legislative proposals to regulate the rental housing industry. One proposes that landlords be required to notify incoming tenants if there have been any incidences of bed bugs whatsoever in the past five years. This idea will unnecessarily stigmatize the vast majority of rental housing providers yet will do nothing to address the bed bug issue. Another proposal is for licensing of landlords to address bed bugs. The introduction of a massive costly new bureaucracy will do nothing to address bed bugs. Its main accomplishment would be to reduce housing affordability.

Costs will impact housing affordability. Treatment of bed bug problems can be very costly. While housing providers accept their responsibility for many of these costs, there must be

recognition that all these costs will ultimately be borne by tenants, whether direct costs for the treatment of belongings, or in building treatment costs that ultimately get passed on to them. A program to help tenants with treatment costs, particularly low income tenants, would be beneficial.

What can be done? There is currently no magic bullet for bed bugs. However, a concerted and coordinated effort could have an impact. FRPO recommends that the province consider the following actions:

1. A large scale public relations effort: to educate the public about identifying bed bugs, and actions they can take to prevent their spread and cooperate with treatment strategies
2. A national bed bug strategy by the federal government: the federal government should have staff dedicated to this issue and should be pursuing the following:
 - International bed bug strategy coordination: work with other governments on strategies and information sharing
 - Speedier chemical approvals: consider speedier approvals for chemicals that have already gone through extensive testing in other jurisdictions
 - Research: federal resources should be dedicated to researching the effectiveness of new chemicals, and on the effectiveness of different treatment and preventions strategies
3. A provincial bed bug strategy for the provincial government: the provincial government should also have dedicated staff and resources dedicated to this important problem:
 - A major, comprehensive public education campaign
 - Funds for provincial research on treatment strategies for Ontario
 - Materials for all real estate types that educate on effective treatment strategies
 - Assistance for low-income tenants on treatment
 - Additional funding for services for households with special needs, to help them deal with this and other challenges of living independently
 - Legal requirements for tenants to cooperate with pest control responses
 - Penalties for tenants who do not cooperate with treatment strategies

BED BUGS ARE A GLOBAL PROBLEM

Bed bugs are a problem around the world. Because of this, and because of international travel, a bed bug strategy is going to require coordination between governments around the world. This means that the federal government needs to be involved in solutions.

Recognition of the global spread of bed bugs is critical in developing strategies to prevent and control infestations. Ontario has an opportunity to learn from research and methods used in other jurisdictions. Ontario can also benefit from lessons learned from other countries on the most effective strategies governments can adopt to help people address bed bug issues.

The same factors that lead to risk of bed bug infestation in one country apply to all others. Lack of awareness of contributing actions, failure to promptly detect and act on bed bug infestations, and lack of cooperation between building owners, occupants and pest control professionals are generally common, problematic factors across North America. Information sharing between the federal, provincial and municipal governments, and with governments in other countries, is crucial to developing the most effective strategy to educate and provide assistance to people in their efforts to prevent and control bed bugs.

In addition to being a global problem, bed bugs are also a province-wide issue. In Ontario, bed bugs are not just being found in the province's largest city of Toronto, but also in municipalities such as Ottawa, Hamilton, Windsor, Kingston, London, Huntsville, North Bay, Wasaga Beach, and Owen Sound. The Ontario government must rapidly increase awareness and education across the province, in all urban and rural areas, on the risks of bed bug infestation and best practices to prevent and control this problem.

Recommendations

FRPO recommends that the federal government:

- work with other governments on strategies and information sharing
- consider speedier approvals for chemicals that have already gone through extensive testing in other jurisdictions
- dedicate resources for research on the effectiveness of new chemicals, and on the effectiveness of different treatment and preventions strategies

FRPO recommends the Ontario government:

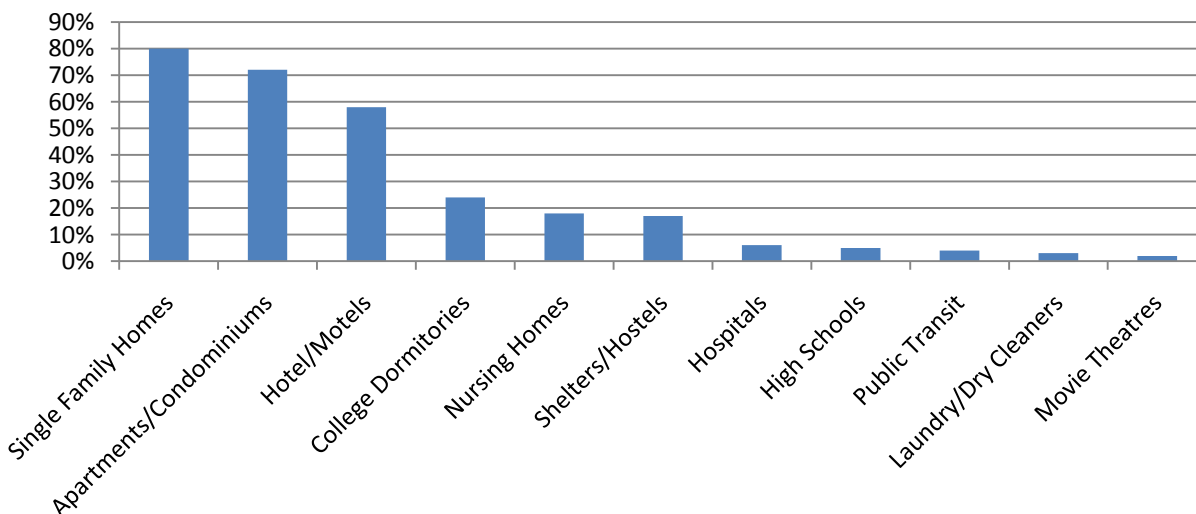
- Work with the federal government on developing research and education strategies for bed bug prevention
- Coordinate efforts of municipal governments to provide resources to people and ensure compliance with local health by-laws
- Ease provincial restrictions on chemicals and pesticides that are already approved by the federal government

BED BUGS ARE NOT SOLELY A RENTAL HOUSING PROBLEM

Many academic and scientific reports on bed bugs have provided adequate documentation on how bed bugs are spread. Typically, many developed countries have seen bed bug epidemics originate with air travel passengers, with infestations spreading throughout hotels and motels. Bed bugs can hide easily in the hem of a garment, the seam of a briefcase, the crease in a shoe, and properties related to the travel and hospitality industry are prime locations for the spread and infestation of bed bugs. Once spread from hotels, bed bugs have easily been transported into people's homes – not just rental homes in apartment buildings, but also equally or more frequently into single family homes and condominiums.

Bed Bugs are not just a rental housing problem. The chart below shows the number of pest control companies reporting bed bug infestations for a wide range of properties. Single family homes, hotels, and college residences and nursing homes figure prominently for bed bug problems. Any solutions pursued by governments must recognize this basic fact, and encompass all types of public and private property, both residential and non-residential.

Frequency of Pest Control Companies Reporting Bed Bug Infestations for Various Properties



Source: Survey of 509 U.S. Pest Control Firms on Properties Treated for Bed Bugs (By Potter, Romero & Haynes, University of Kentucky, 2008. "Battling Bed Bugs in the U.S.A.", from Proceedings of the Sixth International Conference on Urban Pests, 2008).

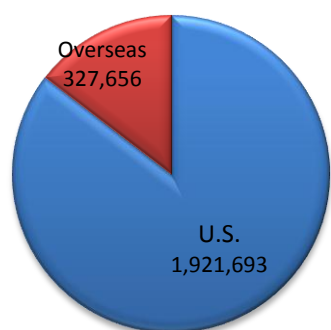
Hotels

Government policies targeting the eradication and prevention of bed bugs must focus on properties in the travel and hospitality industry. Bed bugs do not simply appear in one location – they are imported through the travel and movement of people. In Australia, where data exists for example, 56% of all bed bug treatments occurred in hotels, motels, hostels and

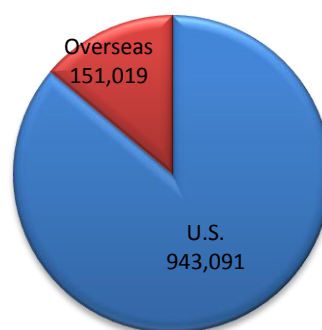
resorts, from 2000 to 2005¹. A study in Malaysia and Singapore similarly found that among 54 infested sites, over 74% of bed bug infestations occurred in hotels, while just 26% where in residential premises². This study speculated that the route of movement of bed bugs in hotels and public accommodations is more direct than in residential premises.

As shown by the pie charts below, well over 1.1 million people visit Ontario each month, the majority being from the United States. Also, over 2.2 million Ontarians travel to other destinations each month, and increasing the possibility of importing bed bugs upon their return. The rapid movement of people across long distances facilitated by air travel is partly what makes the current bed bug epidemics different than in the pre-war era. Hotel and resort properties are key transfer points for the movement of bed bugs, both for Ontario residents and visitors from other countries. Addressing the spread of bed bugs through travel, hospitality and tourism (on both people and their belongings) must be a key part of the government's prevention and control strategy.

Ontario Traveller Destinations



Visitors to Ontario



Hospitals

The American Society for Healthcare Environmental Services reported that there were more than 500 bed bug infestation treatments in hospitals and health care facilities and more than 130 treatments in long-term care facilities in 2009³. While hospitals may be perceived as being clean and sanitary, the simple presence of people moving in and out makes them vulnerable to infestations. Hospitals are where patients stay for long periods of time, and have the potential for attracting and encouraging bed bugs. Overnight guests in maternity, long-term care and hospices are more likely to bring luggage and other personal effects that may be infested.

¹ S. Doggett and R. Russell, 2008. *The Resurgence of Bed Bugs in Australia*, Proceedings of the Sixth International Conference on Urban Pests, William H Robinson and Dániel Bajomi (editors), July 13 to 16, 2008.

² Yee-Fatt How, Chow-Yang Lee, 2010. *Survey of Bed bug Infested Premises in Malaysia and Singapore*, Journal of Vector Ecology, Volume 35, Issue 1, June 2010.

³ National Centre for Healthy Housing, 2010. *What's Working for Bed Bug Control in Multifamily Housing*, February 2010.

Single Family Homes

Despite public perception, bed bugs are typically found in residential homes, as commonly or more so than in multi-family residential properties. Bed bugs do not discriminate, are not necessarily a sign of unkempt/dirty homes or buildings, but rather bed bug infestations are often a result of people travelling or bringing infested furniture or other items into their houses. Many pest management professionals report that in single family homes, most people may try to treat a bed bug problem themselves, causing the problem to continue to even worsen due to ineffective amateur treatment methods. This signals the fundamental need for increased education by public health authorities, including the Ministry of Health.

Public Spaces

Schools (secondary schools, universities and colleges), entertainment venues, public transit and office buildings are quickly becoming important, but neglected, locations for bed bug travel and infestations. In New York City, bed bugs are routinely found in government offices, movie theatres, and even upscale retail stores. However, despite bed bugs increasingly being reported in non-residential properties, public policies fail to address preventing or treating infestations in public spaces. This failure by governments at all levels will only contribute to the spread of bed bugs, not just in public spaces, but in residential, hospitality, and health care facilities.

While the presence of bed bugs in residential properties may raise health-related concerns, infestations in public spaces such as workplaces, commercial properties and tourism destinations will have a devastating economic impact if government policies neglect them and only focus on rental housing.

Recommendation

Bed Bugs pose unique challenges for landlords and tenants in rental housing. The spread of bed bug infestations, however, is affecting all forms of property, and poses a risk to occupants of public and private structures, in both residential and non-residential settings.

Any policies implemented by the Ontario government to address bed bugs must:

- Recognize the existence of this pest problem in all forms of property
- Enforce similar protocols consistently for housing (rental and owner-occupied), hotels and motels, post-secondary accommodations and schools, and other public spaces and workplaces.

Making rental housing the focus of any new government policy will only allow bed bug infestations to spread and become much worse.

LANDLORDS ARE ALREADY REGULATED

The Federation of Rental-housing Providers of Ontario recognizes and accepts that rental housing providers are responsible for quick action and costs for treatment for any infestation of pests in a rental complex. Landlords already face very clear obligations under the *Residential Tenancies Act* to take responsibility for building related pest control. Municipal property standards and public health bylaws also require rental housing providers to keep rental units clear of pests and exterminate them when reported. Each of these respective responsibilities is discussed further below.

There have been recent proposals for expensive licensing schemes or other new regulation of the rental housing industry to address Ontario's bed bug issue. The focus for the government should be to increase education and enforcement of existing regulations, not to create and impose new, costly laws and bureaucracy.

If properly enforced and utilized, the current regulatory framework works well to ensure that landlords live up to their pest control obligations.

Beyond current regulations, most rental housing providers already want to deal with any issue as quickly as possible. Firstly, they are financially motivated to keep their existing tenants, as losing tenants is costly in this business. Secondly, they cannot afford to have their buildings develop a reputation as being problematic, as can happen through the internet through the Bed Bug Registry website, for example.

A review of existing regulatory requirements is listed here, for both landlords and tenants:

Provincial regulatory obligations for landlords

Landlords face strictly enforced rules for providing housing that is fit for habitation, healthy, reasonably free of insects and in compliance with maintenance standards under the *Residential Tenancies Act*, and under the Act's Regulation 516-07.

The Residential Tenancies Act

Sec 20. Landlord's responsibility to repair

20. (1) A landlord is responsible for providing and maintaining a residential complex, including the rental units in it, in a good state of repair and fit for habitation and for complying with health, safety, housing and maintenance standards.

(2) Subsection (1) applies even if the tenant was aware of a state of non-repair or a contravention of a standard before entering into the tenancy agreement.

Ontario Regulation 517-06 under the *Residential Tenancies Act*

46. (1) A residential complex shall be kept reasonably free of rodents, vermin and insects.

- (2) The methods used for exterminating rodents and insects shall be in accordance with applicable municipal or provincial law.
- (3) Openings and holes in a building containing one or more rental units shall be screened or sealed to prevent the entry of rodents, vermin, insects and other pests.

Under the Residential Tenancies Act, if a landlord breaches their obligation, they may be forced to:

- Offer an abatement of rent to the tenant
- Allow the tenant to terminate the tenancy
- Complete specified work to ensure the unit is in a state of repair and fit for habitation
- Pay sums of money to the tenant for out of pocket expenses or replacement of damaged property of the tenant
- Comply with an order prohibiting any increase in the rent

Any tenant who has a problem with their landlord's lack of action on pest control can apply to the Landlord and Tenant Board (LTB) for one of the above noted remedies. The LTB is a tenant friendly Tribunal, where there is free legal assistance available for all tenants who want help with such applications. Clearly there is already strong legislation in Ontario requiring rental housing providers to live up to their obligations. A new expensive bureaucracy solely for landlords is not an answer to Ontario's bed bug problem.

Municipal regulatory obligations for landlords

Landlords also face another layer of regulation related to pest control and treatment of bed bug infestations. Most municipalities duplicate the *Residential Tenancies Act* requirements for pest control through their own municipal property standard by-laws. Those who do not comply with these municipal by-laws can face work orders or fines.

One example is the following sections of the City of Toronto's property standard by-law:

City of Toronto By-law 629

629-9. Pest control.

- All properties shall at all times be kept free of rodents, vermin, insects and other pests and from conditions which may encourage infestation by pests.

629-5. Owner's duties.

The owner of property shall:

- Repair, maintain and keep clean the property in accordance with the standards and take immediate action to eliminate any unsafe condition.

Provincial regulatory obligations for tenants

Tenants do not have specific legal responsibilities to help prevent and control pest and insect infestations. They do have responsibility for ordinary cleanliness. However, current tenant legal responsibilities are not adequate to deal with one of the main challenges the rental industry has in dealing with bed bugs – uncooperative tenants.

Among the tenant characteristics that create problems for landlords in dealing with bed bugs are the following:

- have low income so can't afford to treat their belongings (e.g. vacuum cleaner)
- low literacy/language skills
- hoarders
- mental illness
- physically challenged
- don't think it's a problem
- don't care
- don't report due to stigma
- afraid to report

Currently, the regulatory system in Ontario is not helpful in dealing with uncooperative tenants. Some tenants don't report bed bugs, because they don't care, or don't think it's a problem. Some refuse entry to the landlord. Some are hoarders, who create an environment which allows for a major infestation that is hard to treat, and many times hoarders will not allow entry. In these circumstances, there is little the landlord can do, and nothing that public health officials are willing to or can do. While there are concerns about people's right to privacy and not to be disturbed, in multi-residential situations one tenant's behaviour can have a significant external effect on surrounding tenants. In these cases, it is not a matter of one individual's or families' right to privacy solely. Public policy must also balance the rights of neighbours to health and wellbeing.

It is impossible for landlords and pest management professionals to control and treat a rental unit for bed bugs if the tenant does not fully cooperate.

Residential Tenancies Act

PART IV - RESPONSIBILITIES OF TENANTS

Tenant's responsibility for cleanliness

33. The tenant is responsible for ordinary cleanliness of the rental unit, except to the extent that the tenancy agreement requires the landlord to clean it.

Municipal regulatory obligations for tenants

There are also municipal property standard by-laws that apply to occupants and tenants. For example, City of Toronto property standard by-law requires the following:

City of Toronto By-law 629

629-6 Occupant's duties.

Every person who occupies property shall:

- A. Maintain the property in a clean and sanitary condition;
- B. Maintain all plumbing, cooking, refrigerating appliances and fixtures, and all storage facilities and other equipment in or on the property in a clean and sanitary condition;
- C. Maintain all sanitary facilities and every fixture in a sanitary facility in a clean and sanitary condition;
- D. Keep all exits from the property clear and unobstructed;
- E. Co-operate with the landlord in complying with the requirements of this chapter;
- F. Limit the number of occupants to the maximum number permitted by this chapter; and
- G. Take immediate action to eliminate any unsafe condition.

While item E requires tenants to cooperate with the landlord in complying with their public health obligations, it is the experience of FRPO members that when local enforcement officials come across an uncooperative tenant, they seldom attempt to enforce cooperative behavior. So in practice, to date local by-law enforcement has not been helpful in this regard.

Recommendations

FRPO recommends that:

The Ontario Government:

- Amend the *Residential Tenancies Act* to make it an offence for a tenant to fail to cooperate with in a pest control response, with penalties for non-cooperation (e.g. fines) and eviction for persistent non-cooperation

Landlords already face consequences for lack of action on pest control or bed bugs. For a provincial action plan on bed bugs, tenants need to face consequences for non-cooperation as well.

RECENT PROPOSALS NOT RECOMMENDED

There have been two recent provincial legislative proposals to regulate the rental housing industry. The problems with each of these are discussed further below.

Bill 94: Notifying Incoming Tenants

A recent private members bill (Bill 94) proposed that all landlords be required to notify all prospective tenants of any incidence of bed bugs in the building within the past five years. This proposal will stigmatize all rental buildings unnecessarily. Responsible operators who deal with a bed bug problem quickly and efficiently will have their buildings stigmatized for five years. At the same time, the proposal will do nothing to actually address the problem of bed bugs. For these reasons, this proposal should be abandoned.

If a landlord complies with current legal requirements to provide professional pest control treatment, and is successful in eradicating a bed bug infestation from a housing unit, it remains to be seen what value there is in reporting this past occurrence to future occupants. The resulting negative stigma and harm to the landlord's reputation (resulting from an infestation that was of no fault of the landlord) will do little to encourage landlords to be proactive on bed bug treatment strategies.

Cheri DiNovo MPP Bill: Licensing

NDP member Cheri DiNovo has indicated that she intends to introduce a private members bill to require licensing of landlords, rent control, and better access to justice for tenants and that this bill will address Ontario's bed bug issue. As of the writing of this paper, the bill has not yet been introduced into the provincial legislature. In her comments to the media, Ms. DiNovo indicates that her scheme is as follows: landlords would be required to be licensed, and pay for the cost of a licensing scheme; landlords would not be able to show units to prospective tenants until they have been inspected and shown to be bed-bug free; and landlords would have their license removed if they did not comply.

This is an extraordinarily expensive proposition. The costs of this huge regulatory system would be very high, and in all likelihood take resources away from investment in rental buildings and divert them to bureaucracy and administration. It also layers new regulation on an industry that is already massively regulated.

As we saw in the previous section, regulations are already in place to deal with landlords who do not fulfill their legal obligations for building pest control. Putting a new expensive bureaucracy in place will not address bedbugs, and will reduce housing affordability by driving up costs that are passed on to tenants.

New York City Requires One-Year Disclosure of Bed Bug Reports – *But Only For Residential Landlords*

Some proponents of the above mentioned notice proposal point to New York City, where a rental housing bed bug disclosure requirement was recently implemented. There are important differences between proposals in Ontario, and the new requirement in New York, and lessons to be learned on why new requirements are disclosure and licensing are ineffective.

New York City was recently ranked as the most bed bug infested city in the United States⁴. Its municipal and state governments have approved a requirement that landlords disclose the presence of bed bugs reported in the past one year to incoming tenants, using a basic form provided to tenants. With the exception of a \$500,000 public education campaign, the city has taken very little other action to address bed bug problems in all other property types. As a result, bed bug infestations in hotels, schools, retail stores, government offices and theatres will likely continue to get worse.

New York's new disclosure requirement for landlords does not apply to owners of any other property type, despite the growing infestation rate of bed bugs in non-residential spaces. As a result, the bugs will continue to be spread throughout the city, including back to housing units, both owner-occupied single family homes, and rented apartments.

The single most important regulatory tool governments should utilize is the requirement of all property owners (not just apartment owners) to comply with local health and property standard by-laws to keep premises free of all pests. Occupants, such as residential tenants, should be required to report the presence of bed bugs and fully cooperate with treatment strategies.

Recommendations

FRPO recommends that the Ontario government:

- Replace current provincial disclosure and licensing proposals with a more effective comprehensive public awareness campaign that educates landlords and tenants on their current legal responsibilities, obligations and rights when bed bugs are detected.
- Ensure any regulatory policies related to bed bug prevention and control should also be targeted to owners and occupants of all property types, both residential and non-residential, to recognize the exposure to infestation in all private and public spaces.

⁴ Global News (Reuters), "New York most bed bug infested city in the U.S., says extermination company", August 24, 2010

COSTS WILL IMPACT HOUSING AFFORDABILITY

Treatment of bed bug problems can be very costly. While housing providers accept their responsibility for many of these costs, there must be recognition that all these costs will ultimately be borne by tenants, whether direct costs for the treatment of belongings, or in building treatment costs that ultimately get passed on to them. A program to help tenants with treatment costs, particularly low income tenants, would be beneficial.

Treatment strategies for bed bugs are daunting for both landlords and tenants, requiring time and effort on the part of everyone to prepare for and facilitate successful treatment methods. In addition to expensive treatment costs, professional pest management services for bed bugs are becoming in short supply as demand increases.

While landlords recognize these costs and challenges, there seems to be little appreciation on the part of government or housing activists on the impact of these costs on affordability. Currently, the Ontario government is relying on landlords to almost entirely fund the battle against bed bugs, while failing to take any meaningful action to protect the public against infestation. The Ontario government has a very critical role to play on the front lines, by funding and providing educational information on prevention and control of bed bugs through various programs to the public and private sector, while also funding additional research on prevention and control.

A summary of bed bug treatment costs is listed in the table below. It is noteworthy that the vast majority of costs must be borne directly by landlords. The small portion of costs that tenants are responsible for (for laundering, unit preparation and mattress encasements) are for necessary steps in any successful bed bug treatment strategy, and, in the case of mattress encasements, will also help prevent or control future infestations. Since it is known that bed bugs can spread to adjacent housing units, tenants must be held responsible for these costs to ensure neighbouring residents' units are not infested.

Summary of Bed Bug Treatment Costs

Treatment Method	Primary Responsibility for Costs	Estimated Costs	Description
Laundering	Tenant	Dissolvable Laundry Bags: \$22 for 10, plus laundry fees \$5-\$6 per wash/dry	Must be part of every bed bug control effort
Unit Preparation	Tenant	Varies	Mess and clutter do not cause bed bugs, but cleaning and de-cluttering is necessary for ensure effective inspection, treatment and monitoring

Mattress encasements	Tenants	\$80 per mattress; \$50 per box spring	Encasements are required to keep bed bugs from infesting mattresses and box springs, and will also kill existing bed bugs.
Monitors/interceptors	Landlord	4 furniture leg interceptors for \$8; Carbon dioxide attractant devices \$15-\$950	Monitors will detect and catch bed bugs, but will not control infestations
Professional Vacuuming	Landlord/ Tenant	\$250-\$500	Not reliable as an exclusive control method, but used to remove bugs during inspection, vacuum must have HEPA filter.
Professional Steaming Treatment	Landlord	\$500 to \$1500 per rental unit	Steam wands must be moved at rate that heats area to lethal temperature without spreading bugs and eggs
Thermal Heat Treatment	Landlord	\$800 to \$2000 per rental unit	Effective method if lethal temperature is able to penetrate all items and spaces in the room.
Bed Bug Detecting Canine	Landlord	\$1,300 per day	Effect for large scale inspections
Pesticide Treatment	Landlord	\$250-\$500 per treatment	Must be used in combination with other treatment methods. Multiple treatments often required.

It is strongly recommended that the government consider assisting lower-income tenants with some of these costs. In some cases, tenants are not able to properly prepare for treatments, due to disability, age or illness. In these cases the government should also provide additional funding for services for households with special needs, to help them deal with this and other challenges of living independently

Recommendations

FRPO recommends that the Ontario government's bed bug strategy include funding for:

- A major public education campaign
- Provincial research on treatment strategies for Ontario
- Materials for all real estate types that educate on effective treatment strategies
- Assistance for low-income tenants on treatment (eg. Purchase of mattress encasements)
- Additional services for households with special needs, to help them prepare for treatments and other challenges of living independently

KEY CHALLENGES FACED BY LANDLORDS

The key challenge that the rental housing industry faces in addressing bed bugs is uncooperative tenants. If they don't cooperate, the landlord cannot properly address the issue in the building. Ultimately, this impacts all other tenants, who then get exposed to the infestation.

Among the main tenant characteristics that create challenges for landlords are the following:

- have low income so can't afford to treat their belongings (e.g. vacuum cleaner)
- low literacy/language skills
- hoarders
- mental illness
- physically challenged
- don't think it's a problem
- don't care
- don't report due to stigma
- afraid to report

For those who are limited in their ability to cooperate, provincial programs that assist such households would be very beneficial.

For those households who refuse to cooperate, the industry needs more leverage to enforce cooperation, for the sake of all other tenants who are affected. Multi-residential living requires a recognition that all tenants have responsibilities to their neighbours and their landlord, to make multi-residential living workable and fair for all.

Recommendations

- FRPO recommends that the Residential Tenancies Act be amended to include more severe penalties for tenants who refuse to cooperate with pest control treatments.

RESEARCH AND DEVELOPMENT

As the issue of bed bugs has grown in Ontario, it has become apparent to FRPO that there is no focused research on strategies for bed bug treatment. It is through research and development that different strategies for addressing bed bugs can be evaluated, and that information disseminated to a broad audience.

There is a potentially very important role for the province to play in facilitating research and strategy development.

Which approaches to bed bug control have worked the best in which situations? What combination of treatments work together? To answer these questions, there needs to be some scientific testing of treatment methods, with follow up visits to determine success rate.

Recommendations

- FRPO recommends that the province dedicate resources to provincial research and testing of bed bug treatment methods, and then use this information in its public relations efforts.