



P.O. Box 1749  
Halifax, Nova Scotia  
B3J 3A5 Canada

**Item No. 21.6**  
**Halifax Regional Council**  
**December 2, 2025**

**TO:** Mayor Fillmore and Members of Halifax Regional Council

**FROM:** Brad Anguish, Acting Chief Administrative Officer

**DATE:** October 14, 2025

**SUBJECT:** R-400 Information Update

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### **INFORMATION REPORT**

#### **ORIGIN**

On January 24, 2023, the following recommendations were presented to Regional Council for first reading of By-Law R-400 Respecting Registration of Residential Rental Properties, the purpose of which is to establish a municipal residential rental registry, as set out in Attachment A of the [staff report dated January 20, 2023](#)<sup>1</sup>. The recommendations outlined in the staff report were as follows:

1. Adopt By-Law R-400 Respecting Registration of Residential Rental Properties, the purpose of which is to establish a municipal residential rental registry, as set out in Attachment A of this report.
2. Adopt By-Law M-202, the purpose of which is to amend By-Law M-200 Respecting Standards for Residential Occupancies, the purpose of which is to amend certain minimum standards applicable to rental housing, as set out in Attachment C of this report.
3. Direct the Chief Administrative Officer to prepare a staff report two years following implementation of the registry and the amendments to By-Law M-200, on the effectiveness of the registry and the amendments.

On April 4, 2023, Regional Council held second reading of proposed By-Law R-400 Respecting Registration of Residential Rental Properties and proposed By-Law M-202, an amendment to By-Law M-200 Respecting Standards for Residential Occupancies. Regional Council ultimately chose to pass the following motions:

1. Adopt By-Law R-400 Respecting Registration of Residential Rental Properties, the purpose of which is to establish a municipal residential rental registry, as set out in Attachment A of the staff report dated January 20, 2023.
2. Adopt By-Law M-202, the purpose of which is to amend By-Law M-200 Respecting Standards for Residential Occupancies, the purpose of which is to amend certain minimum standards applicable to rental housing, as set out in Attachment C of the staff report dated January 20, 2023.

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<sup>1</sup> <https://cdn.halifax.ca/sites/default/files/documents/city-hall/regional-council/230124rc1517.pdf>

## **EXECUTIVE SUMMARY**

This report provides the information regarding the implementation and effectiveness of By-law R-400, including:

- An update on numbers of registered properties;
- An overview of the registration process;
- Initial findings from R-400 data ;
- How registries required by By-law R-400 are presented through disclosure on HRM's website (open data); and,
- Plans for future education on By-Law R-400 and By-Law M-200.

## **BACKGROUND**

A staff report was presented to the Halifax Regional Council on January 24<sup>th</sup>, 2023, recommending Council adopt By-law R-400 Respecting Registration of Residential Rental Properties, the purpose of which is to establish a municipal residential rental registry, and to amend By-Law M-202 Respecting Standards for Residential Occupancies. This report notes previous debates and reports from the last several years which discuss the merits of having a comprehensive record of all rental properties with HRM.

The January 2023 report ultimately highlighted that a rental registry would provide a valuable data source regarding the number, location and types of rental properties located in HRM. The registry would also provide supports in adapting the current Building Standards program, allowing HRM to conduct more proactive inspections on all types of rental properties. The program ultimately provides a new avenue for ensuring compliance with By-law M-200 Respecting Standards for Residential Occupancies, as prior to the adoption of the R-400 By-Law, HRM relied more on a reactive model of compliance, only actioning properties for investigation when they were identified by complainants. Adopting a proactive approach will alleviate potential landlord retaliation and provide a mechanism to further ensure the existing housing stock meets the minimum standards.

By-law R-400 requires all rental housing within HRM to be registered. This includes both large and small apartment buildings, income properties, single room occupancies, secondary and backyard suites and short-term rentals. The January 24, 2023 staff report also highlighted the importance of including short term rentals in the R-400 registry, as while the province has a provincial registry for short term rentals, the fact that they can be easily converted into long term rentals means that they need to be included on the R-400.

### **Requirements under By-Law R-400**

The January 24, 2023 staff report noted that property owners would need to provide the following information through submission of an online form:

- Address of rental property;
- Contact information of the property owner;
- Information regarding the property management operator, where applicable;
- Description of the rental property;
- Any fee prescribed by Administrative Order 15; and
- Any additional information required by the Registrar to assist in registering the rental housing.

Furthermore, rental property owners are required to have and maintain an up-to-date maintenance plan to ensure that the building is compliant with By-Law M-200 Respecting Standards for Residential Occupancies. Maintenance plans must be made available to the Municipality upon request, and municipal staff are available to provide advice to small-scale landlords. Rental property owners are also expected to make insurance information available upon request.

### Next steps

The January 2023 staff report highlighted several “next steps” which included the creation of an education package, sharing rental registry information on HRM’s webpage through Open Data, and a future staff report on effectiveness of the Rental Registry two years after adoption of the by-law.

### DISCUSSION

Since the adoption of By-Law R-400, in June 2023, HRM’s website was updated to provide residents with information about the Residential Rental Registry, along with an on-line form that enables properties to be registered. The website outlines the steps that are required to register the property, further detailed information on why HRM is collecting this data, along with a link to the online form where residents may enter the information required to start the registration process. The following information is required to be provided by property owners in the application:

- Civic address;
- Property owner contact information;
- Primary contact information (if different from the owner);
- Property manager contact information (where applicable);
- Type of rental unit;
- Number of residential and rental units within the building;
- Type of building which houses the rental unit;
- Any shared services;
- List of fuel fired appliances (if applicable); and
- List of fire protection measures.

There is also a small checklist which allows property owners to confirm if there is a valid insurance policy and indicate that they are providing an up-to-date maintenance plan.

The data collected on the website is then downloaded and added to the R-400 rental registry where applications are subsequently processed. The information provided by the rental property owners is first reviewed by the Assistant Building Officials (ABOs), and then by a Building Standards Coordinator (BSC). The BSC positions were filled in August and September of 2024, at which point they assumed responsibility for the administration of the rental registry from the ABOs.

The BSC reviews the application to ensure that the submitted building model data aligns with the municipality’s GIS information, the Permitting, Planning, Licensing and Compliance system (PPL&C) and HRM’s former permitting and compliance system (Hansen). The primary objective when processing registry applications is to ensure the information is accurate and identify potential fire and life safety risks, data that is referenced by various business units when prioritizing further investigation.

As of October 29<sup>th</sup>, 2025, 11,818 rental registry applications have been submitted to the municipality, 11,799 (99.8%) of which have been registered. A total of 63,023 rental units have been identified to date through the registration process. Of the 63,023 rental units, 1,152 units have identified as short-term rentals. Approximately 4,971 properties have been identified as needing further review and have been prioritized for investigation. Investigations relate to property addresses (70 properties), number of units (2,285 properties), owners (59 properties), number storeys in height (44 properties), and general fire and life safety concerns (3,236 properties).

Upon completion of the review of the application, confirmation of the registration is sent to the client along with a unique R-400 registration number. The following disclaimer is included at the bottom of every completed application: *This registration is not a confirmation of compliance with other Municipal, Provincial or Federal regulations and does not confirm the legal use of the property.*

The registry collects information which provides existing enforcement processes the ability to prioritize proactive inspections, and in collaboration with Fire Services re-enforces the need for community awareness programs. Currently, staff are focussed on identify the properties missing from the registry (of the suspected 90,000 rental units in HRM, it is assumed that roughly 20,000 units are not yet registered), properties that have prior M200 complaints, and properties that have not had a fire inspection within the last 2-3 years. As the program matures, proactive inspections will focus on registered properties that have identified fuel fired appliances without smoke and/or carbon monoxide detection, illegal units, and high risk unit configurations (i.e. dwelling units located above or below other units).

### **Open Data**

On May 5<sup>th</sup>, 2025, the R-400 residential rental registry was added to the data the municipality actively discloses to the public, through the online Open Data catalogue. Citizens can now see all properties currently in the R-400 Rental Registry geolocated on an online map. Open data currently includes the civic address, property identifier (PID), rental unit type, building type, number of registered rental units, shared services, and whether or not a registration has been issued and on what date. It is noted on the open data website that a property may show as not being registered because it is still under review by staff. The open data figures are updated at the end of each month.

### **Enforcement**

As the bulk of rental properties in HRM have been registered, and the number of new registration requests received each week is minimal, staff are now shifting focus towards enforcement. To date, staff have identified upwards of 4,608 rental properties that are not registered with the R-400, several of which have current M-200 complaints. Enforcement priority will be placed on unregistered rental properties with associated potential life safety concerns and M-200 complaints, followed by proactive inspections of registered rental properties that have an increased number of M-200 complaints.

### **Education Package**

Pamphlets are being created to provide information about the R-400 and M-200 By-Laws. The M-200 information brochure provides information on how one can report an issue with their unit, and the steps taken after a call is placed with 311. The M-200 brochure also contains a frequently asked question section which provides context on what an inspector looks for when conducting a M-200 related visit along with an explanation of what is covered under the M-200 By-Law. The R-400 brochure contains information on what the R-400 Bylaw entails, who needs to apply, and the information requested as a part of the application. Furthermore, The R-400 brochure includes information on short term rentals and how to ensure that they are compliant with municipal and provincial regulations. Finally, there is a section with tenant information including a QR code which links to the R-400 Open Data page. This allows renters to see if their rental unit is registered under the R-400 Bylaw.

### **FINANCIAL IMPLICATIONS**

There are no financial implications associated with this report.

### **COMMUNITY ENGAGEMENT**

Further community engagement is planned to occur in late 2025 and into 2026. Staff are planning meetings with community groups along with the Income Property Owners' Association of NS (IPOANS) to further educate the public on municipal By-Laws M-200 and R-400.

## LEGISLATIVE AUTHORITY

*Halifax Regional Municipality Charter, R.S.N.S. 2008, c. 39*

Clauses 188(1)(a) and(b):

**188(1)** The Council may make By-Laws, for municipal purposes, respecting (a) the health, well being, safety and protection of persons; (b) the safety and protection of property.

**188(2)** Without restricting the generality of subsection (1) but subject to Part VIII, the Council may, in any By-Law (a) regulate or prohibit; (b) regulate any development, activity, industry, business, animal or thing in different ways, divide each of them into classes and deal with each class in different ways;

Subsection 199(1), Setting out Regional Council's power to create a Minimum Standards By-Law;

**199 (1)** Without limiting the generality of Section 188, the Council may make By-Laws

(a) prescribing minimum standards of sanitation, plumbing, water supply, lighting, wiring, ventilation, heating, access, maintenance, appearance, construction and material for buildings, or parts thereof, occupied for residential purposes, whether the building, or part thereof, is erected, constructed or converted to residential purposes before or after the date of the making of the bylaw;

(b) limiting the number of persons who may reside in a building or part thereof;

(c) imposing on the owner, tenant or occupant, or any one or more of them, the responsibility for complying with the By-Law;

(d) providing for notice to an owner, occupant or tenant, or any one or more of them, to discontinue the residential use of a building, or part thereof, in contravention of the By-Law; and

(e) prescribing penalties for such residential use after notice to discontinue the use is given.

## ATTACHMENTS

Attachment A: Online Registration Form

Attachment B: R-400 Statistics

Attachment C: M-200 By-Law Brochure

Attachment D: R400 By-Law Brochure

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Report Prepared by: Pat Burton, Building Standards Coordinator, Planning and Development 902.478.1814  
Dawson Patterson, Building Standards Program Manager, Planning and Development  
902.718.6904

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## ATTACHMENT A Online Registration Form

Required fields are marked with an asterisk (\*)

### Application to Register a Rental Property

Halifax Regional Municipality (HRM) is committed to protecting your personal information. In accordance with Section 485 of the Municipal Government Act (MGA), the personal information collected will only be used by municipal staff and, if necessary, individuals under service contract with the Halifax Regional Municipality for purposes relating to the HRM Rental Registry.

If you have any questions about this form/survey, please call 311 or email [contactus@311.halifax.ca](mailto:contactus@311.halifax.ca)

Use this form to register up to 5 buildings that contain rental units on the same property. If you have more than 5 buildings on your property that contain rental units, check the box below and the Registrar will contact you.

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#### Civic Address of Rental Property \*

Address \*

Address 2

City/Town \*

Postal Code \*

Property Owner  \*

Name(s)/Company \*

Email \*

Phone \*

Address \*

Address 2

City/Town \*

Province \*

Postal Code \*

Country \*

Primary Contact same as Owner? \*

 Yes No

Use this form to register up to 5 buildings that contain rental units on the same property. If you have more than 5 buildings on your property that contain rental units, check the box below and the Registrar will contact you.

I wish to register more than 5 buildings on the same property.

### Building 1

Building 1 - Primary Civic Address:

Address \*

Is there an alternate contact for the building? Check if yes.

Does the building have more than one civic address? Check if yes.

Choose the type of rental unit(s): ? \*

Apartment(s)

Backyard Suite

Basement Apartment

Bedroom only

Cabin or Cottage

Condo

Entire House

Mobile Home

Other...

# of residential units you are renting: ? \*

How many of these are short-term rentals: ? \*

What kind of building are your rentals in: ? \*

Apartment Building

Backyard Suite

Multi-Unit Building (3 units or less)

Multi-Unit Building (4 units or more)

Semi-Detached / Duplex House

Single Detached House

Town House / Row House

Other...

How many floors are in the building: ? \*

Total # of residential units in the building: ? \*

Check here if there are any commercial units in the building. ?

Identify any shared facilities or amenities: ? \*

- |  |   |
|--|---|
| <input type="checkbox"/> Amenity Room        | <input type="checkbox"/> Kitchen        |
| <input type="checkbox"/> Bathroom            | <input type="checkbox"/> Laundry Room   |
| <input type="checkbox"/> Corridor            | <input type="checkbox"/> Parking Garage |
| <input type="checkbox"/> Dining Room         | <input type="checkbox"/> Pool           |
| <input type="checkbox"/> Elevator            | <input type="checkbox"/> Storage Room   |
| <input type="checkbox"/> Exit                | <input type="checkbox"/> None           |
| <input type="checkbox"/> Garbage Room        | <input type="checkbox"/> Unknown        |
| <input type="checkbox"/> Gym / Exercise Room |   |

Identify any fire protection measures: \*

- |   |   |
|---|---|
| <input type="checkbox"/> Carbon Monoxide Alarm(s) | <input type="checkbox"/> Smoke Alarm(s)   |
| <input type="checkbox"/> Emergency Lighting       | <input type="checkbox"/> Sprinkler System |
| <input type="checkbox"/> Fire Alarm System        | <input type="checkbox"/> None             |
| <input type="checkbox"/> Fire Extinguishers       | <input type="checkbox"/> Unknown          |

Are there any fuel fired appliances in the building: ? \*

- |   |                                  |
|---|----------------------------------|
| <input type="checkbox"/> Gas / Propane  | <input type="checkbox"/> None    |
| <input type="checkbox"/> Oil            | <input type="checkbox"/> Unknown |
| <input type="checkbox"/> Wood / Pellets |                                  |

Approximate year the building was constructed: \*

Notes & Property Description: ?

Is there a 2nd building?

- Yes  No

Please confirm the property has the following in place, at anytime, HRM reserves the right to request a copy of the above documentation:

- The property is covered by a valid insurance policy. \*
- A current and up to date maintenance plan. \*

Please read and select the appropriate disclaimer: \*

- I am the property owner.

I certify all information I have provided is true and accurate, including all required supporting information required for approval. My identification as the applicant means that I am the primary contact with HRM in all matters pertaining to this application, unless otherwise noted. I understand that having my property registered under the R400 bylaw does not serve as confirmation of compliance with other Municipal, Provincial or Federal regulations.

- I am representing the property owner.

I certify all information I have provided is true and accurate and am submitting this application, including all required supporting information, for approval with the consent of the owner(s) of the subject property(s). My identification as the applicant means that I am the primary contact with HRM in all matters pertaining to this application, in addition to the property owners, unless otherwise noted. I understand that having my property registered under the R400 bylaw does not serve as confirmation of compliance with other Municipal, Provincial or Federal regulations.

Submit

Attachment B: R-400 Statistics

# HALIFAX R-400 Rental Property Registry

Statistical Data as of 10/29/2025 1:43:45 PM

<b>Total Property Records</b>	<b>11,817</b>
Total Rental Units	63,023
Total Short Term Rental Units	1,512

<b>Total Registrations Issued</b>	<b>11,800</b>
Properties with Warning Flags	4,971
Total Deregistered Properties	1359 (0 in Reg.)

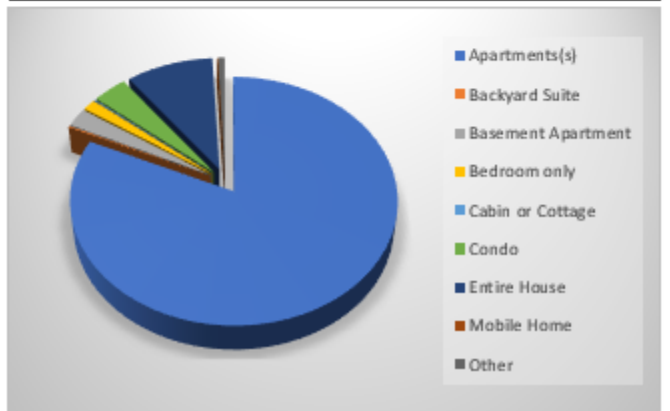
<b>Total Property Owner Records</b>	<b>8,408</b>
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<b>Total Property Contact Records</b>	<b>1,475</b>
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Buildings By Type	
Apartment Building	2,719
Backyard Suite	93
Multi-Unit Building (3 units or less)	1,132
Multi-Unit Building (4 units or more)	648
Semi-Detached / Duplex House	2,446
Single Detached House	3,495
Town House / Row House	1,227
Other	54

Registrations By Type	
Apartments(s)	3,927
Backyard Suite	92
Basement Apartment	1,017
Bedroom only	431
Cabin or Cottage	71
Condo	1,868
Entire House	4,857
Mobile Home	56
Other	122

Rentals By Type	
Apartments(s)	52,695
Backyard Suite	98
Basement Apartment	1,601
Bedroom only	919
Cabin or Cottage	87
Condo	2,393
Entire House	6,069
Mobile Home	59
Other	462



## Attachment C: M-200 By-Law Brochure

### M-200 By-law: Respecting Standards for Residential Occupancies

The M-200 By-law is a list of standards residential buildings in the Halifax Regional Municipality must follow.

If a building is not in compliance with the M-200 By-law, it can be reported to the municipality.

#### Examples of issues that need attention:



**"A window in my apartment has been leaking for months.** I have contacted my landlord multiple times and have had no success."



**"There is no smoke alarm in my apartment** and the property manager hasn't provided one."



**"I am nervous about a potentially dangerous electrical connection** in my apartment, and nobody has come to fix it."

#### STEP 1:

Report an issue to the municipality by calling 311 or emailing [contactus@311.halifax.ca](mailto:contactus@311.halifax.ca)

#### STEP 2:

A service request will be created and assigned to an inspector. Make sure to save the service request number you receive from 311 so you can use it to follow up later.

#### STEP 3:

An inspection of your building will take place. If issues are found, the property owner will be ordered to fix any applicable issues.

### FAQs

#### What places are covered under the M-200 By-law?

Most living spaces are covered under the M-200 By-law. This includes houses, apartments, condos, bedrooms, rooming houses and mini suites.

Public housing programs that are run by the provincial or federal government are not included under the M-200 By-law.

#### When should I report an issue?

As soon as you become aware of an issue in the space you are renting, for example a leaky window or broken door, it can be reported to the municipality through 311.

#### Where do I report the issue?

You can call 311 or email [contactus@311.halifax.ca](mailto:contactus@311.halifax.ca).

#### What happens after I report the issue to the municipality?

A municipal building inspector will inspect your building for issues. The inspector will remain as the point of contact until the applicable issues are resolved.

#### What will the inspector look for?

The inspector will take action to address concerns and will also do an overall check to make sure all requirements of the By-law are being met. The requirements of the By-law include, but are not limited to the following:

- fire safety and egress
- building structure and decks
- pest control and health concerns
- windows and doors
- elevators
- stairs
- heating systems
- plumbing
- electrical
- ventilation

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## R-400 By-Law: Respecting registration of residential rental properties

The *R-400 By-law* requires all rental property owners, both short and long-term, to register their units with the municipality. This includes everything from basement apartments to large apartment buildings.

The Rental Registry helps Halifax Regional Municipality (the municipality) understand the local rental landscape, enabling better services for tenants and property owners. Over time, it will help identify maintenance issues, reduce complaints and improve safety and living conditions across the region.

Registration is free and can be completed at [halifax.ca/form/rental-registry](http://halifax.ca/form/rental-registry).

### Information collected in the Registry Application:



rental property address



number and type of rental units



fuel-fired appliances (e.g., gas, oil, wood)



fire safety features (e.g., smoke/CO alarms, exits)

# Short-term rentals (STRs)

Short-term rentals are accommodations rented for less than 28 consecutive days. This includes primary residences, commercial STRs and traditional tourist accommodations.

**To ensure compliance with municipal and provincial regulations, STR operators must:**

- **Register the property** under the R-400 Residential Rental Registry
- **Confirm the property is in a zone that allows STRs** (use ExploreHRM at [halifax.ca/home/online-services/explorehrm](https://halifax.ca/home/online-services/explorehrm) or contact 311)
- **Register the STR with the Province of Nova Scotia** at [beta.novascotia.ca/register-your-short-term-accommodation](https://beta.novascotia.ca/register-your-short-term-accommodation)

## Want to check if your rental is registered with the municipality?

The registry is updated monthly and available on the municipality's open data site.



**Scan the QR code.**  
If your property isn't listed, please contact 311.

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