



Centre for Equality Rights in Accommodation  
Centre pour les droits à l'égalité au logement

**February 25, 2022**

## **RE: Government of Canada - Pre-budget Consultations 2022**

### **About CERA**

The Centre for Equality Rights in Accommodation (CERA) is Canada's leading non-profit organization working to advance the right to housing, and we've done so for 35 years. We advance the right to housing by serving renters to help them stay housed, providing education and training about housing rights, and advancing rights-based housing policy through research, policy development, advocacy and litigation.

### **Introduction**

As Canada steps into a pandemic recovery period, it is essential that the needs of those most impacted by the pandemic are prioritized. These include individuals and families living on low- to moderate-incomes who were experiencing the debilitating impacts of Canada's growing affordable housing crisis before the pandemic. These individuals live across Canada, in rural and urban settings, many of whom are Indigenous peoples, members of racialized communities, young people, single individuals, lone-parent households, people with disabilities, women and gender-diverse populations, newcomers, and seniors. A healthy society and economy will depend on supporting these communities in 2022.

Canada's recognition of the right to housing through the passing of the National Housing Strategy Act (NHTA) in 2019 and the introduction of the National Housing Strategy (NHS) in 2017 commits the federal government to ensuring that Canadians have access to safe, adequate and affordable homes. While this move by our government is commendable, there remains much room for improvement to the NHS. As investment dollars in the NHS have increased significantly since the inception of the strategy half a decade ago, they have not been directed in the most effective way to address housing needs of those living on low- to moderate-incomes. For many of these households, homeownership is well out of reach, while rental housing and alternative housing choices are becoming increasingly inadequate, inaccessible and unaffordable. Additionally, experiences of homelessness are growing in Canada, a reality that should not be, but sadly is, a reality for many.

### **Recommendations**

CERA urges the federal government to adopt the following recommendations to advance the right to housing and ensure all Canadians have an opportunity to find safe, adequate and affordable places to call home.

#### **Urban, Rural and Northern Indigenous Housing Strategy**

Commit to developing and implementing an Urban, Rural and Northern Indigenous Housing Strategy led by Indigenous communities and for Indigenous communities. Investments in supporting Indigenous



communities and organizations across Canada are critical to address the housing needs of Indigenous communities across Canada.

### **Enhance supports for people experiencing homelessness**

The Reaching Home program has been instrumental in reducing and preventing homelessness in Canada. The federal government should expand this program to meet the growing operational and capacity building needs of communities across the Country. A critical component of enhancing the Reaching Home program will be to expand the definition of chronic homelessness to include the experiences of women, girls and gender-diverse people. Hidden homelessness, such as couch surfing, staying temporarily with family and friends, or living in unsafe situations should be included in Reaching Home's definition of homelessness and reflected in the program's eligibility criteria for funding. This will ensure that necessary investments can support everyone experiencing homelessness in Canada.

Additionally, the federal government should enhance the Rapid Housing Initiative (RHI) which has proven that urgent responses to building housing quickly and creative ways of supporting the needs of the most vulnerable residents are possible. Scaling up this program can prove to be an effective way to end homelessness. It is also important that the government provides operational supports and subsidies to ensure effective implementation of the program.

### **Increase investments in deeply affordable housing supply**

As demand for affordable housing grows across the country, it is essential that our federal government increases its investments to build deeply affordable and supportive housing. Non-profit and co-operative housing can meet the affordability gap that the private housing sector is not filling. Various funding streams under the NHS can be enhanced to better support community housing providers to operate with stable funding they can rely on, to incentivize community housing and supportive housing developments, and to streamline application processes for ease of access to available funding.

### **Promote the construction of affordable purpose-built rental housing**

Purpose-built rental housing allows more stability for tenants choosing to rent in the long-term while also providing more affordable rents compared to condominiums. Increasing the supply of purpose-built rentals requires federal government incentives such as funding, financing, and tax credits to promote building this housing type, while working with municipalities to coordinate these developments. However, it is vital the federal government ensures that public investments on increasing this form of private market housing produces affordable units, not luxury rentals that are out of reach for low- to moderate-income families.

### **Protecting affordable housing supply**

The federal government should support municipalities to acquire existing at-risk affordable market rental housing units and buildings, so they remain part of the housing supply. Similarly, the federal government should expand investments in various funds geared towards revitalization of affordable housing, especially as many of Canada's multi-unit rental housing stock falls into a state of disrepair. Funding revitalization efforts should promote complete communities and ensure existing residents are



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not forced to pay higher rents or displaced from gentrifying forces. In addition, the federal government can adopt various policies or introduce mechanisms to curb the financialization of rental housing such as regulating financial entities or increase capital gains tax to discourage investors from buying up residential housing that is not their primary residence.

### **Assist tenants and stabilize housing**

Policies that increase and protect the supply of affordable housing should be complimented by investments in supports that allow people paying unaffordable rents to stabilize their housing and lower their housing costs. The federal government should deepen and enhance the Canada Housing Benefit to assist households experiencing housing insecurity.

### **Funding NHSA mechanisms**

To ensure that Canada can progressively realize the right to housing, it is important that the Office of the Federal Housing Advocate, and the newly appointed Housing Advocate, and the National Housing Council are well-resourced and funded to carry out their functions and provide recommendations on systemic housing issues.

Thank you for your consideration of our recommendations. CERA welcomes the opportunity to provide our housing expertise and we welcome further consultations to ensure that all Canadians are able to live in safe, adequate and affordable homes.

Sincerely,

A handwritten signature in black ink, appearing to read 'AB', with a large, stylized flourish extending from the bottom right.

Alyssa Brierley  
Executive Director and General Counsel  
Centre for Equality Rights in Accommodation