2025 Federal Pre-Budget Consultations

Submission to the House of Commons Standing Committee on Finance

August 1, 2025



Summary of Recommendations

- 1. Provide immediate support to renters and people experiencing homelessness.
- 2. Protect renters from excessive rents and unfair evictions.
- 3. Build and protect deeply affordable housing.
- 4. Combat the financialization of housing.
- 5. Uphold housing as a human right.



About CCHR

The Canadian Centre for Housing Rights (CCHR) is Canada's leading registered charitable organization working to advance the right to adequate housing. For over 35 years, we have worked tirelessly at the intersection of human rights and housing, providing free services to renters facing evictions and human rights violations to remain housed, providing education and training about housing rights across Canada, and advancing rights-based housing policy through research, policy development, advocacy, and law reform.

Introduction

In the midst of deep social and economic turmoil that has been magnified by a trade war with the United States, Canada continues to face an escalating housing and homelessness crisis. While the crisis is affecting families and communities from all walks of life, it is disproportionately impacting those already facing systemic barriers to socioeconomic justice and equity, including Indigenous people, Black and other racialized people, 2SLGBTQ+ people, people with disabilities, seniors, women, youth, and low-income households.

Across the country, renters are facing <u>increasingly precarious conditions</u>, including excessive rents, arbitrary and unfair evictions, renovictions, demovictions, disrepair, discrimination, and many other issues. While <u>rental housing supply and vacancy rates are increasing</u> across the country, this has not translated into greater affordability, as new units are too expensive for low-and moderate-income renters and are not leading to meaningful reductions in asking rents. Instead, <u>rents continue to rise year-over-year</u>, with <u>turnover rents increasing by 23.5 per cent</u> last year. Moreover, we are losing affordable housing faster than we can build it, due to excessive rent increases, demolitions, or conversions. Estimates show that <u>for every home built under government-funded programs</u>, Canada loses 11 affordable rental homes.

In the absence of strong renter protections and investments to build and protect deeply affordable, non-market housing, renters continue to face high rates of core housing need, meaning that their housing is unaffordable, in need of major repairs, and/or overcrowded. 22 per cent of renters are in core housing need, compared to just six per cent of homeowners, and affordability is their primary challenge. Despite significant federal investments through the National Housing Strategy and Canada Housing Plan, there are 662,000 more households in core housing need now than when the National Housing Strategy was first introduced in 2017. Meanwhile, income inequality reached a record high this year, with renters representing over half of the lowest income earners in the country, despite making up one third of the population.

As a result of poor renter protections, diminishing affordable housing options, and other inadequate social and economic supports, homelessness is increasing at an alarming rate. Estimates show that approximately 235,000 people experience homelessness in Canada every year. In Ontario alone, more than 80,000 people experienced known homelessness last year, an increase of over 25 per cent since 2022. In response, some provincial and municipal governments are taking misguided approaches that criminalize people experiencing homelessness, rather than building and protecting affordable housing and providing necessary health, income, and other socioeconomic supports.



With job and income loss already making its way through the Canadian economy, <u>over 60 per cent of renters</u> fear losing their homes and potentially facing homelessness due to the looming economic impacts of the US trade war. When renters have safe, secure, and affordable homes, they have stronger social and economic outcomes, from <u>better physical and mental health</u> to <u>greater productivity and economic participation</u>. From both a moral and fiscal perspective, building and protecting affordable housing – and the people who live there – is paramount to addressing the rising rates of housing precarity, displacement, and homelessness across the country.

It was promising to see an ongoing focus on the housing and homelessness crisis throughout the 2025 federal election campaign, including recognition of the active role that all levels of government must play to tackle the crisis. To ensure a healthy, equitable, and sustainable future for all, the federal government must prioritize those most impacted by the housing and homelessness crisis: renters and people experiencing homelessness. Below, we outline five key areas requiring urgent and sustained government action to ensure that everyone in Canada has a safe, secure, and affordable place to call home.

Recommendations

1. Provide immediate support to renters and people experiencing homelessness

Urgent support is needed now to keep renters in their homes and to house people experiencing homelessness. Rapidly rising rents, alongside other rising costs, are forcing low- and moderate-income renters out of their homes and preventing people from accessing housing in the first place. Expanding and directing immediate financial and other support to those in greatest need is critical to tackling the housing and homelessness crisis in the short term. At the same time, urgent action is needed to uphold and respect the human rights and dignity of people experiencing homelessness.

We recommend that the government:

- Increase and expand the Canada Housing Benefit (CHB) to provide access to the CHB to all households in core housing need and ensure that CHB levels reflect current rental costs.
- Explore the development of a <u>permanent portable housing benefit</u> as part of the broader income security system, as proposed by Maytree.
- **Expand and enhance the Reaching Home program**, including by dedicating ongoing funding toward addressing encampments and unsheltered homelessness, as well as hidden homelessness and other diverse experiences of homelessness.
- Implement recommendations from the Federal Housing Advocate to uphold the human rights of encampment residents, including by ensuring access to federal funding aligns with a human rights-based approach.



2. Protect renters from excessive rents and unfair evictions

Rental benefits and other financial supports are an important stop gap measure, but in the absence of strong rent regulations and protections against evictions, they will not ensure safe, secure, and affordable homes for renters. While landlord and renter matters are primarily governed by provincial and territorial governments, there is an important role for the federal government to play in helping to regulate rents and prevent evictions, as it has done in the past.

Renter protections vary widely between provinces and territories. The release of the federal Blueprint for a Renters' Bill of Rights marked a significant step toward setting minimum standards for renter protections across the country, following <u>prolonged advocacy</u> from CCHR and other renter advocates. While the blueprint includes important measures that aim to improve renter protections, it omits some key provisions, including clear guidelines around rent and vacancy control, and eviction prevention. Moreover, it lacks adequate enforcement and accountability mechanisms.

To encourage uptake, provinces and territories would have to adopt elements of the Renters' Bill of Rights to access funding through the Canada Housing Infrastructure Fund (CHIF). While the <u>majority of provinces and territories have now signed CHIF agreements</u>, it is unclear what commitments they have made related to renter protections.

We recommend that the government:

- Strengthen the Blueprint for the Renters' Bill of Rights, including by outlining clear guidelines for rent regulation, vacancy control, and eviction prevention, implementing stronger enforcement and accountability mechanisms, and providing ongoing engagement opportunities for renters.
- Report on renter protection requirements under the CHIF, including specific targets, timelines, monitoring, and reporting mechanisms.
- Renew and maximize funding through the Tenant Protection Fund to support renter advocacy and access to justice.

3. Build and protect deeply affordable housing

For decades, all levels of government withdrew from their roles in building and protecting affordable housing. Despite the federal government's recent re-engagement in housing development through the National Housing Strategy, investments have failed to produce truly affordable housing that meets the needs of those most impacted by the housing and homelessness crisis. This is due in large part to the government's over-reliance on the private sector to build new housing. In the absence of strong affordability requirements attached to federal funding for private developers, only a fraction of new housing built with public funding is affordable to lower income households.

At the same time, the government has not adequately supported the non-market, community housing sector (e.g., Indigenous, public, non-profit, and co-operative housing) to build new and protect existing affordable housing that is affordable to low- and moderate-income households,



including deeply affordable, rent-geared-to-income housing. As a result, Canada's current stock of community housing makes up <u>only 3.5 per cent of our overall housing stock</u>. This represents half of the Organisation for Economic Co-operation and Development (OECD) average and is far below the <u>recommended level of 20 per cent</u> needed to tackle the housing and homelessness crisis.

We recommend that the government:

- Prioritize and maximize investments in the community housing sector to build and protect deeply affordable housing to meet OECD levels at a minimum, including through the Affordable Housing Fund, Canada Rental Protection Fund, Co-operative Housing Development Program, <u>Public Lands for Homes Plan</u>, and new Build Canada Homes program.
- Prioritize and maximize investments to launch an Indigenous-led Urban, Rural, and Northern Indigenous Housing Strategy, including by immediately releasing funding committed in Budget 2023 and announcing the Indigenous housing organization selected to administer the funds.
- Enforce strong affordability requirements for access to federal funding for the private sector with clear, consistent, human rights-based definitions, including through the Apartment Construction Loan Program.

4. Combat the financialization of housing

Aside from an as-of-yet unrealized commitment to restrict the corporate acquisition of single-family homes, the government has not grappled with the driving role that <u>financialization</u> continues to play in Canada's housing and homelessness crisis, in particular as it relates to affordability and security for renters. Treating housing as a commodity to maximize profits directly conflicts with housing as a fundamental human right, as outlined in <u>international law</u> and <u>recognized by Canada</u>. Following CCHR's <u>recommendations</u> to the Review Panel on the Financialization of Purpose-built Rental Housing, we were pleased to contribute to the National Right to Housing Network's <u>Federal Action Guide to Address the Financialization of Housing</u>, which builds on the Review Panel's findings and proposes concrete recommendations to combat financialization.

We recommend that the government:

- Align federal housing policies and investments with a <u>human rights-based</u>
 <u>approach</u>, including by reviewing fiscal and regulatory incentives that spur
 financialization (e.g., tax loopholes, low interest borrowing, inadequate regulation) and
 ensuring that access to federal funding supports affordability and security of tenure for
 renters.
- Facilitate improved data collection on property ownership, rental housing prices, tenure details, and evictions, including by supporting the development of a public, centralized rental housing database.



5. Uphold housing as a human right

The National Housing Strategy Act codified Canada's commitment to progressively realize the right to housing. This included the establishment of the Federal Housing Advocate, National Housing Council, and Review Panels to hold the government accountable to the right to housing, including through the recent Neha Review Panel on the Right to Housing for Women, Two Spirit, Trans, and Gender-diverse People. However, despite multiple reports and recommendations from these bodies and other advocates, the government has yet to meaningfully put the right to housing into practice.

We recommend that the government:

- Set clear targets, timelines, monitoring, and reporting mechanisms to end homelessness and core housing need in the shortest time possible, including by updating the National Housing Strategy.
- Ensure federal funding prioritizes those in greatest housing need by committing the maximum of available resources and utilizing all appropriate means to end homelessness and core housing need.
- Provide opportunities for meaningful engagement with people with lived experience to support the development, implementation, and evaluation of housing policies and programs and <u>claim their rights</u>, including by sustainably resourcing the Federal Housing Advocate, National Housing Council, and Review Panels.

Conclusion

We thank you in advance for considering our recommendations. We welcome the opportunity to provide our housing expertise and look forward to further discussions to ensure all people in Canada can live in safe, secure, and affordable homes.

Sincerely,

Sara Beyer Manager of Policy

Canadian Centre for Housing Rights (CCHR)

