

2025 Build Canada Homes Consultation

Submission to Housing, Infrastructure and Communities
Canada

August 28, 2025

Summary of Recommendations

1. Prioritize and maximize investments in the community housing sector
2. Uphold all elements of the right to adequate housing
3. Commit to robust monitoring and accountability mechanisms

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 [increasingly precarious conditions](#), including excessive rents, arbitrary and unfair evictions, renovictions, demovictions, disrepair, discrimination, and many other issues. While [rental housing supply and vacancy rates are increasing](#) 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, [rents continue to rise year-over-year](#), with [turnover rents increasing by 23.5 per cent](#) 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 [for every home built under government-funded programs, 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. 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](#), with the most recent data showing nearly [60,000 people experiencing homelessness on a single night](#), a nearly 80 per cent increase from 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, [over 60 per cent of renters](#) 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 [better physical and mental health](#) to [greater productivity and economic participation](#). 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.

Build Canada Homes

It is promising to see the government recognize the urgency of tackling the housing and homelessness crisis and take steps to improve its approach to housing policy and delivery, including through the launch of Build Canada Homes. We are pleased to provide our feedback on the [2025 Build Canada Homes Market Sounding Guide](#), reflecting evidence- and human-rights based findings and recommendations to ensure that Build Canada Homes can effectively meet the needs of those most impacted by the housing and homelessness crisis.

Areas of support

We are glad to see that Build Canada Homes aims to **prioritize affordable housing** for low- and moderate-income families, including through **partnerships with non-market, community housing developers and providers** (e.g., Indigenous, non-profit, co-operative, and public housing). This is critical to ensure that those most impacted by the housing and homelessness crisis have access to housing that meets their needs, and that public funding is directed toward the public good.

To that end, we strongly support the principle outlined in the Market Sounding Guide that **private investors do not disproportionately benefit from public investments**. Over-reliance on the private sector to deliver new housing has [failed to produce housing that is affordable and accessible to those in greatest need](#). At the same time, fiscal and regulatory incentives have spurred the [financialization of housing](#), where housing is treated as a commodity and investment vehicle to maximize profits, instead of as a fundamental human right. Financialization has led to rising rents, poor maintenance and upkeep, and increasing rates of

evictions, with disproportionate impacts on [low-income](#), [racialized](#), and other marginalized communities.

In line with a [human rights-based approach](#), it is also encouraging to see that Build Canada Homes aims to **align funding with housing outcomes**, including as it relates to affordability. The National Housing Strategy Act codified Canada's commitment to progressively realize the right to housing, which includes setting clear targets, timelines, monitoring, and reporting mechanisms to end homelessness and core housing need in the shortest time possible, by committing the [maximum of available resources and utilizing all appropriate means](#).

Recommendations

1. Prioritize and maximize investments in the community housing sector

Canada's current stock of community housing makes up [only 3.5 per cent of our overall housing stock](#). This represents half of the Organisation for Economic Co-operation and Development (OECD) average and is far below the [recommended level of 20 per cent](#) needed to tackle the housing and homelessness crisis. In the absence of a profit motive, the [community housing sector is committed to delivering housing that is affordable and accessible](#) to low- and moderate-income households, with proven [social](#) and [economic](#) benefits.

Build Canada Homes presents a generational opportunity to shift the balance of community housing across the country and scale up the supply of truly affordable housing that meets the needs of those most impacted by the housing and homelessness crisis. This includes culturally appropriate Indigenous-led housing, subsidized rent-geared-to-income housing, mixed-income housing models with below-market rents, and supportive and transitional housing with wraparound supports to help transition people out of homelessness.

The Market Sounding Guide proposes that Build Canada Homes could accelerate and scale up the supply of affordable housing by supporting large-scale development projects and incentivizing the use of modern construction methods. However, given their current scale and capacity, community housing providers [may not have the capital](#) to cover upfront costs required for pre-development studies (including Building Information Modelling), green building components, or prefabrication technology. Moreover, they rarely have the capital or operational capacity to take on large housing development projects.

Focusing on scale at the expense of affordability may inadvertently exclude many community housing providers from accessing funding through Build Canada Homes, as it is currently contemplated. Eligibility requirements such as high loan securities, upfront capital, and short timeframes to complete construction implicitly target large investors and make it almost impossible for smaller and more diverse developers to compete for this type of funding.

We are encouraged to see that Build Canada Homes intends to support affordable housing providers to grow their portfolio through public-private-non-profit partnerships. Such partnerships can help resolve the bottleneck of capital constraints faced by community housing providers in financing affordable housing projects at scale. At the same time, it will be essential to design Build Canada Homes in a way that recognizes the current composition and challenges

facing the community housing sector and prioritizes access to financing and other tools for community housing providers and housing projects that are committed to long-term affordability.

Moreover, while building new affordable housing is critical to tackling the housing and homelessness crisis (so long as the supply is targeted to meet the needs of those most impacted), it is equally important to [preserve the dwindling stock of existing affordable housing](#). With the vast majority of renters living in the private market, it is incumbent on governments to ensure that renters have access to long-term safe, secure, and affordable homes, especially as [inadequate income](#) and [evictions](#) are increasingly leading to homelessness. At the same time, the stock of community housing is falling into disrepair, with the share of units in poor condition rising from just 2.5 per cent in 2019 to [over 20 per cent in 2023](#).

To ensure that new and existing housing supply meets the needs of low- and moderate-income households, we recommend that Build Canada Homes:

- **Set clear and ambitious targets for investments in the community housing sector, with the goal of doubling the stock of community housing in the next decade at a minimum.** This could include minimum requirements for investments in affordable housing projects that are delivered solely by the community housing sector and/or through public-private-non-profit partnerships with robust affordability requirements, working toward 20 per cent market share of community housing over the long-term.
- **Prioritize community housing providers and developers for access to financing and other tools to increase their capacity to deliver large-scale affordable housing projects.** This could include seed funding for pre-development costs, grants for skills training in modern building methods, and preferential loans for consortia of community housing providers.
- **Maximize funding for community housing providers to maintain the current stock of community housing and acquire private market rental housing to preserve affordability and protect tenancies.** This could include increasing investments through the Repair and Renewal stream of the Affordable Housing Fund, integrating the pending Canada Rental Protection Fund within Build Canada Homes, and granting the right of first refusal to community housing providers to purchase private apartment buildings for sale (as [implemented by the City of Montreal](#)).

2. Uphold all elements of the right to adequate housing

Under [international human rights law](#) (to which Canada is a signatory), the right to adequate housing is interpreted broadly as the right to live in security, peace, and dignity. To that end, housing is considered adequate when seven conditions are met:

- **Security of tenure:** housing should include legal protections against forced evictions, harassment, and other threats.
- **Affordability:** housing costs should not interfere with access to other necessities and human rights (e.g., food, clothing, education, healthcare).

- Habitability: housing should be maintained in a state of good repair and be free from health, structural, and other hazards (e.g., mould, pests, cold, heat, rain, wind, and other hazards resulting from poor upkeep and/or changing climate).
- Availability of services: housing should be connected to all services, materials, facilities, and infrastructure necessary to maintain a safe and healthy living environment (e.g., safe drinking water, energy for cooking, heating, and lighting, sanitation and washing facilities, food storage, waste disposal, and access to emergency services).
- Accessibility: housing should be available to and designed in a way that meets the needs of diverse households, particularly marginalized groups whose housing needs have been historically and systemically denied.
- Cultural adequacy: housing should respect and enable the expression of diverse cultural identities.
- Location: housing should be located close to vital community services and other social and economic infrastructure (e.g., grocery stores, employment opportunities, healthcare services, schools, childcare centres, and transit options).

Despite Canada enshrining the right to housing in domestic law through the passage of the National Housing Strategy Act, renters across the country continue to face barriers in accessing and maintaining adequate housing that meets their needs:

- Over [22 per cent of renters are living in core housing need](#), compared to just six per cent of homeowners. Affordability is the primary issue and disproportionately impacts [low-income households](#), [Indigenous peoples](#), [racialized people](#), [women and gender-diverse people](#), and [people with disabilities](#).
- Nearly [17 per cent of households in core housing need experience issues related to repairs and maintenance](#). While some government funding is available to ensure rental buildings are maintained in a state of good repair and/or meet climate resilience standards, [renters often end up paying the price](#) for their buildings to be safe and habitable through excessive rent increases, or are [forced to leave their homes](#) and risk experiencing homelessness.
- Nearly [13 per cent of renters have experienced an eviction](#) at some point in their life, with close to [65 per cent of evictions due to landlord factors](#) (e.g., for a landlord's own use, sale of the property, demolition, conversion, or renovation). Rising rents that are outpacing incomes are also leading to increasing rates of economic evictions, with financialized landlords [driving up rents](#) and [evicting renters up to 2.5 times more](#) than single-building owners.
- Indigenous peoples living in urban, rural, and remote areas are nearly [18 per cent more likely to experience core housing need](#) than non-Indigenous households. Estimates show the need to at least [quadruple the stock of Indigenous-led community housing](#) across the country to meet the needs of Indigenous households living off reserve.

- Nearly [8 million people in Canada live with a disability](#), yet many of their homes lack essential accessibility features. Meanwhile, [people with disabilities are at four times greater risk of homelessness](#) than those without disability.
- Women and gender-diverse people experience increased rates of [poverty, discrimination, and gender-based violence](#), which prevent them from accessing and maintaining adequate housing, and can often lead to homelessness.

To ensure Canada fulfills its human rights commitments and upholds all elements of the right to adequate housing, we recommend that Build Canada Homes:

- **Restrict access to federal funding to housing projects that commit to long-term affordability, reflecting household incomes, rather than market forces.** In addition to prioritizing the community housing sector, this could include clear provisions that define affordable rents so that they meet the needs of low- and moderate-income renters (reflecting a [range of area median incomes](#), rather than average market rates) and include long-term affordability periods that prohibit excessive rent increases and prevent economic evictions.
- **Maximize funding to support new and existing rental buildings to meet high habitability and climate resilience standards, while upholding affordability and security of tenure.** This could include funding for renovations, repairs, and green retrofits, with clear provisions preventing costs from being downloaded onto renters through excessive rent increases, along with protections against displacement and evictions (including renovictions and demovictions).
- **Embed a “For Indigenous, By Indigenous” approach to ensure equitable access to financing and other tools for Indigenous-led housing projects, with the goal of quadrupling the supply of Indigenous community housing in the next decade at a minimum.** This could include integrating the Urban, Rural and Northern Indigenous Housing Strategy within Build Canada Homes, setting minimum targets for new Indigenous-led housing projects, and maximizing funding for Indigenous community housing providers.
- **Set clear and ambitious targets for federally funded housing projects that meet the needs of people with a diverse range of disabilities, including mental health and addictions.** This could include minimum targets for new housing projects that meet the [Accessible Dwellings Standard](#) and [Accessible-Ready Housing Standard](#), as well as funding for accessibility-related accommodations and adaptations in existing buildings.
- **Set clear and ambitious targets for federally funded housing projects that meet the needs of women and gender-diverse people.** This could include minimum targets for new affordable housing developments that are designed for women, Two-Spirit, trans, and gender-diverse people, including [safe and accessible housing for survivors of gender-based violence](#).
- **Set clear and ambitious targets for federally funded housing projects that meet the needs of other groups disproportionately impacted by the housing and homelessness crisis.** This could include minimum targets for new affordable housing developments for Black and other racialized people, 2SLGBTQ+ people, seniors, youth,

immigrants, refugees, people living in rural and remote communities, and people experiencing homelessness.

- **Prioritize housing developments in locations close to vital community services.** This could include projects that promote greater density in existing neighbourhoods with close proximity to essential social and economic infrastructure, including transit-oriented communities.

3. Commit to robust monitoring and accountability mechanisms

Under the [National Housing Strategy Act](#), the federal government is required to adopt and maintain a National Housing Strategy to eliminate homelessness and realize the right to adequate housing for all in the shortest possible time, using all appropriate means and the maximum of available resources. It must also ensure that those affected by homelessness and inadequate housing are able to participate in developing, implementing, and evaluating housing policies and programs.

The introduction of Build Canada Homes presents a significant opportunity to set evidence- and rights-based goals to uphold the right to housing and eliminate homelessness and core housing need. To ensure success, it will be critical for the federal government to partner with all levels of government, industry, and community partners to gather timely, disaggregated data and measure and evaluate impact, in particular for groups most impacted by the crisis.

To ensure the greatest efficacy and impact in tackling the housing and homelessness crisis and upholding the right to housing, we recommend that Build Canada Homes:

- **Set clear targets, timelines, monitoring, and reporting mechanisms to ensure Build Canada Homes is focused on ending homelessness and core housing need in the shortest time possible.** This could include the development of an integrated, comprehensive national database in partnership with Indigenous, provincial, territorial, municipal, community, industry, academic, and other sector partners to gather data, report on progress, and evaluate the impact of Build Canada Homes on reducing homelessness and core housing need, while upholding affordability, security of tenure, habitability, and other elements of the right to housing.
- **Provide opportunities for meaningful engagement with people with lived experience of housing precarity and homelessness to support the development, implementation, and evaluation of Build Canada Homes.** This could include participatory research and data collection methods, such as dedicated consultation sessions and ongoing opportunities to gather feedback from renters, tenant associations, and people experiencing homelessness.

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,

A handwritten signature in black ink, appearing to read 'Sara Beyer', with a long horizontal flourish extending to the right.

Sara Beyer
Manager of Policy
Canadian Centre for Housing Rights (CCHR)