



**Submission to the House of Commons Standing Committee
on Human Resources, Skills and Social Development and the
Status of Persons with Disabilities (HUMA)**

Bill C-20: Build Canada Homes Act



**Canadian Housing and
Renewal Association**

CHRA ACHRU

A Home for the Housing Sector

Why Canada Needs Non-Market Community Housing

A Targeted Approach for Non-Market Community Housing

Bill C-20 gives Build Canada Homes a mandate to build affordable housing. CHRA strongly supports this ambition, but we want to be clear: this must prioritize non-market community housing. Without intentional focus, the pressures of scale and speed can push investment toward easier market-based options, which do not provide the long-term truly affordable homes that low- and moderate-income Canadians need most.

Non-market community housing providers are mission-driven professionals that operate non-profit, public, and co-operative community housing. With a proven track record of building and operating homes for those who need them most, their business models offer far stronger guarantees of long-term affordability than market alternatives

Non-Market Housing Delivers Permanent, Genuine Affordability

One of the most important distinctions between market and non-market housing is long-term commitment to affordability. Market-based affordable housing, even when subsidized, is typically affordable only for a fixed period before it converts to market rents.

Private market operators can deliver affordable housing, usually benefitting from some form of government subsidy through low-interest loans and grant contributions, for a time-limited affordability period.

Non-market community housing, by contrast, is permanently affordable. Owned by mission-driven non-profit organizations, these homes are permanently removed from speculative market pressures. This is not just a social good; it is a fiscally responsible, long-term investment in Canada's housing system.

Affordable housing is better delivered by mission-based non-market community housing providers. They also benefit from the same government subsidy through low-interest loans and grant contributions, but are committed to affordability in perpetuity. In addition, driven by their social mission, they are motivated to stack additional funds from philanthropic sources, other orders of governments, social impact investment, and their own equity to make the bottom line work for their social purpose, not for profit.

Even in an environment where rents are declining, new rental units entering the market today are unaffordable to many people. In many cities, new one-bedroom apartments are listing above \$2,000 per month requiring incomes above \$80,000. Yet the median renter income in Canada was \$62,000 in 2023, and those in core housing need had a median income of just \$31,280. The private market is simply not positioned to serve these households. Only the non-market sector can.

Investment in Non-Market Housing Increases Productivity

We know that investment in non-market community housing is not only a social imperative it is an economic one. Stable, affordable housing is foundational to productivity. Bringing Canada's community housing stock to the OECD average would boost economic productivity by a staggering 5.7% to 9.3%.¹ The inverse is equally true: housing insecurity creates drag on the economy, reducing labour mobility, and increasing public expenditure on health, social services, and emergency responses.

Non-market community housing providers are also important economic actors in their own right employing local workers, purchasing local goods, and reinvesting in communities. BCH investment in the non-market sector is investment in local economies.

We Need to More Than Double the Non-Market Housing Sector

Canada's non-market housing sector currently represents approximately 4.54% of the overall housing stock, down from a peak of 5.2% in 1996.² CHRA's 2025 research report on scaling up Non-market housing, estimates the current stock at roughly 758,000 to 796,000 homes. Both Scotiabank (Canadian Housing Affordability Hurts, 2023) and RBC (The Great Rebuild) underscore the economic urgency of expanding social housing noting that addressing Canada's housing shortage is essential to long-term economic competitiveness and resilience.^{3 4}

Advocates and researchers have converged on the goal of doubling the stock of non-market community housing. Achieving this would require producing more than 750,000 units.⁵ To reach that target in 15 years would require building 50,000 non-market units annually a significant but achievable ambition if the political will and investment are sustained.⁶

Bill C-20 and Build Canada Homes represent an opportunity to reverse decades of decline in the non-market housing sector. We urge this committee to ensure the legislation and BCH's mandate are designed to seize that opportunity.

1 Deloitte Canada. [Economic Study: The Impact of Community Housing on Productivity](#). CHRA. 2023.

2 Steve Pomeroy. [I'll Have a Double-double, Please: Quantifying the base to scale up non-market housing in Canada](#). CHRA. 2025.

3 Rebekah Young. [Canadian Housing Affordability Hurts](#). Scotiabank. 2023.

4 Robert Hogue. RBC. [The Great Rebuild: Seven ways to fix Canada's housing shortage](#).

5 Steve Pomeroy. [I'll Have a Double-double, Please: Quantifying the base to scale up non-market housing in Canada](#). CHRA. 2025.

6 Ibid.

What Is Working About Build Canada Homes

CHRA has been actively engaged with the Government of Canada throughout the development of Build Canada Homes, and we will continue that engagement as BCH fulfills its mandate. We want to be clear: there is much about the direction BCH is taking that CHRA strongly supports. We highlight the most important elements below.

Greater Flexibility in Financing and Funding

One of the most significant improvements in the BCH model is the broad range of financing instruments available to the agency. Compared to previous CMHC programs, which were often rigid and proscriptive in their design. BCH's portfolio approach allows for more creative, context-sensitive solutions. Non-market housing projects are complex and diverse: the needs of a northern Indigenous housing provider are very different from those of a large urban co-operative redevelopment. The flexibility built into BCH's mandate creates space for that diversity.

The lessons from the Affordable Housing Fund at CMHC are instructive here: flexibility in program design leads to better outcomes. A one-size-fits-all approach consistently underserves the communities with the greatest need. We are pleased that BCH appears to have internalized this lesson.

Income-Based Measures of Affordability

CHRA strongly welcomes BCH's adoption of income-based measures of affordability. Under some previous CMHC programs, affordability was measured relative to market rents an approach that was disconnected from the actual incomes of the people who needed affordable housing most.

The shift to income-based affordability standards is a major and meaningful step forward. It ensures that the housing BCH supports is genuinely affordable for the people who need it, not just affordable in a technical, market-relative sense. This is significantly better policy, and we commend the government for making this change.

Dedicated Funding for Supportive and Transitional Housing

CHRA is encouraged by the inclusion of \$1 billion in dedicated funding for supportive and transitional housing within BCH's mandate. This type of housing which combines stable housing with wraparound supports is absolutely essential for Canadians experiencing homelessness or at serious risk of homelessness. It is also among the most difficult housing to fund through conventional channels, because the economics of supportive housing do not work without dedicated, ongoing public investment.

The decision to include this funding stream directly within BCH, reflects a more sophisticated understanding of what it takes to end homelessness. Bricks and mortar alone are not sufficient; housing stability for Canadians most vulnerable to homelessness requires integrated supports.

CHRA's Recommendations

While CHRA is broadly supportive of Bill C-20 and the Build Canada Homes , we believe there are important ways to strengthen the legislation and BCH's mandate to ensure it delivers for the non-market community housing sector and for the Canadians who depend on it. We offer the following recommendations.

Recommendation 1: Prioritize Specifically Non-Market Housing

Affordability is important as a mandate for BCH, but "affordability" is a vague and general term that does not provide enough long-term direction for a new Crown Corporation.

CHRA strongly recommends that Bill C-20, the Build Canada Homes Act be amended to give clear guidance to future generations and include the public mandate of BCH:

1. "Grow the proportion of housing that is non-market, mission driven and that produces housing that is affordable for low- and middle-income households."
2. "Help create the conditions for a high-capacity, growth oriented non-market housing sector that can scale, built on new and innovative partnerships with reduced reliance on ongoing government subsidies."

Recommendation 2: Adopt Clear Targets for Build Canada Homes

One of the most significant gaps in the current BCH framework is the absence of clear, measurable, outcomes-based targets. Ambition without accountability is insufficient. If we do not define success, we cannot measure whether we are achieving it.

CHRA calls on the committee to recommend that Build Canada Homes adopt a robust set of targets, including:

- Explicit targets for growing the overall proportion of non-market community housing in Canada's housing stock, including supportive housing.
- Specific targets for growing the supply of For-Indigenous, By-Indigenous community housing;
- The minimum number of new units that BCH hopes to create; and
- Targets for new housing units that are affordable to moderate-, low-, and very low-income earners (following BCH's existing affordability framework).

Clear, publicly stated targets serve multiple important functions. They provide the non-market community housing sector with the certainty it needs to plan, invest, and build. They also create accountability for BCH and for the government. Finally, they communicate to all Canadians what this historic investment in housing is meant to achieve.

Recommendation 3: Prioritize For-Indigenous, By-Indigenous Housing Providers

Canada faces a profound and urgent crisis in Indigenous housing, including for Indigenous peoples living in urban, rural, and northern contexts, outside of Indigenous-governed territories. This population has been chronically underserved by existing federal housing programs. The result is a critical and growing gap in housing for Indigenous peoples living away from their home communities.

The Indigenous Caucus at CHRA has long called for housing solutions that are designed, delivered, and governed by Indigenous peoples. This For-Indigenous, By-Indigenous principle is not only a matter of self-determination, consistent with Canada's legal commitments under the United Nations Declaration of the Rights of Indigenous Peoples Act (2021); it is also a matter of effectiveness. Indigenous-led housing providers understand the cultural, historical, and practical realities of the communities they serve.

The National Housing Council's report on urban, rural, and northern Indigenous housing offers a comprehensive set of recommendations on how to address this gap, and CHRA strongly encourages this committee to engage with those findings. For Bill C-20 specifically, we recommend that BCH include:

- Funding and financing for Indigenous-led housing providers serving urban, rural, and northern Indigenous peoples;
- Meaningful Indigenous representation in BCH's governance and program design;
- A concrete plan for how BCH will work with urban, rural, and northern Indigenous housing providers to close the existing housing gap.

Build Canada Homes must not replicate the failures of previous federal housing programs by treating urban, rural and northern Indigenous housing as an afterthought. BCH must commit to a path forward that genuinely centers Indigenous housing providers.

Recommendation 4: Maintain and Protect the Flexibility of BCH's Lending Authorities

CHRA strongly supports the wide variety of financing instruments available to Build Canada Homes, and we urge this committee to ensure that this flexibility is protected and sustained as the agency develops. The portfolio approach currently being taken by BCH in which a range of project types, financing mechanisms, and partnership models are available is exactly the right model for a national housing agency with a diverse mandate.

The non-market community housing sector has learned, through hard experience, that rigid, proscriptive program designs consistently fail to serve the most complex and highest-need projects. However, it is crucial that this flexibility is matched with clear outcomes-based targets and a very clear organizational mandate.

We encourage the committee to protect the flexibility of funding and financing provided to BCH through the legislation as tabled, while ensuring that the organization maintains a clear focus on a mandate to deliver truly affordable, non-market community housing.

Recommendation 5: Provide Predictable, Stable, and Long-Term Sources of Funding and Financing

Housing development is a multi-year process. Like any developers, non-market community housing providers work on long timelines finding land, conducting community engagement, completing design and approvals, and securing financing can take years before a single unit is built. The decisions that housing providers are making today about what to build will determine the housing available five to ten years from now.

This reality has a critical implication for BCH: the certainty and stability of funding matters as much as the amount. Unpredictable funding cycles lead to project delays, cancelled developments, and a thinner pipeline of affordable housing.

CHRA welcomes the initial \$13 billion capitalization of Build Canada Homes as an important and significant first step. However, we want to be direct with this committee: the current five-year timeline and funding level will not generate the scale and pace of non-market housing growth that Canada needs. If we are going to more than double the non-market housing sector and build a strong, durable housing system that will be at the core of a strong Canada, BCH's funding must be sustained and scaled beyond the initial investment horizon.

CHRA recommends that the government commit to a long-term funding framework for BCH that extends well beyond the initial five-year period, providing the sector with the stability it needs to plan and invest;

The housing funding decisions made today will determine the housing available to Canadians in 2030, 2035, and beyond. A stable and long-term funding and financing pipeline that prioritizes non-market community housing is an investment not only in housing, but in the economic resilience and social cohesion of Canada.

Conclusion

CHRA thanks the committee for the opportunity to present this submission. We believe that Bill C-20 and Build Canada Homes represent an opportunity to think differently about Canada's approach to housing one that has the potential to begin reversing decades of decline in the non-market community housing sector.

For that potential to be realized, BCH must be designed with non-market community housing providers as genuine, central partners, in Canada's permanently affordable housing system. It must be accountable to clear outcomes. It must be adequately and stably funded. And it must make meaningful space for Indigenous-led housing solutions.

CHRA has been and will remain deeply engaged with the government in the implementation of Build Canada Homes. We stand ready to work with BCH, this committee, and all partners to ensure that this initiative delivers for the millions of Canadians who need and deserve a safe, stable, and permanently affordable home.

About CHRA

The Canadian Housing and Renewal Association (CHRA) is Canada's national voice for the non-market community housing sector. CHRA represents a diverse membership of non-profit and cooperative housing providers, Indigenous housing organizations, provincial and territorial housing associations, municipalities, and other housing stakeholders.

Our members are on the front lines of Canada's housing crisis every day building, operating, and managing homes for the people who need them most: seniors on fixed incomes, families in core housing need, people transitioning out of homelessness, Indigenous peoples in urban, rural and northern contexts, and countless others.

CHRA believes that addressing Canada's housing crisis requires bold, sustained action. The market alone cannot and will not solve the affordability crisis. We need a strong, well-funded, permanently affordable non-market community housing sector to meet the needs of millions of Canadians.

CHRA's central position is clear: Canada must more than double the supply of non-market community housing.

We strongly support the creation of Build Canada Homes (BCH) and the introduction of Bill C-20 to establish it as a Crown corporation. Done right, BCH has the potential to be a powerful tool that positions non-market community housing at the core of the federal government's response, within the context of an updated National Housing Strategy. We welcome the opportunity to present our recommendations to this committee.

For more information, please contact:

Kenneth Milner
Director, Policy & Government Relations
Canadian Housing and Renewal Association

kenneth@chra-achru.ca