



September 24, 2024

Marie-Josée Houle
Federal Housing Advocate
Canadian Human Rights Commission
344 Slater Street
Ottawa, Ontario K1A 1E1

Dear Marie-Josée Houle:

On behalf of the Government of Canada, I would like to thank you for your report titled, *Putting people first: The Federal Housing Advocate's 2023-2024 Annual Report to the Minister*. Pursuant to subsection 17(1) of the *National Housing Strategy Act* (NHS Act), I am pleased to respond to your Report.

As you know, we are currently facing a housing crisis that represents one of Canada's greatest social and economic challenges. This crisis extends beyond large urban centers, affecting small towns and northern and rural communities and has a disproportionate impact on those who face systemic barriers. The Government of Canada recognizes that housing is essential to everyone's dignity and well-being and to building sustainable and inclusive communities. In response to your recommendations, I outline in the pages that follow the steps we are taking towards ensuring that everyone in Canada has a safe and affordable place to live.

Improving housing programs through the National Housing Strategy and Canada's Housing Plan

I note your recommendations on the National Housing Strategy (NHS), which focus on improving housing outcomes for those in greatest need, ensuring programs make measurable progress towards reducing housing need and homelessness, and increasing the non-market housing stock.

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Introduced in 2017, the NHS is designed to help Canadians access housing that meets their needs and that they can afford. The Government of Canada remains committed to that vision. To ensure that NHS programs achieve measurable progress, we established a set of targets, including removing 580,000 households from housing need, creating 240,000 new housing units, and protecting 385,000 community housing units. I am pleased to share that as of June 2024, the NHS has reduced or eliminated housing need for more than 540,000 households, is supporting the construction of more than 149,600 new homes and protecting the affordability of more than 356,000 community housing units.

After decades of federal inaction on housing, in 2017, Canada started investing in housing again. For the first time in decades, our country invested in more housing for low-income and vulnerable Canadians, we started incentivizing rental construction, and we created programs to make it easier for people to buy their first home.

This allowed us to achieve near record levels of home construction, and the fastest pace of building in decades.

However, as we came out of the pandemic, housing pressures grew. A lot of Canada's housing stock was purchased while interest rates were low and more people came seeking opportunities in Canada. Then higher interest rates slowed the economy, including home construction.

Today, the national housing crisis presents one of Canada's greatest social and economic challenges.

As part of our comprehensive efforts to address the crisis, the Government of Canada introduced *Solving the Housing Crisis: Canada's Housing Plan* in April 2024. Canada's Housing Plan sets out an ambitious suite of measures, reiterated in and supported through Budget 2024, to tackle the most urgent challenges facing our housing system today by building more homes, making it easier to rent or own a home, and helping Canadians who cannot afford a home.

These measures include:

- a new \$1.5 billion Canada Rental Protection Fund to support affordable housing providers to acquire units and preserve rents at a stable level;
- an investment of nearly \$1 billion to launch a new Rapid Housing stream under the Affordable Housing Fund (AHF) to build deeply affordable housing, supportive housing, and shelters for those in greatest need (this is in addition to \$1 billion announced in the 2023 Fall Economic Statement to support non-profit, co-op, and public housing providers to build 7,000 new homes);

- a \$1.5 billion Co-operative housing development program, which represents the largest investment supporting the co-op housing sector in the last 30 years; and
- new flexibilities under the Federal Community Housing Initiative for eligible housing providers to access funding to maintain affordability for low-income tenants and co-op members.

Housing affordability and housing supply are real challenges faced by many Canadians. To give more Canadians a place to call home, the Government of Canada launched the \$82+ billion, 10-year NHS. In addition, Canada's Housing Plan underscores our commitment to solving the housing crisis for all Canadians. By working together with key stakeholders and investing in critical housing infrastructure, we are on the path to make a meaningful difference in the lives of Canadians and help build a more sustainable and equitable housing system for future generations.

Prioritizing vulnerable populations and integrating the human rights-based approach to housing

The Government of Canada believes that everyone deserves the stability, security, and increased sense of well-being that comes with having a safe, stable and adequate place to call home.

And that is why, through the NHS Act, the Government of Canada affirmed the commitment to the progressive realization of the right to adequate housing as recognized in the International Covenant on Economic, Social and Cultural Rights. The NHS and Canada's Housing Plan support this commitment by addressing the distinct housing needs of Canadians, particularly by prioritizing projects that address the housing needs of survivors of gender-based violence, seniors, racialized groups, 2SLGBTQIA+ people, Indigenous peoples, people experiencing or at risk of experiencing homelessness, young adults, people with disabilities, individuals dealing with mental health and addiction, Veterans, and recent newcomers. Through the NHS and Canada's Housing Plan, we are investing:

- \$4 billion over nine years, from 2019-20 to 2027-28 under Reaching Home: Canada's Homelessness Strategy, including approximately \$100 million in additional funding in 2023-24 to help communities to respond to urgent needs, particularly associated with rises in unsheltered homelessness including encampments;
- an additional \$1.037 billion over four years to stabilize Reaching Home funding for communities and to accelerate community-level reductions in homelessness;
- an additional \$250 million over two years to support human rights-based community responses to unsheltered homelessness and encampments, with funding to be cost-matched by other jurisdictions;

- \$79.1 million over five years for the Veteran Homelessness Program to support rent supplements and wraparound supports for Veterans experiencing or at risk of homelessness, as well as research and capacity building on Veteran homelessness;
- \$14.65 billion in the Affordable Housing Fund (AHF) to support the creation of new market and below-market housing and the repair and renewal of existing housing, focusing on those households in greatest need, including:
 - \$50 million for Black-led organizations to provide rental housing that will benefit Black Canadians;
 - \$250 million for the Women and Children Shelter and Transitional Housing Initiative; and
- \$4 billion for the Rapid Housing Initiative, which has supported the construction of more than 15,800 new affordable housing units as of June 2024.

The NHS also recognizes non-discrimination, inclusion, participation and accountability as key principles of a human rights-based approach to housing. I want to commend the role you play as Federal Housing Advocate in supporting these principles as demonstrated through key activities that you undertook in 2023-2024, including your review on homeless encampments, your report on Inuit housing conditions and the research you commissioned on Canada's housing supply and on security of tenure, as well as the second review panel you referred to the National Housing Council on the failure to prevent and eliminate homelessness amongst women and gender-diverse people, particularly Indigenous women, gender-diverse, and Two-Spirit people.

In particular, the consultations you led in support of your systemic review of homeless encampments – the first review of this kind under the NHS Act – informed a deep understanding of both the root causes of encampments and the very real and specific needs of those living in encampments. Your approach was key to amplifying the voices of persons with lived experience of homelessness to inform the development of housing policy in a manner that upholds the human rights commitments outlined under the NHS and the NHS Act.

I want to thank you for meeting with me on July 16, 2024, to discuss your report on homeless encampments. I appreciated the opportunity to hear your perspective on approaches to address encampments. As you continue to advance your mandate, I would be pleased to meet with you again to seek your advice on key considerations for the implementation of Canada's Housing Plan. Specifically, I would like to explore how the insights you gathered through your engagement with people with lived experience can inform the direction of Canada's housing and homelessness programs. My office will be in touch with you to schedule a follow-up discussion.

I also acknowledge your recommendation to comprehensively integrate NHS human rights commitments in all government decisions related to housing. While we've made great strides through the NHS and redoubled our efforts through Canada's Housing Plan, we know that our work isn't done. We will continue to explore ways to enhance how we deliver housing policy until everyone in Canada has a safe and affordable place to call home. To this end, I have asked officials from Housing, Infrastructure and Communities Canada to work with your Office to leverage the educational tools you created on the right to adequate housing to continue to deepen our expertise in this space. Together, we can continue to advance human rights commitments under the NHS Act.

Measuring progress and housing outcomes

The Government of Canada acknowledges that having accurate information and data is crucial for our understanding of housing needs and systemic barriers, to measure progress and outcomes for all housing investments, and to develop evidence-based solutions. With the launch of the NHS, we expanded our data collection and dissemination capabilities in collaboration with key partners including Statistics Canada and Employment and Social Development Canada.

NHS results are reported on quarterly and on a triennial basis. NHS progress, success stories, and data on housing in Canada are publicly reported online. In December 2023, the Canada Mortgage and Housing Corporation (CMHC) and Statistics Canada completed a pilot study on people who have lived or are living in housing units constructed or repaired with NHS funding. This project collected anonymized data for about 5,610 people living in 2,810 new and repaired units funded by the Affordable Housing Fund and the Apartment Construction Loan Program. Work has already begun on expanding the study to include at least 10,000 NHS units and 20,000 inhabitants. Findings from the pilot study were published in the second triennial NHS Report to Parliament, [Building Momentum: Moving Canada's Housing Commitments Forward](#). Findings from additional NHS initiatives are expected in 2025-26.

Reporting requirements for provinces and territories (PTs) are outlined through bilateral agreements under the NHS. Every three years, the PTs (excluding Quebec) develop Action Plans that outline their strategies for achieving our mutually agreed-upon targets and outcomes. They report their progress every six months, and the federal government collaborates with them to validate and approve the data before it is published. Through this process, we ensure that accurate and up-to-date information is available.

Building on NHS administrative data, the NHS' Housing Needs Data Initiative created two surveys to better understand housing conditions and experiences in Canada, including for those living in social and affordable housing. The survey of Social and Affordable Housing – Rental Structures (SAHS-RS) asks property managers and owners of community and affordable housing to provide details about their properties, such as the types of units, targeted clientele, unoccupied units and rents, to help us better understand how new housing units address housing need. In addition, the Canadian Housing Survey (CHS) collects information on the housing needs and experiences of Canadian households, including core housing need and satisfaction with their homes and neighbourhoods.

By combining the SAHS-RS with CMHC's Rental Market Survey, we get a comprehensive view of rental housing, including vacancies, rents, and turnover rates. Together with the CHS and other data from Statistics Canada including the Census and Canadian Income Survey, along with the Core Housing Need/Severe Core Housing Need measures, we can assess various socio-economic and well-being outcomes of households and vulnerable populations over time.

Further, as per Budget 2024, the Government of Canada is investing \$20 million over four years, starting in 2024-25, for Statistics Canada and CMHC to modernize and enhance the collection and dissemination of housing data, including municipal-level data on housing starts and completions, and to develop an approach to track the progress of Canada's Housing Plan.

Supporting Indigenous Housing and Self-Determination

The Government of Canada recognizes that access to safe and affordable housing is critical to improving socio-economic outcomes and ensuring a better future for Indigenous communities. We know the impacts of colonialism in Canada have left a legacy of inequities for Indigenous peoples including high rates of poverty, core housing need and homelessness relative to non-Indigenous people. The Government of Canada is committed to working with Indigenous peoples towards addressing their housing and homelessness needs, recognizing the inherent interdependencies with social determinants of health and the advancement of self-determination, and in alignment with the United Nations Declaration on the Rights of Indigenous People and the passage of the *United Nations Declaration on the Rights of Indigenous Peoples Act (UNDA)*.

Since 2015, the Government of Canada has committed approximately \$11 billion to support Indigenous peoples to address housing needs in their communities, including \$4.3 billion to advance an Urban, Rural, and Northern (U.R.N.) Indigenous Housing Strategy, which is set to launch in 2024-25.

Aligned with your recommendations to consult and cooperate with First Nations, Inuit, and Métis peoples and their representative organizations, the Government of Canada has worked closely with First Nations, Métis, and Inuit partners to co-develop distinctions-based housing strategies that target the distinct and unique needs of Indigenous population. Specifically, the Métis Nation Housing Sub-Accord launched in July 2018 with an initial investment of \$500 million over 10 years and received an additional \$190 million over seven years through Budget 2022 to address urgent housing needs. The Inuit Nunangat Housing Strategy received an initial \$400 million in 2018 and \$845 million over seven years through Budget 2022. In addition, Budget 2022 provided \$2.4 billion over five years to support First Nations housing on reserves, and \$565 million over five years to support housing in Self-Governing and Modern Treaty Holder First Nations communities.

The Government of Canada recognizes the significant housing needs of Inuit in Inuit Nunangat and acknowledges the exceptional fact-seeking report that you released in November 2023. Through the Inuit-Crown Partnership Committee, the Government of Canada has been working with Inuit Tapiriit Kanatami (ITK) and the Inuit Treaty Organizations of Nunavut, Inuvialuit, Nunavik and Nunatsiavut, to address key housing issues. In addition to the funding provided as part of the Inuit Nunangat Housing Strategy, CMHC is working with Pauktuutit Inuit Women of Canada to develop critical emergency shelters and transition homes across Inuit Nunangat for women and children fleeing domestic violence and abuse. We acknowledge your recommendation that housing programs should be transferred to Inuit. We are working closely with ITK and the Inuit Treaty Organizations to apply the Inuit Nunangat Policy to all of our housing programs and policies to ensure that Inuit are able to fully access the existing programs and to create opportunities for Inuit Treaty Organizations and their development corporations to take the housing lead for their communities.

The mandate letter of the former Minister of Housing and Diversity and Inclusion committed to co-developing an U.R.N. Indigenous Housing Strategy that would complement the three existing distinctions-based housing strategies and fill gaps for Indigenous Peoples living in urban, rural and northern areas. Budget 2022 committed \$300 million to develop and launch the U.R.N. Strategy with Indigenous partners. Budget 2023 committed an additional \$4 billion over seven years, starting in 2024-25, to implement the Strategy. Of this, \$281.5 million was accelerated over two years instead of five years to meet urgent unmet housing needs in U.R.N. areas, delivered through Indigenous Services Canada and led by the National Indigenous Housing Collaborative Inc. (NICHI) whereby 73 successful projects were announced on July 22, 2024. CMHC is helping to fulfill this commitment and is working with Indigenous Services Canada, Crown Indigenous Relations and Northern Affairs Canada, and Indigenous partners to create and implement a Strategy that is informed by Indigenous-led engagements with Indigenous governments, organizations and housing providers. The funding for the U.R.N. Indigenous Housing Strategy will be delivered directly by First Nations, Inuit, and Métis governments, Modern Treaty holders and Self-Governing Indigenous Governments, and through a new Indigenous-led National Indigenous Housing Centre.

Beyond these targeted strategies to meet the needs of First Nations, Inuit and Métis peoples, the NHS also includes dedicated programming and funding for Indigenous housing, including:

- \$420 million through the Indigenous Shelter and Transitional Housing Initiative which, as of June 2024, has committed funding towards the construction of 19 shelters and 16 transitional homes;
- \$38.1 million through the Affordable Housing Fund, including \$25 million to repair 560 units in the existing urban Indigenous community housing stock (186 units committed as of June 2024) and \$13.1 million for 2 emergency shelters in the territories as part of the 2020 Shelter Initiative for Indigenous women and children escaping family violence;

- \$200 million through the Canada Community Housing Initiative to support 7,000 units in the existing urban Indigenous community housing stock so they continue to be made available to low-income households;
- \$900 million through Reaching Home: Canada’s Homelessness Strategy to address Indigenous homelessness predominantly in urban centers, including \$686.05 million through an Indigenous Homelessness stream to maintain the community-based approach and to continue to address local priorities, and \$210.4 million to be invested in priorities determined in collaboration with Indigenous partners; and
- legacy funding to support First Nations housing on reserve – between April 2018 and March 2023, CMHC invested \$250 million to support more than 3,450 newly constructed homes and more than 2,540 renovated homes, and \$733.5 million to subsidize housing on reserve. As of March 2023, 22,750 units continued to be subsidized.

The NHS has also supported many Indigenous and Northern housing projects through programs of general application. As of June 2024, more than \$4.5 billion has been conditionally or financially committed under the federal supply initiatives (including the Affordable Housing Fund, Rapid Housing Initiative, Federal Lands Initiative, Apartment Construction Loan Program, Affordable Housing Innovation Fund) toward the construction of more than 18,300 new units and the repair of more than 9,100 units through Indigenous and Northern projects; \$113.78 million through the Housing Accelerator Fund to accelerate permits for more than 17,900 units in Indigenous communities; \$2.50 million through the Federal Community Housing Initiative to support the affordability of 170 community housing units for Indigenous peoples; and \$4.35 million through the Community Housing Transformation Centre to support 61 Indigenous housing projects.

Access to safe and affordable housing is critical to improve health and social outcomes and essential to Canada’s commitment to reconciliation with Indigenous peoples. We are dedicated to making these housing improvements a reality and supporting Indigenous communities in every way we can.

The Government of Canada is committed to upholding rights outlined under the United Nations Declaration on the Rights of Indigenous Peoples, including the rights to self-determination as outlined in Article 3, which includes the right to develop and administer housing plans and programs (Article 23), rights to land, territories, and resources traditionally owned, occupied, used, or acquired by Indigenous people (Article 26), and the right to not be forcibly removed from lands or territories without free, prior, and informed consent (Article 10), among other provisions. As demonstrated through the approach adopted for the development of distinctions-based housing strategies, we respect the right of Indigenous communities to develop and manage their own housing plans.

Working collaboratively to solve the housing crisis and tackle shared responsibilities

Solving the housing crisis demands a Team Canada approach. No one level of government, home builder, not-for-profit organization, or community can do it alone. We need every partner pulling in the same direction to build the homes Canadians need. The Government of Canada continues to look to provincial, territorial, and municipal governments to match our ambition to increase housing supply, enhance affordability, and support vulnerable populations.

Through the NHS, the Government of Canada demonstrated its commitment to work collaboratively with provinces and territories (PTs), municipalities, and Indigenous partners to address the housing crisis in communities across the country. We worked with provinces and territories to develop the Housing Partnership Framework Agreement (HPF), which outlines how governments work together to build better housing outcomes for Canadians. Approved by all Federal, Provincial and Territorial (FPT) ministers except for Quebec in 2017, the HPF also sets out the terms and conditions for bilateral agreements with each PT for the delivery of over \$15.4 billion in cost-shared NHS funding for the Canada Community Housing Initiative, PT Priority Funding, the Canada Housing Benefit and the Northern Funding Initiative.

Through Canada's Housing Plan and Budget 2024, the Government of Canada has further leveraged opportunities to deepen its partnership with provinces and territories, including through Canada Builds, which leverages the \$54.9 billion Apartment Construction Loan Program to partner with provinces and territories with ambitious housing plans to build more rental housing across the country through cost-shared bilateral agreements. This program will help to create more than 131,000 rental units. We are also investing over \$4.4 billion in the Housing Accelerator Fund to help municipalities cut red tape and fast-track permits for 112,000 homes by 2027-28 and unlock over 750,000 additional homes over the next decade.

The Government of Canada continues to exercise leadership by playing a convening role in its work with other jurisdictions, particularly through the FPT Forum on Housing. The FPT Forum is the primary venue for intergovernmental collaboration on housing and provides advice to FPT ministers on how to work better together to address housing and homelessness issues. Under the FPT Forum, we have established two working groups focused on those most in need: the FPT supportive housing and homelessness working group; and the FPT urban, rural, and northern Indigenous housing strategy working group. These groups meet regularly to share information, conduct research and to provide advice on housing policy.

I thank you once again for this report and its recommendations. The Government of Canada's housing policy will continue to evolve to address the housing crisis. Alongside human rights mechanisms, including your role as Federal Housing Advocate, we will work to ensure that the needs of the most vulnerable populations and the voices of those with lived experience of housing need and homelessness help steer our efforts to solve the housing crisis.

Please accept my best regards.

Sincerely,

A handwritten signature in cursive script, appearing to read "S. Fraser".

The Honourable Sean Fraser, P.C., M.P.
Minister of Housing, Infrastructure and Communities