Social Housing & Human Rights

Organizing for Change

SOCIAL HOUSING AS A HUMAN RIGHT: A HOUSING RIGHTS PRIMER

ACKNOWLEDGEMENTS

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INTRODUCTION

OVERVIEW OF CONFERENCE, GOALS OF THIS RESOURCE

The 2017 National Housing Strategy (NHS) was intended to reduce core housing need and homelessness through a range of programs, research, and funding initiatives. Five years after the launch of the NHS, social housing experts and advocates describe the failure of the NHS to meet the needs of low-income renters. The NHS relies heavily on private market development, and only 3% of units funded by the NHS Rental Construction Financing Initiative are actually affordable to low-income households. With five years remaining in the NHS's timeline, there is still time to shift funding and policy toward what researchers and housing advocates have identified as necessary: an expansion of non-market, social housing.

This booklet introduces the current housing context in Canada. It compiles recent research on the history of social housing, offers a scan of existing housing initiatives, and analysis of the National Housing Strategy. It highlights Canada's ongoing reliance on the private market for housing provision, and offers some solutions to the current housing crisis.

The booklet was written as a foundation for discussions at the *Social Housing as a Human Right: Organizing for Change* event held in Winnipeg, Manitoba in April 2023. It is our hope that it will contribute to broader discussions about the ongoing housing crisis, and the need for a social housing strategy in Canada.

GLOSSARY

Affordable Housing	A commonly used term with multiple possible definitions. It can mean: • Housing that costs less than 30% of household income • Housing that is available to households making below a certain income threshold • Housing that is at or below the median market rent This lack of clarity can make it difficult to know whether housing is truly affordable to the lowest-income households.
Chronic homelessness	People who are experiencing homelessness for at least six months in the last year or/and have had reoccurring experiences of homeless over the last three years that lasted at least eighteen months total and have been unsheltered, in emergency shelters, temporarily sheltered with other individuals or in short-term rentals without longer term guaranteed residency.
Community housing	“Community housing (sometimes referred to as social housing) is housing that is offered at below market rates so that it is more affordable. Community housing is typically provided by organizations whose mandates are to offer affordable housing. Rents are typically subsidized by public sources (be they federal, provincial/territorial, or municipal) so that rents can be maintained at a level that is affordable to the tenants. Rents are usually calculated using a "rent geared to income" model that calculates rent as a manageable proportion of a tenant's income.”

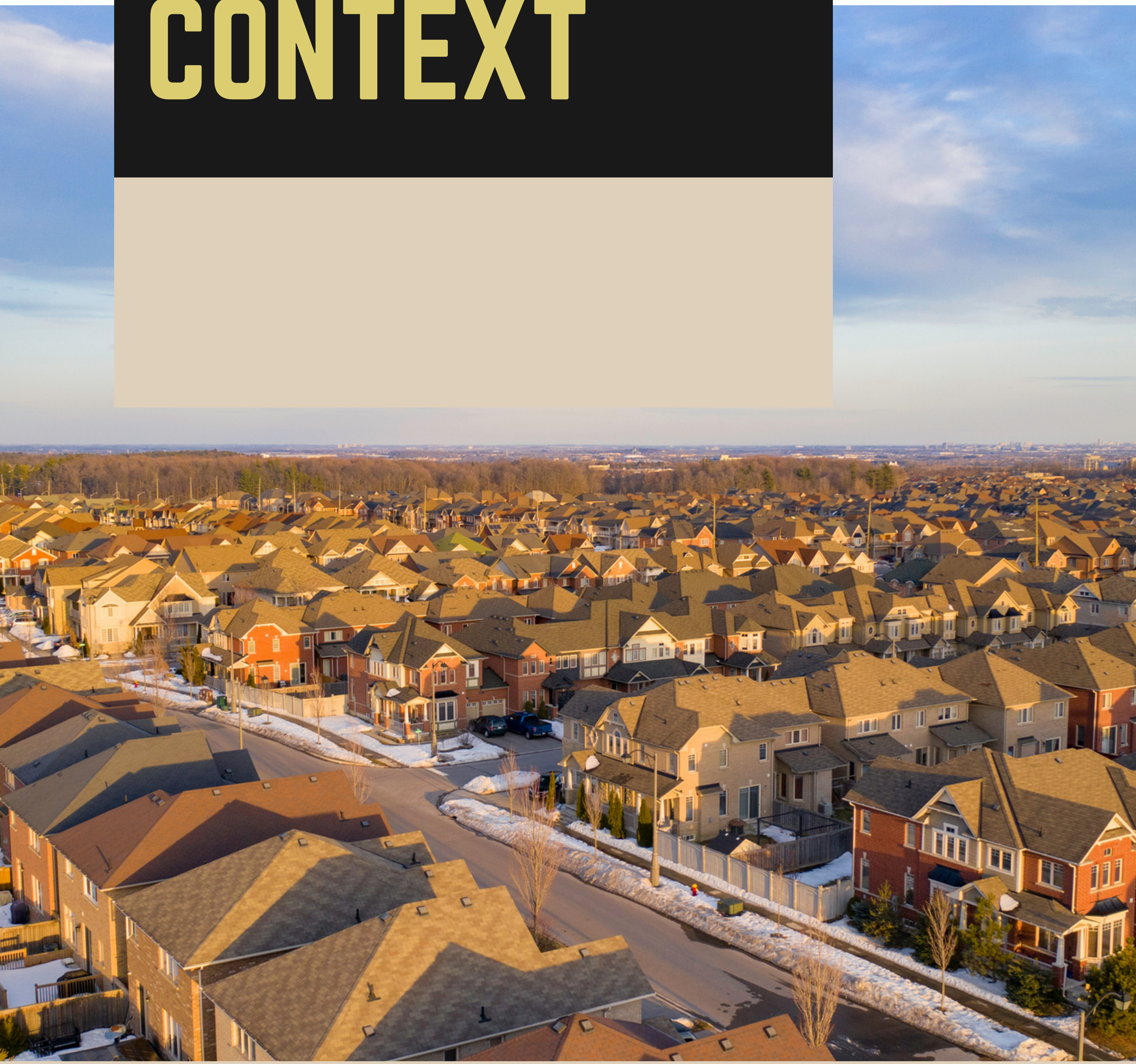
Core housing need	A household in core housing need is below one or more of the following standards: adequacy (not in need of major repairs), suitability (enough bedrooms for the size of the household) and affordability (housing costs are less than 30 percent of before-tax household income) or a household that would have to spend 30 percent or more of its before-tax household income to access housing that meets all three of the above standards.
Lower-end-of-market	Lower end of market housing is housing that is below the median market rent.
National Housing Strategy	The National Housing Strategy was released in 2017, and will invest $82+ billion in housing of all types.
Nonprofit housing	Housing owned and operated by non-profit housing providers. Usually lower end of market or RGI housing, and may be targeted to specific groups. From 1973 to 1993, federal programs provided capital and operating subsidies through funding agreements for new construction of non-profit housing. Many non-profit housing organizations still provide low-rent housing, even as their funding agreements expire.
Public housing	Housing that is owned and operated by the government. Rents are usually very low or set at 30% or less of household income. In some cases public housing is managed by non-profit housing providers.
Rent geared to income (RGI) housing	Housing where rents are set at a percentage of household income (generally 25-30 percent). The difference between the rent paid by the tenant and the cost of providing the unit is covered by a subsidy.

REIT (Real Estate Investment Trust)	A Real Estate Investment Trust is a company that buys residential real estate, then distributes shares of the pooled income to shareholders. Often, REITs reduce expenses (like maintenance or staffing) and increase revenues (by increasing rents or charging additional fees), often with negative impacts for tenants (August, 2022)
Social housing	Social housing is housing that has been removed from the market (so it cannot be used for investment or speculation) and receives subsidies from the government. In Canada, social housing includes public, non-profit and co-operative housing.
Social housing agreements	Sometimes called funding agreements or operating agreements, the social housing agreements were signed by federal and provincial governments as well as non-profit or cooperative housing providers (as appropriate). The agreements set out terms for the management and operation of the housing, including subsidies, rent mixes and reserve funds. These have been expiring since the early 2000s, and will all have expired by 2040.
Urban Native Housing providers	From the 1970s to 1993, the Urban Native Housing Program funded low-rent housing provided by Indigenous-led non-profit housing providers. Most of these housing providers continue to offer low-rent housing today.

[1] Canadian Housing and Renewal Association. (2023). What is Community Housing? https://chra-achru.ca/what-is-community-housing/

[2] August, Martine. 2022. The Financialization of Multi-family Rental Housing in Canada. Office of the Federal Housing Advocate, Canadian Human Rights Commission. https://www.homelesshub.ca/sites/default/files/attachments/august-financialization-rental-housing-ofha-en.pdf

SETTING THE CONTEXT



SOCIAL HOUSING AND THE HUMAN RIGHT TO HOUSING IN CANADA

According to the United Nations Committee on Economic, Social and Cultural Rights the right to adequate housing is broadly defined as "the right to live somewhere in security, peace and dignity." Adequate housing was recognized as part of the right to an adequate standard **of living in article 25 of the 1948 Universal Declaration of Human Rights.** Canada agreed to comply with the right to housing under international human rights law in 1976 when it ratified the International Covenant on Economic, Social and Cultural Rights.

The National Housing Strategy (NHS), introduced in 2017, promised rights-based legislation to implement the government's commitment to the progressive implementation of the right to housing, as guaranteed in the International Covenant on Economic, Social and Cultural Rights. The National Housing Strategy Act (NHS Act) received Royal Assent in 2019.

As described by the National Right to Housing Network,

> the NHS Act brings Canada in line with international standards, which require the **right to housing** to be ensured not only through policies and programs but also through independent monitoring and access to hearings and effective remedies. The legislation affirms that the government's housing policy **is based on the recognition of the right to housing as it is understood in international human rights law.** It requires the government to implement reasonable policies and programs to **ensure the right to housing** for all within the shortest possible timeframe. It also means **priority must be given to vulnerable groups and those in greatest need of housing.**

Social housing is particularly relevant to the human right to housing. Government investment in social housing—non-market housing that is deeply affordable—has been demonstrated to be an essential component of government housing policies.

As described by the National Right to Housing Network, the right to housing under international human rights law does not mean that the government must provide everyone with housing. However it does mean that governments must, among other things:

- Refrain from actions that violate the right to housing, such as criminalizing those who are homeless or discriminating against particular groups;

- Protect the right to housing through appropriate legislation and regulation;
- Implement housing policies and programs focused on those most in need as well as on progressively ensuring access to housing for all;
- Prohibit all forms of discrimination and address systemic barriers to access to housing facing women, racialized groups, persons with disabilities, young people, LGBTQ, elderly people, and other groups; and
- Fulfil the right to housing over time through rights-based housing strategies and programs.
- Protect affordable housing and ensure security of tenure, including protection from unreasonable rent increases
- Ensure that any upgrading of existing housing or new developments are administered with meaningful participation of existing residents in their design and planning, ensuring that they are able to remain in, or return to their communities and are ensured access to adequate housing during any necessary relocation.

Acknowledging the right to housing in Canadian law is an important step to address housing precarity. However legislation alone won't solve the housing crisis nor result in the expansion of much needed social housing. Realizing the expansion of social housing as necessary to achieving the right to housing will require political will to invest in housing as a social good.

WHAT IS SOCIAL HOUSING?

Social housing is government-subsidised housing for individuals and groups who cannot afford adequate and suitable homes in the private market. Social housing includes public, non-profit and cooperative housing, and is often developed in partnership with the non-profit sector. It is non-market housing, meaning it cannot be used for investment or speculation, and rents are often set at 30 percent or less of household income (rent-geared-to-income, or RGI, housing). There are various populations served in social housing, including low-income households, newcomers, persons with disabilities, Indigenous people, and victims of domestic violence.

From the end of World War II to 1993, when funding for new social housing construction was ended, these programs evolved to meet the housing needs of Canadians. Social housing has primarily been funded through bilateral agreements between federal and provincial governments, or amongst federal or provincial governments and social housing providers. By 2040, all of the long term funding and operating agreements for social housing built in the 1960s-1993s will expire. Programs under the 2017 National Housing Strategy will replace these funding streams, but have been critiqued for not adequately meeting the needs of low-income households.[1]

In addition to aiming to meet the needs of vulnerable, often low income Canadians, social housing also functions to foster community integration and well-being. There is growing awareness on the effectiveness of social housing and its role in poverty eradication strategies. Below are key social housing models that operate across Canada:

Public housing
Public housing is owned and operated by provincial or territorial housing corporations (or, in the case of Ontario, by municipal housing corporations). Most public housing was built between 1949 and 1978, with the peak of public housing construction in the late 1960s. The vast majority of public housing is rent-geared-to-income. While many public housing complexes have a sense of community and provide additional services and supports, the chronic underfunding of public housing has often resulted in concentrations of socio-economic problems and stigma.[2]

Non-profit housing
Between 1973 and 1993, the federal non-profit and cooperative housing programs provided capital and operating funding for this form of housing that is designated for low and/or moderate income households. Non-profit housing is operated and managed by non-for-profit associations, most of which were created by local community groups–faith based groups, service clubs, unions, and others–who saw a need in their community. Prior to 1985, most non-profit housing projects had a mix of lower-end-of-market and rent-geared-to-income units; after 1986, most were 100 percent rent-geared-to-income.

Co-operative housing

Co-operative housing is collectively owned and managed by residents. Members do not have equity or capital gain to be made from their units. The housing costs may be scaled based on a member's income. Low-income members typically pay less while moderate income earners pay more. The opening of Willow Park in Winnipeg, Manitoba, in 1966, was the first housing co-operative in Canada. The co-operative introduced democratic ownership and decision making among members, while also spearheading a repair reserve fund. These features have become common in co-operatives today.

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[1] Blueprint ADE and Wellesley Institute. (2022, February). Analysis of Affordable Housing Supply Created by Unilateral National Housing Strategy Housing Programs. The National Housing Council. https://assets.cmhc-schl.gc.ca/sites/place-to-call-home/pdfs/analysis-affordable-housing-supply-created-unilateral-nhs-programs-en.pdf

[2] Silver, J. (2011). Good places to live: Poverty and public housing in Canada. Halifax, NS: Fernwood Publishing.

SELF-DETERMINATION IN HOUSING FOR INDIGENOUS PEOPLES

First Nation, Inuit and Metis housing need has distinct causes and occurs in distinct ways. As Jesse Thistle noted in *The Definition of Indigenous Homelessness in Canada*,

> Indigenous homelessness is not simply a response to current housing markets and the limited availability of affordable housing, but is best understood as the outcome of historically constructed and ongoing settler colonization and racism that have displaced and dispossessed First Nations, Métis and Inuit Peoples from their traditional governance systems and laws, territories, histories, worldviews, ancestor and stories.

In other words, Indigenous homelessness and, by extension, housing need, is caused by past and present colonial practices. It will not be solved by simply building more low-rent housing. Instead, what is needed is a holistic decolonization of housing for First Nation, Inuit and Metis peoples.

Self-determination is a right protected under the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). Article 3 of UNDRIP states that "Indigenous peoples have the right to self-determination. By virtue of that right they freely determine their political status and freely pursue their economic, social and cultural development." Self-determination means that Indigenous peoples have the right to make decisions about all aspects of their lives and futures, including self-government—and including housing.

What does self-determination in housing look like? Some Indigenous people are using housing as a tool to assert their territories. For example, the Tiny House Warriors build small houses distributed across Secwepemc lands to emphasize their ongoing use and occupation and to resist unwanted resource extraction. Idle No More's One House Many Nations designs and builds housing locally as a way to "hack" systems that create homelessness, and moves from individual housing units to villages of housing units as a way of building community. These examples highlight the relationships between land and community and housing.

In urban areas, Indigenous non-profit housing organizations provide low-rent housing for Indigenous individuals and households. Kinew Housing, located in Winnipeg, Manitoba, was the first Indigenous housing provider in Canada. It was founded in 1970 through the leadership of the Indian-Metis Friendship Centre and governed by a board made up of members of Winnipeg's Indigenous community. It became a model for other similar organizations across Canada, and in 2007 it was estimated that together, these Indigenous-led organizations owned and operated over 10,000 units of housing.[1] Today, many of these housing organizations continue to provide low-rent housing.

In recent years, Indigenous housing providers have organized at a national level to address urban, rural and northern off-reserve housing need. In 2013, they established the Indigenous Housing Caucus at the Canadian Housing and Renewal Association, and in 2020 the Caucus released its For Indigenous By Indigenous (FIBI) advocacy campaign. The FIBI campaign calls on the federal government to fund a National Urban, Rural and Northern Indigenous Housing Strategy—a major gap in the 2017 National Housing Strategy.

In 2022, the National Urban, Rural, Northern Indigenous Housing Coalition (NURNIHC) was formed, bringing together Indigenous housing providers across the country to "provide FIBI housing solutions for urban, rural, and northern Indigenous peoples, to support each other, and to provide leadership and expertise to government for the well-being of all Indigenous people."[2] And, in 2023, the NURNIHC established established the National Indigenous Collaborative Housing Incorporated, "which solidifies the Coalition's commitment and determination for an Indigenous-led, Indigenous-designed and Indigenous-delivered organization to advocate for Indigenous housing solutions."[3] The FIBI movement is enacting self-determination in housing, and is working to find new and decolonial solutions to Indigenous housing need.

[1] Manitoba Urban Native Housing Association. (2007). Aboriginal housing plan. In collaboration with the Institute of Urban Studies. University of Winnipeg.
[2] Aboriginal Housing Management Association. (2022). Newly created National Indigenous Housing Coalition to address crisis and funding. Press release. https://www.ahma-bc.org/news-
[3] National Indigenous Collaborative Housing, Inc. (2023). Indigenous Housing Coalition calls on the federal government to commit to funding a National Urban, Rural and Northern Indigenous Housing Strategy. Press release. https://www.ahma-bc.org/news-

HISTORIC TIMELINE FOR LOW COST HOUSING IN CANADA

PRE-WORLD WAR II - GETTING PUBLIC HOUSING ON THE AGENDA

The Great Depression of the 1930s caused Canadians to rethink many federal social policies, and housing was no exception. One major factor in bringing housing policy to the forefront was the collapse of the construction industry in the early-to-mid 1930s, and the realization by construction leaders that "ensuring adequate shelter for low-income families would bring prosperity to their own damaged industry."[1] By 1933, residential construction had fallen to 31 percent of the 1929 level. Household incomes also fell sharply, and vacancy rates rose as households could no longer afford to pay their rent or mortgage. The insurance industry became increasingly unwilling to provide mortgages due to falling real estate and rental values. This led to increases in municipal taxes to make up for falling property values, further deterring housing construction. These factors held back the housing market even as the overall economy recovered in the late 1930s, with the housing market only at 73 percent of 1929 levels in 1937.

This shock to Canada's economy had major implications for many households, leading to higher levels of homelessness and increased levels of debt. This, along with the effect on the overall housing market, led to various civic groups and government authorities working to find a solution to housing needs. The National Construction Council (NCC), which was formed in 1933, began lobbying the federal government for the implementation of a comprehensive housing program. The NCC was more focused on providing employment rather than concerns with housing, but this was the first instance of government officials, civic institutions, and the business community sharing a common goal on the issue of housing. Along with the impending election in the fall of 1935, this led to the adoption of the Dominion Housing Act, which firmly solidified the federal government's role in the housing market.

At the same time, there was an increased interest on the part of social reformers in the terrible living conditions experienced in many Canadian cities at the time. Public health advocates, social workers and other reformers drew attention to the impacts of slums for poor families, where housing was overcrowded, expensive, and often in bad shape, with many not having adequate sanitation. Many Canadians were forced to accept these living conditions in order to access the economic opportunities of the time as industrial activity within cities continued to increase. Unfortunately, these advocates were also concerned with focusing on regulating the lives of the poor through paternalistic policies and exerting control over the lower-class workers, many of whom were immigrants, who lived under these poor conditions. Despite pressures from housing advocates, however, there continued to be widespread opposition to public housing. In the end, the market advocates won the argument of the day and this laid the groundwork for many of the housing issues the country still faces today.

The Dominion Housing Act was first introduced in Parliament in June 1935 on behalf of the Minister of Labour because of its emphasis on generating employment. It included two

sections: one focused on research and the importance of recognizing housing as a local responsibility, while the second focused on the provision of immediate financial assistance for housing construction and designated lending institutions as the administrators of the program. However, 90 percent of households at the time earned too little to qualify for the housing produced through the Act. From a housing perspective, the bill was considered a disappointment because of how little the government was providing; however, it was passed primarily as a result of its employment-generating qualities.

In the end, the Dominion Housing Act resulted in only 3,158 loans being issued, and 4,903 housing units constructed. The average down payment ($800) was far too high for most urban households and most of the loan recipients were white-collar workers. The Dominion Housing Act also provided no assistance for renters at all and therefore did not help the most vulnerable households. In terms of low-cost housing development, the Dominion Housing Act was a failure. However, it still had a major long-term impact on Canada's housing market because it was administered by the Department of Finance and relied on mortgage lenders in both developing and implementing the Act. This resulted in the market focused approach to housing development that remains dominant today.

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[1] Bacher, J.C. (1993). Keeping to the marketplace: The evolution of Canadian housing policy. Montreal, QC: McGill-Queen's University Press. p.37

POST-WORLD WAR II INVESTMENTS IN PUBLIC HOUSING

The era of social housing in Canada began in the 1940s, following the Great Depression, World War II, and the return of soldiers needing housing. Across Canada during and after the Second World War, hundreds of families were homeless and were housed temporarily in emergency shelters. In addition, many more lived in areas described as slums, doubled up with friends or family. Post-war, city populations grew rapidly as manufacturing jobs increased, and for the first time, in 1951, poor households were in a minority. The federal government's management of the wartime economy transitioned into management of a strong industrial economy with greatly increased employment.

The period from 1945 to the late 1960s was one of cooperative federalism. It was characterized by post-war prosperity, underdeveloped provincial political agendas, and strong functional "trust ties" between federal and provincial bureaucrats and politicians. While the Dominion Housing Act of 1935 focused primarily on the private lending and construction industries, the follow-up National Housing Act (NHA) of 1938 included a section on public housing. However, no funding was allocated to implement a public housing program (Suttor 2016). In 1944, a new National Housing Act was created, and in 1945 the Central Mortgage and Housing Corporation (later the Canada Mortgage and Housing Corporation–CMHC) was established to implement it. But this Act focused on private sector market rate rental housing and homeownership, not low-rent housing. Since then, CMHC's main activity has been the provision of mortgage insurance for private market housing, but it has also played a leading role in policy development and the provision of subsidies for social housing programs.

From the National Housing Act of 1949 through to 1964, the major housing policy focus was on economic growth and the creation of construction jobs. The federal government developed national programs to promote the growth of a development industry that could build standardized housing on a large scale. The policies assumed faith in the efficiency of the private market and the ability of government planners to direct growth efficiently. It was assumed that as middle-income households moved to the suburbs, their former smaller, older, and cheaper housing would become available for lower-income households. This was also the era of the first large-scale public housing projects in Canada, financed through federal-provincial partnerships. As well, the NHA enabled municipalities and charities to build limited dividend housing (similar to non-profit housing today). Overall, this period saw the construction of 14,314 public housing units and 11,641 units of limited dividend housing. Between 1945 and 1968 the housing stock in Canada almost doubled. The policies were considered successful in building up the industry and increasing homeownership; however, with new housing primarily spreading out across the suburbs, the exodus from the inner city resulted in a lack of investment in the urban core. To address the decline resulting from this

lack of investment, renewal and slum clearance programs were introduced. Existing housing was bulldozed, and new city halls, convention centres, hotels, and public housing were built. This renewal in the urban centres of Canadian cities displaced many low-income families who could not afford to move to the suburbs.

By the mid to late 1960s, Canada's baby boomer generation had grown up and was creating new pressures on the housing market. This era saw a shift towards community involvement, intergovernmental coordination and flexibility, and neighbourhood revitalization as provincial and municipal governments became more involved in social programs.

In 1964, amendments to the National Housing Act resulted in a boom in public housing construction. From 1949-1964, an average of 1700 public housing units were built per year; between 1964 and 1973, the average was closer to 16,000 units per year. CMHC began working more closely with the provinces and offered new provincial housing corporations significant new funding, including a 50/50 cost sharing agreement for operating costs and subsidies. This was a boom time for private apartment development as well, allowing public housing complexes to be mixed in with other developments being built around the same time. The focus on socially mixed urban development reduced the stigma of public housing and strengthened public support, as did a focus on seniors' housing and the provision of housing as part of a broader housing agenda that included supports for middle-class households.

This era saw a proliferation of studies and reports on housing and urban life in Canada. Many of these reports focused on the mistakes of past policies and either offered prescriptions for resolving the new problems or encouraged critical thinking about them. These reports (the Task Force on Housing and Urban Development, 1969; the Lithwick Report, 1970; and the Dennis-Fish Report, 1971) were highly influential in shaping later programs.

1970S: THE SHIFT TO NON-PROFIT DRIVEN HOUSING

In 1973, the federal government introduced the non-profit and cooperative housing programs. They were intended to overcome the stigma of government-managed public housing and increase local control over housing provision by having low-rent housing delivered by local community groups. Service groups and churches, as well as non-profit agencies directly owned by provincial and municipal governments, became the primary delivery mechanisms for low-cost housing. The programs were aimed initially at the inner city but later many new projects were constructed in suburban areas.

This was a major shift in social housing policy, as these new programs were decentralized and locally-oriented, and usually mixed-income. A variety of housing programs were created over the next ten or so years, establishing non-profit and cooperative housing funding agreements across the country. Rent geared to income units were often added in as a 'stacked supplement' through a secondary agreement. These programs responded to the growing pressures from moderate- and middle-income households for rental housing and reflected an increasingly popular, more grassroots approach to social policy.

Although the nonprofit and co-operative housing programs were a novel program of the time, receiving a lot of attention in the 1970s and '80s, support for private-market rental and low-cost homeownership programs took a larger share of total spending. For example, from 1975 to 1982, about 137,000 units of social housing were built, while about 350,000 units of publicly-subsidized private rental housing were built. In the mid to late 1970s a growing imbalance between supply and demand in the housing market became evident as stagnant resale housing prices and increasing mortgage rates forced large numbers of homeowners to abandon their houses. CMHC, which had guaranteed the mortgages, became one of the largest owners of housing in the country. The short-term response was to encourage non-profit groups to purchase existing projects from CMHC or from the provinces. Changes made to CMHC's non-profit program in 1978 were mainly driven by a desire to utilize the inventory of unoccupied projects, to deal with unemployment in the construction sector, and to reduce the pressure on rental markets. As inflation dominated the economy in the late 1970s, private-market tenants faced daunting rent increases which resulted in the implementation of rent regulations in most provinces.

Federal direct loans for the non-profit housing programs were replaced by private-lender financing. CMHC's planning concepts for this period emphasized disentanglement, privatization, and cost containment. As of 1978, public housing construction essentially ended, giving way to the much more popular nonprofit and co-operative housing programs. The federal government also began phasing out its responsibility for the physical planning and social aspects of housing policy, passing more of this responsibility to the provinces.

During this time, CMHC also began to respond to housing needs in rural areas, as well as to off-reserve Indigenous housing needs. Throughout the late 1960s and '70s, Indigenous activists organized to create housing that reflected the needs of the growing Indigenous populations in cities, and advocated to CMHC for funding for pilot projects. In response, in 1985, CMHC created the Urban Native Housing Program, "which grew out of the pronounced need of urban Aboriginal households for culturally appropriate social housing and the capacity of growing urban Aboriginal communities to address their own priorities." The Urban Native Housing Program enabled providers to provide culturally appropriate housing, and to support not only individual Indigenous households, but also Indigenous communities.

These programs were supplemented by neighbourhood improvement and residential rehabilitation assistance programs, which were designed to redevelop existing inner-city neighbourhoods rather than to destroy them. These new programs were a direct response to the demand for community input into revitalization. The urban renewal program of the past was the only major policy halted during this time as a movement for the income integration of urban neighbourhoods took hold.

At the end of the 1970s, it was clear that changes were needed since the non-profit and cooperative housing programs were not delivering the intended policy goals. This helped drive the shift towards targeted non-profit housing policies that took hold in the 1980s.

1980S: A SHIFT TO TARGETED NON-PROFITS

The early and mid 1980s were marked by a shift away from government investment in public housing to non-profit housing. This was part of a broader privatisation agenda aligned with the neoliberal policies beginning to take hold across the global north. A global recession opened the door for opponents of Keynesian economic policies and the idea that the state has an important role in social protections, including housing. Proclaimed to be a necessary response to concerns about the stigma of public housing, as well as necessary to reduce the federal deficit, the federal government introduced a new non-profit program program in 1978. Non-profit housing and housing co-ops were seen as a way to establish mixed income housing communities, while also reducing the role of the state.

Also at this time, the dire housing need of urban Indigenous households led to the introduction of the Urban Native Housing Program (UNHP). Many urban Indigenous households could not afford unsubsidized housing in the private market, and culturally appropriate housing was needed for the social and economic welfare of this population. The UNHP delivered subsidies to Indigenous housing providers through operating agreements that would provide housing for Indigenous people residing or moving into urban areas.[1] The belief was that UNHP would produce higher levels of service, community building, security, stability and independence for Indigenous residents. Despite the success of the program, the UNHP was cancelled along with other social housing programs in 1993.

In the 1980s, CMHC developed the core housing need metric to pinpoint which households would receive housing assistance. The idea of core housing need is grounded in social norms to determine what is "acceptable" and "non-acceptable" housing.[2] In 1986, CMHC's non-profit housing program was amended to target households in core housing need. Residents would pay for their housing based on rent geared to income guidelines. The program also assisted residents with special housing needs, such as seniors and people with disabilities. The same measurements continue to be used today, but many question whether the metric is effectively meeting the needs of those in greatest housing need. (See the Glossary for more information on core housing need).

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[1] Brant, D. J., & Irwin-Gibson, C. (2019). Urban, rural and northern Indigenous housing: The next step. CHRA. https://chra-achru.ca/wp-content/uploads/2019/09/20190802-urn_indigenous_housing_final_report.aug26.2019.pdf

[2] Clayton, F., & Bailey, D. (2021). Who is being left behind in the GTA housing market: A profile of core housing need, 1991-2018. Ryerson University. https://www.torontomu.ca/content/dam/centre-urba

1990S: DEVOLUTION AND RETRENCHMENT

With neoliberalism now deeply entrenched, the mid-1990s saw the devolution of social housing funding, policies, and programs. This period is described by Michael Shapcott (2004) as "…a lost decade for affordable housing funding, policies, and programs in Canada."[1]

In 1993, the federal government ceased funding new social housing units. Non-profit providers could not construct new units after the mid 1990s due to the lack of government support. By the late 1990s, the number of social housing units being built dropped to nearly zero, confirming the federal government's departure from affordable housing. At the same time, funding transfers to provinces and territories for housing were cut, and most provinces followed suit in slashing housing funding.

Spending cuts and a growing housing and homelessness crisis ignited a rise in housing advocacy. In 1998, the Toronto Disaster Committee (TDRC) was created by unhoused people and advocates to shine light on the homelessness disaster while demanding action from all levels of government. TDRC fought for homelessness to be treated with the same urgency as environmental disasters such as floods or forest fires. Their State of Emergency Declaration called for "…a National Homelessness Relief and Prevention Strategy using disaster relief funds both to provide the homeless with immediate health protection and housing and to prevent further homelessness."[2] In 1999, community groups across Canada united to form the National Housing and Homelessness Network.

Private entities such as the Toronto Board of Trade and the TD Bank Financial Group spoke up on the country's housing crisis and voiced the need for renewed government investment. Non-profit housing providers warned that the low-cost rental housing crisis would grow as operating agreements began to expire.

Citizens across Canada expressed concern about housing and homelessness. National and regional opinion polls showed a majority supporting government intervention even if that involved raising taxes (Shapcott, 2004). Political pressure led to increased intervention, but more broadly focused on 'affordable housing' through private sector (for profit and non-profit) development. Intergovernmental housing agreements were largely unsuccessful in expanding the supply of low-cost rental housing.

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[1] Shapcott, M. (2004). Where are we going? Recent federal and provincial housing policy, Chapter 12, Finding Room: Policy Options for a Canadian Rental Housing Strategy, J.D. Hulchanski and M. Shapcott, editors, Toronto: Centre Urban and Community Studies, University of Toronto. http://neighbourhoodchange.ca/documents/2018/01/shapcott-2004-housing-policy.pdf p.1

[2] Quoted in Shapcott, M. (2004). p.9

EARLY 2000S: RECENT RE-ENGAGEMENT

Eight years after the federal government's departure from funding new social housing, it was evident that there was a growing need for low-cost rental housing. The federal government re-engaged, but in a far more limited way aligned with its continued belief that the market could solve the problem. In 2001, a new federal Affordable Housing Framework was established in collaboration with the provinces and territories. Governments entered into 50/50 cost-shared funding agreements. Non-market, rent-geared-to-income housing was not a priority, and only offered to low-income people through provincial/territorial subsidies. While a large portion of the funding went towards affordable rental construction, the programs were only producing 30% annually of what was being built every year in the mid-1980s.[1]

In the 2006 federal budget, more "one-time" funding streams were opened up for provinces and territories to use towards affordable housing. This funding was inherited by the Harper Conservative minority government in 2006, originating from a budget deal made between the NDP and Liberal minority government. NDP leader Jack Layton was able to negotiate a lump sum of affordable housing investments in exchange for supporting the Conservative government budget. The Harper government packaged the commitment into the below three trust funds, a total of $1.4 billion.[2]

Trust Title	Purpose	Funding Value
Affordable Housing Trust	To counteract interim pressures on affordable housing supply at the time. Issued over three years (2006-2009).	$800 million
Northern Housing Trust	To counteract interim pressures on affordable housing supply in northern Canada. Issued over three years. (2006-2009).	$15 million each - Yukon, Northwest Territories and Nunavut. Additional $150 million for chronic housing need in Nunavut.

Off Reserve Indigenous Housing Trust	To meet the housing needs of Indigenous peoples living off reserve in provinces. Issued over three years. (2006-2009).	$300 million allocated across provinces depending on the proportion of Indigenous peoples residing off-reserve.

The 2008-2009 financial crisis was followed by the federal government's promise of $1.9 billion dollars over five years to address housing needs of low-income earners and people experiencing or at risk of homelessness. Other announcements included a two-year renewal of the Affordable Housing Initiative and federal/provincial/territorial renovation programs were agreements. That same year, Canada's Economic Action plan sought to create employment by rolling out investments for construction and renovation of social housing and housing infrastructure. $2 billion was devoted to two years to the social and affordable housing sectors with $1 billion allocated towards renovation and energy retrofit for off-reserve social housing, and the remainder directed to new housing construction or renovation for vulnerable populations (ie. seniors, Indigenous peoples living on reserve, persons with disabilities, and northern housing).

Canada's Economic Action Plan's housing investments were primarily intended to sustain economic recovery during the financial crisis. The Harper government was silent on whether it would continue to invest in the maintenance of existing social housing as funding operating agreements for projects constructed between 1960-1994 began to expire. In 2011, the Harper government combined the Affordable Housing Initiative (AHI) and the previously cost-shared Residential Rehabilitation Assistance Program (RRAP) into one lump sum payment, further signaling its intentions to download housing responsibility to the provinces and territories through the newly named Investments in Affordable Housing program.

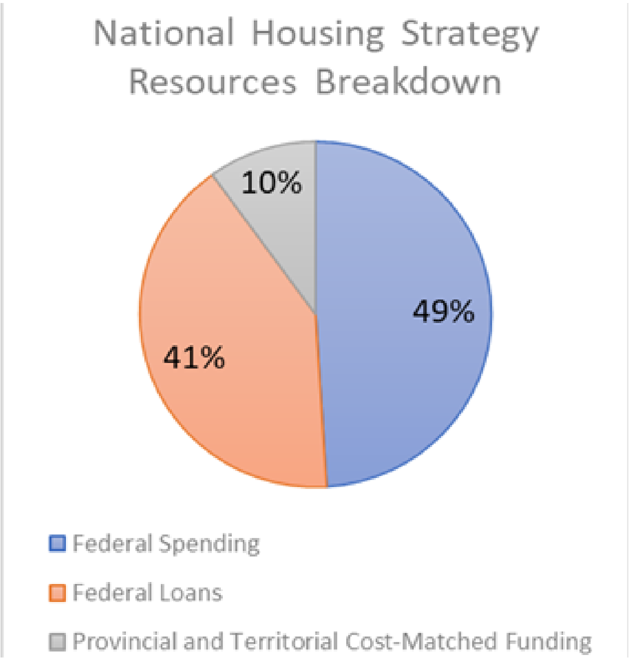
[1] Pomeroy, S. (2021). Background Primer on Canada's Housing System. CHEC-CCRL. https://chec-ccrl.ca/wp-content/uploads/2022/08/Background-Primer-on-Canadas-Housing-system-APRIL-20-2021.pdf
[2] Pomeroy, S., & Falvo, N. (2013). Housing policy in Canada under the Harper regime. https://www.focus-consult.com/wp-content/uploads/2014/07/PomeroyFalvoThe-Harper-Years-ENHR-with-table.pdf

NATIONAL HOUSING STRATEGY

THE CONTEXT OF THE NATIONAL HOUSING STRATEGY

Consistent neoliberal pressures in the 1990s continued to shape the not-for-profit housing sector and culminated in 1996 as the federal government began to off-load the management and responsibilities of the social housing sector to the provinces. In 2001, the federal government took some interest in affordable housing with $1.2 billion in cost-matched support for the Affordable Housing Initiative (AHI), a ten-year fund that created bilateral agreements with loose conditions for the provinces and territories. However, the AHI funding was insufficient to deal with the mounting housing need.

In the early 2000s, social housing agreements (SHA) began to expire. These agreements provided capital and ongoing subsidies to enable public, nonprofit and cooperative housing providers to offer very low rents. The still-ongoing expiration of SHAs has resulted in a cascade of issues including reserve funds too low to support building repairs, decreased organizational capacity due to inadequate funds and a dwindling social housing stock as the sector's maintenance and development depended on the provincial and territorial governments' appetite to engage in affordable housing.[1] Social housing organizations with expired SHAs have begun to charge higher rents, change tenant mixes, and move away from deeply subsidized units.



Source: Parliamentary Budget Officer, 2021, p. 10

In the past two decades, low-cost housing units in the private sector also have become more vulnerable to being sold to investors as their operating costs increased and housing prices have escalated.[2] The result of nearly 30 years without meaningful federal engagement in low-cost housing provision is a growing housing crisis with almost 1.7 million households in core housing need in 2016, and a declining universe of low-cost private rental housing.

In 2017, the federal government introduced the National Housing Strategy (NHS) which committed more than $40 billion to support housing over ten years. The announcement of the NHS was followed by the National Housing Strategy Act in 2019, which formally recognized the right to housing in Canada. The NHS signalled the re-engagement of the federal government in affordable housing policy. The initial funding commitment was insufficient to meet the NHS's goals and so was expanded in 2019, 2020, and 2022, ultimately doubling the original commitment.

[1] Pomeroy, S. (2017). Discussion Paper: Envisioning a Modernized Social and Affordable Housing Sector in Canada. Carleton University Centre for Urban Research and Education (CURE). https://carleton.ca/cure/wp-content/uploads/Envisioning-a-strengthened-social-housing-sector-FINAL-Oct-2018.pdf

[2] Thomas, R., & Salah, A. (2022). Supporting non-profit and co-operative housing in Halifax, Nova Scotia. Housing and Society, 49(3), 271–300. https://doi.org/10.1080/08882746.2021.2005316

THE NATIONAL HOUSING STRATEGY'S IMPACT ON AFFORDABLE HOUSING SUPPLY

The Government of Canada states that the "primary goal of the National Housing Strategy is to make safe and affordable housing accessible for the most vulnerable Canadians and for those struggling to make ends meet."[1] As of December 31, 2022, the National Housing Strategy (NHS) had:

- created or committed to 118,418 new housing units of a 160,000 unit target,
- repaired or committed to repairing 298,357 units of a 300,000 unit target and
- protected 233,957 community housing units of a 385,000 unit target.[2]

The NHS will most likely achieve these three goals. However, CMHC has not provided an update on the targets for housing for those who have low incomes, are in core housing need or impacted by chronic homelessness. There has been no reporting on how many social housing units have received rent assistance, how many households have been removed from core housing need, or how many people living in chronic homelessness have been housed. And, while the National Housing Strategy is achieving its targets of creating 160,000 housing units, the majority of these units are not at rent-geared-to-income rates—in other words, they are not affordable to those who need housing the most. It is for this reason that the National Housing Council's 2022 Engagement Summary found that 75 percent of housing sector survey respondents believed that the NHS was not making progress on creating new affordable housing, 69 percent did not believe the NHS was making progress on removing households from housing need, and 59 percent did not believe it was reducing chronic homelessness by half.[3]

Key Factors limiting NHS Effectiveness

1. The largest NHS program, the Rental Construction Financing Initiative, intends to create a large number of market housing units that will not meet the needs of those in core housing need. Moreover, the Rental Construction Financing Initiative (RCFI) issued 73 percent of its loans to private developers who build market housing.[4]
    a. Only three percent of units from the Rental Construction Financing Initiative, can lift low-income households out of housing need.[5]
    b. The Office of the Federal Housing Advocate found that "new RCFI rental units come on the market at rents that are 40% to 75% higher than average market rent levels and as such do not contribute to meeting NHS affordability goals."[6] Many housing experts believe the support would have been better allocated towards creating low-cost housing for low-income earners in the community housing sector.

2. Most of the below-market rents are created through mixed-income projects through the National Housing Co-Investment Fund, where the majority of the units do not, for the most part, meet the affordability needs of low-income earners. This reflects a policy shift away

from social housing that is supported with government-based funding agreements towards a mixed-income housing model with a minority of rent-geared-to-income units.

a. Only 35 percent of new units funded under the second largest NHS program, the National Housing Co-Investment Fund are affordable for low-income households.[7]

3. The NHS has no target for the number of low-cost housing units that it intends to create. NHS programs have varying definitions of affordability and most programs require a minority of units to meet shallow levels of affordability.

   a. The 2019 Parliamentary Budget Officer report found that "asides from rent subsidies, there is no plan or change that would be expected to reduce core housing need in social housing" and further noted, "units with affordability commitments are not necessarily allocated to low-income households, or affordable by CMHC's definition, and may have been built anyways."[8] The report was published before the introduction of the Rapid Housing Initiative (RHI) which funds the development of housing for low-income households and people experiencing homelessness, but the RHI comprises a relatively small portion of the total units created under the NHS.

4. NHS program requirement to ensure a level of affordability is only required for 10-20 years, depending on the program. This means that the NHS is spending billions of dollars on housing that has no permanent affordability requirements. Moreover, the majority of NHS support (57%) has gone to the private sector, which is unlikely to create long-term affordable housing.[9]

5. Almost half of the NHS funding is provided through loans and another portion of the NHS funding is provided through loans and another portion of the funding is cost-shared from provinces and territories. As a result, the funding has not been enough to create rent-geared-to-income units without significant long-term funding from another source.

6. Deeply affordable rent-geared-to-income (RGI) housing has become nearly impossible to create with funding solely from one of the two main NHS programs (the Rental Construction Financing Initiative and the National Housing Co-Investment Fund). For example, the National Housing Co-Investment Fund requires another level of government support, which in theory could lead to the subsidization of units to RGI levels. However, many provincial governments (and municipalities) did not allocate funding or program delivery to enable this level of subsidy. Thus, even though the NHCF funded many housing organizations at a similar rate across the country, provincial affordable housing policies severely limited the creation of RGI units in some provinces.

7. The NHS has redirected policy that once focused on creating the bricks-and-mortar housing units towards the expansion of portable housing benefits in the bilateral agreements. Many provincial governments are focused on creating portable housing benefits through bilateral agreement funding, rather than building social housing. Portable housing benefits can be a temporary fix for a lack of affordable housing options, but they should not be relied on as the main affordable housing tool. The National Housing Council found that many tenants with portable housing benefits face discrimination in finding adequate housing in the private market, and that housing advocates believe that "PHBs could trigger inflation in the lower end of the rental market as landlords raise rents to capture the value of the benefit."[10] Over the long term, portable housing benefits require continued funding without investment in affordable housing construction. There is also less stability than renting social housing for the tenant as the benefit can be eliminated with a change in policy.

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[1] CMHC. (2017). Canada's National Housing Strategy. Government of Canada. https://eppdscrmssa01.blob.core.windows.net/cmhcprodcontainer/sf/project/placetocallhome/pdfs/canada-national-housing-strategy.pdf

[2] CMHC. (2022). Progress on the National Housing Strategy. Government of Canada. fhttps://www.placetocallhome.ca/progress-on-the-national-housing-strategy

[3] Canadian Urban Institute. (2022). What we heard: NHS Engagement Summary. National Housing Council. https://assets.cmhc-schl.gc.ca/sites/place-to-call-home/pdfs/national-housing-council/nhs-what-we-heard-report-nhs-programs-2022-en.pdf?rev=d8ede964-ca31-497d-86ce-6b0776425873

[4] Blueprint ADE and Wellesley Institute. (2022, February). Analysis of Affordable Housing Supply Created by Unilateral National Housing Strategy Housing Programs. The National Housing Council. https://assets.cmhc-schl.gc.ca/sites/place-to-call-home/pdfs/analysis-affordable-housing-supply-created-unilateral-nhs-programs-en.pdf

[5] Blueprint ADE and Wellesley Institute. (2022, February).

[6] Office of the Federal Housing Advocate. (2022). Towards a Stronger National Housing Strategy: Meeting Canada's Housing Obligations. Ottawa: The Office of the Federal Housing Advocate. https://www.homelesshub.ca/sites/default/files/OFHA-factsheets-EN.pdf p.9

[7] Blueprint ADE and Wellesley Institute. (2022, February).

[8] Office of the Parliamentary Budget Officer. (2019, June). Federal Program Spending on Housing Affordability. Office of the Parliamentary Budget Officer. https://www.pbo-dpb.gc.ca/web/default/files/Documents/Reports/2019/Housing_Affordability/Federal%20Spending%20on%20Housing%20Affordability%20EN.pdf

[9] Blueprint ADE and Wellesley Institute. (2022, February).

[10] Blueprint ADE. (2022, August). Analysis of the Progress of Bilateral National Housing Strategy Programs. The National Housing Council. https://assets.cmhc-schl.gc.ca/sites/place-to-call-home/pdfs/national-housing-council/blueprint-report-analysis-progress-bilateral-nhs-programs-en.pdf?rev=0d9e503d-6318-4ccb-b909-e1a00f291163 p.32

NATIONAL HOUSING STRATEGY TARGETS

Following decades of federal disengagement in social housing policy, the 2017 National Housing Strategy (NHS) was met with optimism. The NHS promised to reduce chronic homelessness by 50 percent, remove 530,000 households from core housing need, protect 385,000 community housing units and build 160,000 new housing units by the 2027–28 fiscal year (see Table 1). Since then, some of the targets have been amended, including the target for removing households from core housing need, which now plans to "eliminate or significantly reduce Housing Need for at least 490,000 households overall, which includes at least 300,000 households adequately supported through a Canada Housing Benefit."[1] In addition, the Canadian government has committed to eliminate chronic homelessness completely (Canadian Housing Evidence Collaborative, 2021, p. 2).

Table 1: National Housing Strategy targets and progress

National Housing Strategy Housing 2017 Targets	Created and Committed Units as of December 31, 2022
Federal target: 160,000 new housing units	118,418 units with committed funding
Federal target: 300,000 repaired units	298,357 units with committed funding
Federal and bilateral target: Cut chronic homelessness by 50 percent.[2]	No data available.
Federal and bilateral target: Remove 530,000 families from housing need.[3]	No data available.

Federal and bilateral target: 385,000 protected community housing units, including no net loss of Urban Native Social Housing Units available to households in Housing Need (330,000 provincial and 55,000 federal)	233,957 units with committed funding.
Bilateral target: 60,000 units (20 percent) of existing Social Housing Units repaired, including Urban Native Social Housing Units are repaired to good condition	No data available.
Bilateral target: 50,000 (15 percent) increase of rent-assisted Social Housing Units	No data available.

Adapted from: CMHC. (2022)[4]

A substantial number of housing units have been created or committed to (see Table 1). However, as the NHS has matured, housing experts have found that its programs will not meet the housing needs of low-income households, and have criticized CMHC for not using appropriate reporting mechanisms to track NHS targets. For example:

1. The 2019 Parliamentary Budget Officer report found that "CMHC's assumptions regarding the impact of NHS outputs on housing need do not reflect the likely impact of those programs on the prevalence of housing need."[5] This is in large part because the majority of NHS programs create market housing and do not create housing that would be affordable for low-income earners or those experiencing homelessness.

2. The Auditor General of Canada reported that CMHC did not know who was benefitting from the NHS programs and found that CMHC did not measure housing outcomes for priority vulnerable groups, including people who were experiencing homelessness. The

report concludes that the NHS will likely not meet the target to reduce chronic homelessness by 50 percent.[6]

3. The National Housing Council confirmed that CMHC does not use core housing need to assess the impact of its programs. In addition, it states that even if all the affordable housing created under the three largest unilateral programs served those in affordable housing need, the NHS would not reach the target to reduce core housing need by 530,000 households.[7]

4. The National Housing Council also found that Canada will have fewer units of government-supported community housing units in 2028 than in 2015 even if bilateral agreement targets are met. In addition, it concluded that provincial and territorial reporting on program outcomes "has been inconsistent and has left Canada Mortgage and Housing Corporation (CMHC) and researchers without even a high-level overview of progress made under the Housing Partnership Framework nationally to date."[8]

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[1] Canadian Housing Evidence Collaborative. (2021, June). Review and Options to Strengthen the National Housing Strategy. Canadian Housing Evidence Collaborative. https://chec-ccrl.ca/wp-content/uploads/2022/08/Review-and-recommended-strengthening-of-the-NHS-JULY-2021.pdf
[2] This target has been raised to one hundred percent (Canadian Housing Evidence Collaborative, 2021, p. 2)
[3] This number has been revised in the Bilateral agreements to "eliminate or significantly reduce Housing Need for at least 490,000 households overall, which includes at least 300,000 households adequately supported through a Canada Housing Benefit" (Canadian Housing Evidence Collaborative, 2021, p. 2).
[4] CMHC. (2022) Progress on the National Housing Strategy. Government of Canada. https://www.placetocallhome.ca/progress-on-the-national-housing-strategy
[5] Office of the Parliamentary Budget Officer. (2019, June). Federal Program Spending on Housing Affordability. Office of the Parliamentary Budget Officer. https://www.pbo-dpb.gc.ca/web/default/files/Documents/Reports/2019/Housing_Affordability/Federal%20Spending%20on%20Housing%20Affordability%20EN.pdf p.23
[6] Office of the Auditor General. (2022). Report 5. Office of the Auditor General. https://www.oag-bvg.gc.ca/internet/English/parl_oag_202211_05_e_44151.html
[7] Blueprint ADE and Wellesley Institute. (2022, February). *Analysis of Affordable Housing Supply Created by Unilateral National Housing Strategy Housing Programs*. The National Housing Council. https://assets.cmhc-schl.gc.ca/sites/place-to-call-home/pdfs/analysis-affordable-housing-supply-created-unilateral-nhs-programs-en.pdf
[8] Blueprint ADE. (2022, August). *Analysis of the Progress of Bilateral National Housing Strategy Programs. The National Housing Council.* https://assets.cmhc-schl.gc.ca/sites/place-to-call-home/pdfs/national-housing-council/blueprint-report-analysis-progress-bilateral-nhs-programs-en.pdf?rev=0d9e503d-6318-4ccb-b909-e1a00f291163

UNILATERAL PROGRAMS UNDER THE NATIONAL HOUSING STRATEGY

The National Housing Strategy (NHS) has been expanded and modified since its launch in 2017 to provide greater support for the complete housing continuum. The NHS consists of both unilateral and bilateral programs. A unilateral NHS program is a program that is developed and administered by the federal government. The following details the three major unilateral programs that account for 97 percent of the planned NHS support under the New Construction and Modernized Housing Supply stream, and 35 percent of planned expenditures for the NHS overall. Details on the major unilateral NHS programs are shown in Table 1.

1. The largest NHS program is the Rental Construction Financing Initiative (RCFI), a low-cost loan program for developers to build new rental housing. To access the program, developers must ensure 20 percent of units meet the affordability criteria of rent that is less than or equal to 30 percent of median gross income for the area of the development project. This level of affordability must be maintained for 10 years. In addition, the project's gross achievable residential rental income must be 90 percent or less of the potential gross income.

   Critiques: Housing experts have stated that the program is mis-aligned with the NHS targets to reduce core housing need and questioned the need for incentivized market housing construction. As Steve Pomeroy notes, the fact that "since 2017, fewer than 4% of new rental starts have utilized this program confirms overwhelming disinterest from developers. Meanwhile due to more favourable market conditions and demand, new rental construction has expanded three-fold since 2015, unrelated to the RCFI incentive."[1]

2. The National Housing Co-Investment Fund (NHCF) has two streams. One is a repair and renewal stream for existing community and low-cost housing, and the second is for new construction. The NHCF is the second-largest NHS program for new construction and provides governments, non-profit housing providers and private developers with low-interest loans and contributions of up to 40 percent of project costs. This program focuses on mixed-income development projects where 30 percent of units must have rents at less than 80 percent of median market rents for a minimum of 20 years.

   Critiques: NHCF projects require the support of another level of government to be funded. The funding each provincial or territorial government is willing to provide for NHCF projects varies. Because of this, many NHCF projects are not affordable for low-income earners who require deeply subsidized rents. As well, not-for-profit housing developers are finding that NHCF funding is no longer adequate as interest rates and the cost of residential construction have increased, because they are able to borrow less to finance more expensive projects. Maximum grants of up to 40 percent of project costs have been limited to a maximum of $25,000 per unit.[2] Based on the CMHC's 2019

calculation of at least $100,000 in subsidy required per unit for affordability, the NHCF will not result in many more low-cost units unless the program is significantly adjusted.[3]

3. The Rapid Housing Initiative (RHI) was announced in the wake of the COVID-19 pandemic to enable the rapid construction of new housing and the acquisition of existing buildings to be converted to permanently affordable housing. It is the only program to support rents set at less than 30 percent of gross household income for targeted groups for 20 years. The project funds 100 percent of a project's capital costs. As of March 2023, there have been three rounds of RHI funding. The federal government has not committed to future rounds of RHI.

   Critique: Prior to the announcement of the RHI, deeply affordable rents were missing from the NHS housing program continuum. The RHI has filled this gap, but the first two rounds of the program are expected to create a relatively small 10,000 new units of housing.[4] Unless the RHI is expanded into a permanent NHS program, the NHS will not be able to reach people in need of deeply subsidized rent.

4. The Federal Community Housing Initiative (FCHI) intends to replace 55,000 federally administered social housing agreements as old federal social housing agreements expire.

   Critique: Unlike the Canada Community Housing Initiative (CCHI), which is directed toward provincially administered social housing agreements, the FCHI does not support repairs or expansion of the existing community housing stock.[5]

Several smaller or emerging programs are also in the NHS and include the Affordable Housing Innovation Fund, housing research initiatives and funds for Indigenous off-reserve housing.[6]

Table 1: NHS Unilateral Program Descriptions

Major Unilateral Programs	Program Description	Progress as of December 31, 2022
Rental Construction Finance Initiative (RCFI)	• Low-cost loan program for developers to build market rentals. • Program requirement is for at least 20 percent of units to have rents below 30 percent of the median total income for the area, and the total residential rental income must be at least 10 percent below its gross achievable residential income.	Committed funds to support the creation of 39,682 units.
National Housing Co-Investment Fund	• Two project streams, one repair stream and one new construction stream. • Provides non-repayable loans and repayable loans. • Program requirement is for 30 percent of units to have rent at less than 80 percent of median market rent, for a minimum of 20 years. • Must be supplemented by investments from another order of government.	Committed funds to support the creation of 28,985 new units. 19,271 rent at less than 80 percent of median market rent. Committed funding for the repair/renewal of 111,752 units. 103,836 units rent at less than 80 percent of median market rent.

Rapid Housing Initiative (RHI)	• Capital is 100 percent funded to support deeply affordable units. • Expedites the delivery of new affordable, supportive, and transitional housing units that are targeted to CMHC priority populations. • Supports new construction, land acquisition and conversion of non-residential to affordable housing. • Affordability is defined as less than 30 percent of gross income. • Program requirement to maintain affordable units for at least 20 years.	Committed funds for the creation of 10,249 new affordable units in Rounds 1 and 2.
Federal Community Housing Initiative (FCHI)	• Replace 55,000 federally administered social housing agreements as old federal social housing agreements expire.	Committed subsidies to 25,706 households during Phase 1.

Source: CMHC. (2022).[7]

[1] Canadian Housing Evidence Collaborative. (2021, June). Review and Options to Strengthen the National Housing Strategy. Canadian Housing Evidence Collaborative. https://chec-ccrl.ca/wp-content/uploads/2022/08/Review-and-recommended-strengthening-of-the-NHS-JULY-2021.pdf

[2] Gorenkoff, J (2023). For Canadians to have Access to Affordable Homes, New Policies must be Created to Address High Interest Rates and Construction Costs. Policy Options. Institute for Research on Public Policy. https://policyoptions.irpp.org/magazines/march-2023/hitting-the-reset-button-on-the-national-housing-strategy/
[3] Pomeroy, S. & Kreda, J. (2017). *Demand or Supply Side Housing Assistance*. CMHC. https://assets.cmhc-schl.gc.ca/sf/project/cmhc/pubsandreports/research-insights/2019/research-insight-demand-supply-measures-pomeroy-69464-en.pdf?rev=eda25dd6-2d0b-47ff-baa4-8515c74dfdbb
[4] CMHC (2022). Rapid Housing Initiative Updates. Government of Canada. https://www.cmhc-schl.gc.ca/en/professionals/project-funding-and-mortgage-financing/funding-programs/all-funding-programs/rapid-housing/rapid-housing-updates
[5] Blueprint ADE. (2022, August). Analysis of the Progress of Bilateral National Housing Strategy Programs. The National Housing Council. https://assets.cmhc-schl.gc.ca/sites/place-to-call-home/pdfs/national-housing-council/blueprint-report-analysis-progress-bilateral-nhs-programs-en.pdf?rev=0d9e503d-6318-4ccb-b909-e1a00f291163
[6] Canadian Housing Evidence Collaborative. (2021, June).
[7] CMHC. (2022). Progress on the National Housing Strategy December 2022. Government of Canada. p. 2-5. https://assets.cmhc-schl.gc.ca/sites/place-to-call-home/pdfs/progress/nhs-progress-quarterly-report-q4-2022-en.pdf?rev=aec29f50-fbd9-43b2-9a47-086486a59bc7

BILATERAL PROGRAMS UNDER THE NATIONAL HOUSING STRATEGY

Starting in 2018, the federal government signed bilateral agreements with the provinces and territories under the National Housing Strategy (NHS). Provinces and territories agreed to housing targets, cost-shared commitments and reporting mechanisms from 2018/2019 to 2027/2028. Provinces and territories must each produce an action plan identifying how the bilateral agreement targets will be achieved. A bilateral NHS program is a program that is developed and administered by the provincial or territorial government, and initially included the Canada Community Housing Initiative (CCHI), Provincial-Territorial Priorities Funding (PTPF), and Northern Housing Initiative (NHI). The bilateral agreements were later amended in 2020 to include funding for the Canada Housing Benefit (CHB).

1. The Canada Community Housing Initiative (CCHI) provides cost-matched funding to replace 330,000 units of expiring provincially administered social housing agreements through baseline targets set in each bilateral agreement. The CCHI also requires no net loss of Urban Native housing units. Many provinces and territories are using the funds to repair and upgrade existing social housing. In addition, some of the funding is used to fund rent-assisted social housing units.[1]

   Critiques: Due to a lack of reporting on the provincial and territorial action plans, it is not possible to know if CCHI funding is being used to support rent-geared-to-income units at risk from expiring social housing agreements. The National Housing Council stated that “P/T reporting on program outcome summary statistics thus far has been inconsistent and has left Canada Mortgage and Housing Corporation (CMHC) and researchers without even a high-level overview of progress made under the Housing Partnership Framework nationally to date".[2] As well, the CCHI does not fund units that expired prior to its introduction. Social housing agreements (SHA) began to expire in the late 1990s, long before the introduction of the CCHI. Housing providers with expired social housing agreements were not able to support rent-geared-to-income units and had to increase rents, sell units, or stop operating community housing. The number of units that have expired social housing agreements is unknown.[3]

2. The Canada Housing Benefit (CHB) is a portable housing benefit that is designed and administered by the provincial and territorial governments. The benefit is paid directly to tenants to bridge the gap between affordable rent for a household and their actual rent in the private market. Some provincial and territorial governments already had existing portable housing benefits, so some governments have used the CHB to fill the gaps of the existing program, stack with the existing program or develop a new program if none exist.

Critique: Provincial and territorial governments have created vastly different benefits through the CHB. An individual that is eligible for the CHB in one province may not be eligible in another province. The National Housing Council found that the benefits are designed to be “sufficient to close, or nearly close, the entire affordability gap for most eligible households (BC, AB, NL, PEI), or are designed to close the affordability gap together with existing housing supports (MB, QC). In some provinces (NS, ON), the benefit will close the affordability gap for many eligible households but will leave some households with larger gaps between their incomes and rents in need. In Saskatchewan, the benefit does not close the affordability gap for any eligible households and closes less than half of the affordability gap for most eligible households."[4] It also concluded that at current levels of funding, only 36 percent of households in core housing need are eligible for the CHB.

3. The Provincial-Territorial Priority Fund (PTPF) is cost-matched funding that provincial and territorial governments can use at their own discretion to fund regional priorities.

   Critique: The scope of PTPF funding initiatives is wide and can vary dramatically depending on provincial or territorial priorities. For example, Alberta’s Action Plan states it may use the funds toward mixed-income housing projects, repairs for social housing, rent supplements and operating deficits for social housing,[5] while New Brunswick's Action Plan states PTPF funding will go towards repair programs for low income earners, emergency shelters and second stage housing as well as a homeownership assistance program for low and moderate income earners.[6]

4. Northern Housing Initiative (NHI) provides each territory with a fixed amount of annual funding to support housing. The NHI is funded entirely by the federal government but territories have agency over how the funding is used.

   Critique: Similar to the PTPF, territories may fund programs as they see fit. This will likely result in the creation of uneven levels of low-cost housing.

Table 1: NHS Bilateral Program Descriptions

Bilateral Program	Program Description	Progress as of December 31, 2022
Canada Community Housing Initiative	• Expand and replace 330,000 provincially and territorially administered social housing agreements as social housing agreements expire. May also be used to repair community housing.	Committed funds to support 196,374 units.
Provincial-Territorial Priority Funding	• Provinces and territories can use the funds at their discretion to support regional needs.	Committed funds to support 242,842 units.
Canada Housing Benefit	• Provides funding for portable housing benefits. • Provinces and territories have considerable flexibility to design the CHB to meet needs within their region. • Reduce or eliminate housing need for 300,000 households	Committed funds to support 166,129 households.

Northern Housing Initiative (NHI)	• Provides each territory with a fixed amount of annual funding to support housing. • The NHI are funded entirely by the federal government but territories have agency over how the funding is used.	Committed funds to support 1,439 units. (307 will be new units, 370 will be repaired units and 762 will be rent supplements).

Source: Canada Mortgage and Housing Corporation. (2023). [7]

[1] Blueprint ADE. (2022, August). Analysis of the Progress of Bilateral National Housing Strategy Programs. The National Housing Council. https://assets.cmhc-schl.gc.ca/sites/place-to-call-home/pdfs/national-housing-council/blueprint-report-analysis-progress-bilateral-nhs-programs-en.pdf?rev=0d9e503d-6318-4ccb-b909-e1a00f291163
[2] Blueprint ADE. (2022, August). p.6
[3] Blueprint ADE. (2022, August).
[4] Blueprint ADE. (2022, August). p.47
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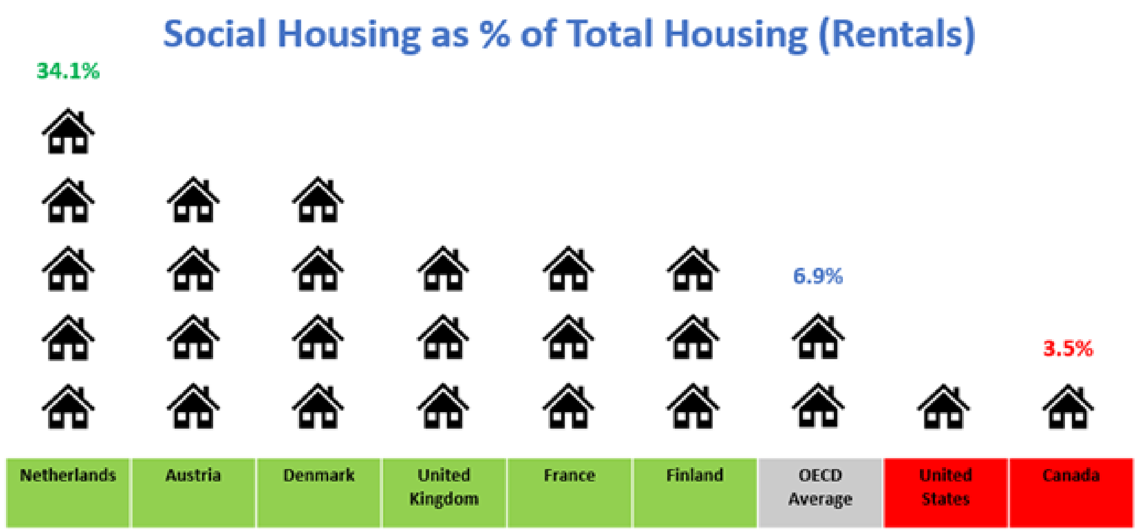
FACTORS SHAPING THE PRESENT MOMENT

WHERE CANADIAN HOUSING POLICY FITS IN THE INTERNATIONAL CONTEXT

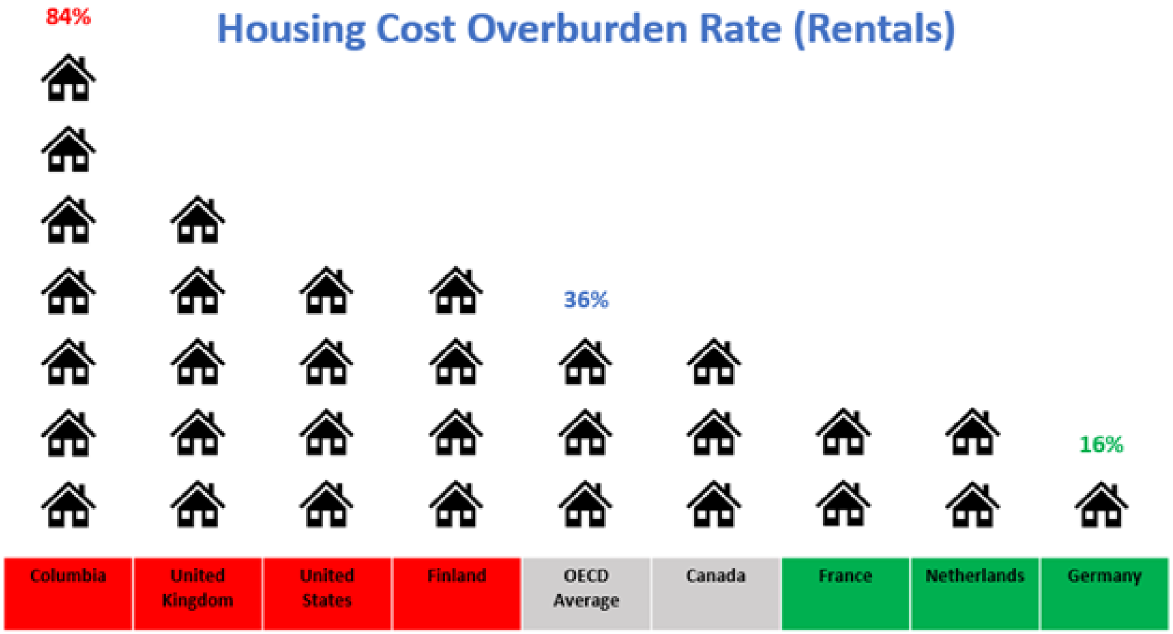
The challenges Canada faces regarding housing policies are not unique. Many nations with similar levels of economic wealth have experienced affordable housing shortages, but some have been able to tackle these challenges much more successfully than Canada has. This provides advocates and policymakers in Canada an opportunity to learn from the best practices implemented around the world to ensure that Canada's housing policy going forward is more successful.

In 2020, Canada was ranked 20th among OECD countries in terms of the number of social rental dwellings as a share of the total number of dwellings at just 3.5%. This pales in comparison to countries such as the Netherlands (34.1%), Austria (23.6%), Denmark (21.4%), United Kingdom (16.7%), and France (14.0%). The OECD average (6.9%) is almost twice as high as the rate is in Canada.



Source: OECD. (2020).[1]

Canada does fare better in terms of the rate of housing cost overburden as measured by the OECD, although there is still plenty of room for improvement here as well. This rate measures the share of the population in the bottom income quintile that are spending more than 40% of their disposable income on rent. Canada sits right at the OECD average (36%) in this measure but trails significantly behind global leaders such as Netherlands (27%) and Germany (16%).



Source: OECD. (2020).[2]

Finland provides a great example for Canadian housing advocates and policymakers to imitate. While Finland does not have the most robust stock of social housing in OECD countries, it has continued to make positive gains in recent years through increased investments. The government has designed policies which ensure there is a particular level of affordable housing available in every city. Finland does employ demand side policies such as rent benefits; however, its success is a result of its constant policy of providing affordable social housing. This is a stark contrast when compared to other governments which continue to look to the failed market solutions that emerged in the 1980s and escalated with the ascendancy of neoliberalism.

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[2] OECD. (2020).

RELIANCE ON RENT ALLOWANCES AND THE PRIVATE MARKET

Canada is a liberal welfare state that has a history of reliance on the private sector and of favouring policies of homeownership over social rental housing. The majority of housing is built by the private sector, and most housing is owned and operated privately:

- 68% of homes are privately owned by residents, while 27% are privately operated rental units.
- Less than 5% of homes are owned and operated by the non-market sector . Unlike the private market, the non-market sector sets rent prices administratively rather than reflective of market forces.[1]

The issue with depending on the private rental market is twofold: first, the market simply does not produce good-quality housing that is affordable to the lowest-income households; and second, even for those households that can afford rental housing, the private rental market is constrained by limited construction, loss of lower-rent units, and high demand. Property developers moved away from purpose-built rental buildings to more profitable condominiums in the 1990s. With little rental construction for decades, rents for existing units increase constantly. The expansion of Real Estate Investment Trusts (REITs) during the 1990s and 2000s accelerates this process by acquiring vast amounts of already limited assets. These circumstances create a "perfect storm" that currently drives down vacancy rates and increases rents for existing market stock.[2]

Although rental starts have doubled as a proportion of all housing starts nationally since 2014, there is rapid erosion of existing rental stock. Demolition to spur new development, and REIT-owned units undergoing property upgrades for larger investment returns, have been linked to the loss of lower rent units. Concurrently, new rentals built after 2015 are on average 140% of average market rent.[3] With the private rental market facing a loss of affordable units due to acquisition of these properties by REITs[4] and other investors, a solution could be for non-profit providers to be equipped to acquire affordable units to deter further erosion. However, the majority of National Housing Strategy programs are for new construction rather than acquisition.

The non-profit sector is also facing its own challenges. Funding for the non-market sector is decreasing as funding agreements signed in the 1970s and 1980s expire, and small housing providers are often left to their own devices to make up for a lack of capital through refinancing, intensification or redevelopment of assets. Although the National Housing Strategy promised to address the loss of rent-geared-to-income units in non-profit and cooperative housing, the budget announced for the Federal Community Housing Initiative in 2017 is insufficient.

While there was a top-off of $118 million allocated to the program in the 2021 budget, this amount is still not enough when accounting for larger provincially administered stock.[5]

Private market developers can also apply for low cost loans to incentivize affordable market rentals through the Rental Construction Financing Initiative. However, this program's affordability criteria state that 20% of units must be rented at 30% of area median household income or less. The RCFI is "…the single largest element of the NHS at $25.75 billion over the decade of the NHS window".[6] Yet, only a meagre 4% of new rental starts used this program's financing. It lends the question: if property developers are not enthusiastic about rental incentives, despite market rental starts rising due to demand, why direct such high levels of funding towards the private sector versus the public sector?

Finally, in recent years, policy solutions to housing need have focused on portable rent benefits rather than bricks and mortar social housing construction. Portable rent benefits are a form of subsidy that travels with the tenant, and can be used to reduce housing costs in private or nonprofit rental housing. Although they do not directly address the quality or size of housing, they provide a household with extra money for rent, hopefully enabling the household to afford a good quality and appropriately-sized unit. However, they do not create new units, nor do they address discrimination or other social barriers to housing. Because they can be used in private housing, portable rent benefits act as a subsidy to private landlords, in contrast to social housing which offers an alternative to the private market. The Canada Housing Benefit is a new portable rent benefit that is being rolled out across the country, but each province has its own portable rent benefit programs as well.

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[1] Pomeroy, S. (2021). Background Primer on Canada's Housing System. CHEC-CCRL. https://chec-ccrl.ca/wp-content/uploads/2022/08/Background-Primer-on-Canadas-Housing-system-APRIL-20-2021.pdf

[2] Pomeroy, S. & Maclennan, D. (2019). Current state of rental housing in Canadian cities. In Tsenkova, S (Ed).The future of affordable housing: Planning and design innovation (pp. 59-73).

[3] Pomeroy, S. & Maclennan, D. (2019).

[4] A REIT is a Real Estate Investment Trust. See Glossary for more information.

[5] Pomeroy, S. (2021). Review and options to strengthen the National Housing Strategy. CHEC-CCRL. https://chec-ccrl.ca/wp-content/uploads/2022/08/Review-and-recommended-strengthening-of-the-NHS-JULY-2021.pdf

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EXPIRING OPERATING AGREEMENTS

Excerpted from: [The changing nature of social housing in Manitoba](), originally published by the Canadian Centre for Policy Alternatives-Manitoba (2019).

Each public, non-profit and cooperative housing project was established through an operating agreement signed with the federal government, and sometimes with the provincial government as well. The agreement lays out how the property will be managed: how many and what kind of subsidies are available, how many units are to be subsidised, and so on. It also includes limits on rents, how the property could be financed, and how much money the organization could contribute to its reserve fund. The agreements are usually set to expire when the mortgage is paid off, after 35-50 years.

Today, these agreements have been expiring for almost two decades, and will continue to expire for two more decades. The expiries offer several opportunities and challenges for nonprofit and cooperative housing providers. Opportunities include a shift in accountability from the Province to the board of directors, giving greater freedom for new directions; greater flexibility in managing an organization, including the chance to develop new policies and procedures to improve how the organization operates; and the chance to use the equity in the property to access private financing and mortgages to renovate or expand. For many organizations, these opportunities are energizing and exciting, and they outweigh the loss of subsidies and the challenges that also come with the end of the agreements.

The challenges are not, however, insignificant. The biggest challenge is perhaps the loss of operating and RGI (rent geared to income) subsidies. Organizations must be sure that they will be able to continue to provide housing once the agreement expires. If the subsidy makes up the difference between the rent a tenant pays and the operating cost of a unit, the organization must make up the difference. Housing providers estimate that at least 70-80 percent of the units must charge market rents in order to provide subsidies to the remaining 20-30 percent. If a majority of the units are RGI, it will not be possible.

This situation is complicated by aging buildings that may need repairs and upgrades. While all organizations have reserve funds for capital investment, the operating agreements often limited contributions to the fund. As a result (and because of Manitoba's slow rental market for many years), many organizations have very low reserves. Housing providers may need to increase rents to complete necessary repairs and to ensure that the reserve fund is sustainable.

To deal with these challenges, boards of directors must be ready to change how the organization operates. However, some boards do not have the capacity to deal with this new and evolving situation. In some cases, these challenges are compounded within one organization, making it even more complicated for the board. For some providers the only option is to sell the property, often to the private market—in which case the low-cost housing is likely to be lost.

Housing providers' responses to these challenges and opportunities depend on their outlook. While the opportunities for housing providers are significant, they require a business-oriented mindset that can adapt to the realities of a post-subsidy context. Providers that focus on providing low-cost housing to very low-income tenants may face greater difficulty after their agreement expires, as they may face a choice between providing low-cost housing and maintaining the organization. Overall, the post-expiry context is relatively new, and even those providers whose agreements were among the first to expire are still figuring out their next steps.

These changes are not neutral, however. As little, if any, social housing has been built in the last 25 years, the loss of any low-cost housing is likely to result in increased housing need. Most of the agreements that have already expired are for mixed-income housing: providers that offer RGI, lower-end-of-market, and affordable or market rents. However, the agreements that were signed in the 1980s and early 1990s were, for the most part, for 100 percent RGI housing. The majority of these agreements will begin to expire in 2021. Since RGI rents are usually lower than a unit's operating cost, it is impossible for providers to continue to offer the same level of low-cost housing without ongoing subsidies. At that point those organizations will need to make difficult decisions about how to move forward: for example, increasing rents and finding new tenants, or selling some units to subsidize others.

For organizations that are strongly committed to providing low-cost housing to very low-income households, the loss of the subsidies is a significant challenge, and no amount of increased flexibility can make up for that. For tenants, the loss of secure, affordable, and collectively created housing is a key element in the slowly shrinking social safety net. The answer is not to increase the role of the market in housing provision, but to reinforce the right to housing through the provision of long-term social housing.

THE FINANCIALIZATION OF HOUSING

Globally as well as in Canada, housing is often treated as a commodity: it's used for speculation and financial gain. In fact, investors have now acquired almost one fifth of Canada's private multi-family rental stock. Yet, this was not always the case; before the 1990s, real estate was almost always purchased in a local context and for the purpose of it being a place to live. The emergence of financial mechanisms like REITS have increased the ability of national and international investors to purchase real estate in housing markets in which they have little to no connection.[1] REITs often purchase 'underperforming' affordable housing properties in order to increase rents and maximize profits. This process results in the loss of low-cost housing units in the private market, fewer housing options for low-income earners, and has exacerbated the number of people living in core housing need and experiencing homelessness.

The commodification and financialization of housing intensifies when governments dismantle social housing and decrease regulation for real estate investments.[2] Government deregulation of rent controls further increased the loss of affordable housing, and tenants often face displacement without strong government rent controls (often in the form of 'reno-victions').

As such, government policies have created the housing crisis of today by supporting the financialization of housing. As Martine August writes, "the federal government canceled involvement in social housing and downloaded responsibility to the provinces—effectively putting an end to new construction and reducing the supply of affordable housing going forward. Federal efforts turned to financializing homeownership, by securitizing and guaranteeing mortgage loans with risk-free returns for finance capital."[3] Even during a housing crisis, the federal government is reluctant to halt the financialization of housing as financial institutions, including CMHC, generate profits through the commodification of housing.

Housing experts have found that the number of affordable units created by the National Housing Strategy (NHS) will not be enough to keep up with the loss of naturally occurring affordable housing units.[4] Moreover, the NHS has further entrenched financialization and commodification in Canadian housing policy through its focus on market-rate housing and provision of housing by private sector landlords. For example, in 2021, the National Right to Housing Network stated, "by subsidizing private market development, [the NHS rental housing construction programs] risk exacerbating the adverse effects of gentrification, displacement, speculation, and other manifestations of the financialization of Canada's housing system. This in turn could worsen the socioeconomic outcomes of more households than the number directly housed through the funded projects, counter to a human rights-based approach to housing." [5]

The solution to commodification and financialization of housing is consistent government policies and funding that de-commodify housing and build the capacity of the social housing sector to meet the needs of those living in core housing need.[6] The following policy and program changes have been suggested by housing policy experts to curtail the financialization of housing:

- Disallow private investors from accessing NHS loans and funding.
- Revise tax policy to benefit housing providers who provide affordable housing and dissuade excess profit on rental housing.[7]
- Implement stronger rent control, including vacancy control regulations.[8]
- Legislate greater tenant protections.[9]
- Create conditions around anti-displacement for NHS loans and funding.[10]
- Disallow CMHC backed mortgages for REITs that are trying to acquire affordable housing units.[11]
- Create regulations on who can purchase affordable housing stock.
    - Montreal has implemented a bylaw to allow the right of first refusal on affordable housing.[12]
    - Germany has made it illegal for REITs to own multi-family residential buildings.[13]
- Implement a not-for-profit housing acquisition strategy to ensure existing affordable housing units are not lost to the financialization of housing.[14]

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CULTURALLY SAFE HOUSING FOR INDIGENOUS PEOPLES

Culturally safe housing are homes that foster connections to places of belonging, identity and where one comes from. A culturally safe home is where you live and feel a sense of commitment to caring for inside its walls and on the land it's built upon.[1]

Culturally safe housing is paramount in improving the quality of life for Indigenous people. The CHRA Indigenous Caucus assert that 73,000 Indigenous-specific housing units should be created in urban, rural and northern areas to keep up with demand.[2] In order for Indigenous Housing initiatives to have successful outcomes, they need to be Indigenous-led and incorporate culturally safe supports. Indigenous Peoples are in the best position to know what housing works in their communities. Colonial policies have harmed First Nations, Inuit, and Metis people and are responsible for grave housing conditions in their communities today. More than 1 in 6 Indigenous people are living in crowded housing. On-reserve homes disproportionately require retrofit and renovations. The on-reserve shortage of available housing has resulted in Indigenous people moving to urban areas, where culturally safe, affordable housing is scarce.[3]

Culturally safe community housing may have a variety of characteristics. An initiative called the *Urban Indigenous Homeward Bound* program demonstrated that built-in programming allows for single mothers to gain and maintain employment which yielded an 88% return on funding. Community housing assisted with housing Indigenous people and preventing police calls and homeless shelter stays - saving approximately $15,000 per housed individual a year. Educational attainment and self-determination also improved when the participants received culturally safe services, along with reducing thoughts of anxiety. People can reach healing and calmness when they feel stable and connected to loved ones and community in their home environments (Brant & Irwin-Gibson, 2020). Nisichawayasihk Cree Nation is taking a community economic development approach to housing - integrating culturally based local training, employment and environmental stewardship.[4]

Housing design can also impact how cultural identities are formed and how the home is used. Indigenous housing advocates have emphasised the need for more culturally safe housing that reflects traditional layouts and ways of family life. For instance, constructing units with eco-friendly and natural materials to create larger communal areas, access to outdoor spaces and suitable areas for holding ceremonies are recommendations for Indigenous-specific housing. There is also an identified need for homes larger than three

bedrooms, deeply subsidised housing, and housing with wraparound supports. The provision of affordable homes with wraparound services that reflect the cultures and origins of its recipients provide spaces for intergenerational healing and community.[5]

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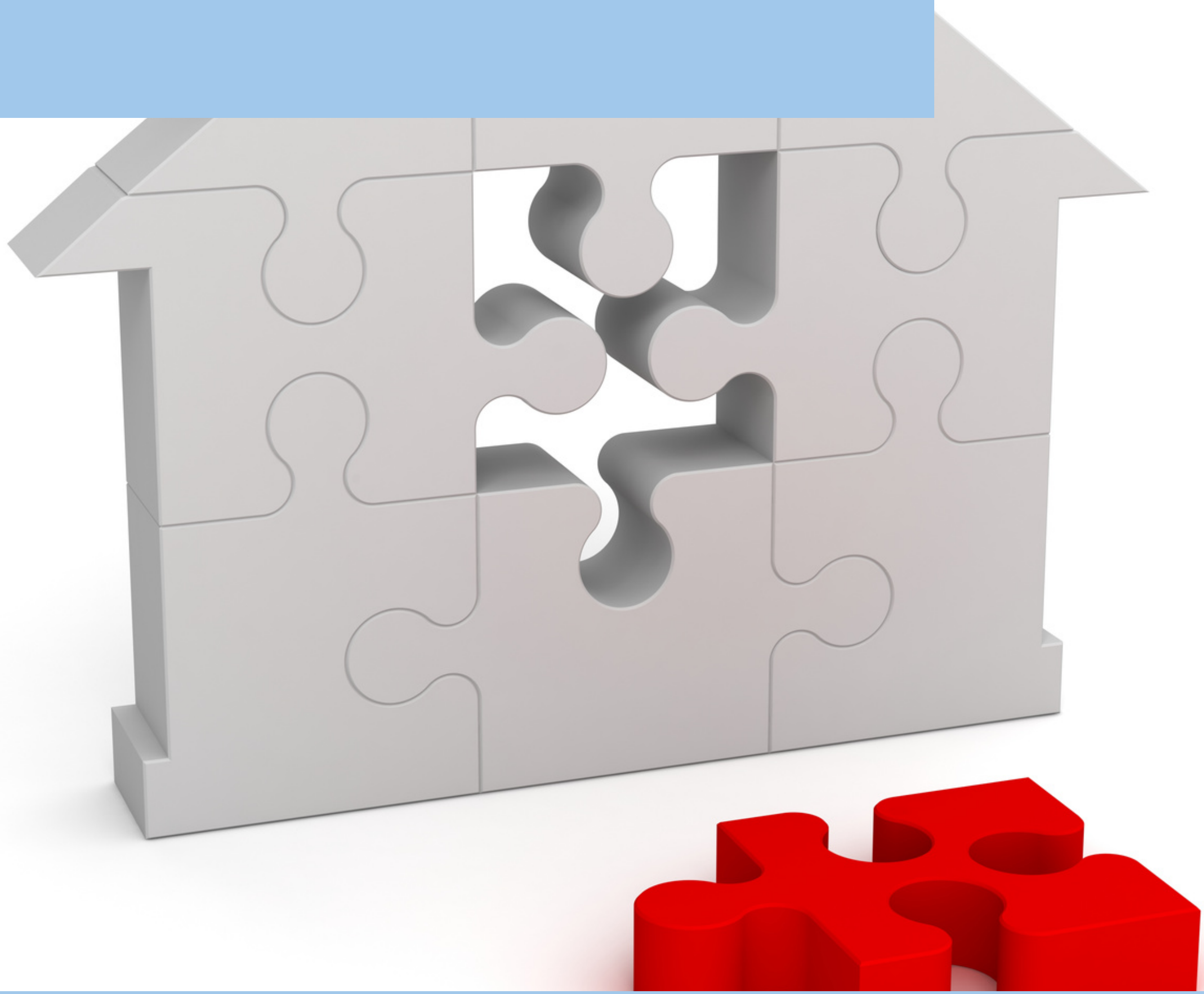
SOLUTIONS

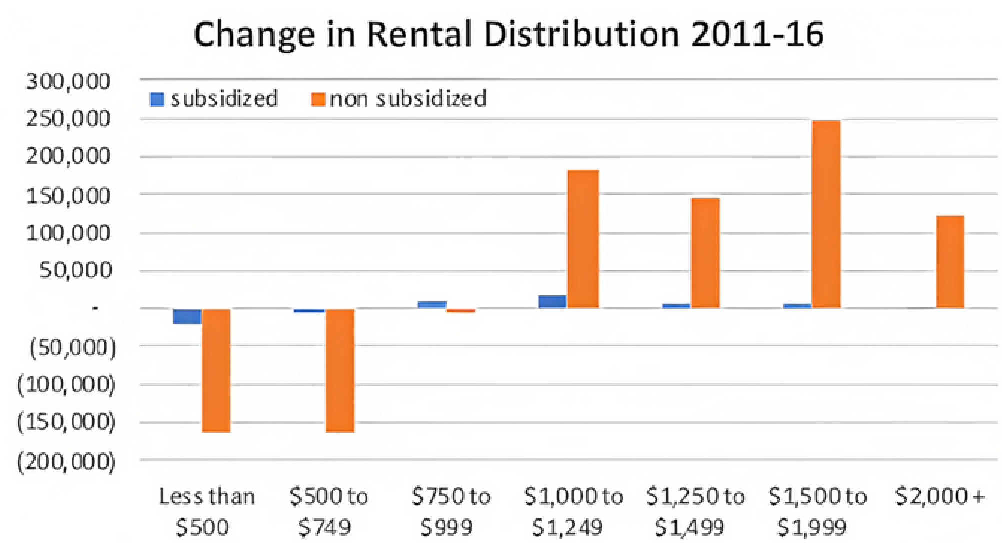


WHY CANADA NEEDS A NON-MARKET RENTAL ACQUISITION STRATEGY

By Steve Pomeroy

The challenge: Canada is losing affordable housing faster than we can create it

The erosion of "naturally occurring affordable housing" (NOAH) units is the most serious threat to Canada's supply of affordable housing. Between 2011 and 2016 the number of private rental units affordable to households earning less than $30,000 per year (rents below $750) declined by 322,600 units — a trend that appears to be continuing.



Source: NHS 2011 and Census 2016

Over the same period, the federal and provincial Investments in Affordable Housing program together with unilateral provincial initiatives, mainly in BC and Quebec, added fewer than 20,000 new affordable units – so for every one (1) new affordable unit created, at considerable public cost, fifteen (15) existing private affordable units (rents below $750) were lost![1]

These losses are driven chiefly by the financialization of rental housing – an asset class attracting investment from both large capital funds, as well as smaller investors, both seeking to capitalize on dramatically rising rents. A further contributor is the intensification and redevelopment of sites with older low-moderate rent properties. These annual losses far outstrip the 150,000 (only 15,000 per year) new affordable units planned under the 10-year National Housing Strategy (NHS).

This much heralded $40 Billion national initiative establishes a number of new funding envelopes. But missing from this array is an initiative to preserve Canada's rapidly eroding privately owned affordable rental stock.

The solution: preserve Canada's affordable housing stock through a non-market community-based acquisitions strategy.

While some are advocating for regulation to constrain the financialization of moderately priced rental housing, a complementary approach is to intervene to acquire these affordable properties. If you can't beat them, join them – this suggests an approach that would enable community-based non-profit providers to emulate the behavior of the REITs and capital funds to acquire rental buildings with rents at or below the median market rent.

Such non-market acquisition can shift these assets out of the speculative market (where they are considered "under-performing assets") into a non-market environment where these precious affordable rental units can be managed to preserve affordability in perpetuity.

Over the past three or four years the median rent in many cities has been increasing and double and triple the rate of inflation, abetted by turnover and a regulatory policy of vacancy decontrol. Holding rent increases to an inflation or rent index, can ensure the units remain at below median market levels. Indeed an analysis in Ottawa found that after 10 years of inflationary increases compared to ten years at 5% per year, rents would be 25% lower that if left in the market.

By reducing the loss of critically important moderate rent homes, this approach can help to prevent homelessness – especially family homelessness. In the immediate post-Covid recovery period, this can also help to manage the risk that speculative capital funds will scoop up affordable rental facing financial difficulty.

Originally published as a blog post in May 2020, at https://www.focus-consult.com/why-canada-needs-a-non-market-rental-acquisition-strategy/. For more information, please see https://chec-ccrl.ca/wp-content/uploads/2022/10/Updated-Analysis-on-Housing-Erosion-from-2021-Census-Steve-Pomeroy.pdf

[1] Malatest Associations (2019) Sponsorship and Funding of Investment in Affordable Housing Construction, prepared for CMHC enumerated 9,.839 IAH . This excluded any unilateral provincial units, and during this period both BC and Quebec were constructing on average over 2,100 units annually (so together likely contributed a further 10,000 units in addition to the 9,839 reported in Malatest (2019).

UPDATING THE NATIONAL HOUSING STRATEGY FOR SOCIAL HOUSING

The National Housing Strategy (NHS) is an encouraging first step towards maintaining thousands of affordable housing units. Yet, the housing crisis will persist as the ongoing loss of low-rent social and private market units means there will be even less affordable housing stock after the completion of the NHS than there was before its implementation. This is due to the lack of policies and programs that address the neoliberal conditions that created the housing crisis. Additionally, the NHS is an ineffective use of resources for those who are unhoused and in core housing need. The following highlights policy changes needed to confront the housing crisis, emphasizing an increase of rent-geared-to-income units to meet the needs of those in greatest housing need.

- **Rental Construction Financing Initiative (RCFi)**

The Rental Construction Financing Initiative was designed to create market housing for middle-class persons. Not only would this overwhelmingly private-owned housing stock have likely been created without government subsidy, but many of the market rental units from the program charge above median market rents.

- Instead, the RCFi funding should be reallocated toward one or more of the following:
    i. The National Housing Co-Investment Fund to create deeper levels of affordability with rent-geared-to-income rental units
    ii. The Rapid Housing Initiative to ensure further rounds of funding.
    iii. A not-for-profit housing acquisition program.

- **National Housing Co-Investment Fund (NHCF)**

The NHCF is not likely to create rent-geared-to-income units without substantial additional funding sources from another level of government. However, many provinces are not providing the funding needed to create rent-geared-to-income units.
As well, the NHCF only requires that affordability requirements be maintained for 20 years. This means that housing providers may increase funded housing units to market or even above-market rentals after this period.

- Instead, the NHCF should be funded by CMHC and provincial and territorial governments to create permanent rent-geared-to-income units. The mixed income model should not be relied upon as the main financial contributor to a social housing provider as it cannot provide rent-geared-to-income units nor support services.
    i. CMHC could invest greater capital funding into the NHCF (as the Rapid Housing Initiative does) to ensure a percentage of rent-geared-to-income units are available along with deeply affordable and affordable units. This model could be similar to BC

Housing's Community Housing Fund where 50 percent of units are rent-geared-to-income, 20 percent of units are based on income assistance rates and 30 percent of units are at affordable market rental rates. [1]

ii. Bilateral agreements could ensure that provinces and territories provide a project-based subsidy to social housing providers to maintain the affordability requirements of the units as well as to fund required support services.

Rapid Housing Initiative (RHI)

The RHI provides needed rent-geared-to-income units. Since the Rapid Housing Initiative responded to the acute need to house people who were unhoused during the pandemic, the program was put together very quickly with tight timelines and originally only announced one round of funding. A second and third round of funding was subsequently announced, and application processes have progressively become more relaxed. However, the Rapid Housing Initiative still does not have continuous funding like other NHS programs.

- Instead, the RHI should be expanded to be a permanent NHS program to meet the original NHS targets to reduce core housing need by 530,000 individuals and eliminate chronic homelessness by at least 50 percent.

Canada Community Housing Initiative (CCHI)

Social housing agreements (SHAs) have been extremely important to the social housing sector as they have been the only significant mechanism that has ensured long-term rent-geared-to-income units across Canada.

- Instead, CMHC bilateral agreements should ensure extended social housing agreements are funded at rent-geared-to-income levels. This data must be made more readily available to the public as there is currently a lack of transparency in how different regions are dealing with the expiring social housing agreements.

Provincial-Territorial Priority Fund (PTPF) & the Northern Housing Initiative (NHI)

The PTPF and NHI are both administered by provinces and territories, causing concern over a lack of consistent funding that meet the needs of people in the greatest housing need.

- Instead, the PTPF and NHI should have targets for new construction of rent-geared-to-income social housing units that would reach people in core housing need and people experiencing chronic homelessness.

Canada Housing Benefit (CHB)

The CHB is underfunded to meet the needs of those in core housing need in Canada. Additionally, provinces and territories have a high degree of flexibility to design and implement the CHB. This has meant that CHB does not reach those in core housing need equally across different regions in Canada. As the National Housing Council's Analysis of the Progress of Bilateral National Housing Strategy Programs notes "we estimate that the cost of serving all households eligible to receive the benefit in 2022 would be approximately $3.5 billion. In our model, this figure falls slightly to $3.4 billion by 2027... While funding for the CHB does increase over time, our model shows that this growth will not be enough to bridge the funding gap. The total funding gap for 2026/27 closes slightly but remains large at approximately $2.5 billion."[2]

- Instead, the CHB should be scaled up to consistently meet the needs of all eligible households living in core housing need across Canada.

Financialization of Housing

The financialization of housing must be addressed by the NHS to halt the erosion of naturally existing affordable housing.

- Policies to prevent investors from further exploiting the housing market must be implemented. See the handout on the financialization of housing for further information.
- A not-for-profit housing acquisition strategy must be implemented to stop the erosion of naturally existing affordable housing. See the handout on the City of Toronto's City of Toronto's Multi-Unit Residential Acquisition program for more information.

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[1] BC Housing. (2020). Request for Proposals. Government of British Columbia. https://www.bchousing.org/sites/default/files/media/documents/CHF-Request-for-Proposal.pdf p.6-7.

[2] Blueprint ADE. (2022, August). Analysis of the Progress of Bilateral National Housing Strategy Programs. The National Housing Council. https://assets.cmhc-schl.gc.ca/sites/place-to-call-home/pdfs/national-housing-council/blueprint-report-analysis-progress-bilateral-nhs-programs-en.pdf?rev=0d9e503d-6318-4ccb-b909-e1a00f291163 p.37

RESEARCH SNAPSHOT

HOUSING AS A HUMAN RIGHT, NEOLIBERALISM, AND THE NEW CANADA HOUSING BENEFIT

By Catherine Leviten-Reid and Megan Digou, Cape Breton University, and Jacqueline Kennelly, Carleton University

This research explores whether demand-side approaches, and the new Canada Housing Benefit (CHB) in particular, can fulfill government obligations under a rights-based approach to housing. The CHB is a portable housing allowance that is provided directly to tenants; it is designed bilaterally and thus has regional features, but at its core, it provides cash assistance to tenants to help them pay their rent.

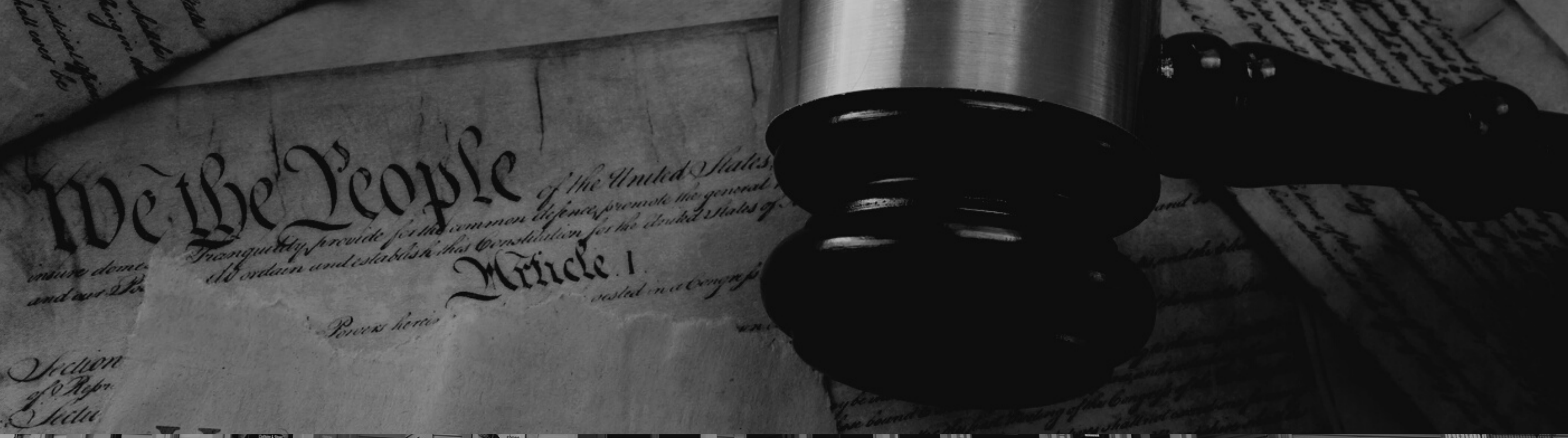
This research takes place in the Cape Breton Regional Municipality (CBRM, population 94,000), the second largest municipality in Nova Scotia. Twenty-two in-depth interviews were conducted in 2021-2022 with fourteen tenants and five staff of a non-profit organization which supports them (n=19). Seventeen interviews were held with fourteen tenants; follow-up interviews occurred when they had recently moved to a new unit, or had just begun to receive a subsidy. We also reviewed government documents and secondary data. Five of the tenants who participated in this research are receiving a rent supplement as the organization (and province) is transitioning to the new CHB allowance; nine are receiving the new CHB allowance rather than the rent supplement. The rent supplement program involves agreements between government and landlords which are based on agreed-upon rents, which must be reasonable and in keeping with rents charged in the region, as well as housing condition. In the supplement program, the subsidy is provided directly to the landlord and is tied to the unit. The CHB housing allowance provides cash assistance directly to tenants, with the amount provided capped at average market rent (AMR).

Most tenants interviewed were women and lived alone, with the average age being 37 and average household income equaling $15,900.

Findings

All those we interviewed emphasized how helpful it was to receive financial assistance with rent every month. Participants noted that it helped them to pay for housing, and that the extra funds they had available from the rental subsidy allowed them to buy other necessities, especially food. Despite the financial relief provided, tenants continued to face significant financial struggles. One of the significant shelter-related expenses was energy costs.

Results were mixed with respect to housing condition. Some tenants we interviewed spoke positively about their units and buildings. Others, in receipt of both the CHB allowance and the rent supplement, noted rodent infestations and problems adequately heating or cooling their apartments. Some tenants, and in particular some receiving the CHB allowance, also reported living in housing in need of major repair.



Tenants also reported mixed experiences with their landlords. Some described landlords as responsive to problems they reported, making repairs quickly and taking care of property maintenance, while others reported concerns about possible eviction and lack of landlord response to requests for major repairs.

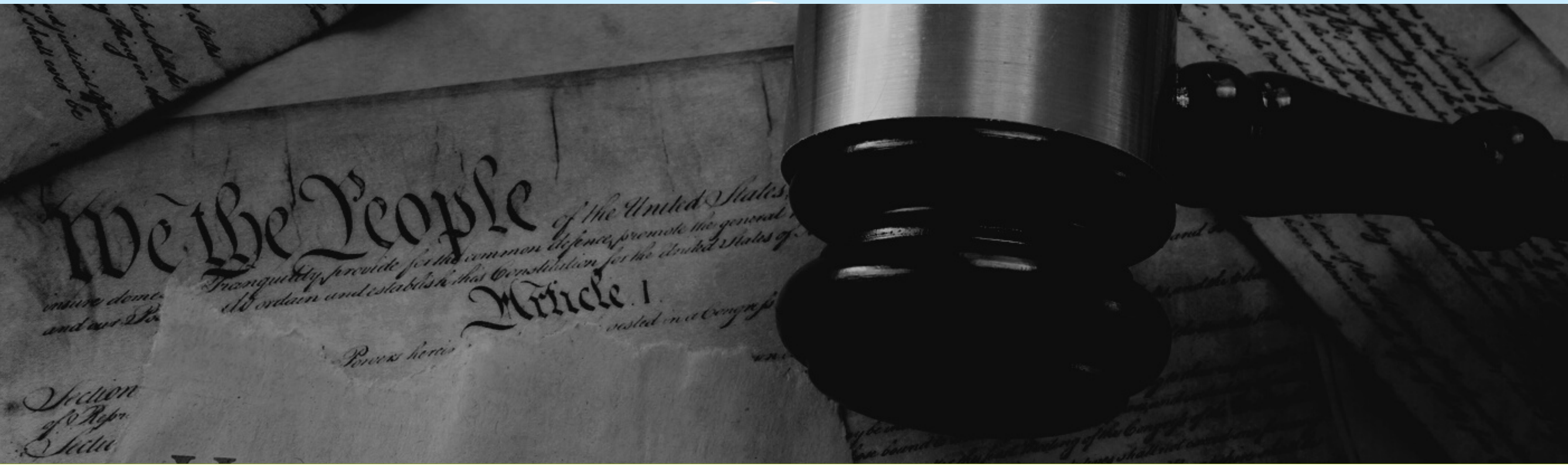
Tenants with rent supplements received greater financial support than those with CHB allowances. One reason for this is because utility costs are treated differently by the two subsidy types, with a partial credit available in the supplement program, versus no consideration given in the CHB calculation. Another is rooted in the use of the rent cap at AMR for the CHB allowance, in contrast to providing a subsidy amount which bridges the gap between the tenant's portion and their actual rent, as used in the supplement program.
For the nine research participants receiving the new CHB allowance, only three had units which were below or equal to the AMR rent ceiling. Housing workers noted that the AMRs used in the allowance calculation were not updated regularly enough by the province to reflect changes in the housing market, nor did they reflect the rents of vacant units. The results are a rent cap which greatly underestimates actual rental costs in the community, and many CHB allowance participants who are paying at least 50% of their income on shelter costs.

Discussion and Policy Solutions

Our findings demonstrate a clear misalignment between a rights-based approach to housing and the experiences of tenants in receipt of demand-side housing assistance. They show that tenants in receipt of both kinds of financial rent assistance are living in units that fail to meet standards of adequate housing as defined by the United Nations. Findings also show that the shift from the older rent supplement to the new CHB allowance has fundamentally represented a step back for the most vulnerable of individuals and families.

Neoliberal policy-making is visible within both types of rental assistance. For example, any use of public money which flows directly to private landlords reduces the social state and relies on private enterprise to meet citizens' needs. The risks of this approach are mitigated, somewhat, by the older rent subsidy design, which includes agreements between government and the housing provider to encourage proper maintenance and repair; and subsidy calculations that do not impose an artificial 'cap'. Both of these protective measures have been discarded under the newer CHB design in Nova Scotia.

It is possible to correct some of the flaws in the new CHB allowance program through policy design. Monthly financial support could be provided for utilities. The AMR cap could be removed altogether so it is consistent with public, rent-geared-to-income housing, or it could be raised to, for example, 120% of AMR, with research showing, not surprisingly, that



more generous housing subsidies reduce rent burdens. To address the habitability of units, inspections could be conducted by government before and during a tenant's lease agreement.

Beyond specific changes to the CHB design, legislating vacancy control would be a structural mechanism to address affordability challenges. To address habitability, instead of targeted inspections, a universal program of landlord licensing and inspections could be used. Such an approach would also address more systemic problems with the housing market, including the renting of housing in need of significant repair, and the opting out by landlords of renting to subsidy recipients when repairs during a tenancy are requested. However, political openness to these structural changes is slim.

Also relevant is the state of the local rental housing market, which is chronically lacking in affordable units that meet reasonable standards of habitability. This results in constrained choices for tenants and housing support workers alike. Findings suggest that any effort to respond to Canada's lack of affordable housing primarily through demand-side programs is unlikely to succeed without substantial investment in supply-side responses that generate affordable and habitable rental units.

Acknowledgements
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RESEARCH SNAPSHOT: AN ANALYSIS OF TORONTO'S MULTI-UNIT RESIDENTIAL ACQUISITION PROGRAM

By Sahla Mitchell

Background & Context

The Canadian Housing Policy Roundtable estimates that in Canada from 2010 to 2020, 60,000 affordable units were sold every year and subsequently lost their affordability.[1] Affordable units were defined as monthly rents below $750, which would be necessary for annual incomes under $30,000. In response, there has been a growing call for governments to fund an affordable housing acquisition strategy for the not-for-profit housing sector. This would enable not-for-profit housing providers to acquire existing at-risk affordable housing in the private sector to ensure units are kept at affordable rental rates. [2]

Toronto's Multi-Unit Residential Acquisition (MURA) program was announced in 2021 and is one of the first programs in Canada that is dedicated to halting the loss of naturally occurring affordable housing units. Without an effective not-for-profit affordable housing acquisition program, the City of Toronto's target to create 40,000 affordable units by 2030 would be ineffective due to the loss of naturally occurring affordable housing. Furthermore, achieving this goal would be unnecessarily costly as the City would rely on new construction.[3] Preserving already existing affordable housing is cost-efficient as it costs 30 to 60 percent less than new construction.

Facts of the Case

MURA is a $20 million fund dedicated for not-for-profit and Indigenous housing providers to purchase, renovate, and operate at-risk private market affordable housing buildings. MURA projects are selected through an annual call for proposals made through the Housing Secretariat. The program covers capital costs of up to $200,000 per apartment building unit and up to $150,000 for single occupancy rooms. Proponents may also be eligible for a municipal and school property tax exemption for a 99-year term. In addition to funding, the City of Toronto's Open Door Program is available to proponents to take advantage of affordable housing incentives such as access to surplus public land, fee exemptions and the expedition of planning approvals. Once a property is identified, proponents submit full project details which include capital and operating budgets to the Housing Secretariat. The Housing Secretariat then confirms that the proposed project meets the program criteria and forwards the approval to the City. Upon final approval the City forwards the total funding to the proponent within 30 days.[4]

To date, MURA has awarded funding to six organizations which will go towards the purchase of 140 housing units. One of the proponents was the Parkdale Neighbourhood Land Trust (PNLT).

In 2021, PNTL was able to purchase an affordable housing property with 36 units through financing from a community investment bank and $2.6 million in guarantees from investors. A year after the building was purchased, PNLT bought out the investors' 30 percent equity in the building with MURA funding which reduced the $8 million dollar loan to a $2.79 million dollar mortgage. MURA funds likely enabled PNLT to reduce their loan, thus reducing monthly mortgage payments and building equity for the organization which ultimately increased the organization's capacity to be able to purchase and preserve the affordability of more buildings. MURA enables not-for-profit and Indigenous organizations to acquire at-risk affordable housing units in the private market that do not private financing resources available to them. MURA ultimately allows housing providers to maintain affordability and improve quality through reduced financing costs.

Lessons Learnt

MURA has several lessons learnt as housing advocates have quickly weighed in on the program's successes and challenges:

Challenges

1. MURA has reduced its annual budget from $20 million in 2022 to $18.85 million in 2023, and City Council passed a motion to identify funding for $10 million in funding each year which could result in the program having less funding than it did when it was announced. This is a challenge for the scale of the program as Toronto is a city with very high property acquisition costs.

2. Toronto is known for its towers and many of the older high-rises provide affordable housing. Yet, buildings with more than 60 units are not eligible for MURA funding. The program would require additional funding to enable the purchase of at-risk affordable towers. Parkdale Neighbourhood Land Trust's 2022 report, *Parkdale Tower Rental Housing Study*, recommends the Province provide new capital funding for the acquisition in addition to new rent-geared-to-income rental housing supplements to ensure that acquisition projects are able to be kept at affordable rates.

3.There is no equivalent provincial or federal program to make MURA compatible for stackable funding. MURA would be most efficient with a provincial and federal program that work together to fill policy and funding gaps. For instance, MURA does not provide low-interest loans for the remainder of the project costs, but low interest loans are a key aspect of the National Housing Strategy's new construction streams. The Canada Mortgage and Housing Corporation would be well suited to integrate low-interest loans with MURA projects.

Successes

1. MURA has been successful in achieving its objective of securing some at-risk affordable housing units in the private sector. While funded MURA project details that outline the level of affordability have not been made public, the not-for-profit housing sector will ensure rental rates are as affordable as funding levels allow for.

2. MURA has demonstrated that governments can disburse funds rapidly for the acquisition of real estate. MURA has a two phased funding application review process that allows non-profit organizations and Indigenous organizations to be in partnership with the City of Toronto to move quickly to purchase affordable housing before it is sold off for redevelopment. The federal and provincial governments could consider a similar program design to ensure an expedited funding application review process of 30-60 days.

3. MURA funding agreements ensure affordable housing will be secured for 99 years. This will help to ensure that the efforts of MURA will be permanent.

Conclusion

MURA has demonstrated that cities can play a major leadership role in addressing housing challenges through effective programs and funding. Yet, to address the scale of the loss of naturally affordable housing, the cooperation of all levels of government are needed. The successes of MURA could be increased when designing complementary provincial and federal programs to create an inter-jurisdictional not-for-profit affordable housing acquisition strategy in Canada.

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[4] City of Toronto. (2022).