



**Written Submission for the Pre-Budget Consultations
in Advance of the Upcoming Federal Budget**

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on behalf of the Social Housing and Human Rights Coalition
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List of Recommendations

Social Housing and Human Rights - Call to Action

1. Create a minimum of 50,000 net new accessible rent-geared-to-income social housing (i.e. non-market owned) units each year for 10 years, starting now. These units should be targeted for those experiencing core housing need and homelessness and have rents permanently set at no more than 30% of household income or social assistance housing allowances.
2. Invest in the acquisition, construction, operation, and maintenance of new and existing public, non-profit, and cooperative-owned housing that meets the unique and varied requirements of people experiencing core housing need and homelessness.

This should be achieved in part by:

- a) Renewing the National Housing Strategy and redirecting federal housing investments for market housing toward non-market owned accessible housing with rents set at less than 30% of household income. The Rapid Housing Initiative is an example of a program that investments can be redirected to.
- b) Targeting the Rental Protection Fund exclusively to non-market owned accessible housing with rents set at less than 30% of household income.
- c) Setting aside public land and buildings for non-market owned accessible housing with rents set at less than 30% of household income.
- d) Partnering with other levels of government so that all social housing programs include ongoing operating subsidies that ensure rents are permanently set at less than 30% of household income and targeted to low-income renters.

Background

In November 2023, the Social Housing and Human Rights (SHHR) campaign officially launched focusing on the expansion of social housing: public, non-profit, and co-op owned housing for low-income renters where rents are set at less than 30% of household income, or social assistance housing allowances, in perpetuity.

In April 2023, over 100 researchers and advocates from across Canada attended the SHHR conference in Winnipeg. Our synthesis of the vast research on housing precarity concluded that the decades-long approach of relying on the private sector to solve all housing issues has not worked. Participants identified many strategies that must be implemented simultaneously to address housing needs, including rental assistance, rent regulations, and wrap-around supports.

There was consensus that the federal government, in collaboration with regional governments across the country, must prioritize the expansion and maintenance of the social housing supply, and recognition that this critical strategy had no focused national campaign. Support for this call to action is growing across Canada among experts, advocates, and people with lived experience around housing insecurity and homelessness.

Defining social housing in relation to affordable housing

SHHR defines social housing as housing owned by public, non-profit or co-op housing providers that exists outside of the market. It cannot be used for speculation or to generate wealth. Agreements between governments and housing providers limit how properties can be used, and provide subsidies tied to the unit to ensure rents are geared to household income or set at social assistance housing allowances for eligible households. Social housing is targeted to low-income renters and people experiencing homelessness.

The Canada Mortgage and Housing Corporation (CMHC) considers housing affordable if it costs less than 30% of before tax household income. In most provinces and territories, social housing rents are set at less than 30% of household income or at social assistance housing allowances. In Quebec, the threshold is set and must be maintained at less than 25% of household income.

Social housing is different from affordable housing which varies in definition across governments and housing programs. These definitions don't often align with CMHC's definition and produce rents that are typically more affordable than market housing but still unaffordable to the lowest-income households. For example, the national Affordable Housing Fund that ran under the National Housing Strategy set affordability criteria at 70% of median market rent for a 20-year minimum. In Winnipeg, this is approximately \$880/month. However, Winnipeg's lowest-income households can only

afford \$510-\$820/month.¹

Like CMHC, Build Canada Homes (BCH) defines affordable housing as housing that costs less than 30% of before-tax household income, but it doesn't ensure that all tenants in affordable housing projects pay an affordable rent. Affordable projects are targeted to households with incomes at or below the median in a given municipality or subcensus area. BCH divides these households into four income bands as a percentage of area median income: very low-income (less than 26%), low-income (26–50%), moderate-income (51–75%), and median-income (76–100%). The rent of BCH projects must not exceed 30% of the income at the upper threshold of each income band. As a result, such rents could still be unaffordable for households with lower incomes within the same band if the maximum rent is applied. Although BCH can support proposals that create housing affordable to very low- and low-income households, targeting renters in these bands is not a requirement. BCH must commit to outcome-based targets for the quantity or percentage of housing that will be affordable to very low- and low-income households.

It is important to note that BCH chose to target affordable projects to households with incomes below the area median of all incomes rather than of renter incomes, which is much lower. Using the all income median raises the upper threshold of each income band. This makes higher income households eligible to live in BCH projects and increases rents, making BCH projects less accessible for the renters who need it most. BCH must target affordable projects to households with incomes below the median income of renters to guarantee the supply of housing for those in greatest need, very low- and low-income renters and persons experiencing homelessness.

Federal investments in Social Housing

Canada has a strong history in building and sustaining social housing. The most significant investments were made between 1950 and 1985. Since then, federal investment produced very little in social housing, shifting toward market and affordable housing programs for middle and high-income households.

The 2017 National Housing Strategy (NHS) represented a historic federal investment in housing but it was designed to produce very little social housing and therefore has produced few units affordable to low-income households and people experiencing homelessness.² For example, the Rapid Housing Initiative (RHI) was the only program exclusively targeting non-market-owned housing with household income-based affordability criteria. The most recent NHS progress report shows that only 10% of funding allocated through the Strategy's four largest programs has gone through the RHI, which has produced only 4% of the 226,086 units created.

¹ [Carter, T., Janzen, T., McCullough, S., Shirliffe, R., & Sinclair, E. \(2020\). City of Winnipeg comprehensive housing needs assessment. Institute of Urban Studies, University of Winnipeg.](#)

² [Analysis of Affordable Housing Supply Created by Unilateral National Housing Strategy Programs: Research Report." Prepared for the National Housing Council Working Group on Improving the National Housing Strategy \(Blueprint ADE and Wellesley Institute, February 4, 2022\).](#)

Other NHS affordable housing programs, like the Affordable Housing Fund (AHF), targeted for-profit and non-profit housing providers and based affordability criteria on market rents or median incomes rather than household income. The AHF was the second largest NHS program. A 2022 report found that approximately 50% of units it created are unaffordable to middle-income households, and approximately 65% are unaffordable to low-income households.³

The largest NHS program, the Apartment Construction Loan Program, primarily supports for-profit housing providers. One report found only 3% of homes financed through this program meet the needs of low-income households.⁴

Overall, NHS investments overwhelmingly support market strategies that fail to house those most in need. With no outcome-based targets to produce non-market owned housing for very low- and low-income households, BCH is in danger of the same failure. SHHR urges the federal government to commit to outcomes-based targets and substantial investments in the renewed NHS towards non-market owned housing with rents set below 30% of household income, specifically for renters in core housing need and those experiencing homelessness.

Moving Forward with the Fall 2026 Budget

The SHHR coalition calls on the federal government to implement our recommendations in the Fall 2026 Budget. This includes:

1. Create a minimum of 50,000 net new accessible rent-geared-to-income social housing (i.e. non-market owned) units each year for 10 years, starting now. These units should be targeted for those experiencing core housing need and homelessness and have rents permanently set at no more than 30% of household income or social assistance housing allowances.
2. Invest in the acquisition, construction, operation, and maintenance of new and existing public, non-profit, and cooperative-owned housing that meets the unique and varied requirements of people experiencing core housing need and homelessness.

The federal government has projected the need to expand overall supply by building 5.8 million homes over the next decade (580,000 per year). Since 33.5% of households are renters, 194,300 of this supply should be rental. Approximately one quarter of renters are in core housing need, so a minimum of 48,575 (rounded to 50,000) should be at rent-geared-to-income rates affordable to low-income renters. This more than triples the target in the NHS to build 160,000 affordable homes and redirects the NHS focus from modest affordability to deep affordability at less than 30% of household income. This amount is relatively consistent with calls to double the number of social housing units to

³ Ibid.

⁴ Ibid. 1925

more closely align with the OECD average.

Expanding social housing requires capital investments to build new units and acquire/repurpose existing properties. New and existing social housing also require ongoing subsidies to support operating costs while charging rents geared to income. Operating costs may include community-based, culturally appropriate supports. Finally, social housing requires ongoing capital investments to maintain its quality. Canada is losing social housing units because of expiring operating agreements and underinvestment in maintenance. The federal government must work with other levels of government to develop social housing programs that cover all these costs. Capital programs will not produce social housing if they fail to include ongoing operating subsidies.

The federal government can add 50,000 new social housing units annually for 10 years by:

- a) Renewing the National Housing Strategy and redirecting federal housing investments for market housing toward non-market owned accessible housing with rents set at less than 30% of household income. The Rapid Housing Initiative is an example of a program that investments can be redirected to.
- b) Targeting the Rental Protection Fund exclusively to non-market owned accessible housing with rents set at less than 30% of household income.
- c) Setting aside public land and buildings for non-market owned accessible housing with rents set at less than 30% of household income.
- d) Partnering with other levels of government so that all social housing programs include ongoing operating subsidies that ensure rents are permanently set at less than 30% of household income and targeted to low-income renters.

The expansion and preservation of social housing across Canada will require leadership and a significant funding commitment from the federal government. The federal government must also partner with other levels of government to ensure capital programs for social housing also include operating subsidies that guarantee affordable rents for those most in need. The SHHR coalition strongly recommends the federal government make funding to lower levels of government conditional on the expansion of housing owned by public, non-profit, and co-op sectors with rents set at less than 30% of household income and targeted to low-income renters. Provincial, territorial, and municipal levels of government all have important roles to play in the expansion and preservation of social housing and must be held accountable for every dollar they receive from the federal government.

About SHHR

The Social Housing and Human Rights (SHHR) coalition is a group of organizations and

individuals concerned about the lack of deeply affordable rental housing for low-income individuals and families.

[Visit our website](#) for a list of Supporting Members that endorsed the SSHR call to action.