



THE NATIONAL  
**RIGHT TO HOUSING**  
NETWORK

# **BUILD CANADA HOMES**

## **ANALYSIS AND FEEDBACK**

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**PREPARED BY:**

**THE NATIONAL RIGHT TO HOUSING NETWORK**

August 27, 2025

## NRHN Analysis of Build Canada Homes

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Thank you for the opportunity to contribute feedback to the design of Build Canada Homes.

The [National Right to Housing Network](#) (NRHN) is a broad-based, grassroots civil society network established to fully realize the human right to housing for all in Canada. Launched in February 2020, NRHN has quickly become a key resource in guiding Canada's new human rights-based oversight mechanisms—introduced under the *National Housing Strategy Act* (NHSA) —to address systemic housing inequities which exacerbate the housing and homelessness crisis across the country. Our network of over 2,000 organizations and individuals works with policymakers to ensure that their human rights commitments made under the NHSA are meaningfully realized.

As the connective tissue for the housing justice movement, our network is guided by the NHSA and the progressive realization of the right to housing, as articulated in the International Covenant on Economic, Social and Cultural Rights. We are informed by first voice advocates and rights holders and are focused on amplifying the voices of historically marginalized populations including women and gender-diverse persons, Indigenous peoples, persons with disabilities, Black and racialized persons.

In the past, we have worked closely with the federal government to help advise on and strengthen a rights-based approach to Canada's National Housing Strategy, Canada Housing Plan, and other housing policies. The NRHN has also been deeply engaged in international human rights processes, including the review of Canada by the UN Committee on the Elimination of Discrimination Against Women, and the 2023 Universal Periodic Review, where Canada received recommendations to, “Step up efforts to ensure the right to adequate housing and achieve clear goals for eliminating all forms of homelessness in accordance with the National Housing Strategy.”

### **Build Canada Homes as a Pillar of Canada's National Housing Strategy**

We are encouraged by the recommitment of the Government of Canada to make housing more affordable and see potential for alignment within the measures proposed in the Market Sounding Guide to Canada's human rights commitments to end homelessness and address core housing need.

Critically, we recommend that the team at Housing, Infrastructure and Communities Canada consider, in the next steps of implementing the Build Canada Homes entity, that the Minister of Housing and Infrastructure Canada, has a legislative requirement to, “**develop and maintain a national housing strategy to further the housing policy, taking into account key principles of a human rights-based approach to housing.**” (see NHSA s. 5(1)).

The NHSA further articulates that this means, tangibly that the government's National Housing Strategy is to:

- (a) set out a **long-term vision for housing** in Canada that recognizes the importance of housing in achieving social, economic, health and environmental goals;

**(b)** establish **national goals relating to housing and homelessness** and identify related priorities, initiatives, timelines and desired outcomes;

**(c)** focus on **improving housing outcomes for persons in greatest need**; and

**(d)** provide **for participatory processes** to ensure the ongoing inclusion and engagement of civil society, stakeholders, vulnerable groups and persons with lived experience of housing need, as well as those with lived experience of homelessness. (see NHSA s. 5(2)).

### **Feedback on Build Canada Homes**

If Build Canada Homes is to be a central pillar of Canada's next national housing strategy, it must similarly align with a human rights-based approach, and the commitment to the progressive realization of the right to adequate housing.

Concretely, in alignment with the legislative requirements of the NHSA, Build Canada Homes should:

1. Include explicit reference to the *National Housing Strategy Act* and articulate that Canada's housing policy has a **particular focus on ending homelessness** as an urgent priority in the shortest possible amount of time. In the context of Build Canada Homes, this means that the emphasis should be on maximizing deeply affordable housing for very low- and low-income households – those with incomes below 50% of median household income.
2. Ensure all development projects for Build Canada Homes involve a **community housing (including public housing) provider** in a lead position. Consider an approach that enables development at scale, includes Indigenous-led housing, and cements a strong partnership between government and the community housing sector. There must also be a route for small communities and rural areas when a portfolio-based approach is not practical – or when a portfolio-based approach will not serve projects with specific needs.
3. Begin with a **consistent definition of “affordability”** that focuses on improving outcomes for those in greatest need. It is recommended that the federal government use an income-category based definition - which acknowledges that what is affordable for a median income household is not going to be affordable for a low-income household. This can be developed based on the [Housing Assessment Resource Tools \(HART\) income categories](#). This definition should be reviewed consistently to ensure affordable housing is genuinely in reach for those in core housing need or experiencing homelessness.
4. **Focus Build Canada Homes projects on those in greatest need** (i.e. those experiencing homelessness and in core housing need), create accountability mechanisms and processes for review to ensure the entity remains steadfast in this focus.
5. Embed a **“For Indigenous, By Indigenous”** mandate into Build Canada Homes' approach with a 20% Indigenous-led target, alongside a dedicated Indigenous stream, proportional regional

funding that reflects critical Indigenous housing needs, and a governance structure that meaningfully includes Indigenous voices in decision-making.

6. Outline how projects funded by Build Canada Homes will target rights holders who experience intersectional barriers to housing. This is best accomplished through a 20% Indigenous-led target, and community housing leadership throughout projects. The targets for rights holders includes the **priority populations** outlined in the National Housing Strategy, including:

- Indigenous Peoples
- Women and children fleeing domestic violence
- Seniors
- Young adults – including students
- People with disabilities
- People dealing with mental health issues
- Drug users
- Veterans
- 2SLGBTQ2IA+
- Black and Racialized groups
- Recent immigrants, especially refugees
- People experiencing homelessness

Similarly measure how projects will support those in protected groups not included in the National Housing Strategy including:

- Those who have interacted with the criminal justice system
- Persons with precarious immigration status
- Persons with disabilities who require both housing and accompanying support services to live independently in the community
- Migrant workers
- Low-income women and lone caregivers
- Rural and remote communities

7. Under the rights and gender-based analysis plus requirements of the federal government, require that any Build Canada Homes projects be targeted to **the 25% threshold of Canada's National Housing Strategy to meet the needs of women and gender-diverse persons.**
8. Require reporting by Build Canada Homes of how rental projects funded will **respect the rights of tenants**, following the elements of the Renters Bill of Rights. Tenant rights, landlord disclosures may be required to demonstrate how these investments are consistent with the NHA ([SHARE Investors for Affordable Cities](#)).

9. Coordinate with other departments to **improve the adequacy of income supports** for those experiencing homelessness and core housing need, especially as Build Canada Homes is being set up ([Maytree social assistance summaries](#)).
10. Capital financing must be paired with **ongoing rental assistance** to enable deep affordability for low-income households.

#### **Recommendation for Next Steps in the Build Canada Homes Consultation**

We echo the concerns of our partners, like the Le Front d'action populaire en réaménagement urbain (FRAPRU) that the process of consultation needs to be more robust to be in alignment with s. 5(2)(d) of the NHSA, with a particular focus on the input of rights holders, tenants, and people experiencing homelessness. Similarly, we understand the financial pressures of Canada's economy – this is not the time to be reducing the government's financial commitments to solving the housing crisis. This is, instead, a moment for the government of Canada to emerge as a leader to solve the housing crisis.

Thank you for the opportunity to contribute to this process. We look forward to engaging further as we work together to make housing more affordable to everyone in Canada – and to fulfill Canada's commitment to the progressive realization of the right to housing.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michele Biss'.

Michèle Biss, Executive Director  
National Right to Housing Network