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Rights-based intergovernmental agreements for the next National Housing Strategy

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The opinions, findings, and conclusions or recommendations expressed in this document are those of the author and do not necessarily reflect the views of the Canadian Human Rights Commission or the Federal Housing Advocate.

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List of Abbreviations

AMHI: Area median household income

CMHC: Canada Mortgage and Housing Corporation

GBA+: Gender-based analysis plus

HAF: Housing Accelerator Fund

HART: Housing Assessment Resource Tools

HIFIS: Homeless Individuals and Families Information System

NHS: National Housing Strategy

NHSA: National Housing Strategy Act

FPT: Federal, provincial, and territorial

Executive Summary

This report is intended to support the development of multilateral and bilateral agreements with provinces, territories, municipalities, regions, and Indigenous governments, as part of the next National Housing Strategy. The report provides recommendations for a multilateral Housing Partnership Framework agreement, based on essential principles of a rights-based approach, common definitions, and key indicators to track progress towards outcome targets that progressively end homelessness and ensure that all Canadians have an affordable and adequate home. It provides specific suggested revisions to the 2018 Housing Partnership Framework to accomplish this.

The Government of Canada has taken steps to progressively realize the right to adequate housing, as ratified in international covenants. In 2017, the first National Housing Strategy aimed to reduce chronic homelessness and housing need over the decade leading to 2027-28. As part of the strategy, bilateral agreements were signed with provinces and territories, informed by a 2018 multilateral Housing Partnership Framework. In 2019, the National Housing Strategy Act provided a legal framework for a rights-based approach to ensuring adequate housing for everyone in Canada. On June 21, 2021, the United Nations Declaration on the Rights of Indigenous Peoples Act came into force, affirming the Declaration as an international human rights instrument that can help interpret and apply Canadian law and providing a framework to advance its implementation. By 2022, further bilateral agreements had been signed with municipalities, regions, and Indigenous governments as part of the Housing Accelerator Fund.

Despite some program success, all indications are that Canadian housing conditions have worsened over the past decade. All forms of homelessness have increased, housing costs have become more unaffordable, especially for vulnerable communities, and generational disparities in outcomes have worsened, threatening the economic and social viability of several large cities. It is time for a bolder and more coordinated rights-based approach.

This report recommends **internationally comparable rights-based outcomes, such as ending homelessness by 2040, ending low-income housing need by 2050, and providing enough affordable and adequate supply for moderate- and median-income households by 2060**. These measurable outcomes should be underpinned by:

1. Annual public-facing transparent data based on common definitions, to be collected as a condition of bilateral and multilateral agreements.
2. Clear and accountable relationships between the federal government, provinces and territories, municipalities and regions, and Indigenous governments.
3. Moving from a project basis for programs to portfolio-based conditional infrastructure and housing financing and grants with municipalities, regions, Indigenous governments, provinces, and territories to improve affordable housing supply and support modern methods of construction.

Introduction

This report, written to inform ministerial and intergovernmental engagements by the Federal Housing Advocate, is intended to support the development of the next National Housing Strategy, which is due no later than March 2028. It builds on several recent government reports, including:

- National Housing Council. (2025a). *Measuring What Matters: Proposing an Outcomes Framework for Federal Housing Policy*. National Housing Council.
- National Housing Council (2025b). *Scaling Up the Non-Market Sector in Canada*. National Housing Council.
- Whitzman, C. (2025). *Human Rights-Based Housing Targets and Mechanisms for Canada*. Office of the Federal Housing Advocate.
- Neha Review Panel. (2025). *We Are Human. We Deserve a Place to Live. It's That Simple*. National Housing Council.
- Canadian Human Rights Commission. (2023). *Federal Housing Advocate's Observational Report—British Columbia*.

Following on from the National Housing Council's Outcomes Framework, this report elaborates on how an “outcomes-focused approach to measurement” can be embedded into “federal housing policy, including in the emerging Build Canada Homes” as well as a revised intergovernmental Housing Partnership Framework” as part of a rights-based approach to “housing as an interconnected system... requiring complementary policies... from homelessness to homeownership.”¹ To gain perspectives on how outcomes-based indicators would work, the author met with legal scholars, including Professor Alexandra Flynn (Peter J. Allard School of Law, University of British Columbia) and Michèle Biss (National Right to Housing Network). She also met anonymously with several provincial and municipal figures who had worked on previous intergovernmental housing agreements.

The report is also informed by recent Canadian literature regarding intergovernmental agreements, including:

- Flynn, A. (2025). *Binding Rights: Contractual Federalism and the Right to Housing in Canada*. *European Review of Contract Law*, 21(3), 393–412.
- Han, J. Y. (2024). *Charting Progress: Clearing Up the Confusion Over Bilateral Agreements*. Centre for Excellence on the Canadian Federation.
- Neve, A. (2023). *Closing the Implementation Gap: Federalism and Respect for International Human Rights in Canada*. Institute for Research on Public Policy.
- Schwan, K., & Perucca, J. (2022). *Realizing the Right to Housing in Canadian Municipalities: Where Do We Go from Here?* Office of the Federal Housing Advocate.

¹ National Housing Council. (2025). *Measuring What Matters: Proposing an Outcomes Framework for Federal Housing Policy*. <https://nhc-cn1.ca/publications/post/measuring-what-matters-2>

The report responds to the five priorities expressed by federal, provincial, and territorial housing ministers in September 2025:

- 1) Renewing **intergovernmental partnerships** on affordable housing beyond the expiry of the National Housing Strategy in 2028;
- 2) Addressing homelessness through strengthened responses and coordinated investments, including more **deeply affordable, supportive and transitional accommodation** with wraparound supports for vulnerable populations to help reduce chronic homelessness;
- 3) Increasing housing supply, with a focus on **affordable housing**, by coordinating efforts to unlock new housing starts and reduce barriers;
- 4) Supporting **Indigenous housing** and working with First Nations, Inuit and Métis to advance Indigenous-led solutions and improve access to safe, culturally appropriate housing; and,
- 5) Scaling up **modern methods of construction** by accelerating the adoption of modular, prefabricated, and other innovative technologies, where they make sense, to enhance speed and efficiency in delivering housing.²

Canada has long prided itself on leadership in international human rights, including the right to adequate housing.³ From 1968 onwards, successive federal policies echoed the principle that “all Canadians have the right to be adequately housed.”⁴ In 2017, the first National Housing Strategy, with an explicitly rights-based approach, aimed to reduce homelessness and housing need over the decade leading to 2027–2028.⁵ As part of that strategy, bilateral agreements were signed with provinces and territories, informed by a multilateral Housing Partnership Framework.⁶ In 2019, the National Housing Strategy Act provided a legal framework for a rights-based, federal-led approach to providing adequate housing for

² Government of Canada. (2025, September 25). Ministers working together to tackle key housing and homelessness issues. <https://www.canada.ca/en/housing-infrastructure-communities/news/2025/09/ministers-working-together-to-tackle-key-housing-and-homelessness-issues.html>

³ Neve, A. (2023). *Closing the Implementation Gap: Federalism and Respect for International Human Rights in Canada*. Institute for Research on Public Policy. <https://centre.irpp.org/wp-content/uploads/sites/3/2023/05/Closing-the-Implementation-Gap-Federalism-and-Respect-for-International-Human-Rights-in-Canada.pdf>

⁴ Oberlander, H. P., & Fallick, G. (1992). *Housing a Nation: The Evolution of Canadian Housing Policy*. Government of Canada. Quotation from 1968 report, cited on p. 86. https://publications.gc.ca/collections/collection_2018/schl-cmhc/nh15/NH15-818-1992-eng.pdf

⁵ Government of Canada. (2018). *Canada's National Housing Strategy: A Place to Call Home*. Government of Canada. <https://www.cmhc-schl.gc.ca/nhs/guidepage-strategy>

⁶ Federal-Provincial-Territorial Meeting of Ministers Responsible for Housing. (2018, April 9). *NEWS RELEASE – Federal, Provincial and Territorial Ministers Endorse New Housing Partnership Framework*. <https://scics.ca/en/product-produit/news-release-federal-provincial-and-territorial-ministers-endorse-new-housing-partnership-framework/>

everyone in Canada. After 2022, there were further bilateral agreements signed with municipalities, regions, and Indigenous governments through the Housing Accelerator Fund.

However, despite some program success, all indications are that Canadian housing inequalities have worsened over the past 10 years. Homelessness has increased,⁷ housing costs have become more unaffordable, especially for vulnerable communities,⁸ and generational disparities in outcomes have worsened, with affordable options extremely limited in several of Canada's most populous metropolitan areas, including the Greater Toronto Area and BC's Lower Mainland.⁹

This report is intended to improve the outcomes of the next National Housing Strategy. Agreements between federal and other levels of government can better enable outcomes that can progressively end homelessness and ensure that all Canadians, including those who are most marginalized, are able to access adequate housing, which is essential to their survival and well-being.

The report provides rights-based recommendations for intergovernmental agreements based on:

- Principles and elements of a rights-based strategy
- Lessons from the current National Housing Strategy ("NHS 1.0") for the next National Housing Strategy ("NHS 2.0")
- Definitions
- Targets and governance of agreements
- Indicators
- A new Housing Partnership Framework

⁷ In Ontario, Canada's most populous province and the province with the best data, homelessness increased 50% between 2021 and 2025, with a total of almost 85,000 people unhoused. Donaldson, J., Kandyba, L., & Wang, D. (2026). *Municipalities Under Pressure One Year Later: An Update on the Human and Financial Cost of Ontario's Homelessness Crisis*. Association of Municipalities of Ontario. <https://www.amo.on.ca/sites/default/files/assets/DOCUMENTS/Reports/2026/MunisUnderPressure1YearUpdateReport2026-01-13.pdf>

⁸ There is no major city in Canada where a single person on minimum wage can afford a one-bedroom rental. Macdonald, D., & Tranjan, R. (2024). *Out-of-Control Rents: Rental Wages in Canada, 2023*. Policy Alternatives. <https://www.policyalternatives.ca/wp-content/uploads/2024/09/OUT-OF-CONTROL-RENTS.pdf>

⁹ Since 1977, escalating home values have contributed an additional \$3.2 trillion in housing wealth, with two-thirds of it going to those over age 55. Meanwhile, in Ontario, the median home price would need to fall by 60%, a decrease of \$530,000, for the median household under 40 to be able to afford a home. Kershaw, P., Long, A., Kudus, K., & Harris, M. (2022). *Celebrating Stalling Prices for Canadian Homes: Why Canadians Need Statistics Canada to Improve Measurement of Housing Inflation in the Consumer Price Index*. https://assets.nationbuilder.com/gensqueeze/pages/6865/attachments/original/1669063474/GS_National_Housing_Report_2022_.pdf?1669063474

Principles and Elements of a Rights-Based Strategy

The National Housing Strategy Act (NHSA)¹⁰ requires that: “The [responsible] Minister must develop and maintain a national housing strategy to further housing policy, taking into account key principles of a human rights-based approach to housing.” These principles include:

- Prioritizing vulnerable groups
- Meaningfully engaging with vulnerable populations
- Addressing discrimination and inequality as it affects the right to housing
- Using all appropriate means to promote the right to adequate housing and allocating sufficient resources
- Ensuring independent monitoring of the realization of the right to adequate housing

The human right to adequate housing comprises seven defined elements,¹¹ only two of which are explicitly measured in the standard Canadian definition of core housing need:

1. **Affordable:** Housing costs should not be a barrier to meeting other basic needs, such as food, and costs should be protected against unreasonable increases. This element is measured as part of core housing need through the internationally standard proxy of housing costs amounting to no more than 30% of before-tax household income. International indicators focus on affordability for low-income households, who have the least disposable income.¹²
2. **Habitable:** Dwellings should have adequate space for the inhabitants, be properly maintained, and provide protection from the elements and other threats to health and well-being, including maximum and minimum home temperatures. This element is measured as part of core housing need, with overcrowding determined by the National Occupancy Standard in the case of overcrowding, and state of repair by self-reporting in the census and Canadian Housing Surveys.
3. **Secure:** Security of tenure provides protection from arbitrary eviction, forced relocation, and harassment. There is no current standard measurement in Canada, although both evictions and “forced moves”—the latter including moves due to natural disasters, health changes, or bad relations between landlord and tenant that do not involve a formal eviction—were measured in the past two Canadian Housing

¹⁰ Government of Canada. (2019). *National Housing Strategy Act* (C29 S313). <https://laws-lois.justice.gc.ca/eng/acts/N-11.2/FullText.html>

¹¹ Special Rapporteur on the Right to Adequate Housing. (2021). *The Human Right to Adequate Housing*. <https://www.ohchr.org/en/special-procedures/sr-housing/human-right-adequate-housing>

¹² Organization for Economic Cooperation and Development. (2021). *OECD Affordable Housing Database: Overview of Affordable Housing Indicators*. <https://www.oecd.org/els/family/HC1-5%20Overview%20of%20affordable%20housing%20indicators.pdf>

Surveys. In the last survey, 3% of renters reported that they had been evicted over the previous 12 months, which represents 1% of the Canadian population.¹³

4. **Availability of basic services:** These include safe drinking water, sanitation, heating, lighting, and emergency services. This element is not comprehensively measured in Canada as part of housing need, although the cost of utilities for heating and lighting is included as part of housing costs. Safe drinking water is of particular concern for on-reserve housing, and access to safe water and basic sanitation is an issue in many encampments.¹⁴
5. **Accessible:** This applies to people of all abilities, particularly those experiencing discrimination or living in vulnerable circumstances. This element is not currently measured as an aspect of housing need in Canada, although there are measures in the Canadian Housing Survey that can be used, such as the proportion of people with physical disabilities who feel that their home is adequate to meet their needs.¹⁵ A standardized measure of the number of homes that are physically accessible is not available; however, Canadian standards for “accessible” and “accessible ready” were developed in 2023 and 2025¹⁶ that could be applied to existing and new housing stock.
6. **Well-located:** This refers to housing that is close to public transit, employment, and basic social services, such as childcare, education and health care, and is not located in a polluted or dangerous area. The Canada Mortgage and Housing Corporation (CMHC) has the Proximity Measures Database but does not currently estimate or have an indicator related to what proportion of Canadian households live in well-located households.¹⁷
7. **Culturally adequate:** Adequate housing must respect and be appropriate for the expression of the inhabitants’ cultural identity and ways of life. Canada does not currently have an indicator or way to measure this element.¹⁸

¹³ The 2021 and 2022 Canadian Housing Survey both found an annual eviction rate for renters of approximately 1%. Eviction data is self-reported by renters and excludes people in shelters, seniors’ homes, and supportive housing as well as those who are evicted into homelessness. Canada Mortgage and Housing Corporation. (2025). *Towards Understanding the Magnitude of Evictions in Canada*. Government of Canada.

<https://assets.cmhc-schl.gc.ca/sites/cmhc/professional/housing-markets-data-and-research/housing-research/research-reports/2025/towards-understanding-magnitude-evictions-en.pdf>

¹⁴ Canadian Human Rights Commission. (2023). *Federal Housing Advocate's Observational Report – British Columbia*. Government of Canada. <https://www.chrc-ccdp.gc.ca/publications/federal-housing-advocates-observational-report>

¹⁵ In the 2021 Canadian Housing Survey, only 38% of respondents with physical disabilities said that their homes were accessible. This data excludes those in emergency shelters, group homes, and institutions.

¹⁶ Government of Canada. (2023). *CSA/ASC B652:23 Accessible dwellings*.

<https://www.csagroup.org/store/product/CSA-ASC%20B652%3A23/>; Government of Canada. (2025). *CAN-ASC-2.8:2025 – Accessible-Ready Housing*. <https://accessible.canada.ca/creating-accessibility-standards/can-asc-282025-accessible-ready-housing/9-definitions-and-abbreviations>

¹⁷ Canada Mortgage and Housing Corporation. (2020). *Proximity Measures Database*. <https://www.cmhc-schl.gc.ca/en/blog/2020-housing-observer/proximity-measures-database>

¹⁸ These elements are fully discussed in Canadian Human Rights Commission, 2023.

While environmental sustainability and climate change mitigation are not explicit elements of adequate housing, habitability includes maximum and minimum home temperatures, and well located includes walkable and transit-oriented development, which are both important factors in environmental sustainability and carbon emission reductions.¹⁹

The current challenge for the NHS 2.0 is to agree upon a strong set of indicators to track the elements of adequate housing. These indicators must be **reliable** (e.g., based on national surveys or census data), **comprehensive** (including all individuals and households, not only non-student “private” households), **replicable** (asking the same questions over time to see what is working), and **comparable** (able to be used across Canada’s geographic and demographic diversity). A standard set of indicators can work to reinforce agreement conditions with other levels of government, just as the 1984 Canada Health Act set standards and targets that were linked to federal transfer payments.²⁰ Tenure security is a priority for inclusion in calculations of Canada’s housing need, because the evidence link between evictions and entry into homelessness is strong.²¹ Accessibility, affordability, and the availability of basic services could be measured as an outcome if consistent data were collected as part of building permits and surveys of existing housing. Location could be measured as an outcome, with variations between urban and rural areas. Indigenous self-determination is a viable proxy for cultural adequacy, but meaningful measurement cannot rely on pan-Indigenous indicators and must instead be grounded in Indigenous Rights, distinctions-based approaches, and UNDRIP-aligned governance.

What Has and Has Not Worked in NHS 1.0 Agreements

The first National Housing Strategy (NHS) was launched in 2017 and was intended to last a decade, until the 2027-28 budget year. The NHS’s rights-based approach included:

- Prioritizing vulnerable groups: seeking to reduce chronic homelessness by half from an estimated 35,000 people, and core housing need by one third from a census-derived (but incomplete²²) count of a little less than 1.7 million households;

¹⁹ Taskforce for Housing and Climate. (2024). *Blueprint for More and Better Housing: How Federal, Provincial, and Municipal Governments Can Ensure We Build 5.8 Million Homes that Are Affordable, Low-Carbon and Resilient*. <https://housingandclimate.wpcomstaging.com/blueprint/>

²⁰ Flynn, A. (2025). Binding rights: Contractual federalism and the right to housing in Canada. *European Review of Contract Law*; Graefe, P., & Fiorillo, N. (2023). *The Federal Spending Power in the Trudeau Era: Back to the Future?* Institute for Research on Public Policy. <https://centre.irpp.org/wp-content/uploads/sites/3/2023/06/The-Federal-Spending-Power-in-the-Trudeau-Era-Back-to-the-Future.pdf>

²¹ Canada Mortgage and Housing Corporation. (2025). *Evictions in Canada: Links Between Evictions and Homelessness*. Government of Canada. <https://assets.cmhc-schl.gc.ca/sites/cmhc/professional/housing-markets-data-and-research/housing-research/research-reports/2025/evictions-canada-links-between-evictions-homelessness-en.pdf>

²² Whitzman, C. (2023). *A Human Rights-Based Estimate of Canada's Housing Shortages*. Office of the Federal Housing Advocate. https://www.homelesshub.ca/sites/default/files/attachments/Whitzman-Human_Rights_Based_Supply_Report-EN_1.pdf

- Addressing inequality and discrimination: undertaking a GBA+²³ analysis of some program outputs, including sub-targets for women, girls, and gender-diverse people in its Co-Investment (Affordable Housing) Fund and Rapid Housing Initiative supply programs.

Most NHS programs were unilateral, meaning they were solely funded and administered by the federal government. These included the largest NHS program, the Apartment Construction Loan Program (originally called the Rental Construction Finance Initiative), which involved \$55 billion in low-rate finance for purpose-built apartments, directly funded and administered by the CMHC through agreements, mostly with market developers. The Affordable Housing Fund, with \$15 billion in grants and financing, was unilateral, as was the Rapid Housing Initiative, with a total of \$4 billion in grant funding to reduce homelessness through deeply affordable supply.

Other, smaller programs were intended to be bilateral, costs and administrative responsibilities shared between federal and other levels of government. Initial federal bilateral programs with provinces and territories (FPT agreements) include:

- Canada Community Housing Initiative: \$4.3 billion to provinces and territories to maintain rent supplements for 255,559 low-cost non-market and market affordable homes over ten years.
- Canada Housing Benefit: intended to relieve 300,000 households in core housing need by the program's end, at a total cost of \$4.6 billion over eight years.
- Provincial/Territorial Priority Fund: \$1.4 billion in federal cost-matching intended for homelessness prevention and the repair of aging non-market housing over eight years.
- The Northern Housing Fund: \$300 million earmarked for territories.²⁴

To receive funding transfers, provinces and territories were required to report regularly on agreed-upon targets and outcomes, which were intended to “increase access to Housing, reduce Housing Need and achieve better housing solutions across the spectrum.” To use the example of the federal government's agreement with Canada's most populous province, Ontario, the agreement, which commenced April 1, 2018, and ends March 31, 2028, is intended to:

- a) Remove at least 490,000 households overall from Housing Need, which includes at least 300,000 households adequately supported through a Canada Housing Benefit.

²³ “GBA+” means gender-based analysis plus other aspects of diversity such as age, disability, education, ethnicity, economic status, geography (including rurality), language, race, religion, and sexual orientation.

²⁴ The Affordable Housing Fund was the second largest program in the NHS. While it was a \$14.6 billion unilateral federal program to fund 60,000 new housing units and repair or renew 170,000 housing units, it required matching funding, which in many cases, was provided by other levels of government.

- b) Based on the number of Units still supported by Social Housing Agreements or federal-provincial agreements as at March 31, 2019:
- i) 330,000 Units continue to be offered in Social Housing, including no net loss of Urban Native Social Housing Units available to households in Housing Need;
 - ii) At least 20% of existing Social Housing Units repaired (approximately 60,000 units), including that retained Urban Native Social Housing Units are repaired to good condition;
 - iii) The number of rent-assisted Social Housing Units expands by 15% (approximately 50,000 units)²⁵

In the 2021 federal election campaign, the Liberal Party promised a \$4 billion Housing Accelerator Fund (HAF), conditional federal funding to municipalities to support 100,000 additional so-called middle-class homes by 2024-25. Funding was flexible and could be used to hire planners, offset land purchases, and address infrastructure needs. Municipalities often used HAF to subsidize deeply affordable housing. In return, municipalities (and, later, regions and Indigenous governments) agreed to specific commitments related to reducing approval times, simplifying zoning and other planning requirements, and encouraging transit-oriented development.²⁶ HAF had an initial application round in 2022 during which it funded 150 municipalities, regions, and Indigenous governments for three years. The program received an additional \$400 million in the 2024 budget for a second round of applications.

Despite “right-to-housing” wording, National Housing Strategy programs have been largely non-compliant with right-to-housing principles:

- **Prioritizing vulnerable groups:** Despite NHS targets focused on reducing homelessness and housing need, the Apartment Construction Loan Program has provided \$55 billion in low-cost loans, almost half the total NHS budget, to mostly market developers, in return for minimal affordability conditions. According to analysis by the National Housing Council, only 3% of homes completed were affordable to those in core housing need.²⁷ The Housing Accelerator Fund’s target of increasing middle-class homes did not include a definition of that term or any form

²⁵ Canada Mortgage and Housing Corporation. (2018). *CMHC-Ontario Bilateral Agreement Under the 2017 National Housing Strategy*. <https://assets.cmhc-schl.gc.ca/sites/cmhc/nhs/fpt-housing-agreements/cmhc-ontario-bilateral-agreement-en.pdf>. Capitalization is from the agreement.

²⁶ Liberal Party of Canada. (2021). *Give Cities the Tools to Speed Up Housing Construction*. <https://liberal.ca/housing/give-cities-the-tools-to-speed-up-housing-construction/>

²⁷ Blueprint. (2022). *Analysis of Affordable Housing Supply Created by Unilateral National Housing Strategy Programs*. Canada Mortgage and Housing Corporation. <https://assets.cmhc-schl.gc.ca/sites/place-to-call-home/pdfs/analysis-affordable-housing-supply-created-unilateral-nhs-programs-en.pdf>

of GBA+ analysis of the needs of priority populations. It was not compatible with human rights principles or the performance measurement targets of NHS 1.0.

- **Meaningfully engaging with vulnerable populations:** Indigenous-led plans to address housing and homelessness²⁸ remain largely ignored,²⁹ despite clear evidence of the over-representation of Indigenous people within the unhoused population and of the comparatively high incidence of unaffordable, overcrowded, or poorly repaired housing both on and off reserve. The Government of Canada's commitment, through the UN Declaration on the Rights of Indigenous People Act (2021) to "self-determination and self-governance" in all laws and programs has not been adhered to.³⁰
- **Addressing discrimination and inequality as it affects the right to housing:** Despite clear evidence that people with disabilities suffer higher rates of homelessness and housing need, there are still no clear guidelines or measurements in relation to accessibility for people with disabilities, who are excluded from housing choices due to design, income inequalities, and shortages of support services.³¹
- **Using all appropriate means to promote the right to adequate housing and allocating sufficient resources:** Affordable housing commitments under NHS bilateral agreements have not been met by provinces, such as Ontario, and there have been limited consequences for non-adherence.³² Most NHS programs were unilateral, and there was not enough attention paid to the roles of provincial and territorial governments and of municipal, regional, and Indigenous governments, respectively. The funding emphasis was instead on unilateral programs, where the federal government negotiated directly with market and non-market developers.
- **Ensuring independent monitoring of the realization of the right to adequate housing:** The CMHC stopped recording housing completions in non-metropolitan areas in 2023³³ and has not tracked the affordability outcomes or the impacts on core housing need of its largest NHS programs.³⁴ Canada still does not have a

²⁸ Canadian Housing Renewal Association Indigenous Caucus. (2018). *A For Indigenous by Indigenous National Housing Strategy*. https://chra-achru.ca/wp-content/uploads/2015/09/2018-06-05_for-indigenous-by-indigenous-national-housing-strategy.pdf

²⁹ Neha Review Panel. (2025). *"We Are Human. We Deserve a Place to Live. It's that Simple": The Final Report and Recommendations of the Neha Review Panel*. National Housing Council. [https://cms.nhc-cn1.ca/media/Neha/Reports/final-report-and-recommendations-ENGLISH%20\(web\).pdf](https://cms.nhc-cn1.ca/media/Neha/Reports/final-report-and-recommendations-ENGLISH%20(web).pdf)

³⁰ Canadian Human Rights Commission. (2023). *Federal Housing Advocate's Observational Report – British Columbia*. Government of Canada. <https://www.chrc-ccdp.gc.ca/publications/federal-housing-advocates-observational-report>

³¹ Michel, C. (2023). *Security of Tenure in Canada: Summary Report*. Office of the Federal Housing Advocate. <https://homelesshub.ca/wp-content/uploads/2024/03/Summary-Report-Security-of-Tenure-in-Canada.pdf>

³² Han, J. Y. (2024). *Charting Progress: Clearing Up the Confusion Over Bilateral Agreements*. Centre for Excellence on the Canadian Federation. <https://centre.irpp.org/research-studies/clearing-up-confusion-bilateral-agreements/>

³³ Standing Senate Committee on Banking Commerce and the Economy. (2026). *Out of Reach: Unlocking Canada's Housing Crisis*. Government of Canada. <https://sencanada.ca/en/info-page/parl-45-1/banc-housing-affordability-crisis/>

³⁴ Blueprint, 2022.

reliable, replicable, comprehensive, and comparable method to measure homelessness in all cities and regions, although HIFIS would be the best option if it was adopted across Canada and expanded to include violence against women shelters and refugee claimants.³⁵ Core housing need excludes 2.3 million post-secondary students, 700,000 people in congregate housing, involuntary households (those doubling up involuntarily for reasons of affordability, often considered as a component of homelessness), and net migration from job- and service-rich areas due to affordability.³⁶

In terms of compliance with agreements and a rights-based perspective, the track record of NHS 1.0 could be improved.

Progress on FPT bilateral housing agreements has been tracked through action plans, which must be submitted by the provinces and territories every three years (in 2019, 2022, and 2025). Due to the pandemic, the federal government gave provinces and territories the option of submitting a one-year action plan for 2022–2023 in exchange for a deadline extension for the plan covering 2022–2025. Manitoba, Nova Scotia, Ontario and Saskatchewan chose this option. These provinces followed up with a 2022–2025 action plan in 2023.

After reviewing Ontario's 2023 plan, the federal government concluded the province had not made sufficient progress on building new affordable rental units. It argued that the province planned to increase its stock of affordable housing units by only 6% by the end of 2025, rather than the 15% in the agreement. Most other provinces had completed more than 60% of their target. Ontario was the bottom performer.

In April 2024, the federal government informed the Ontario government that it had not made sufficient progress on its target of increasing non-market housing by 15% and, consequently, Ottawa would redirect \$357 million in transfers directly to Ontario's 47 service managers (municipal and regional authorities coordinating affordable housing and homelessness prevention). Ultimately, the federal and Ontario governments came to an agreement whereby Ottawa would deliver the funds to the province, as originally planned, and Ontario would commit to building 8,644 new non-market housing units by the end of 2025, or around 44% cent of its total target. Additionally, the province agreed to submit its third action plan ahead of schedule, by the end of 2024.³⁷

This might be considered a partial success. The federal government used its spending power to shift the direction of the Ontario government. But the fact that outcomes were not being monitored on an annual basis means that Ontario, the most populous province with the highest core housing need numbers, was able to ignore the national direction from 2019 to

³⁵Homeless Hub. (2025). How Many People Are Homeless in Canada?

<https://homelesshub.ca/collection/homelessness-101/how-many-people-homeless-canada/>

³⁶ Whitzman, 2023.

³⁷ Han, J. Y., 2024.

2024, at least half of the duration of the NHS. Furthermore, there was no evidence that, even if the full target of new non-market housing was reached, this would have an impact on reducing the proportion of the population that is homeless or in housing need. There was no emphasis on reducing inflows into homelessness by lowering eviction rates or increasing supportive housing, and there was no GBA+ analysis.

The City of Toronto pledged to allow six-plexes as a minimum as of right in all residential areas as part of its Housing Accelerator Fund agreement. Toronto council voted against the planning report recommending this measure in June 2025, despite a warning by the Minister of Housing in March that this would threaten the next tranche of funding.³⁸ It took over six months before the \$671 million committed to Toronto was reduced by \$10 million in January 2026.³⁹ Again, this might be considered a partial success: at least renegeing on part of the agreement led to federal funding consequences. But the consequences were neither substantive nor timely. HAF agreements have had little emphasis on rights-based priorities, such as reducing homelessness or core housing need, or on producing affordable housing more generally. There is no GBA+ analysis of outcomes.

Lessons from NHS 1.0 on conditionality include the necessity of annual monitoring before releasing the next tranche of funding and requiring five-year plans, not three-year plans, as building large-scale housing developments can take many years, and scaling benefits from consistent programs.

Right to housing principles can and should be better integrated into the next iteration of the NHS:

- **Prioritize vulnerable groups:** This means ensuring that there is one clear, rights-based definition of affordable housing in all programs at all levels of government, including a clear and consistent definition of income categories related to area median household incomes and an emphasis on addressing the needs of very low-, low-, moderate- and median-income households, the majority of the Canadian population. Data disaggregation based on priority populations helps identify interventions to assist those most in need with the adequate housing they require.
- **Meaningfully engage with “vulnerable populations”:** While this language appears in the National Housing Strategy and the National Housing Strategy Act, it must be understood as working with groups who have been disadvantaged by laws, policies, and systems, including by ensuring that decision-making for Indigenous housing rests

³⁸ Alevato, J. (2025, July 13). Toronto risks losing \$30M in federal funding after vote against sixplexes citywide. *CBC News*. <https://www.cbc.ca/news/canada/toronto/toronto-sixplexes-federal-funding-1.7581867>

³⁹ Draaisma, M. (2026, January 20). Canada's housing minister defends \$10M cut to Toronto housing fund. *CBC News*. <https://www.cbc.ca/news/canada/toronto/federal-housing-minister-gregor-robertson-toronto-mayor-olivia-chow-housing-fund-cut-9.7054038>

with First Nations, Métis, and Inuit governments, who have provided adequate housing since time immemorial.

- **Address discrimination and inequality as it affects the right to housing:** Include indicators and programs related to tenure security, so that renters as well as owners can exercise this right. Further develop programs to improve accessibility in existing housing as well as new housing, informed by targets.
- **Use all appropriate means to promote the right to adequate housing and allocate sufficient resources:** Create real partnerships through expanded conditional agreements with provinces, territories, municipalities, regions, and Indigenous governments. These agreements must include with universal definitions and be linked to housing and infrastructure funding.
- **Ensuring independent monitoring of the realization of the right to adequate housing:** The federal government should develop one set of definitions, indicators, and targets and link housing and infrastructure funding to annual reports and to provincial and territorial housing strategies that are related to meeting these targets.

Definitions for Rights-based Agreements

To improve agreements, the federal government must create a set of common definitions to inform need assessments, programs, and indicators. Key terms that should be included in a housing partnership agreement and bilateral agreements are outlined below.

Affordable housing: UN guidelines for the right to adequate housing advise that, “Housing is not adequate if its cost threatens or compromises the occupants’ enjoyment of other human rights,” such as access to food or health care.⁴⁰ This has been translated in Canada⁴¹ and many international jurisdictions⁴² as housing that consumes no more than 30% of pre-tax household income, usually with an emphasis on low- and moderate-income households (see “Income categories”). In Canada, for renters, shelter costs include, as applicable, rent and payments for electricity, fuel, water, and other municipal services. For owners, shelter costs include, as applicable, mortgage payments (principal and interest), property taxes, condominium fees, and payments for electricity, fuel, water, and other municipal services.

Despite a clear federal definition of affordable housing, NHS 1.0 supply programs did not use these definitions in their programs. The result is that much of the supply created was unaffordable to those who needed it most. Numerous recent reports⁴³ have argued that,

⁴⁰ Special Rapporteur, 2021.

⁴¹ Canada Mortgage and Housing Corporation. (2025). *Housing Information Portal: Core Housing Need (Census-Based and NHS-Based Housing Indicators and Data)*. <https://www03.cmhc-schl.gc.ca/hmip-pimh/en/TableMapChart/CoreHousingNeedMethodology#>:

⁴² Organization for Economic Cooperation and Development, 2021.

⁴³ Whitzman, C., & Perwani, P. (2025). *Scaling Up Affordable Housing Through a ‘Build Canada Homes’ Proposal*. Maytree. <https://maytree.com/publications/scaling-up-affordable-housing-through-a-build-canada-homes-proposal/>; Taskforce for Housing and Climate, 2024;

with free leased government land, replicable industrial methods of building housing, and long-term low-rate financing, non-market developers can produce sustainable housing that recovers costs and is affordable to moderate- and median-income households. Up front government grants and ongoing rent subsidies are necessary to provide affordable housing for very low- and low-income households.

It is therefore recommended that a revised definition of affordable housing be adopted: Housing costs, including utilities and taxes, that consume no more than 30% of the pre-tax household income of very low- to median-income households. However, to meet the needs of very low- and low-income households, a subset of affordable housing, deeply affordable housing, requires an additional definition: “Housing costs, including utilities, that consume no more than 30% of the pre-tax household income of very low- and low-income households.”

Collective housing: According to Statistics Canada, collective dwelling “refers to a dwelling of a commercial, institutional, or communal nature in which a person or group of persons reside or could reside. They must provide care or services or have certain common facilities, such as a kitchen or bathroom, which are shared by the occupants.” Examples include lodging or rooming houses, hotels, motels, tourist establishments, nursing homes, residences for senior citizens, hospitals, staff residences, military bases, work camps, correctional facilities, and group homes.⁴⁴ Student residences, market and non-market co-housing projects, and other forms of housing with shared facilities are also commonly included. These types of housing are often heavily restricted by zoning and building codes, despite being necessary and often lower cost than private alternatives. They should be promoted by reducing the emphasis on unit counts in zoning and building codes.

Core housing need: “Living in housing that is unaffordable, overcrowded or in poor repair, and being unable to afford an adequate home in your community.”⁴⁵ Core housing need has only been calculated for those living in private households, which excludes approximately 700,000 collective households with shared facilities, such as supportive housing, seniors’ housing, and student dormitories. Core housing need also excludes 2.3 million post-secondary students, most of whom rent; households in band or reserve housing; and those living on farms. Almost four in five households in core housing need are very low- or low-income and require deeply affordable housing.⁴⁶

Emergency Shelters: Like encampments and housing commonly labelled as “transitional,” emergency shelters are an aspect of homelessness, not a solution. As designed, these forms

Hemingway, A. (2022, April 21). Financing public housing: how a massive expansion of rental homes can literally pay for itself. *PolicyNote*. <https://www.policynote.ca/financing-public-housing/>

⁴⁴ Government of Canada. (2022). *Collective Dwelling*. <https://www12.statcan.gc.ca/census-recensement/2021/ref/dict/az/definition-eng.cfm?ID=dwelling-logements002>

⁴⁵ CMHC, 2025.

⁴⁶ Housing Assessment Resource Tools. (2025). *Housing Needs Assessment Tool*. <https://hart.ubc.ca/housing-needs-assessment-tool/>

of accommodation are intended to meet short-term needs and do not provide security of tenure, even when individuals and families remain for extended periods because there is nowhere affordable to move on to. Emergency shelters are “temporary, short-term accommodation for homeless individuals and families [which]... may or may not include other services such as food, clothing or counselling.” There are two main types of emergency shelters: those intended to assist people experiencing homelessness, mainly funded by municipalities and regions, and violence against women shelters, mainly funded by provinces and territories. While a limited number of truly short-term shelters may still be necessary, even in contexts of functional zero homelessness, a rights-based response prioritizes diversion from shelters into permanent, deeply affordable housing, with supports where needed, as advanced by a national coalition, the Canadian Shelter Transformation Network.⁴⁷

Homelessness: In Canada, homelessness is defined primarily in terms of not having a structure or as “the situation of an individual, family or community without stable, permanent, appropriate housing, or the immediate prospect, means and ability of acquiring it.”⁴⁸ There is also an Indigenous definition of homelessness that has been developed by Métis-Cree scholar Jesse Thistle: “Individuals, families and communities isolated from their relationships to land, water, place, family, kin, each other, animals, cultures, languages and identities.”⁴⁹

Internationally, the ETHOS definition includes six forms of homelessness:

1. Living rough: in the streets or public spaces without a shelter that can be defined as living quarters, such as encampments
2. In emergency accommodation such as shelters
3. In accommodation for those experiencing homelessness where the period of stay is time-limited, such as transitional accommodation
4. In institutions, such as hospitals and prisons
5. In unconventional dwellings due to lack of housing, such as cars
6. In a conventional dwelling that isn't their place of residence, such as doubling up temporarily with family and friends⁵⁰

Canada does not have a standard means of measuring homelessness, and very few homelessness counts include people in violence against women shelters or those doubling-

⁴⁷ Canadian Shelter Transformation Network. (2026). *Transforming Shelter from an Emergency Service to a Housing Focus*. <https://transformshelter.ca/>

⁴⁸ Built for Zero Canada. (2021). *Built for Zero Canada Functional Zero Homelessness Question and Answer Document*. <https://bfzcanada.ca/wp-content/uploads/Functional-Zero-QA.pdf>

⁴⁹ Thistle, J. (2017). *Definition of Indigenous Homelessness in Canada*. Canadian Observatory on Homelessness Press.

<https://www.homelesshub.ca/sites/default/files/attachments/COHIndigenousHomelessnessDefinition.pdf>

⁵⁰ FEANTSA (European Federation of National Organisations Fighting Homelessness). (2022). *ETHOS: European Typology of Homelessness and Housing Exclusion*. <https://www.feantsa.org/download/fea-002-18-update-ethos-light-0032417441788687419154.pdf>

up, which means that a large proportion of women and girls without permanent and secure housing are excluded from the definition.⁵¹ Canada also has a definition of chronic homelessness, which is a total of at least six months (180 days) of homelessness over the past year or recurrent experiences of homelessness over the past three years, with a cumulative duration of at least 18 months (546 days). Recent estimates of homelessness suggest that up to half of those who are currently homeless are chronically homeless, indicating failure of systems intended to end homelessness.⁵² In contrast, the goal of functional zero homelessness refers to a situation where homelessness is rare (less than 0.01% of an area population), brief (an episode of no more than three days), and nonrecurring.⁵³

Income categories: From the 1940s to the 1990s, the federal government focused on the needs of low- and moderate-income households in its housing policy, defined as the lowest two household income quintiles. Wartime homes and successor ownership programs from the 1940s to the 1970s focused on costs affordable to households in the second income quintile. Non-market rental housing programs from the 1960s to the 1980s focused on low- and moderate-income households.⁵⁴ Because of wide variations in median income across the country, the US began to use area household income-based categories for its programs in the 1980s. The Housing Assessment Resource Tools (HART) project,⁵⁵ funded by the CMHC,⁵⁶ analyzed housing need in terms of income categories, household size, and demographic characteristics in 2021 based on this US methodology, and the federal government recommends HART data for use in municipal needs assessments. In this calculation, area median household income (AMHI) is based on either a census subdivision (urban) or a census division (rural). The five suggested income categories are:

1. Very low-income: less than 20% of AMHI. This category includes households on fixed income, such as a pension or social assistance (about 2% of non-student private households; if people experiencing homelessness, students, and those in collective housing were included, it would be closer to 5%).
2. Low income: 21% to 50% of AMHI. This category includes households on full-time minimum wage (about 18% of private non-student households).

⁵¹ Schwan, K., Versteegh, A., Perri, M., Caplan, R., Baig, K., Dej, E., Jenkinson, J., Brais, H., Eiboff, F., & Pahlevan Chaleshtari, T. (2020). *The State of Women's Housing Need & Homelessness in Canada*. Women's National Housing and Homelessness Network. <http://womenshomelessness.ca/literature-review/>

⁵² Infrastructure Canada. (2023). *Everyone Counts 2020-2022 – Results from the Third Nationally Coordinated Point-in-Time Counts of Homelessness in Canada*. <https://secure.infc.gc.ca/alt-format/pdf/homelessness-sans-abri/reports-rapports/pit-counts-dp-2020-2022-results-resultats-en.pdf>

⁵³ Built for Zero Canada, 2021.

⁵⁴ Oberlander, H. P., & Fallick, G. (1992). *Housing a Nation: The Evolution of Canadian Housing Policy* https://publications.gc.ca/collections/collection_2018/schl-cmhc/nh15/NH15-818-1992-eng.pdf

⁵⁵ Housing Assessment Resource Tools, 2025.

⁵⁶ Government of Canada. (2025). *Housing Need Assessment Template*. <https://housing-infrastructure.canada.ca/housing-logement/hna-ebml/template-modele-eng.html# toc1>

3. Moderate income: 51% to 80% of AMHI. This category refers to households on starting salaries for professionals (about 19% of private households).
4. Median income: 81% to 120% of AMHI (about 21% of private households).
5. Higher income: 120% or more of AMHI (about 41% of private households).⁵⁷

Intergovernmental partnerships: This is defined not only as agreements between the federal government and its provincial and territorial counterparts, but also as agreements with cities, regions, and Indigenous governments. These agreements should be based on specific outcomes and outputs, which are informed by common principles, definitions, targets, and mechanisms. A long-term “Team Canada” approach is the only way to achieve the kind of certainty and continuity that will allow the housing outcomes Canadians need.

Modern methods of construction: The federal government supported the development of non-market housing, which represented an average of 14% of new and acquired homes per year in the 1970s and 1980s (or 20,000 to 40,000 homes). In contrast, non-market housing under NHS 1.0 has lagged at 4,000 to 6,000 new homes per year, or 2% to 3% of new homes.⁵⁸ Aside from government land and stable, long-term, low-rate financing, a potential enabler to scale rapid and low-cost market and non-market housing is modern methods of construction. This is defined as:

...a range of technologies and methods such as factory construction of components or modules (from panels to volumetric units); repeatable, standardized designs (but potentially mass customizable); integration of digital design and production technologies (e.g., Building Information Modelling); and, more controlled production environments, which reduce waste, improve quality, and de-risk workforce gaps.⁵⁹

While modern methods of construction could improve productivity, reduce the need for scarce specialized labour, and reduce waste, a major barrier to modern methods scaling is outmoded, unharmonized and inconsistent municipal zoning, building, and approval processes. One advantage of the portfolio financing being discussed by Build Canada Homes is that it can enable consistent demand for the development of regional industries that can replace the US finished components on which we currently rely.⁶⁰ Modern methods of construction are not in and of themselves rights-based, but they are a necessary mechanism to scale non-market and market affordable housing.

⁵⁷ HART, 2025.

⁵⁸ Whitzman & Perwani, 2025.

⁵⁹ Government of Canada. (2025). *Build Canada Homes Investment Policy Framework - November 2025 (revised)*. <https://housing-infrastructure.canada.ca/bch-mc/policy-framework-invest-cadre-strategique-eng.html>

⁶⁰ Hwang, J. H., Rankin, J., Searle, B., Odo, N., Montazeri, S., Al-Hussein, M., Zelele, T., Tomalty, J., Farmer, M., & Edean, J. (2025). *Roadmap to Transform the Canadian Construction Industry*. <https://www.unb.ca/ocrc/assets/documents/webinar-roadmap-transform-construction-industry-final.pdf>

Non-market housing: Housing provided for community benefit rather than profit, often referred to internationally as “social housing.” This includes:

- **Public housing** owned by a level of government, whether provincial, territorial, municipal, or regional (often known as “public housing”). It represents about 54% of the sector.
- **Community housing** owned by a non-profit entity, including most supportive housing. It represents about 22% of the sector.
- Housing incorporated as a non-profit **cooperative**, which represents about 16% of the sector.
- **Indigenous housing** owned by an Indigenous non-profit organization or government, which represents about 3% of the sector.⁶¹

A characteristic of non-market housing is its emphasis on permanent affordability, with rents or sale price based on construction and operating costs rather than on market demand. This is in contrast to market housing that is considered affordable but which often loses affordability after a short-term covenant or agreement expires or it is resold. For this reason, non-market housing becomes significantly more affordable than similarly located and sized market housing over time.⁶² Historically, non-market housing has been rental, or in the case of co-operatives, non-equity co-ownership. Ownership housing with a permanent affordability covenant or a community land trust restricting the cost of re-sale (as is the case, for instance, with Habitat for Humanity or Whistler Housing Authority) is included in most current definitions of non-market housing. Similarly, while non-market housing has typically been aimed at low- and moderate-income households, with decreasing sources of financing and increasing rental unaffordability, non-market housing often encompasses affordable housing for median income households.⁶³ Non-market housing is currently estimated to represent 4.4% of all homes in Canada.⁶⁴ The National Housing Council has recommended: “To provide sufficient affordable housing for all who need it, a higher target of 20% [non-market housing] may be required.”⁶⁵ Scaling up non-market housing will require a

⁶¹ National Housing Council. (2025). *Scaling Up the Non-Market Housing Sector in Canada*. <https://cms.nhc-cnl.ca/media/Scaling%20Non%20Market%20Housing%20Report%20-%20V10%202.pdf>

⁶² Suttor, G., Otogwu, C., & Falvo, N. (2022). *The Co-op Difference: Comparing Co-op and Market Rents in Five Canadian Cities*. Cooperative Housing Federation of Canada. <https://chfcanda.coop/wp-content/uploads/2022/11/The-Co-op-Difference-report.pdf>

⁶³ Whitzman, C. (2025). *Human Rights-Based Housing Targets and Mechanisms for Canada*. Office of the Federal Housing Advocate. <https://homelesshub.ca/resource/human-rights-based-housing-targets-and-mechanisms-for-canada/>

⁶⁴ Pomeroy, S. (2025). *I'll Have a Double Double Please: Quantifying the Base to Scale Up Non-Market Housing in Canada*. Canadian Housing and Renewal Association. https://chra-achru.ca/wp-content/uploads/2025/11/Scaling-up-non-market-housing-CHRA-report_2025.pdf

⁶⁵ National Housing Council. (2025). *Scaling Up the Non-Market Housing Sector in Canada*. <https://cms.nhc-cnl.ca/media/Scaling%20Non%20Market%20Housing%20Report%20-%20V10%202.pdf>. It is a sign of poor federal housing data that this report, concurrent with the Pomeroy (2025) report, estimates 3.3% of the total housing stock is non-market, as compared to Pomeroy’s higher estimate of 4.4%.

modernized and possibly regulated non-market development and provider sector and can also be greatly aided by modern methods of construction.

Priority populations: As part of its GBA+ intersectional analysis, NHS 1.0 identified the following priority populations, which refers to populations that are more likely to face inadequate housing outcomes, including homelessness:

- Survivors fleeing domestic violence: This population should be derived from agency data, especially agencies serving women who experienced violence, as part of HIFIS, but those in violence against women shelters and transition houses are rarely included in homelessness counts.⁶⁶
- Racialized persons and communities: Despite being illegal, discrimination against racialized households in renting is still common, especially against those who are newcomers, those with disabilities, and those with children.⁶⁷ Recent Canadian surveys suggest a disproportionate number of people experiencing homelessness are Black.⁶⁸
- Seniors: Those over age 65, although the increasing number of those aged 85 is also analyzed for housing need in HART data.
- People with mental health and addiction disabilities: About 60% of those experiencing homeless report mental health or addiction issues, with discrimination against people with mental health and addictions being both a cause and an impact of homelessness.⁶⁹
- Veterans: A disproportionate number of people experiencing homelessness are veterans.⁷⁰
- People experiencing homelessness: While the inclusion of this priority population may seem repetitive, people experiencing homelessness find it difficult to secure permanent housing due to discrimination as well as low incomes. Those living in encampments are the most visible people without housing and are often discriminated against because of that fact. Those living in encampments as well as those presenting at emergency shelters should be provided with choices of adequate, permanent housing with tenure security as a means of reducing homelessness.

⁶⁶ E.g. Donaldson et al., 2026.

⁶⁷ Earle, M., Hodson, G., & O'Manique, S. (2025). *Measuring Discrimination in Rental Housing Across Canada*. Canadian Centre for Housing Rights. <https://housingrightscanada.com/reports/measuring-discrimination-in-rental-housing-across-canada/>

⁶⁸ Infrastructure Canada. (2023). *Everyone Counts 2020-2022 – Results from the Third Nationally Coordinated Point-in-Time Counts of Homelessness in Canada*. <https://secure.infc.gc.ca/alt-format/pdf/homelessness-sans-abri/reports-rapports/pit-counts-dp-2020-2022-results-resultats-en.pdf>

⁶⁹ Infrastructure Canada, 2023.

⁷⁰ Infrastructure Canada, 2023.

- People with developmental disabilities: People with impairments related to development and cognition are more likely to be homeless and in core housing need.⁷¹
- People with physical disabilities: People with physical disabilities affecting mobility, sight, and hearing, are more likely to be homeless (although, like mental disabilities and addictions, this should be seen as both a risk factor for homelessness and a common outcome of homelessness).⁷²
- First Nations, Inuit, and Métis Peoples: People identifying as First Nations, Inuit, and Métis comprise up to 90% of the homeless population in some cities and regions, and homelessness can be seen as a key aspect of colonial dispossession.⁷³
- 2SLGBTQI+: People with minority sexualities and gender identities are more likely to be homeless and in housing need, and housing is often not culturally adequate for them.⁷⁴
- Young adults: Those aged 18 to 25, especially those exiting foster care, are more likely to be homeless.⁷⁵
- Newcomers (including refugees and refugee claimants): They are at increased risk of homelessness, rental discrimination, and housing need.
- Women and children: They are at greater risk of hidden and unmeasured homelessness. Single mothers are the demographic group most at risk of core housing need.⁷⁶

Given evidence on the pipeline between homelessness and incarceration in jails, prisons, and hospitals,⁷⁷ those who are institutionalized should be included as a priority population. Homelessness and housing need data should be broken down by priority populations, and these populations should be prioritized in consultations in order to direct efforts to prevent and eliminate inadequate housing from a rights-based perspective. To ensure broader accountability and to find efficiencies with data collection, a whole-of-government approach could be taken that ties priority populations more closely to responsible government departments with intersecting mandates. For example, Immigration, Refugees and Citizenship Canada for newcomers, refugees, refugee claimants and Indigenous Services Canada, Women and Gender Equality, and Health Canada for people with mental health and addiction disabilities.

⁷¹ Canadian Human Rights Commission. (2024). *Monitoring the Right to Housing for People with Disabilities*. <https://www.chrc-ccdp.gc.ca/resources/publications/monitoring-the-right-housing-people-disabilities>

⁷² Canadian Human Rights Commission, 2024.

⁷³ Flynn, 2025.

⁷⁴ Canadian Human Rights Commission, 2023.

⁷⁵ Infrastructure Canada, 2023.

⁷⁶ HART, 2025.

⁷⁷ Husein, S., & Taylo, C. (2025). *From Incarceration to Encampment*. John Howard Society. <https://johnhoward.on.ca/wp-content/uploads/2025/07/Rethinking-Justice-Housing-Report-From-Incarceration-to-Encampment.pdf>

Rent supplements: “Programs which bridge the gap between deeply affordable housing and non-market or market rents.” Internationally and within Canada, rent supplements take two forms: those attached to non-market and affordable units as part of government financing of conditional operating agreements; and housing benefits attached to households that are primarily used to subsidize market housing.⁷⁸ There has been a shift away from rent supplements attached to units, which often provide the full difference between 30% of household income and non-market, cost-based rents. Instead, portable housing benefits are increasingly used, which in many cases have been insufficient to provide deeply affordable housing⁷⁹ to those who need it most and often have conditions, such as the household being removed from non-market housing waiting lists. From a rights-based perspective, rent supplements, no matter what the form or government source (currently, most are cost shared between federal, provincial, and territorial governments), should fully subsidize affordable and adequate housing, whether market or non-market. Rent supplements can make the development and operation of non-market, deeply affordable housing more viable and, as such, should be prioritized as a vital mechanism to scale up the non-market sector as well as to prevent and address homelessness and housing need.

Supportive housing: There is no standard national definition of supportive housing. According to the B.C. government, “Supportive housing is subsidized housing with on-site supports for single adults, seniors and people with disabilities at risk of or experiencing homelessness.”⁸⁰ According to the Ontario government,

Supportive housing programs provide seniors, adults with physical or cognitive disabilities, mental health issues, HIV/AIDS and other conditions, living independently with some supports in more shared accommodation settings in specially designed units, such as houses or apartments.

Supportive housing buildings are owned and operated by not-for-profit corporations like municipal governments, housing cooperatives or non-profit groups including faith groups, seniors’ organizations, service clubs, cultural groups and service providers. In most cases, the rent charged is based on ability to pay, or the market level rent is subsidized through the Ministry of Housing.

Through the Ministry of Health, personal support is provided on-site, with staff available to respond 24 hours a day.⁸¹

⁷⁸ Leviten-Reid, C., Digou, M., & Kennelly, J. (2025). Housing as a human right, rent supplements and the new Canada Housing Benefit. *Housing Studies*, 40(3), 565–588.

⁷⁹ Levitan-Reid et al., 2025; see also Neha, 2025.

⁸⁰ BC Housing. (2025). *Supportive Housing*. <https://www.bchousing.org/housing-assistance/housing-with-support/supportive-housing#>:

⁸¹ Ontario Health at Home. (2026). *Supportive Housing*. <https://ontariohealthathome.ca/supportive-living/supportive-housing/>

A suggested definition would be “deeply affordable permanent housing with on-site or linked health and social services for people who face ongoing barriers to housing stability, including but not limited to mental health challenges, substance use, trauma, cognitive or developmental disabilities, physical or mobility-related needs, or challenges related to daily living.” This includes a range of housing types, from collective housing with shared kitchens, bathrooms, and living spaces, to independent living, from subdivided single-family homes to units within apartment buildings. Although supportive housing is often associated with single people, couples and families also need housing with on-site services if one or more family members have a disability. Specifically, single parents should not lose custody of their children because of the absence of suitable supportive housing.⁸² Seniors’ assisted living and long-term care should be considered supportive housing and should be non-market.⁸³ All forms of supportive housing need to adhere to tenancy law, and there needs to be sufficient high-support options so that people with complex mental health and addictions needs are not evicted into homelessness.⁸⁴

Not all people experiencing homelessness need supportive housing: asylum seekers, women and children escaping violence, people exiting incarceration, young people aging out of foster care, and Indigenous and racialized people often simply need deeply affordable housing with security of tenure and which is culturally adequate, with access to off-site or visiting services ranging from mental health support to employment assistance and second language instruction. But multiple recent reports have argued that it is impossible to end homelessness without greatly increasing the amount and quality of supportive housing, and this requires capital support for new, acquired, and renovated facilities as well as operating costs to ensure affordable and culturally appropriate health and social services.⁸⁵

To be rights-compliant, supportive housing would need to be affordable, permanent, and habitable and provide tenure security. The level of support would need to be flexible to accommodate changing individual and household needs⁸⁶ and culturally adequate. The world’s largest experiment in the effectiveness of the Housing First model, the federally funded At Home/Chez Soi project (2011–2014) found success in ending homelessness in five cities, with high needs tenants with complex mental health and addictions issues requiring

⁸² Neha, 2025.

⁸³ Brown, J. (2022). *The Financialization of Seniors' Housing in Canada*
<https://www.homelesshub.ca/sites/default/files/attachments/Brown-The-Financialization-of-Seniors-Housing-ofha-en.pdf>

⁸⁴ Canadian Human Rights Commission, 2023.

⁸⁵ Rosenberg, J., Ganesan, K., Husein, S., & Wilson, S. (2025). *Policy Brief: Bold Action on Supportive Housing*.
<https://www.wellesleyinstitute.com/wp-content/uploads/2025/03/Policy-Brief-Bold-action-on-supportive-housing.pdf>; Addictions and Mental Health Ontario. (2024). *Policy Recommendations for Mental Health & Addictions Supportive Housing in Ontario*. https://amho.ca/wp-content/uploads/2024/05/AMHO_Supportive_Housing-Final.pdf; Donaldson et al., 2026.

⁸⁶ Oudshoorn, A., Van Berkum, A., Rolfe, S., Marshall, C. A., Krywucky, A., Crockett, M., Caxaj, S., Thuemler, N., Gilliland, J., McLean, S., Ezukuse, V., Ariba, Y., & Befus, D. (2023). *Making Supportive Housing Work for Canada's Most Vulnerable - final report*. <https://www.abeoudshoorn.com/wp-content/uploads/2023/03/Indwell-Project-Final-Report-Feb-9-2023.pdf>

staff ratios of one staff person per 10 tenants.⁸⁷ Ideally, there would be a range of supportive housing choices and the ability to move between light and heavy supports within the same building (as is sometimes the case in seniors' supportive housing). Ideally, all singles, couples, and families in supportive housing should have a bedroom of their own with a door that they can lock for the security of themselves and their belongings and the ability to choose supports as needed.

Transitional accommodation: Often a term used interchangeably with supportive housing, transitional accommodation refers to temporary housing that acts as a stopgap measure between homelessness and permanent housing. It is associated with the ladder approach to homelessness eradication, which is that people experiencing homelessness require counselling or life-skills training before being considered ready for permanent housing. As such, it has developed in opposition to a Housing First approach, which provides permanent housing, with supports if necessary, to people experiencing homelessness. Because of the severe shortage of permanent, deeply affordable housing, transitional accommodation has either become de facto permanent housing, or it leads to a return to homelessness after the maximum stay (usually between three months and three years). Transitional accommodation was funded by programs that predate NHS 1.0 programs and did not consistently fund supportive housing.⁸⁸ While transitional accommodation continues to fill an important gap in the housing and homelessness response system, it cannot be considered permanent housing for the purposes of a human rights-based approach unless key elements of adequacy are met, particularly security of tenure. This concern is especially acute where individuals and families remain in transitional accommodation well beyond intended short-term program timelines due to the lack of affordable housing options to transition into. Strengthening tenure protections and pathways to permanent housing is therefore essential should transitional models be funded under NHS 2.0

Recommended Targets and Governance Framework

The federal government must efficiently use health, social, and infrastructure spending power to ensure that all levels of government work together in a harmonized and consistent fashion to address the right to adequate housing.⁸⁹ This means the federal government must develop a set of targets for both provincial and territorial governments and municipal, regional, and Indigenous governments and link housing and infrastructure investments to monitoring these targets and reporting on them.

⁸⁷ Centre for Public Impact. (2019). *Canada's At Home/Chez Soi Project*.

<https://www.centreforpublicimpact.org/case-study/canadas-home-chez-soi-project>

⁸⁸ Covenant House. (2015). *Youth Transitional Housing Toolkit*. https://homelesshub.ca/wp-content/uploads/2015/02/Youth_Transitional_Housing_Toolkit.pdf

⁸⁹ Flynn, 2025.

Part of Canada's start-stop approach to housing policy is that housing is not mentioned in Canada's constitution:

Housing touches on provincial control over property and civil rights, federal jurisdiction over finance and Indigenous affairs, and municipal authority over zoning and service delivery. It also implicates kinds of governments with unspecified powers in the Constitution, namely territories, municipalities, and Indigenous governments.⁹⁰

There has been a great deal of responsibility shifting, most notably with the primary responsibility for housing policy being downloaded from the federal government to provinces and territories in 1992, followed by further downloading in provinces such as Ontario to municipalities and regions in 2000.

A rights-based approach means that all levels of government in Canada must use the maximum available resources to prioritize the needs of those who are most vulnerable. It is the responsibility of the federal government to use its greater spending and legislative powers to enforce standards. The federal government may need to develop a model zoning code and amend the National Building Code to unlock the potential of modern methods of construction (which need an element of replicability currently stymied by vastly different zoning and building codes across hundreds of jurisdictions). Federally led zoning, building, and approval reform is also necessary to improve accessibility, habitability (particularly in regard to maximum and minimum unit temperatures), and affordability outcomes. A promised federal Renters' Bill of Rights may be necessary to improve tenure security outcomes.⁹¹ Having said that, provinces and territories, which control so many aspects of housing, from income support to tenancy law, need to provide their own program leadership in meeting national targets.

NHS 1.0 had static targets that did not address an increasing and changing population, nor did it address the net loss of affordable housing for very low-, low- and moderate-income households, which increased the number of households in core housing need and at risk of homelessness.⁹² While there was a decrease in households in core housing need in the 2021 census, due to the temporary impact of COVID-related emergency income measures, core housing need bounced back to 1.7 million households in the 2022 Canadian Housing

⁹⁰ Flynn, 2025.

⁹¹ Canadian Centre for Housing Rights. (2024, September 19). What a strong Renters' Bill of Rights could mean for renters across Canada. <https://housingrightscanada.com/what-a-strong-renters-bill-of-rights-could-mean-for-renters-across-canada/>

⁹² Pomeroy, S. (2022). *Updating Analysis on Erosion of Lower Rent Stock from 2021 Census*. <https://chec-crl.ca/wp-content/uploads/2022/10/Updated-Analysis-on-Housing-Erosion-from-2021-Census-Steve-Pomeroy.pdf>

Survey⁹³ and is currently projected to increase to 2.6 million, about 17% of households, by the end of the NHS.⁹⁴

Ideally, targets for NHS 2.0 would be simple to track, regionally flexible in program mechanisms, and comprehensive and rights-based in scope. Rather than focus on static outputs (e.g., number of supposedly affordable units created, with no standard definition of affordable), targets would measure dynamic outcomes (e.g., a reduction in the proportion of Canadian individuals and households experiencing homelessness or in housing need). Rather than time-limited stop-start programs, the emphasis would be on long-term infrastructure financing in return for comprehensive policy shifts towards a shared goal of all people in Canada living in adequate and affordable housing, whatever their tenure.

As part of NHS 2.0, the federal government must modernize and standardize its data. Core housing need measurements, as derived from census data, exclude major populations in need: post-secondary students, residents in collective housing, and people experiencing homelessness. Including these groups, as well as those involuntarily doubling up or forced to move from job- and service-rich cities, gives an estimate of 4.4 million households in housing need as of the 2021 census, of which 3 million were very low or low income.⁹⁵ Core housing need also leaves out vital elements of the international definition of adequate housing, such as security of tenure, location, accessibility, and cultural adequacy.

This report suggests three rights-based outcome targets:

1. End homelessness by 2040 (i.e., functional zero homelessness)
2. End housing need among very low- and low-income renters by 2050
3. Ensure that all Canadians have access to an adequate home they can afford by 2060

Homelessness is a violation of the right to life as well as the right to housing, with women experiencing homelessness in Toronto having a life expectancy 42 years shorter, and homeless men 25 years shorter, than people who are housed.⁹⁶ There is considerable Canadian evidence of how to prevent and end homelessness, with the At Home/Chez Soi national project having shown the impact of housing with support services more than a decade ago, and Dunn House in Toronto more recently demonstrating impacts of supportive housing in terms of lessening dependence on emergency rooms while providing stable housing.⁹⁷ The City of Ottawa, following successful work in the Niagara Region, has a pilot

⁹³ Canada Mortgage and Housing Corporation. (2024). *2022 Canadian Housing Survey*. <https://www.cmhc-schl.gc.ca/blog/2024/2022-canadian-housing-survey#>:

⁹⁴ Segel-Brown, B., & Vrhovsek, Z. (2024). *Federal Spending on Housing Affordability in 2024*. Parliamentary Budget Office. <https://www.pbo-dpb.ca/en/publications/RP-2425-023-S--federal-spending-housing-affordability-in-2024--depenses-federales-axe-es-abordabilite-logement-2024>

⁹⁵ Whitzman, 2023.

⁹⁶ Rosenberg et al., 2025, p. 1.

⁹⁷ Government of Canada. (2026, January 20). *Canada, Ontario, and Toronto Work Together with Build Canada Homes to Invest in Dunn House 2.0 to Provide Supportive Housing in Toronto* <https://www.canada.ca/en/housing-infrastructure-communities/news/2026/01/canada-ontario-and-toronto->

project focused on homelessness prevention. It involves diverting entrants to the shelter system within 48 hours, assisting with rental arrears, and providing rapid pathways to permanent supportive housing.⁹⁸

While indicators would be targeted to outcomes, other levels of government would have considerable flexibility in program delivery (see Box 1).

Box 1: Housing-Related Responsibilities of Various Levels of Government

Federal

- 2019 National Housing Strategy Act and rights-based mechanisms to address systemic housing issues
- National Housing Strategy and Reaching Home
- Taxation (including wealth taxes, such as capital gains tax)
- Data and measurement (census, Housing Surveys, etc.)
- Well-located federal land for affordable housing (including purchasing land)
- Direct development of affordable housing (through the new Crown corporation, Build Canada Homes)
- Immigration (the largest component of population growth) and refugee policy
- Infrastructure financing for new build, acquisitions, and renovation
- Building code reform to allow less expensive and more accessible homes (including small apartment buildings with large apartments enabled through single-egress and smaller elevator requirements)

Provincial and Territorial

- Provincial and territorial housing and homelessness strategies
- Health and social services
- Tenant protection
- Landlord licensing
- Social assistance, including rent supplements
- Property assessment and land information
- Planning policy
- Well-located land for affordable housing
- Taxation, infrastructure financing, and building code

[work-together-with-build-canada-homes-to-invest-in-dunn-house-20-to-provide-supportive-housing-in-toronto.html](https://www.sghottawa.com/wp-content/uploads/2026/01/2026-01-Shelter-Diversion-Report-EN.pdf)

⁹⁸McCulloch, M. (2026). *Shelter Diversion Pilot Outcomes Evaluation*. Alliance to End Homelessness Ottawa <https://www.sghottawa.com/wp-content/uploads/2026/01/2026-01-Shelter-Diversion-Report-EN.pdf>

Municipal and Regional

- Community plans, including housing and homelessness
- Taxation (property taxes, development charges)
- Planning approvals
- Infrastructure provision and zoning and building codes
- Local coordination of housing and homelessness policies and services
- Well-located land for affordable housing

Indigenous

- First Nations, Inuit, and Métis housing and homelessness strategies and programs
- Municipal and regional powers, such as planning approvals and infrastructure provision
- Some have authority for health and social service provision similar to provincial and territorial governments

Note: Housing is not explicitly assigned to a level of government by the Canadian constitution, and some policy areas, such as building regulation, infrastructure financing, and health service provision, are shared by various levels of government. Municipal governments have tried to prevent evictions through renoviction and demoviction bylaws. Greater clarity and a review of taxation powers should be considered as part of future partnership agreements.

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Ending homelessness requires:

- Federal capital and low-cost financing commitment for:
 - A new generation of purpose-built, acquired, and renovated deeply affordable non-market homes, with varying levels of support. At least 50,000 supportive homes are needed per year to end homelessness by 2040.
 - An Indigenous-led urban, rural, and northern housing strategy, using area rates of Indigenous homelessness on and off reserve, to provide culturally appropriate deeply affordable homes. This would include approximately 20% of those 50,000 supportive homes per year, as well as a proportion of non-market homes sufficient to meet local needs.
- Provincial and territorial commitments to:
 - Increasing social assistance and rent supplements for very low-income people, including people with disabilities and seniors, to an amount that allows housing where rents are based on costs to be sustainable.

- Implementing Indigenous-led housing strategies, which include but are not limited to the settlement of land claims and providing sufficient funding for Indigenous housing.
- Eliminating evictions into homelessness and reducing evictions year over year
- Increasing health and social services to a level that will allow people with disabilities to thrive, whether in supportive housing or while receiving supports in other housing.
- Municipal and regional commitments to:
 - Rapid approvals and standardized zoning and building codes that would allow scaling up well-located, deeply affordable options, including collective housing.
 - Local coordination of homelessness prevention and eradication efforts, including a portfolio approach to scaling up non-market housing.
 - Eliminating encampment evictions that do not conform to human rights law.⁹⁹
- Indigenous government commitments to:
 - Continuing to lead engagement on and refinement of their distinctions-based housing and homelessness plans with adequate funding from the federal government.
 - Developing partnerships to meet on-reserve and off-reserve housing needs, including working with urban, rural, and northern Indigenous housing providers not affiliated with a specific Nation.

All levels of government need to:

- Provide regular updates on the number of people experiencing homelessness, using a consistent HIFIS system, broken down by priority population.
- Commit to using government land for permanent supportive housing.
- Work towards lessening reliance on emergency shelters and transitional accommodation as permanent adequate alternatives are created.

Ending housing need for Canada's very low- and low-income renter households will require ambitious targets to scale up non-market housing. Very limited deeply affordable housing has been built over the lifespan of NHS 1.0, in part due to multiple definitions of affordable housing that are not rights compliant. To maintain financial viability, non-market housing portfolios should be mixed income,¹⁰⁰ with at least 150,000 non-market homes being acquired, renovated, or built per year, of which at least one third should be deeply affordable to very low- and low-income households and up to two-thirds affordable to moderate- and median-income households. This will require:

⁹⁹ Farha, L., & Schwan, K. (2020). *A National Protocol for Homeless Encampments in Canada*. <https://www.make-the-shift.org/wp-content/uploads/2020/04/A-National-Protocol-for-Homeless-Encampments-in-Canada.pdf>

¹⁰⁰ Exceptions would include supportive housing and student housing.

- A substantial and stable program from the federal government that may include loan guarantees for market sector finance as well as direct grants and lending, encompassing a combination of new build housing, acquisition of market rental for non-market housing providers, and renovation funds to improve accessibility and energy efficiency. This program would preferably involve revolving finance, where repayments return to the fund.
- Free government land (donated or leased) for 100% deeply affordable and affordable non-market housing.
- Ongoing rent supplements, a guaranteed basic income, or greatly increased social assistance and minimum wage rates from provincial and territorial governments, as well as rent stability and eviction prevention commitments to maintain market affordability.
- Municipal commitments to rapid approvals with no development charges or property taxes for non-market housing.
- Intergovernmental standardized zoning and building codes to enable the scaling up of modern methods of construction for well-located housing.

Creating and retaining a sufficient supply of new and renovated affordable homes, both rental and ownership, for the next generation of people in Canada, will require a long-term effort which includes:

- A federal review of taxation systems, particularly capital gains tax exemptions, to ensure that scarce resources prioritize increasing access to permanently affordable housing.
- Provincial reforms to ensure tenure security for renters and reduce land speculation, possibly including progressive property taxes or another form of wealth tax.
- The transformation by municipalities of zoning and approval systems to enable affordable market ownership and rental options for moderate- and median-income households. Municipalities would also need to work with developers to bring down costs, including by eliminating development charges in areas with established infrastructure.

Indicators

Most of the conditional funding in the NHS related to bilateral agreements with provinces and territories were demand-side subsidies totalling a small proportion of NHS funding.¹⁰¹ There was no emphasis on the mechanisms required to reduce inflows into homelessness, such as preventing evictions, or providing supportive housing. The bilateral agreements

¹⁰¹ Affordable Housing Funds were provided on a project basis, not a portfolio basis, so they weren't contingent on bilateral agreements. They were heavily skewed towards Ontario and BC, at least in their initial phases, due to the more advanced state of affordable housing developers there—and the initial refusal of the Quebec government to participate. Pomeroy, S. (2020). *Summary of CMHC approved projects under RCFI and NHCF*. Unpublished.

under the Housing Accelerator Fund focused on aggregate supply by enabling new build housing, and there was little relationship between the indicators in the provincial and territorial agreements and the municipal, regional, and Indigenous agreements.

This report recommends a standardized set of outcome and output indicators, which would be linked to conditional funding for federal housing and infrastructure capital programs, for any government entering into an agreement with the federal government. The federal government should be able to provide this data on a public-facing dashboard.

Baseline Indicators: To Be Provided by the Federal Government as Part of NHS 2.0

Data for many outcome indicators can best be provided by the federal government on a municipal or regional level every five years using the census. Because of smaller sample sizes, other indicators in the biennial Canadian Housing Survey can only be provided for provinces, territories, and Canada's three most populous metropolitan areas: Toronto, Montréal, and Vancouver.

Baseline indicators should include:

- **The number of people experiencing homelessness and their proportion of the population**, preferably using HIFIS data, broken down by area, household size, and priority population. This can be annually updated once bilateral agreements are in place. As recently incarcerated people are at a greatly elevated risk of homelessness, we recommend that they be included as a priority population.
- **The number of households in core housing need and their proportion of total households**, broken down by area, income category, household size, and priority population, according to the 2026 census.¹⁰²
 - Supplemental data on housing need should be included for students and those in collective housing, and on net losses of households from areas with high housing costs, such as BC's Lower Mainland and the Greater Toronto Area.
- **The number of self-reported evictions and the proportion of renter households who have been evicted**, as recorded in the most recent Canadian Housing Survey (2026).
- **The number of people with disabilities reporting satisfaction with the accessibility of their homes** (Canadian Housing Survey 2026) **and the proportion of all households self-reporting a person with a disability.**
- **Number of housing completions in the past year**, broken down by area and generated from local data.

¹⁰² Similar to the HART data for 2016 and 2021, which is broken down by city, region, province, and territory.

- Including any supplemental data on the affordability of new and existing housing (home sales broken down by affordability category or asking rents) as well as non-market and market completions.
- **Net changes in the number and affordability of market and non-market housing** over the past five years, broken down by area (census 2026).
- **Population projections**, including projected immigration and demographic changes, broken down by area (Statistics Canada generates this data).

Outcome Indicators

These would be provided on an annual basis as part of agreements by other levels of government.

- **Number and proportion of the population experiencing homelessness.** Data on the number of people experiencing homelessness, the proportion of the total population, and a categorization of the acuity (in terms of support needs) of those identified as experiencing homelessness should be provided on an annual basis using HIFIS data. This data should be disaggregated by priority population.

Ontario is the only province that has a standardized mechanism for measuring homelessness on a real-time basis in all municipalities and regions.¹⁰³ It uses a national data management system called HIFIS, the Homeless Individual and Families Information System, which allows communities to collect and track information about the people accessing homelessness-sector resources in a community-wide coordinated access system, where names are anonymized but information from multiple agencies on the same person or household can be aggregated.¹⁰⁴ It is difficult to include people temporarily doubling up with family and friends unless they seek assistance, but HIFIS data should include this group to the extent possible by using, for instance, municipal and regional non-market housing waiting lists. The Ontario data currently excludes people in violence against women shelters and in institutions, which should be remedied. Even with these omissions, HIFIS data is much more comprehensive than biennial point-in-time counts. The HIFIS system also includes a single intake across area agencies to determine the level of care needed, which may change over time. This avoids re-traumatization as people experiencing homelessness navigate multiple services to meet basic needs like housing and health care.

- **Proportion of the homeless population that self-identifies as Indigenous.** This data is essential to determine the proportion of housing that should be provided by

¹⁰³ Donaldson et al., 2026. Several provinces, such as New Brunswick and Alberta, have consolidated HIFIS counts for urban areas only.

¹⁰⁴ Dionne, M.-A., Laporte, C., Loepky, J., & Miller, A. (2023). *A Review of Canadian Homelessness Data, 2023*. Statistics Canada. <https://www150.statcan.gc.ca/n1/pub/75f0002m/75f0002m2023004-eng.htm>

Indigenous organizations and governments and to improve the cultural adequacy of services. HIFIS data should be used, supplemented by information provided by Indigenous governments and respecting data sovereignty.

- **Number of people entering the homelessness system, and number of people exiting into permanent housing.** This data can be tracked using HIFIS data.

Output or Intermediate Indicators

- **Number of deeply affordable non-market homes, including supportive housing, currently available and completed each year.** This is an output indicator that can be provided by non-market housing providers. It should be broken down by new build, acquisition, and renovation from other uses, including emergency shelters and transitional accommodation. With an incomplete and rapidly increasing estimate of 85,000 people experiencing homelessness in Ontario in 2025,¹⁰⁵ and an assumption that Ontario has 40% of the unhoused population in Canada, we can estimate at least 200,000 individuals and families without homes at present. A supply of 1.2 million net new deeply affordable homes from 2028 to 2040, along with improved income support or rent supplements, health and social supports, and tenure security to prevent inflows into homelessness, should be sufficient to end homelessness for 200,000 individuals and households by 2040. Beyond that priority population, it would substantially address the 3 million very low- and low-income households estimated to be in housing need as of 2021.¹⁰⁶
- **Number of affordable non-market homes currently available and completed each year.** This is an output indicator that should be generated by non-market housing providers. It should be broken down by new build, acquisition, and renovation. At a combined net increase of 200,000 supportive and other non-market housing stock per year, this would double Canada's non-market stock from 700,000 to 1.4 million in less than four years¹⁰⁷ and move towards a target of 20% non-market housing by 2060. Scaled up non-market supply would not single-handedly eliminate estimated very low- and low-income need (calculated as 3 million homes in 2021 and has almost certainly increased since then),¹⁰⁸ but combined with eviction prevention, rent regulation, increased income support, and other market and non-market housing reforms, it can form the basis of efforts to meet this target by 2050.
- **Number of deeply affordable and affordable market homes completed, and proportion of total completions.** Municipalities and regions should be tracking prices and rents of completed homes by affordability to various income categories. There are currently 15 million private homes in Canada plus at least one million more collective homes. An expanded housing universe of 32 million homes, or a doubling

¹⁰⁵ Davidson et al., 2026.

¹⁰⁶ Whitzman, 2023.

¹⁰⁷ Pomeroy, 2025.

¹⁰⁸ Whitzman, 2023.

of current homes in 32 years (from 2028 to 2060), of which 6.4 million homes are non-market, should be sufficient to meet the needs of a growing and changing population. If it does not meet needs, the targets should be adjusted in future National Housing Strategies.

- **Number, proportion and net change in rental and ownership market and non-market homes affordable at income category price points.** This data can be generated from real estate sales and asking rents provided by rental.ca, preferably by the CMHC. There is an assumption in this report that given the relative neglect of affordable housing outcomes over the past four decades (from the late 1980s to the late 2020s), there is a need for one third of net new housing to be affordable to very low- and low-income households, all of which would be non-market (comprising about 20% of total households), one third of net new housing to be affordable to moderate- and median-income households (comprising about 40% of households), which would be both non-market and market, and one third of net new housing to be affordable to higher-income households (comprising about 40% of households), provided solely by market developers.
- **Net changes in household size and demographics.** This data can be provided by the CMHC on an annual basis. A net loss of children under 5 or household heads under 40¹⁰⁹ or a much greater proportion of intergenerational or roommate households in high-cost parts of the country such as the Greater Toronto Area and BC's Lower Mainland¹¹⁰ is usually interpreted as an outcome of affordability concerns rather than household preferences.
- **Tenure Security—Number of evictions and proportion of tenants evicted.** This indicator should be provided by provincial and territorial governments and should be compared with self-reported evictions in the Canadian Housing Survey. The goal is to reduce evictions over time through evidence-based mechanisms, ranging from rent banks and alternative dispute resolution to policies to reduce renovations and demovictions.
- **Habitability—Number of building code complaints and average time spent remedying complaints.** This measure should be provided by municipal, regional, and Indigenous governments. Provincial and territorial governments may consider licensing both market and non-market rental providers and linking data on affordability, habitability, and tenure security to licensing requirements.¹¹¹ The

¹⁰⁹ Moffatt, M. (2025, March 4). Young Families are Leaving the GTA in Search of Family-Sized Homes. *Missing Middle Initiative*. <https://www.missingmiddleinitiative.ca/p/young-families-are-leaving-the-gta>

¹¹⁰ von Bergmann, J., & Lauster, N. (2022, October 3). Still Short: Suppressed households in 2021. *Mountain Doodles*. <https://doodles.mountainmath.ca/blog/2022/10/03/still-short-suppressed-households-in-2021/>

¹¹¹ Shareholder Association for Research and Education (SHARE). (2025). *Investors for Affordable Cities Responsible Investment in Housing Disclosure Framework*. <https://share.ca/wp-content/uploads/2025/05/2025-05-28-SHARE-Housing-Framework.pdf>

federal government should consider renovation programs where habitability, accessibility and energy efficiency improvements are linked to affordability.¹¹²

- **Number and proportion of homes that are accessible to people with physical mobility impairments, using CSA-ASC-2.8:2025.** This indicator should be provided by municipal, regional, and Indigenous governments, but again linked to federal renovation and new build programs.
- **Number and proportion of homes that are well located.** For urban areas with a population of 100,000 or more, an important measure is the proportion of housing that is available within 500 metres of rapid transit, which can include busways as well as light and heavy rail. For communities with fewer than 100,000, location might be calculated as walkable distance to essential grocery, health, education, and childcare services, using the national Proximity Measure Database.

Conclusion: An Intergovernmental Outcomes Framework

The federal government should develop an expanded Housing Partnership Framework as part of a renewed National Housing Strategy, governing the federal government's relationships with its provinces and territories as well as with municipalities and regions (through the umbrella body, the Federation of Canadian Municipalities) and Indigenous governments (through umbrella bodies the Assembly of First Nations, the Inuit Tapiriit Kanatami, and the Métis National Council). Adherence to the principles, priorities, and targets of the Framework, as measured by annual public-facing indicators related to five-year plans to eradicate homelessness and reduce housing need, should be linked to federal infrastructure funding, including but not limited to:

- **Capital and financing for a new generation of non-market homes**—new build, acquisition, and renovation, on a portfolio basis, and favouring modern methods of construction
- **Renovation financing for the subdivision of market homes, and improving accessibility and energy efficiency for market ownership and rental**—on a portfolio basis
- **Public transport, water and sanitation, childcare, schools and other physical and social infrastructure financing**—for both new and renovated infrastructure
- **Health funding related to the prevention and eradication of homelessness**

Funding for provinces and territories should be conditional on receipt of annual indicators and progress on five-year, rights-based plans:

¹¹² Tower Renewal Partnership. (2017). *German Retrofit Financing*. http://towerrenewal.com/wp-content/uploads/2017/04/20170331_Case-Study_KFW.pdf

- **To reduce homelessness**, with annual targets leading to ending homelessness by 2040 (mechanisms may include new and acquired deeply affordable housing—including supportive housing—rent banks, rent supplements, and income support)
- **To end low-income renter housing need by 2050**, which will involve annual targets and mechanisms related to reducing the net loss of affordable housing (mechanisms may include acquisitions by non-market providers and rent regulation)
- **To increase the supply of new affordable housing** (mechanisms may include simplified zoning and building codes, providing alternatives to development charges, land banking, and right of first refusal for market rental)
- **With targets and mechanisms to address tenure security towards a goal of no evictions into homelessness** (may include market and non-market landlord registration and legal aid for tenants at risk of eviction)
- **With targets and mechanisms to improve habitability** (may include market and non-market landlord registration and use of renovation funds linked to affordability)
- **With targets and mechanisms to address accessibility for people with disabilities** (may include renovation funds linked to affordability and changes to building code)
- **With targets and mechanisms to increase culturally adequate housing for and by Indigenous organizations**

All municipal, regional and should provide annual indicator reports as well as report on progress of five-year plans with targets and mechanisms to:

- **Reduce homelessness, with annual targets** (may require better coordination of services and transforming emergency shelters and transitional accommodation to permanent supportive housing)
- **End low-income renter housing need** (may require changes to zoning and approval systems)
- **To increase affordable housing for individuals, couples, and families, especially in areas within 500 metres of rapid transit** (may require changes to development charge systems in return for infrastructure funding)

National outcomes should be expressed as proportional targets (e.g., reduce homelessness from 0.5% of the population, which is the current Ontario estimate, to 0.01% of the population, or functional zero homelessness, by 2040), with sub-targets for provinces, territories, municipalities, regions, and Indigenous governments derived from public-facing national data, collected annually (with census-based updates and revisions to the National Housing Strategy every five years).



Box 2. Suggested Revised Wording for the Housing Partnership Framework

Note: The Framework has not been reviewed in full. There is an emphasis on long-term vision, elements of adequate housing, goals, targets, and indicators. Definitions should be an appendix to the Framework.

Current wording—Long-Term Vision for Housing

- Federal, Provincial and Territorial Ministers Responsible for Housing agree to a shared vision where:
Everyone in Canada has housing that meets their needs and they can afford.
Affordable housing is a cornerstone of sustainable and inclusive communities and a Canadian economy where we can prosper and thrive.

Suggested Revision—Long-Term Vision

- Federal, Provincial and Territorial Ministers Responsible for Housing, as well as representatives of the Federation of Canadian Municipalities, Assembly of First Nations, the Inuit Tapiriit Kanatami, and Métis governments, agree to a shared commitment to:
Progressively realize the right to adequate housing for all residents of Canada according to the principles of the National Housing Strategy Act (2019): prioritizing the needs of vulnerable groups, meaningfully engaging with vulnerable populations, addressing discrimination and inequality as it affects the right to housing, using all appropriate means to promote the right to adequate housing, allocating sufficient resources, and ensuring independent monitoring of the realization of the right to adequate housing. Affordable and adequate housing is necessary for the lives and well-being of individuals, families, and communities, as well as a cornerstone of a Canadian economy where we can prosper and thrive.

Current Version—Rights-Aligned Elements of Adequate Housing

- The FPT Housing Partnership Framework is a multilateral agreement that sets the foundation for federal, provincial and territorial governments to work towards achieving this long-term vision. The Framework is grounded in the National Housing Strategy (NHS) and is complemented by provincial and territorial housing strategies. It marks a renewed relationship between Canada and the provinces and territories and commits FPT governments to work together to achieve better housing solutions across the spectrum, from homelessness to market housing.
- NHS shared investments seek to lift Canadians out of housing need; reduce homelessness year-over-year; support the community housing sector; increase housing supply; improve housing conditions and affordability—including for Indigenous peoples and those living in the North; promote social inclusion;

contribute to environmental sustainability; and improve economic stability in Canada through job creation, training and support to local enterprise.

Suggested Revision—Rights-Aligned Elements of Adequate Housing

- The Housing Partnership Framework is a multilateral agreement that sets the foundation for all governments in Canada to progressively realize the right to adequate housing. Grounded in the National Housing Strategy Act (2019), it reflects a human rights-based approach, including Indigenous rights and self-determined housing, non-discrimination, transparency, and meaningful participation of rights holders, and establishes shared expectations around affordability, habitability, tenure security, accessibility, location, access to essential services, and cultural adequacy. It commits governments, working with non-profit, Indigenous-led, and private partners, to end homelessness and housing need, promote social inclusion, support environmental sustainability, and strengthen economic stability.

Current Version—Outcome Targets

- Ministers Responsible for Housing agree that better housing outcomes will be achieved as FPT governments: coordinate their efforts; cooperate in the development of housing policies and strategies; build upon existing housing investments and effective housing programs; and share data and information that will make program development and delivery more effective. Ministers further commit to collaborate with many diverse stakeholders and align housing policies and planning with other sectors to create effective housing solutions and vibrant communities.

Suggested Revision—Outcome Targets

- Signatories agree that the goal of adequate housing for all can only be achieved through coordination and partnerships between all governments in Canada, using all appropriate means to promote the right to adequate housing, allocating sufficient resources, and ensuring annual independent monitoring. Together, we commit to:
 - Ending homelessness by 2040
 - Ending very low- and low-income housing need by 2050
 - Ensuring that all residents of Canada have access to an affordable, adequate home by 2060

Current Version—Indicators

- Federal targets below will inform the development of mutually agreed to PT targets in bilateral agreements with the goal of achieving the following:
 - Maintain/increase social housing supply:
 - 330,000 units continue to be offered in social housing

- A 15% expansion of rent-assisted units (approximately 50,000 units based on number of units still supported by social housing agreements in 2018-19)
- No net loss of Urban Native Social Housing units available to low-income households (baseline to be determined bilaterally)
- Repair existing stock:
 - At least 20% of existing social housing units repaired (approximately 60,000 units based on number of units still supported by social housing agreements in 2018-19)
 - Retained Urban Native Social Housing units will be repaired to good condition
- Direct affordability support to households:
 - At least 300,000 households adequately supported through a Canada Housing Benefit
 - Remove households from housing need:
 - Overall, at least 490,000 households removed from housing need as a result of NHS funded housing interventions (ensuring an appropriate balance between targeting households in severe core housing need and core housing need)

Suggested Revision—Indicators

- Federal outcome indicators below will inform the development of mutually agreed upon targets from other levels of government in bilateral agreements, accompanied by annual, indicator-based progress reports and five-year plans to improve performance, with the goal of achieving the following:
 - Sufficient new, acquired, and renovated housing and associated supports to end homelessness by 2040
 - At least 100,000 net new deeply affordable non-market homes per year: 50,000 (half) delivered as supportive housing, including a proportion, related to homelessness numbers, as Indigenous housing, which would be set nationally at 20%, and 50,000 (half) delivered as part of the non-market targets below
 - Sufficient income support or rent subsidies and health and social services to maintain adequacy in these homes
 - Annual reduction in homeless counts, including of those in violence against women shelters, people in institutions, and those involuntarily doubling up with family and friends, using HIFIS data
 - No net loss of deeply affordable housing and no evictions into homelessness
 - Sufficient new, acquired, and renovated adequate non-market housing to end very low- and low-income housing need by 2050

- At least 200,000 mixed income affordable and deeply affordable non-market homes per year, with at least half of these to be deeply affordable (see above)
- No net loss of affordable housing and a reduction in evictions and other forced moves year over year
- Sufficient adequate homes (that are affordable, tenure secure, well located, accessible, habitable, culturally adequate, and with access to essential services) to serve everyone in Canada by 2060
 - Annual increases in the proportion of non-market homes, towards a target of 20% of all homes by 2060
 - Net increases in well-located, affordable, adequate homes year over year, in line with projected increases in population and households and changes provided by the federal government
 - Improvements in accessibility, habitability, location, and access to essential services
 - Improvements in zoning, building code, approvals, and construction methods to ensure timely delivery of sustainable, accessible, and affordable homes for the next generation of Canadians.



In relation to bilateral agreements, the federal government, through Build Canada Homes, is moving away from project-based funding to a municipal and regional portfolio approach, with multiple sites, projects and development and service partnerships. Portfolio-based approaches that span multiple regions to deliver particular forms of necessary housing (e.g., seniors' housing, supportive housing, and student housing) should be considered. It is possible that smaller provinces and territories, like Nunavut or PEI, should be treated as a region for the purpose of bilateral agreements. It is also possible that the federal government may need to provide funding to regions and smaller provinces to implement a successful method to track and address people experiencing homelessness and those at risk of homelessness. But funding should not go to governments unwilling to annually track and improve outcomes or to non-signatories to the National Housing Framework.

NHS 2.0 must include a mechanism for human rights-based, conditional funding transfers to subnational governments (provinces, territories, municipalities, regions, and Indigenous governments) in the manner of agreements and transfers under the Canada Health Act (1984) and the Canada Child Care Act (2023). There must be a basic level of housing action demonstrated in annual reports, in return for investments from the level of government with the most money and power, the federal government. The federal government should expand its regular intergovernmental roundtable approach to formally include municipalities,

especially big cities (whose populations are greater than many provinces and territories) and Indigenous governments (First Nations, Métis, and Inuit).¹¹³

In cases of non-compliance or failure to meet targets, the federal government should either withhold further payment (e.g., health transfers and infrastructure funding) until an acceptable improvement plan is provided or transfer equivalent payments to another level of government with jurisdiction, for instance municipalities and regions instead of a province or a First Nation instead of a municipality.

To accurately track progress towards goals, the federal government should ensure that any non-market or market housing that receives a direct or indirect federal subsidy (whether GST rebates, land, financing, mortgages, or loan insurance) provides public information on rents and house prices on an annual basis, and that subsidy should be limited to permanently affordable housing that serves the majority of the Canadian population.

Building on evidence-based practices in Canada and internationally, a priority for NHS 2.0 should be to develop a shared Housing Partnership Framework with a set of standard definitions, rights-based annual targets and indicators, and a system of contract-based bilateral agreements that can work together to deliver the necessary quantum and quality of affordable and adequate housing for all Canadians.

¹¹³ Neve, 2023; Flynn, 2025.