



Ontario Non-Profit Housing Association (ONPHA)

Written Submission to the Ministry of Finance for the 2025 Pre-Budget
Consultations



List of Recommendations

ONPHA's six recommendations seek to grow, protect, and support the community housing sector in Ontario:

Grow the community housing sector:

1.1: Introduce a "Housing for Housing Principle" that would reinvest a portion of tax generated revenue from the housing market into the non-profit housing sector.

1.2: Establish community housing targets for service managers to ensure affordable housing developments keep up with growing demand.

Protect the community housing sector:

2.1: Formalize ONPHA's role in the sector to improve efficiency, streamline best practices, and reduce capacity shortfalls.

2.2: Commit to an ongoing "Efficiency Review" of the legislative and regulatory environment to identify unnecessary red tape and administrative burdens.

Support the community housing sector:

3.1: Increase homelessness prevention funding to increase the supply of supportive housing and provide shelter to those exiting homelessness.

3.2: Develop an Indigenous Housing Advisory Committee to hear directly from Indigenous housing providers to understand their needs and to co-develop culturally appropriate housing solutions.



Dear Hon. Peter Bethlenfalvy,

CC. Hon. Paul Calandra, Hon. Vijay Thanigasalam

Thank you for the opportunity to provide recommendations to the pre-budget consultations in advance of the 2025 Budget. We look forward to continuing to work with all levels of government, non-profit, and private sector partners to address the ongoing housing crisis.

The Ontario Non-Profit Housing Association (ONPHA) is the voice of non-profit housing in Ontario. With close to 700 non-profit landlords and around \$30 billion in built assets, ONPHA is one of Ontario's largest housing developers, accounting for approximately half of Canada's affordable housing stock. Founded over 30 years ago, our members provide safe, affordable, and stable housing for half a million Ontarians along the housing continuum.

Ontario is in a housing crisis. Rising prices, limited supply, and an ever-widening affordability gap have left countless Ontarians forgoing the dream of homeownership. These realities led the working middle class to community housing. Homelessness too has increased, and downtown streets are full of encampments, deterring pedestrians, and hindering local businesses.

Community housing is the bridge between homelessness and homeownership. Without the appropriate supply of housing along the housing continuum, a true solution to the housing crisis cannot be accomplished. Adequate funding and removal of operating barriers are essential to unlock the sector and increase the supply of non-profit housing that is desperately needed in Ontario.

To address the homelessness and housing crisis, and upcycle the economy towards the future, more policy support and investments are needed. Investments in housing along the continuum and coinciding community supports will release economic pressure in the short-term, allow for construction and job creation to kick-start the economy in the mid-term, and protect public investment across the healthcare, justice, and social systems for long-term savings.

We appreciate that the Government of Ontario has taken substantial action on housing in recent years. To continue moving forward, we recommend the government target its investments towards non-profit housing providers to maximize public dollars with the greatest potential for return on investment, ensuring long-term sustainability for affordable housing in Ontario. Our recommendations seek to grow, protect, and support community housing and have been developed based on our extensive network and experience. We are eager to continue working alongside the province in these important efforts.

Sincerely,

Marlene Coffey, MA, MAES, MCIP, RPP
Chief Executive Officer, ONPHA



Grow the community housing sector:

1.1. Introduce a “Housing for Housing Principle” that would reinvest a portion of tax generated revenue from the housing market into the non-profit housing sector to facilitate growth of the sector compared to the broader housing market.

ONPHA is recommending the Ontario government to commit to a “Housing for Housing Principle” whereby the government would reinvest a portion of the tax revenue collected from the private housing market (e.g., land transfer taxes, HST) and earmark this revenue for the non-profit housing sector in Ontario.

By tapping into future revenue, the government will avoid taking away from any current programming and in turn, will ensure the opportunity for housing affordability is anchored proportionately to growth. This increased funding to non-profit providers would help facilitate the sector’s growth, ensuring it can expand and keep pace with the broader housing market, creating a sustainable funding loop where the success of the private housing market also supports the growth of affordable housing.

1.2. Introduce community housing targets for service managers to ensure affordable housing developments keep up with growing demand.

Over the past year, Ontario’s population has grown by over 500,000, representing a 3.4% increase in the province’s population. As demand and waitlists for community housing continue to grow, the construction of new community housing has lagged, exacerbating the crisis.

Complementing the government’s existing 2031 Municipal Housing Targets, ONPHA recommends implementing targets for the creation of new community housing for all of Ontario’s 47 service managers. The targets would provide clear goals to service managers on increasing the supply of a range of housing types within their communities while also providing the provincial government with a framework of accountability to track and monitor progress against its targets.

Protect the community housing sector:

2.1. Formalize ONPHA’s role in the community housing sector through amendments to the *Housing Services Act*, which would amalgamate the sector under one united voice to improve efficiency, streamline best practices, and reduce capacity shortfalls.

Similar to how the Housing Services Corporation is mandated by the *Housing Services Act* to deliver bulk purchasing programs for all of Ontario’s non-profit housing providers, ONPHA is recommending a similar and complementary mechanism be implemented to formalize ONPHA’s role in education, training, and capacity building programs for non-profit providers in this province.

ONPHA has a long history of successfully delivering education and capacity building programs for our membership base, often utilizing provincial funding to do so. However, there is currently a void that is left unfilled for the remaining non-profit providers who are not actively involved with ONPHA. By requiring all non-profit providers operating under the *Housing Services Act* to be affiliated with ONPHA for the purposes of education, training, and capacity building opportunities, ONPHA can help strengthen the sector through consistent programming that will improve operational efficiency and ensure best practices are incorporated in housing providers of all sizes. This role would also reduce the need for service managers to be actively involved in training and capacity building with their providers, with ONPHA mandated to provide high-quality and consistent programming across the province.

2.2. Commit to an ongoing “Efficiency Review” of the legislative and regulatory environment governing the non-profit housing sector to identify unnecessary red tape and administrative burdens that hold back providers, while cultivating innovative best practices to modernize the sector.

ONPHA believes the non-profit housing sector in Ontario is poised for significant expansion in the coming years. However, to achieve its full potential in improving affordability for Ontarians, our sector needs a modern and flexible regulatory environment that promotes growth and sustainability.

To that end, ONPHA is recommending the Ontario government to commit to an ongoing “Efficiency Review” of the *Housing Services Act* and its regulations to ensure non-profit housing providers are not overburdened by unnecessary, inefficient, and costly red tape at the provincial level. ONPHA’s extensive network of housing providers and internal expertise could be called upon to help assist in this review.

Support the community housing sector:

3.1. Increase funding to the provincial Homelessness Prevention Program (HPP) and Indigenous Supportive Housing Program (ISHP) to increase supply of supportive housing and provide shelter to those exiting homelessness.

In cities across Ontario, visible homelessness and encampments have become a common sight. Ontario has dedicated social service agencies and housing providers that work tirelessly with those experiencing or at risk of homelessness, but more funding for affordable housing and wrap-around support services is desperately needed. Without an increase in funding from the provincial government, these issues will only continue to grow and persist.

ONPHA is therefore calling on the provincial government to implement an immediate one-time increase to the province’s HPP and ISHP programs. Both initiatives provide significant flexibility for local responses to homelessness, such as funding for supportive housing, shelters, community outreach, and emergency assistance.



3.2. Develop an Indigenous Housing Advisory Committee to hear directly from Indigenous housing providers to better understand the core housing needs of their communities and to co-develop culturally appropriate housing solutions.

ONPHA recommends the Ontario government establish a formalized housing advisory table between government officials and the Indigenous non-profit housing sector (including Ontario's two Indigenous Program Administrators) to facilitate a platform for collaboration, informed decision-making, and a more inclusive strategy to mitigate housing challenges faced by Indigenous people living in Ontario.

Consistent and ongoing dialogue between the province and the Indigenous non-profit housing sector is essential for finding culturally appropriate solutions to the Indigenous housing crisis and demonstrating the government's commitment to remaining responsive to the needs and challenges faced by these communities and organizations.