

# WRITTEN SUBMISSION FOR THE PRE-BUDGET CONSULTATIONS IN ADVANCE OF THE UPCOMING FEDERAL BUDGET

By The Ontario Non-Profit Housing Association



**Recommendation 1:** That the federal government establish an acquisition fund for community housing providers to enable capital expansion.

**Recommendation 2:** That the federal government reduce red tape and administrative burdens for community housing providers trying to access government funding and programming.

**Recommendation 3:** That the federal government prioritizes excess government lands for community housing to ensure affordability over the long-term.

**Recommendation 4:** That the federal government establish a Community Housing Advisory Table to facilitate consultations and informed decision making.

**Recommendation 5:** That the federal government ensures a seamless transition to Build Canada Homes.

**Recommendation 6:** That the federal government co-develop Indigenous led solutions to the housing crisis.



August 28, 2025

## WRITTEN SUBMISSION FOR THE PRE-BUDGET CONSULTATIONS IN ADVANCE OF THE UPCOMING FEDERAL BUDGET

Dear Minister François-Philippe Champagne and the Department of Finance,

Thank you for the opportunity to provide recommendations to the pre-budget consultations in advance of the 2025 Budget.

The Ontario Non-Profit Housing Association (ONPHA) is the voice of non-profit housing in Ontario. For more than 30 years, our member-funded and directed association has represented non-profit landlords and local housing corporations across the province. Our membership spans the housing continuum, from social and supportive housing to low-end of market rentals.

As one of the largest developers in Canada, ONPHA represents non-profit landlords and developers who together provide over 30% of Canada's community housing stock, housing over half a million Canadians.

Ontario's housing crisis stands out as one of the most severe in Canada. Skyrocketing prices, limited supply, and an ever-widening affordability gap have left countless Ontarians struggling to achieve the dream of homeownership. For many, it is no longer just a question of affordability but of basic access, finding a stable, safe, and suitable place to live has become increasingly out of reach.

Vacancy rates in many communities are at historic lows, pushing rents higher and forcing households to spend unsustainable portions of their income on housing. Young people are delaying life milestones, families are being priced out of the communities where they work, and vulnerable populations face heightened risks of homelessness. The crisis is not only undermining social and economic well-being but also threatening Ontario's long-term competitiveness and ability to attract and retain workers.

We know that community housing is a fundamental part of the solution to this crisis. We see the community housing sector as a critical piece in the government's solution to achieve longterm sustainability and housing affordability. While the government's additional funding in the



Affordable Housing Fund was a step in the right direction, further investments, policies, and programs are essential to truly put forward the solutions needed to solve the housing crisis.

ONPHA looks forward to continuing to collaborate alongside you in developing solutions to the housing crisis.

Sincerely,

Marlene Coffey, MA, MAES, MCIP, RPP

Chief Executive Officer, Ontario Non-Profit Housing Association



#### **Recommendation 1: Create an Acquisition Fund**

ONPHA is recommending the federal government launch a fund to help non-profit housing providers access capital to acquire existing rental units and preserve stable rents for tenants across Canada.

Growing the community housing sector is a key solution to addressing the housing crisis. As operational costs rise and capital repair needs persist, non-profit housing providers have struggled to save up enough funds to compete with the private sector in acquiring new rental units and land for expansion.

By creating an acquisition fund, non-profit housing providers would have access to the capital they need to compete in the market and acquire rental stock where affordability will be preserved over the long-term. Increasing the asset base of community housing providers will also ensure their operations become more sustainable, reducing the reliance on costly government grants and subsidies.

Additionally, with ongoing trade uncertainty with the United States, the cost of building materials is expected to rise, meaning the limited funding available for new rental construction will be further squeezed. Acquiring existing buildings as a tool for sector expansion will be less expensive and faster than building from scratch.

#### **Recommendation 2: Reduce Red Tape and Administrative Burdens**

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

To that end, ONPHA is recommending the federal government commit to identifying and eliminating unnecessary red tape and administrative burdens that hold back housing providers. Our membership cannot afford delays or unnecessary costs that inhibit their ability to expand and grow. With the government's support, the full potential of the community housing sector can be harnessed to build more affordable housing for Canadians.



#### **Recommendation 3: Prioritize Government Lands for Affordable Housing**

ONPHA recommends that the government prioritize excess government lands for non-profit housing. Amid a housing crisis, affordable housing remains top of mind for Canadians. As the government looks for innovative ways to mitigate the housing crisis, while also disposing of surplus government lands that are costly for taxpayers to maintain, transforming excess government lands for housing has become a popular policy choice.

It is important that the federal government use their leverage to ensure strict affordability requirements are placed on any developer who will be building housing on excess government lands. By providing the land for little or no cost, setting strict affordability requirements, and prioritizing non-profit housing providers during sales, long-term affordability can be achieved for Canadians.

#### **Recommendation 4: Establish a Community Housing Advisory Table**

ONPHA recommends the federal government establish a housing advisory table between government officials and the community housing sector to provide a platform for collaboration, informed decision-making, and a more inclusive strategy to tackle affordable housing challenges across the country.

Consistent and ongoing dialogue between interest holders from the community housing sector, development community, urban planners, and the federal government is essential to staying on top of the sector's evolving landscape and needs. The advisory table will promote innovative solutions through the unique expertise and operating realities of each member. An open forum for dialogue ensures that the government remains responsive to the current needs and challenges faced by the sector while also understanding the unique operating realities and best practices of each jurisdiction within Canada.

#### **Recommendation 5: Ensure a Smooth Transition from CMHC to BCH**

In the current housing crisis, community housing providers cannot afford to face funding gaps. Many providers have urgent, shovel-ready projects to serve their communities. As the federal government transitions to Build Canada Homes, it is essential that this process be seamless, with continued access to the programs and resources currently administered through CMHC.



At the same time, the federal government should leverage the expertise of the community housing sector to ensure the transition is successful and that funding reaches the ground effectively and efficiently to make the greatest impact.

### Recommendation 6: Co-Develop Indigenous Led Solutions to the Housing Crisis

ONPHA recommends the federal government take an active role in supporting Indigenous housing providers across this province and in facilitating the creation of culturally appropriate housing solutions.

Despite government initiatives, Indigenous households in Canada continue to face disproportionate rates of homelessness and inadequate housing. The government led approach has not been working. ONPHA is asking the federal government to provide decision-making autonomy and financial flexibility to Indigenous housing providers to allow them to build culturally appropriate housing for their communities.