



Ontario Non-Profit Housing Association (ONPHA)

Written Submission for the 2026 Federal Pre-Budget Consultations

September 4, 2026



List of Recommendations

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

Recommendation 1: That the federal government establish a renewed National Housing Strategy that protects existing community housing, supports new supply, and provides predictable and sustainable investment over the long term.

Recommendation 2: That the federal government reduce administrative burdens for community housing providers accessing federal funding and programs.

Recommendation 3: That the federal government prioritize government lands for community housing to ensure affordability over the long term.

Recommendation 4: That the federal government ensure Build Canada Homes delivers effectively for the full community housing sector.

Recommendation 5: That the federal government invest in a standalone off-reserve Urban, Rural and Northern (URN) Indigenous housing program.



September 4, 2026

Dear Hon. Minister François-Philippe Champagne and Members of the Standing Committee on Finance,

Thank you for the opportunity to provide recommendations as part of the pre-budget consultations in advance of the 2026 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 supportive housing to low-end-of-market rentals.

As one of the largest developers in Canada, ONPHA represents non-profit landlords and developers across Ontario, home to more than half of Canada's community housing stock. Together, our members house over half a million Canadians.

Canada continues to face significant housing affordability and supply challenges. In Ontario, high housing costs, limited supply, and ever-growing demand for affordable housing are placing increasing pressure on communities, while also challenging the organizations working to provide and preserve these affordable homes.

At the same time, federal housing direction is entering an important new phase. As the current National Housing Strategy approaches the end of its term and Build Canada Homes moves into full implementation, the federal government has an opportunity to establish a stronger and more sustainable community housing system for the next decade and beyond.

Non-profit housing providers are essential partners in achieving this goal. Our members build and operate community housing, preserve affordability for tenants, and reinvest in the communities they serve. With the right policy and program environment, our sector can play an even greater role in protecting and expanding the supply of affordable homes for Canadians.

ONPHA's five recommendations identify practical steps the federal government can take to preserve existing affordable housing, enable the development of new supply, strengthen the capacity of community housing providers, and ensure federal investments deliver lasting affordability.

ONPHA looks forward to continuing to work with the federal government to build a stronger and more sustainable community housing system.

Sincerely,

Marlene Coffey, MA, MAES, MCIP, RPP

Chief Executive Officer, Ontario Non-Profit Housing Association



1. Establish a renewed National Housing Strategy (NHS) that supports a sustainable community housing system.

As the current NHS approaches the end of its term, the federal government has an opportunity to establish a stronger and more resilient community housing system for the next decade.

A renewed NHS should look beyond individual programs and short-term funding commitments. It should recognize the full lifecycle of community housing by protecting existing affordable supply, supporting the development of new supply, and providing a predictable funding environment that allows housing providers to plan and invest with confidence.

This is particularly important in Ontario, which is home to more than half of Canada's community housing stock. Much of this housing was built several decades ago and now requires significant capital renewal while providers face rising construction and operating costs and growing pressure to expand affordable housing supply.

ONPHA urges the federal government to work with provinces, territories, and the community housing sector to develop a renewed NHS that provides longer-term funding certainty, improves the coordination and accessibility of housing programs, and strengthens the capacity of community housing providers to preserve existing assets while planning and building for the future.

2. Reduce administrative burdens for housing providers accessing federal funding.

In order for the community housing sector to expand and achieve its full potential, providers need a modern and flexible funding environment that allows them to focus their resources on maintaining existing housing while developing new supply.

ONPHA recommends that the federal government identify and eliminate unnecessary administrative requirements within federal housing programs. Complex application processes, duplicative reporting requirements, and lengthy approval timelines can increase project costs, delay development, and place a disproportionate burden on community housing providers that operate on thin margins.

These challenges are compounded when providers must stack multiple sources of funding to make a single project viable, each with its own requirements, timelines, and approval processes.

Reducing unnecessary administrative burdens and improving coordination across federal housing programs would allow providers to spend less time navigating government processes and direct more resources toward preserving and increasing the affordable housing supply for Canadians. ONPHA can support this work by facilitating direct engagement with our members, leveraging their on-the-ground expertise to help identify opportunities to streamline requirements and reduce unnecessary administrative burdens.

3. Prioritize government lands for community housing to ensure affordability over the long term.

Access to affordable land remains a significant barrier to the development of new community housing. As the federal government identifies surplus public lands for housing, these assets should be used strategically to expand the supply of permanently affordable homes.

ONPHA recommends prioritizing suitable surplus federal lands for community and Indigenous housing providers through preferential access, long-term land leases, or other arrangements that reduce upfront development costs. Where federal lands are used for housing, affordability requirements should be designed to preserve long-term affordability and ensure that public land continues to deliver lasting public value.

Prioritizing community housing on suitable federal lands would help lower development costs, support the creation of new affordable housing, and preserve affordability for future generations.

4. Ensure Build Canada Homes (BCH) delivers effectively for the full community housing sector.

BCH represents a unique opportunity to accelerate the development of affordable and non-market housing across Canada.

As BCH moves to advance funding opportunities, the federal government should ensure that community housing providers of different sizes and capacities can effectively access BCH financing and supports.

ONPHA encourages the federal government to continue working closely with the community housing sector to ensure BCH programs and processes reflect the realities of non-profit housing development, complement existing federal and provincial housing programs, and support projects from early development through to construction. This should include ensuring a seamless transition between CMHC and BCH funding streams, so that projects are not required to restart application processes, risking delays as funding responsibilities shift between programs.

5. Invest in a standalone off-reserve Urban, Rural and Northern (URN) Indigenous housing program.

The federal government's investments through distinctions-based funding represent an important step forward in addressing the significant housing needs facing Indigenous communities.

ONPHA recommends that the federal government also establish a standalone funding program for off-reserve Indigenous housing providers to give Indigenous housing providers the long-term certainty needed to plan, build, preserve, and operate culturally appropriate housing for their communities.

Indigenous housing programs should also be designed through meaningful and ongoing engagement with Indigenous housing providers and sector leaders. Indigenous organizations have deep knowledge of the communities they serve and should be treated as delivery partners in the design and



implementation of housing programs. Federal programs should provide sufficient flexibility to reflect diverse community needs, including culturally relevant supports, wraparound services, and other Indigenous-led approaches that contribute to successful tenancies.

Making Indigenous housing investment permanent, while ensuring programs are shaped by Indigenous expertise, will help governments build more of the right kinds of housing and strengthen Indigenous-led housing capacity over the long term.