ONPHA
ONTARIO NON-PROFIT
HOUSING ASSOCIATION

November 18, 2026

Standing Committee on Finance and Economic Affairs
Legislative Assembly of Ontario
Queen's Park
Toronto, Ontario

Re: Bill 143, *Plan to Protect Ontario Act, 2026* – Proposed Amendments to the *Assessment Act*

Dear Members of the Standing Committee,

On behalf of the Ontario Non-Profit Housing Association (ONPHA), we appreciate the opportunity to comment on the proposed amendments to Ontario's *Assessment Act* introduced through Bill 143, particularly those affecting property tax exemptions for non-profit housing providers.

ONPHA is the leading voice of non-profit housing in Ontario, representing members who provide safe, affordable, and stable housing to over half a million Ontarians. Collectively, our members are among the country's largest housing developers, with approximately $38 billion in built assets.

ONPHA welcomes the Province's commitment to reviewing the existing property tax exemption framework. This presents an opportunity to clarify eligibility, strengthen accountability, and establish a clear definition of qualifying community housing providers to ensure property tax relief supports their non-profit housing mandate.

We have already heard concerns from our members about the financial implications of Bill 143, particularly for providers with pending exemption applications and affordable housing projects in the development pipeline. As an immediate first step, we ask the Province to confirm that qualifying non-profit housing providers will continue to have access to existing property tax exemptions while it consults with the sector on a permanent solution.

1. Strengthen transitional protections for existing providers and projects in the development pipeline

Section 3(1)12(iii) of the *Assessment Act* has long provided a property tax exemption for qualifying charitable and non-profit organizations. Following the Ontario Court of Appeal's 2025 *Stamford Kiwanis* decision, which clarified eligibility, more non-profit housing providers have sought this exemption.

Bill 143 proposes to temporarily restrict the exemption for rental residential properties in 2027, with exceptions for properties already recognized as exempt or covered by qualifying court orders before October 29, 2026. However, these protections do not extend to providers with pending applications or proceedings, including those initiated before the proposed amendments.

As a result, comparable affordable housing properties could receive different tax treatment based on the timing of their exemption determinations. This creates uncertainty for providers preparing operating budgets, securing financing, and making long-term investment decisions. For projects in development, including those advancing with Build Canada Homes, uncertainty around future property taxes could affect financial viability and delay new affordable housing supply.

ONPHA recommends that the Province provide immediate clarity and strengthen Bill 143's transitional provisions to:

- Protect providers with exemption applications or court proceedings initiated before October 29, 2026.
- Establish a clear, Ministry-led process to maintain access to property tax exemptions for qualifying non-profit and charitable housing projects already in development, as well as new projects advancing in 2027.

2. Establish a predictable, province-wide framework for affordable housing property tax relief

ONPHA supports the Province's review of the existing exemption framework as an opportunity to clarify eligibility, strengthen accountability, and recognize the important role of non-profit housing providers in delivering and maintaining affordable housing. Any longer-term reforms should preserve property tax exemptions for qualifying providers, recognizing that these organizations reinvest their resources into housing operations, capital repairs, and new development.

ONPHA is particularly concerned about a potential shift toward discretionary municipal tax relief. While municipalities are essential housing partners, differences in fiscal capacity and local priorities could result in inconsistent treatment of comparable affordable housing projects across Ontario. The Province's existing Affordable Rental Housing Subclass offers a potential foundation for reform. However, its optional adoption and limited tax relief do not provide the same certainty or financial benefit as a statutory exemption.

ONPHA recommends that longer-term reforms be guided by the following principles:

- Maintain property tax exemptions: Establish a long-term framework that recognizes the mandate of community housing providers and preserves property tax exemptions for qualifying organizations.
- Support financial certainty and long-term investment: Ensure consistent and predictable property tax treatment across Ontario so providers can plan operating budgets, secure financing, attract investment, and make long-term commitments to expanding affordable housing.
- Establish a clear definition of qualifying community housing providers: Work with the sector to develop an agreed-upon definition that reflects the mandate and activities of non-profit community housing providers and provides a foundation for future policy and regulatory changes.

ONPHA appreciates the Province's commitment to further consultation and looks forward to participating in the upcoming Ministry of Finance discussions anticipated for early-December. We welcome the opportunity to work with the Province on a permanent solution that protects non-profit housing providers, strengthens accountability, and supports the sector's long-term financial sustainability.

In the interim, we urge the Province to provide immediate clarity and maintain access to existing property tax exemptions for qualifying providers and projects while the longer-term framework is developed.

Thank you for considering ONPHA's submission.



Marlene Coffey,
Chief Executive Officer, ONPHA