

Written Submission to the Standing  
Committee on Human Resources, Skills and  
Social Development and the Status of Persons  
with Disabilities:

Study on Bill C-20, An Act respecting the  
establishment of Build Canada Homes.

By the Co-operative Housing Federation of Canada

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## **About the Co-operative Housing Federation of Canada**

CHF Canada is the national voice for co-operative housing in Canada. There are over 2,200 non-profit housing co-operatives across the country, home to a quarter of a million Canadians. Housing co-operatives play a unique role in the housing system by providing secure and affordable homes to households with a mix of incomes, where members have a meaningful say in how their housing is run. For over five decades, housing co-operatives have built inclusive, resilient communities across Canada.

## **The Value of Co-operative Housing**

The legal structure of a non-profit co-operative puts member (resident) interest first in delivering sustainable, quality, affordable homes on a permanent basis. Co-operatives operate outside of the speculative market so that residents are insulated from market rate rent increases, renoviction, demo-viction and the financialization of housing. A five-city study in 2022 found that co-op rents are consistently below market, delivering households savings averaging 25-33 percent compared to what they would pay for comparable private rentals.<sup>1</sup> Even in high-cost markets, newer co-operative housing developments rapidly deliver stronger affordability relative to market.

Co-operatives also partner with governments to dedicate a portion of their portfolios to low-income households who otherwise would face housing precarity and core housing need. This is thanks to the availability of rent-geared-to-income rental assistance delivered to households through programs like the Federal Community Housing Initiative and the Canada Community Housing Initiative.

## **Establishing Build Canada Homes to Deliver Co-operative and Non-Profit housing**

Build Canada Homes should prioritize non-market housing to address Canada's housing affordability challenges with proven, long-term solutions. In partnership with the co-operative and community housing sector, Build Canada Homes can mark a transformational shift in how housing is built: not only faster, better, and more efficiently, but in a way that meaningfully improves affordability and scales up the proportion of non-market housing in Canada's housing system.

Bill C-20 could be strengthened to clarify the intent of Build Canada Homes to focus on non-market affordable housing, thereby creating stable conditions to build co-op and non-profit housing at scale.

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<sup>1</sup> Suttor, Otogwu, and Falvo. July 2022. [The Co-op Difference](#): Comparing co-op and market rents in five Canadian cities.

Scaling up co-operative housing is a strategic investment in Canada's future that supports inclusive growth and economic resilience. Expanding co-operative housing will also strengthen local labour markets, build lasting infrastructure, improve productivity and boost GDP.<sup>2</sup> Long-term, predictable financing is essential to enable new co-op and non-profit housing development projects. Federal housing funding must be available over multiple years to give development proponents sufficient time to complete feasibility studies and pre-development activities, and to bring projects to completion.

Build Canada Homes must maintain income-based definitions of affordability when setting rents in new development projects. Many families, seniors, people on fixed incomes or living with disabilities are struggling to get by and need affordable places to live. Income-based affordability ensures that new homes respond to real needs and deliver deeply affordable housing for those most affected by the housing crisis.

CHF Canada is ready to partner with Build Canada Homes, to create lasting homes and communities at the scale and speed that Canadians need. We have identified three high-impact recommendations to maximize outcomes:

## **High-Impact Recommendations to Deliver Affordable, Co-op Homes through Build Canada Homes**

- 1.** Invest now in shovel-ready co-op and non-profit housing projects with long-term, predictable funding and financing;
- 2.** Advance reconciliation through Indigenous-led housing; and,
- 3.** Make rental assistance a key pillar of national housing policy through the extension of the Federal Community Housing Initiative and the Canada Community Housing Initiative.

### **1. Invest Now in Shovel-Ready Co-operative Housing Projects with long-term, predictable funding and financing**

Federal investment in building new co-operatives had ended in the mid-nineties, but the co-operative housing sector is again focused on building to meet unmet demand and need in the current housing crisis. This has been supported by the \$1.5 billion

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<sup>2</sup> Canadian Housing and Renewal Association. November 27, 2023. [https://chra-achru.ca/news/canada-can-boost-gdp-by-billions-through-investing-in-more-community-housing-deloitte-report/Economic Study: The Impact of Community Housing on Productivity](https://chra-achru.ca/news/canada-can-boost-gdp-by-billions-through-investing-in-more-community-housing-deloitte-report/Economic%20Study%3A%20The%20Impact%20of%20Community%20Housing%20on%20Productivity)

Co-operative Housing Development Program (CHDP), which was launched in 2024 as the first dedicated federal co-op housing construction program in over 30 years. Other federal programs, like the Federal Lands Initiative, and other orders of government, have also supported the resurgence in co-op growth.

Together, we have established a robust pan-Canadian pipeline of co-operative housing projects. Two years in, the Co-operative Housing Development Program has already committed \$1.21 billion worth of projects to create 2,787 new co-op homes; as of December 2025, 1,449 units are under construction, and 1,338 units have received conditional commitments<sup>3</sup> Originally established as a four-year program, there are more co-op housing projects in the pipeline than there are funds remaining. Build Canada Homes can work strategically to advance remaining projects in this pipeline, much of which is shovel-ready, ensuring that people are housed faster and projects do not become more expensive and non-viable with the passage of time.

To effectively deliver on Build Canada Homes' important and timely mandate, the government must attend to three significant barriers:

## **Existing Barriers for Non-Market Housing Development**

### ***A) Long-Term Predictable Financing***

Long-term, predictable financing is essential to enable new co-op and non-profit housing development projects. Housing providers and industry partners need clear parameters to build viable pro formas, while government and investors require a transparent and consistent investment framework to guide their capital investments. Predictable funding and financing tools are a critical precondition to build and scale up non-market homes.

### ***B) Guarantee requirements***

Non-market housing providers are looking to grow and already have many large projects in their development pipelines. While proponents can often meet standard security requirements for lending and mortgage insurance projects, many lack the liquidity or asset base to satisfy existing guarantee requirements. This constraint presents a significant barrier to growth.

Accelerating innovation, particularly modern methods of construction and "Buy Canada" procurement approaches may require new or adapted

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<sup>3</sup> Housing, Infrastructure and Communities Canada, Progress on the National Housing Strategy – December 2025. <https://housing-infrastructure.canada.ca/housing-logement/ptch-csd/reports-rapports/prog-nhs-dec-2025-dec-snl-eng.html>

security and guarantee instruments. The Build Canada Homes legislation allows for the provision of guarantees, subject to the approval of the Minister of Finance. Establishing a predictable, appropriately scaled guarantee framework will be critical to unlocking both new-build and acquisition opportunities in the non-market housing sector.

### ***C) Integration and co-ordination across federal partners***

To enable success, Build Canada Homes will need to integrate and rely on other federal departments. The Build Canada Homes Special Operating Agency Framework Agreement identifies Build Canada Homes as a single federal window for non-market housing support, an approach that CHF Canada strongly supports. Bill C-20 only acknowledges coordination with Canada Lands Company. Similar clarity will improve outcomes and implementation with respect to other federal partners, such as CMHC. Policy direction and aligned financial authorities are necessary to ensure effective program delivery.

## **2. Advance reconciliation through Indigenous-led housing**

The federal government has indicated that Build Canada Homes will provide predictable, low-cost financing to support Indigenous housing providers. There is a particular shortage of affordable and culturally appropriate housing for Indigenous households.

Build Canada Homes should include a “For-Indigenous, By Indigenous” mandate for a significant portion of BCH builds. This could be through funding and financing Indigenous-led housing projects, and meaningfully include Indigenous representation in governance and program design. When an Indigenous-led approach is used, the housing created will be culturally appropriate, designed to uphold the varying values, traditions and governance approaches of Indigenous communities.

CHF Canada continues to stand with Indigenous housing providers and supports their vision for Indigenous-led co-operative and non-profit housing in urban, rural, and northern communities.

## **3. Make Rental Assistance a Key Pillar of National Housing Policy**

Build Canada Homes must prioritize affordability, defined on an income bases, as outlined in the Build Canada Homes Investment Framework. Build Canada Homes has indicated that its primary focus will be on non-market housing that is genuinely affordable, and income-based affordability must remain central to this approach.

As outlined in our submission to the Build Canada Homes Market Sounding Guide in 2025, we continue to recommend that Build Canada Homes prioritize a portion of deeply affordable, rent-geared-to-income homes in new projects to create more inclusive, mixed-income communities.

At the same time, the federal government should commit to a permanent extension and expansion of rental assistance, paramount to housing stability for thousands of Canadians living in existing co-op and non-profit housing. This can be achieved by extending and expanding federal rental assistance like through the Federal Community Housing Initiative (FCHI) and the Canada Community Housing Initiative. Thousands of low-income households in community housing face the expiry of rental assistance programs in 2028. Further, the Canada Housing Benefit is also set to expire. Taken together, this demands urgent attention. The federal government must prioritize preserving these deeply affordable homes, while continuing to find ways to invest in the development of new affordable housing.

## **Canada Needs Proven Solutions like Co-operative Housing**

Build Canada Homes has the transformative potential to scale up co-op and non-profit housing in communities across the country. CHF Canada stands ready to support this work.

By building and financing housing that is genuinely affordable, the federal government can expand the supply of new co-op homes, responding directly to what Canadians are asking for: stable, affordable homes and stronger communities.<sup>4</sup>

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<sup>4</sup> Abacus Data. February 2025. <https://abacusdata.ca/canadians-say-co-op-and-non-profit-housing-can-help-solve-the-housing-crisis/>