

Joint Submission Letter

August 2025

RE: FEEDBACK ON BUILD CANADA HOMES MARKET SOUNDING GUIDE

To: Build Canada Homes Engagement Team, Infrastructure Canada

Email: bchengagement-mobilisationmc@infc.gc.ca

Dear Build Canada Homes Engagement Team,

On behalf of the undersigned Black-led and Black-serving organizations across Canada, we welcome the opportunity to provide input on the design of Build Canada Homes (BCH). We recognize BCH's ambition to address Canada's housing crisis by scaling affordable housing, accelerating modern building methods, and leveraging federal land and financing tools. For Black communities, housing is not only an affordability issue but also a matter of equity, security, and justice. Unless equity is deliberately embedded into BCH's design, there is a risk that systemic barriers will continue to exclude Black-led housing providers from accessing the tools and opportunities BCH promises.

Black Communities and Housing Need

- Black households in Canada are more than twice as likely to live in core housing need compared to the general population (CMHC, 2022).
- In Toronto, over 40% of homeless youth identify as Black, despite representing less than 10% of the youth population (Toronto Shelter Census, 2021).
- Black renters are disproportionately affected by evictions, rental precarity, and discrimination in the housing market (State of Black Economics, 2025).
- Black-led organizations face systemic barriers to CMHC programs, including restrictive eligibility requirements, lack of collateral, and delays in approvals (Unfunded: Black Communities and Philanthropy, 2023).

These statistics underscore the urgency of designing BCH to explicitly include and prioritize Black-led housing providers.

Recommendations for Build Canada Homes

1. Equity in Eligibility and Access

- Ensure explicit inclusion of Black-led and other equity-seeking organizations in BCH eligibility criteria.
 - Establish dedicated carve-outs or set-asides for Black-led providers within BCH financing programs.
-

2. Federal Land & Land Transfers

- Create transparent and prioritized pathways for Black-led organizations to access federal lands for affordable housing.
- Establish a land banking and technical assistance fund to enable smaller, undercapitalized organizations to participate equitably in federal land opportunities. Without such a mechanism, processes will continue to skew in favour of well-resourced actors who can meet requirements more quickly, while equity-seeking providers are left behind despite demonstrated community demand and project readiness.

3. Support for Sector Capacity

- Partner with the Black Communities Technical Housing Resource Centre (BCTHRC) to scale Black-led housing projects. Over 3,000 units are already in the pipeline but lack equitable access to financing and land.
- The oversubscription of CMHC's Affordable Housing Fund by Black-led organizations demonstrates both the demand for federal investment and the readiness of Black-led nonprofits to function as developers and housing providers — not merely as contracted labour. Many proposals already have secured provincial and municipal contributions but are stalled, awaiting federal confirmation. Unlike larger mainstream providers, Black-led organizations lack the capital reserves to keep projects alive during long federal delays.
- This situation underscores the urgent need for dedicated, timely, and flexible BCH financing streams that meet the realities of undercapitalized but shovel-ready Black-led projects.
- As government transitions from CMHC programming to BCH, it must ensure a clear and equitable bridge mechanism. Without this, there is a serious risk that Black-led projects, despite being viable and co-funded, will again be excluded from federal housing delivery.

4. Race-Based Data & Evaluation

- Embed race-based data collection and reporting into BCH's monitoring framework.
- Support Afrocentric evaluation approaches to measure success not only in units built but also in community resilience, stability, and justice outcomes.

5. Partnership & Risk Sharing

- Require consortia funded under BCH to include equity-seeking housing providers as partners in large-scale projects.
 - Adjust financing instruments to reflect the realities of undercapitalized organizations (e.g., more grant components, flexible terms, shared risk).
-

Conclusion

Build Canada Homes represents a generational opportunity to transform Canada's housing landscape. For Black communities, it will either mark the beginning of a new era of inclusion in housing delivery — or risk repeating historical patterns of exclusion.

We urge the government to explicitly embed equity, access, and accountability into BCH's design, and we stand ready to work in partnership to ensure that Black Canadians are not left behind.

Sincerely,

[Organization Name(s)]

[Contact Information]
