



August 29, 2025

RE: Recommendations for the design of Build Canada Homes.

Submitted by email to bchengagement-mobilisationmc@infcc.gc.ca

Food Banks Canada and Daily Bread Food Bank are pleased to make a joint submission regarding the design of Build Canada Homes.

Across the country, people are struggling to put food on the table. In 2024, approximately 10 million peopleⁱ — including 2.5 million children — lived in food-insecure households, the third consecutive year this number has reached a record high. Food banks continue to bear the brunt of the affordability crisis that Canadians are coping with. According to HungerCount reportⁱⁱ, in March 2024, there were over 2 million visits to food banks in Canada—the highest number in history—representing a 90% increase compared to 2019. In Toronto alone, over 1 in 10 residents now rely on food banksⁱⁱⁱ.

Lack of affordable housing is one of the key factors driving reliance on food banks. Nationally, nearly 70% of food bank clients live in market rent housing with people with the lowest incomes spending 80% of their income on food and housing alone. In Toronto, 87% of food bank clients are living in unaffordable housing and nearly three quarters (73%) are living in deep core housing need, putting them at high risk for homelessness. Almost half (48%) of food bank clients reported that the main action government can take to address food insecurity is to create more affordable housing.

These numbers speak to the urgent need to preserve and expand the supply of affordable housing. We deeply appreciate the federal government's commitment to tackling the housing crisis by establishing a dedicated federal entity responsible for building affordable homes. This initiative will bolster the much-needed supply of affordable housing in Canada.

As the federal government advances this vision, we'd like to highlight some key considerations to ensure housing that is truly affordable and remains so over long term.

1. **Definition of affordable housing:** As defined by the Canada Mortgage Housing Corporation (CMHC), housing must be considered affordable if it's less than 30% of a household's before-tax income. This benchmark is critical. Despite billions of dollars flowing into the Rental Construction Financing (RCF) Initiative, a key program under the National Housing Strategy, a 2024 report^{iv} by the National Housing Council pointed that only 3% of units in RCF-funded developments were both suitable for and affordable to low-income households. One of the main reasons for this shortfall was the program's inconsistent definition of "affordable housing," which differed from CMHC's standard.
2. **Keeping housing affordable:** Alongside ensuring the affordable housing definition is consistently applied, it is essential that affordability be maintained through sustainable, long-term and predictable funding.
3. **Setting clear timelines and targets:** The promise of building at scale and at speed must be matched with clear timelines, measurable targets and regulatory reform. The federal government should commit to building and acquiring 372,000 new non-market homes—74,000 annually for the next five years—to reach the OECD average of 7%^v community housing.



4. **Leveraging public land to build affordable housing:** The government must focus on the creation of a public builder model that leverages federal ownership of public land, including lands owned by Canada Lands Corporation, in order to build new units of affordable housing.

Thank you for giving us the opportunity to share our input.

About:

Food Banks Canada is the leader in addressing food insecurity in Canada. Our mission is to provide national leadership to relieve hunger today and prevent hunger tomorrow in collaboration with the food bank network from coast to coast to coast. Over 5,500 food banks and community organizations come together to serve our most vulnerable neighbours. Since 2010, Food Banks Canada has shared over \$1 billion in food supports and over \$275 million in funding to help maximize collective impact and strengthen local capacity – while, backed by leading research, advocating for meaningful actions from governments to counter hunger and its root causes. Our vision is clear: create a Canada where no one goes hungry. Visit foodbankscanada.ca to learn more.

Founded in 1983, **Daily Bread** is Canada's largest food bank, providing more than 90% of emergency food across Toronto. Alongside emergency food relief, Daily Bread advocates for long-term, evidence-based policy solutions to end food insecurity, working with all orders of government to address poverty at its source. Visit dailybread.ca to learn more.

ⁱ PROOF. (2025, May 5). New data on household food insecurity in 2024. University of Toronto. <https://proof.utoronto.ca/2025/newdata-on-household-food-insecurity-in-2024/>

ⁱⁱ Food Banks Canada. (2024). *HungerCount*. <https://foodbankscanada.ca/hunger-in-canada/hungercount/>

ⁱⁱⁱ Daily Bread Food Bank & North York Harvest Food Bank. (2024). Who's Hungry 2024: A profile of hunger in Toronto. Daily Bread Food Bank. <https://www.dailybread.ca/research-and-advocacy/research/whos-hungry-report-2/>

^{iv} National Housing Council. (2024). National Housing Strategy report. https://cms.nhc-cn1.ca/media/PDFs/NHS_Report-FINAL.pdf

^v Canadian Housing and Renewal Association & Deloitte LLP. (2023, November). Community housing and productivity study. https://chra-achru.ca/wp-content/uploads/2023/11/Community-Housing-and-Productivity-Study_final.pdf