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May 31, 2018

BY E-MAIL ONLY
Jean-Yves.Duclos@parl.gc.ca

The Honourable Jean-Yves Duclos, Liberal, MP
Minister of Families, Children and Social Development
House of Commons
OTTAWA, ON K1A 0A6

Dear Minister Duclos:

I am writing you today regarding your call for written submissions about the implementation of a human rights-based approach to Canada's National Housing Strategy. As President of Canada's largest union, I encourage the Government to substantiate your commitment to the right to adequate housing, as outlined by the UN Committee on Economic, Social and Cultural Rights. Living without adequate housing undermines the core of an individual's humanity. People in Canada deserve guarantees to the right to housing through a concrete plan of action.

The Canadian Union of Public Employees represents 650,000 members across Canada. 3,400 of our members work directly in the provision of social housing. We also have many members working in supported housing for the homeless and for municipalities in the delivery of housing and support services. 1.6 million Canadians are in housing need, and our members know first hand the need for a rights-based National Housing Strategy.

The National Housing Strategy is certainly the most substantial commitment to address Canada's housing crisis that we have seen in decades. It will be very important that legislation implementing a rights-based strategy clearly reference the "right to housing". Recognizing individuals who are homeless or living in inadequate housing as rights holders rather than recipients is an important first step in their empowerment.

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MARK HANCOCK
National President/Président national

CHARLES FLEURY
National Secretary-Treasurer/Secrétaire-trésorier national

DENIS BOLDUC, FRED HAHN, JUDY HENLEY, DANIEL LÉGÈRE, MARLE ROBERTS
General Vice-Presidents/Vice-présidences générales

Another crucial step is ensuring they have access to justice if the right to housing is denied. Adjudicative bodies like human rights tribunals or housing commissioners should be able to hear claims related to violations of the right to housing and enforce the legislation that will govern the National Housing Strategy. A crucial aspect of a rights-based strategy will allow marginalized groups to identify unmet housing needs, appropriate remedies, and laws, policies and programs that deny access to adequate housing.

The Housing Advocate will play an important role in ensuring accountability and monitoring of the Strategy. For this reason, the Housing Advocate should be appointed by Parliament and be independent of government with adequate resources to play an effective role. The position will need the authority and resources to visit communities, conduct investigations into systemic issues and participate in human rights tribunals in relevant cases.

The goal of the National Housing Strategy to reduce homelessness by 50% over ten years is not in line with Canada's commitment to achieving the 2030 Sustainable Development Goals. The Strategy must recognize the immediate obligation of Canada to take all necessary measures to end homelessness by 2030. It should also outline a specific commitment to address systemic inequality on the basis of race, gender, disability and other grounds.

CUPE welcomes many of the funding commitments made in the National Housing Strategy. However, we have seen the roll out of important infrastructure funding delayed for the past two years, and subsequently pushed further into the future. In the case of the National Housing Strategy, the government must ensure there are mechanisms in place to disperse the promised funds smoothly and on time. Furthermore, while we applaud the commitment to new construction, we are concerned that reliance on the private sector will make the goal of long-term affordability difficult. Canada Mortgage and Housing Corporation has already indicated its intention to engage in public-private partnerships and market-based tools such as land value capture as it moves forward. We do not believe this approach is optimal.

We also have concerns about the effectiveness of the portable housing allowance that will be introduced in 2020. Without a direct link to public sector affordable housing, this allowance may serve as a direct government subsidy to private landlords. In addition, at its current level, the portable housing allowance will do little to assist those in high-rent urban areas like Vancouver and Toronto, where even mid-income families can be priced out of the market.

The National Housing Strategy must ensure that private sector activity is consistent with Canada's obligation to fulfil the right to housing. Private developers and investors must be required to produce affordable, adequate and accessible housing suitable for a range of household sizes. There should be targets and regulations in place to ensure that rental housing in particular is being developed. This could be accomplished through, for example, working with provinces and municipalities to ensure the development and implementation of rental housing targets and inclusionary zoning policies. The Strategy must also ensure measures to curb speculation and prevent the privatization of public land; public land provided through housing programs should be maintained as public through, for example, long-term leases. Finally, human rights education should be developed and directed at private sector investors and landlords.

As a signatory to the United Nations Declaration on the Rights of Indigenous Peoples, Canada is obligated to fulfilling article 23 of the Declaration, providing for the right of Indigenous Peoples to be involved in developing and determining housing programs affecting them and the right to self-govern those programs. Canada should formally acknowledge these rights in the National Housing Strategy, and move past vague promises of "collaboration" and "cooperation" which fail to adequately recognize these rights.

All people in Canada will benefit from a National Housing Strategy that executes the right to housing in accordance with international human rights law. I am encouraged that we share the same goal of ensuring everyone in Canada has access to adequate housing and will continue to collaborate to make certain the Strategy takes an effective route to achieving that goal.

Sincerely,

A handwritten signature in black ink, appearing to read 'MH' followed by a stylized flourish.

MARK HANCOCK
National President

ED:mv*cope491

cc: A. Vaughan, Parliamentary Secretary to the Minister of Families, Children and Social Development;
S. Benson, NDP Critic for Housing; K. Vecchio, Conservative Shadow Minister for Families, Children
and Social Development; E. Siddall, President and CEO, Canada Mortgage and Housing Corporation