

The Honourable Sean Fraser
Minister of Housing, Infrastructure and Communities
180 Kent Street
Suite 1100
Ottawa, Ontario K1P 0B6
Submitted via email: catalogue@infc.gc.ca

March 15, 2024

Dear Minister Fraser,

We are writing as a collective of stakeholder organizations in response to Infrastructure Canada's call for input regarding the housing design catalogue and consultation paper.

In 2019, the Government of Canada enshrined housing as a human right in the National Housing Strategy Act (2019). Additionally, the United Nations Convention on the Rights of Persons with Disabilities (CRPD), to which Canada is a signatory, requires governments to recognize the equal right of all persons with disabilities to live independently and in the community, with choices equal to others, including by ensuring that persons with disabilities have the opportunity to choose their place of residence. Unfortunately, due to the lack of affordable, accessible housing in Canada, many people with disabilities are unable to access housing that meets their needs and enables them to remain independent in their own homes and communities.

According to Statistics Canada's most recent *Canadian Survey on Disability (2022)*, 27 percent of Canadians aged 15 and older identified with having at least one disability – an increase of 4.7 percent from 2017. This trend is likely to continue as Canada's population ages.ⁱ In 2017 at least 13 percent of those with physical disabilities were unable to obtain the accessibility features and aids that they needed in their homesⁱⁱ. While we applaud the intention of the government's Home Accessibility Tax Credit, it only provides support to people with upfront financial means to pay for accessibility modifications and to wait up to a year to receive the benefit of the tax credit.

We are pleased to see that it is Infrastructure Canada's intention to include plans that will be "selected based on a variety of performance criteria such as accessibility and climate compatibility,"ⁱⁱⁱ and that the designs to be included "will be assessed and selected for inclusion in the catalogue based on their ability to meet a wide variety of performance criteria, including ... accessibility..."^{iv}. However, these intentions do not go far enough to ensure people with disabilities have access to homes that meet their needs under this program.

On January 25, 2024, the Federal Housing Advocate [submitted a letter](#), which we fully endorse, that calls on the federal government to:

- Prioritize the development and acquisition of non-market housing supply that is permanently affordable, accessible or adaptable and provides community value.

- Ensure that all the options provided to builders in the catalogue of blueprints are based on universal design principles and are either accessible or adaptable.
- To expand the accessibility and adaptability requirements in the National Building Code so that all future dwellings are built without barriers.

Ensuring all designs are based on universal design principles and are adaptable means that anyone can easily live in and modify their homes to meet their needs. The additional costs of design features to make a newly constructed home accessible or adaptable are significantly lower than the cost of converting an existing dwelling to make it accessible^v. This is a critical opportunity to “build inclusively from the start”, increasing the supply of accessible housing and preventing future costs of modifications for governments and individuals. Home builders and local governments, as target users of the design catalogue, must have universal design and accessible housing plans to meet the needs of their communities.

Recently, the Government of Australia has updated their national building codes to require all new housing to be universally designed^{vi}. This is in part in response to a report that highlighted the lived experience and negative social, health, and economic impacts of inaccessible housing. This is an important jurisdictional lesson from which Canada can learn for both the housing design catalogue and building code.

Ensuring all the plans in the housing design catalogue are Universal Design, and updating the National Building Code to expand the accessibility and adaptability requirements for all new and renovated buildings will bring Canada a significant step closer to realizing the Accessible Canada Act’s goal of a barrier-free Canada and meet our obligations under the CRPD, the National Housing Strategy Act, and the International Covenant on Economic, Social and Cultural Rights.

The outcome of this decision could enable people who need accessible housing to come home from costly institutional care, facilitate employment and full participation in family and community life, and reduce growing pressures on healthcare and long-term care systems. This is a significant opportunity to improve the quality of life for so many people with accessibility needs. We strongly believe that accessible housing through Universal Design is possible and within reach and we ask for your support to help make this happen.

We thank you for the opportunity to respond to this important consultation.

Sincerely,

This letter is co-signed by a national coalition:

[The Accessible Housing Network](#), including:

Sal Amenta and Minette Samaroo, Co-Chairs
Accessible Housing Network

Alliance for Equality of Blind Canadians / l'Alliance pour l'Égalité des Personnes
Aveugles du Canada

André Leduc, Directeur general
Association d'information en logements et immeubles adaptés (AILIA)

Michelle McDonald, Chief Executive Officer
Brain Injury Canada / Lésion Cérébrale Canada

Mah-E-Leqa Jadgal, President
Citizens With Disabilities - Ontario (CWDO)

Neisha Mitchell, Program Lead, Advocacy & Accessible Community Engagement (GTA)
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Shawn Pegg, Director of Social Policy & Strategic Initiatives
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Community Living Ontario / Intégration communautaire Ontario

Michael Lavis, CEO
Creative Options Regina (COR)

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DisAbleD Women's Network of Canada || Réseau d'Action des Femmes Handicapées
du Canada

Disability Action Women's Network (DAWN) Atlantic Hub

Martin Lalonde, Agent de défense collective des droits
Ex aequo

GTA Disability Coalition

Len Baker, President and CEO
March of Dimes Canada / La Marche des dix sous du Canada Shelley Petit, Chair

New Brunswick Coalition of Persons with Disabilities / Coalition des personnes
handicapées du N.-B. (nbcpd/ cphnb)

Sherry Costa-Lorenz, Executive Director
Nova Scotia League for Equal Opportunities

Sherry Caldwell, CoFounder
Ontario Disability Coalition
Childhood Disability Network Canada

Kate Chung
Older Women's Network
Unitarian Commons
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Regroupement des organismes pour aînés et aînées du sud-ouest de Montréal
(ROPASOM)

Sarah McCarthy, Vice President of Strategic Initiatives
Rick Hansen Foundation / Fondation Rick Hansen

CC: Will Meneray, Canada Mortgage and Housing Corporation
Sean Keenan, Infrastructure Canada

ⁱ Statistics Canada. New Data on Disability in Canada, 2022. [internet].
<https://www150.statcan.gc.ca/n1/pub/11-627-m/11-627-m2023063-eng.htm>. Accessed February 28, 2024.

ⁱⁱ Statistics Canada. Housing Experiences in Canada: Persons with disabilities. [Internet].
<https://www150.statcan.gc.ca/n1/pub/46-28-0001/2021001/article/00011-eng.htm>. Accessed February 28, 2024.

ⁱⁱⁱ Infrastructure Canada. Housing Design Catalogue Consultation Paper. Winter 2024, p. 3

^{iv} Infrastructure Canada. Housing Design Catalogue Consultation Paper. Winter 2024, p. 6

^v Canada Mortgage and Housing Corporation. "Cost of Accessibility Features in Newly-Constructed Modest Houses". CMHC Research Insight. November 2016, p. 2.

^{vi} Wiesel, Ilan. "Lived Experience and Social, Health and Economic Impacts of Inaccessible Housing". Report submitted to the Australian Building Codes Board RIS. August 31, 2020.