

The Honourable François-Philippe Champagne, P.C. M.P.
Minister of Innovation, Science and Industry

The Honourable Sean Fraser, P.C, M.P.
Minister of Housing, Infrastructure and Communities

The Honourable Kamal Khera, P.C. MP
Minister of Diversity, Inclusion and Persons with Disabilities

The Honourable Arif Virani, P.C, K.C., M.P.
Minister of Justice and Attorney General of Canada

June 10, 2024.

Dear Ministers,

On behalf of the Accessible Housing Network, we write to ask you to urgently address the critical issue of accessible housing in Canada. Our [network comprises over 70 organizations](#) who are deeply committed to ensuring that all Canadians have equal access to safe, inclusive, and barrier-free housing.

The Accessible Housing Network's member organizations deeply appreciate the Mme Houle's recognition of accessible housing as a fundamental issue. We regard the Federal Housing Advocate as a champion of AHN's cause, particularly by regarding Universal Design as a critical part of accelerating accessible housing for all. Our comments below are intended to assist in pinpointing what still needs to be done with utmost urgency.

The shortage of accessible housing (specifically housing that is designed, constructed or modified to enable independent living for seniors and persons with disabilities) in Canada disproportionately affects seniors and people with disabilities. Many of the over 8 million people with disabilities in Canada are forced to live in unsafe, inappropriate dwellings, increasing their risk of injury. In 2017 an estimated 50 percent of those with physical disabilities were unable to obtain the accessibility features and aids that they needed in their homes.¹ Many are forced into costly long-term care facilities, straining the healthcare system. These hardships highlight the urgent need for accessible housing.

We fully endorse and support the recommendations and calls to action articulated by the [Federal Housing Advocate, Marie-Josée Houle, sent to you on May 22, 2024](#). Madame Houle expressed in no uncertain terms that the current proposed changes to the accessibility requirements in the National Building Code (NBC) are not enough to meet the challenges of systemic housing issues and will not sufficiently fulfill Canada's human rights obligations in terms of housing for seniors and people with disabilities (PWD). Her letter highlights several key points that demand immediate attention:

1. To improve the consultation process for changes to the NBC by implementing the recommendations in the ARCH Disability Law Centre's report on Meaningful Participation of People with Disabilities in Regulation and having Accessibility Standards Canada (ASC) lead the development of and consultations on the accessibility and adaptability sections of the NBC.

¹ K. Chung, personal communication, StatsCan estimate based on variety of questions, not formally reported, 2023

2. Develop more comprehensive accessibility standards for small scale housing. These new requirements should draw on the most up-to-date accessibility standards for residential housing.
3. Improve current accessibility standards for multi-residential buildings. The current NBC accessibility requirements for large multi-residential buildings have glaring limitations. These requirements should also be revised to conform to the most recent accessibility standards for housing.
4. Explicitly incorporate Canada's international and domestic human rights obligations into the mandates of Code developers. This includes the Canadian Board for Harmonized Construction Codes and the Canadian Table for Harmonized Construction Codes Policy.
5. Undertake and publish further research on the risks that current building codes present for people with disabilities and seniors so that all proposals to improve accessibility in the NBC are being assessed with a full understanding of the health, safety and financial costs that inaccessibility imposes on these groups.

Furthermore, we urge you to revise the NBC to ensure codes are based on universal design principles and adaptable design, so 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. 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.

The right to accessible housing should be integrated into all aspects of Canada's housing policy, including building codes. As the Federal Housing Advocate so accurately writes, "permitting the construction of housing that PWD and seniors cannot use, except at great personal cost, is both discriminatory and a deprivation of their life, liberty, and security of person." We appreciate your commitment to advancing accessibility and diversity. As the Accessible Housing Network, we stand ready to support your efforts in any way possible. Together, we can build a more equitable Canada—one where every person has a place to call home.

Thank you for your attention to this urgent matter. We look forward to positive action under your leadership.

Sincerely,

Sal Amenta
Co-Chair

Minette Samaroo
Co-Chair

Accessible Housing Network

CC: Stephanie Cadieux, Chief Accessibility Officer

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