



National Housing Strategy

Submission to the Government of Canada

October 21, 2016

Introduction

AMO welcomes this consultation on the development of a long-overdue National Housing Strategy. A strong housing sector in Ontario is vital. Housing meets a basic human need and is a platform for improving overall quality of life. An affordable and secure home provides a stable foundation from which individuals, communities, Ontario, and Canada as a whole can prosper. It has positive community-wide benefits related to economic competitiveness, good health, strong achievements in education, and community well-being. Without stable housing, realizing one's full educational potential, attaining and retaining a job, and maintaining good health is compromised. Ontarians, and all those living in Canada, deserve a range of safe, secure, suitable, and adequate affordable housing options, from social housing to rental to home ownership.

An overarching National Housing Strategy introduces the opportunity for Canada to proactively work towards a sufficient, adequate, and appropriate range of housing options to ensure all people in Canada meet their immediate needs and their future housing aspirations. This Strategy offers the opportunity for the federal government to acknowledge that housing is a core federal responsibility and to reengage in housing with the potential to become a global leader in the field.

Municipal governments in Ontario face critical challenges in providing sufficient adequate affordable housing. Ontario is the only province or territory in Canada where housing is a municipal responsibility, and funding this service primarily on the municipal property tax base is not sustainable. It is neither good public nor fiscal policy.

Innovation and strong practice is taking place in municipalities across Ontario, yet responding to the full scope of demand for affordable housing is beyond the magnitude of any one government to address on its own. In fact, it is also beyond the magnitude of government to address on its own. We need a national strategy, not a federal strategy, that leverages the contributions of respective players in the housing field, including government, non-profit, and private sectors.

An effective strategy can facilitate the creation of healthy housing markets for residents in Canada's diverse communities. Federal actions can support and enable well-functioning housing systems in the provinces and territories.

It is essential that we not miss the opportunity to contribute to the future of Canada's housing system. Done right, there will be a social and economic return on investment across numerous areas of municipal, provincial, and federal jurisdictions.

AMO looks forward to working with both the provincial and federal governments on this important initiative to ensure stability and prosperity for our residents and communities.

Context

The Housing Situation in Ontario

Municipal governments in Ontario have a vested interest in shaping the outcome of a National Housing Strategy. Unlike other provinces and territories, housing is a municipal responsibility in Ontario. Housing is funded, planned, designed, and delivered by 47 Consolidated Municipal Service System Managers (CMSMs) and District Social Service Administration Boards (DSSABs). CMSMs are regional, county, and single-tier governments, and DSSABs serve the northern districts.

Each municipal service manager is required by provincial legislation to develop and implement a ten-year housing and homelessness plan. The Minister of Housing provides direction on the content of these plans through an overarching Long-Term Affordable Housing Strategy and a Policy Statement, which outlines the provincial interest in housing. For example, municipal governments and DSSABs are expected to contribute to the provincial goal of ending chronic homelessness within ten years.

Provincial support for housing to meet the demand is insufficient. Federal funding and other actions are needed to assist municipal governments and DSSABs in addressing housing and homelessness in Ontario's communities in a meaningful way.

The Extent of the Issue

The cost of housing is taking a toll on families and communities across Ontario, pushing both personal debt and housing wait lists to record levels. In Ontario, more than 171,000 people are on wait lists for social housing – and this number has significantly increased in recent years.¹ Of the 270,000 social housing units in Ontario, 70 percent is estimated to have capital reserve shortfalls amounting to an estimated \$1.5 billion.² Even newer built housing is in ill-repair, due to the under-funding of capital replacement reserves in most cases. In some cases, and despite long waiting lists, social housing units are unoccupied due to the lack of funding for major capital repairs. Municipal governments in Ontario must use their limited resources for operating costs and to conduct necessary repairs, and are constrained to invest in new stock. The amount of housing stock need to respond to demand is estimated at least 10,000 new units per year over the next decade.³ This is a significant problem for Ontario, but also for Canada, particularly considering that Ontario accounts for almost 40 per cent of total national households.⁴

Not only are social housing wait lists at record levels, but challenges are occurring at every stage of the housing continuum, from supportive housing to rental and ownership. Rising housing prices are pushing more people into a crowded rental market. The problem is particularly acute in Ontario, where a significant number of renters are spending about one-third of their income on housing. Housing ownership is out of reach for many potential first time home buyers. Specific populations are also bringing new housing needs which local housing providers must respond to, including Ontario's aging population, and recent arrivals to Canada.

Provincial and federal governments provide much needed and appreciated funding contributions, yet due to the excessive demand, many municipal service managers have initiated their own programs to reduce pressure on waiting lists. These include property tax concessions, development charge waivers and deferrals, reduced fees and charges for affordable housing, rent supplements,

¹ Ontario Non-Profit Housing Association, 2016 Waiting Lists Survey Report, accessed at <<http://qc.onpha.on.ca/flipbooks/WaitingListReport/>>.

² Housing Services Corporation, data from February 2009, Stewart Pearson, Financing Capital Improvements and the Renovation of Social Housing in Ontario, Housing Services Corporation, prepared for the Asset Leveraging Working Group, Toronto, December 2010, 10, and Housing Services Corporation, Social and Affordable Housing Primer, accessed at <http://share.hscorp.ca/wp-content/uploads/2014/11/hscprimer_final_digital.pdf>.

³ Ontario Non-Profit Housing Association and Co-operative Housing Federation of Canada Ontario Region, Where's Home? The Need for Affordable Rental Housing in Ontario, September 2011.

⁴ Morrison Park Advisors, Feasibility Report Regarding a Dedicated Lending Institution for the Canadian Affordable and Social Housing Sectors, prepared for Housing Partnership Canada, August 3, 2016.

housing allowances and direct funding (or land) to assist in affordable housing development, as well as incentives to the private sector for affordable housing development.⁵

The current funding and delivery system for housing is not sustainable. The municipal property tax base cannot cover the costs of capital repairs, operations, administration, and the development of much-needed new housing. In this context, federal and provincial investments in the respective 2016 Budgets for housing and homelessness prevention, as well as the promise of a National Housing Strategy, are welcome and appreciated. They are a good start.

Housing as a Preventative Investment

Providing a full range of housing supports a diverse productive workforce and is less costly than many remedial social and emergency services. It contributes to a municipal government's ability to accommodate growth and attract and retain employees and businesses, as the cost of housing is a primary factor that individuals and businesses take into account when making decisions about locating or remaining in a community. This affects the GTHA where the population is expected to grow by almost 2.4 million between 2011 and 2031, as does it affect Northern and rural Ontario, where housing prices and vacancies also impact decisions about where to live.⁶ Investing in housing creates jobs in the construction industry and secondary industries. An inadequate range of housing in a municipality risks leading to concentrated poverty, income stratification and homelessness.

Research shows that homeless people are more frequent users of costly emergency services, such as shelters, ambulances, hospitals, and correctional services.⁷ Supportive and social housing is more cost-effective than shelter housing, jail, or a psychiatric inpatient bed, where individuals may alternatively end up. For example, CHRA has calculated that in Toronto, a shelter bed costs \$69 a day, jail costs \$143 a day, a psychiatric inpatient bed is \$665 a day, and supportive or social housing costs between \$25 and \$31 a day.⁸ A British Columbia study found that one homeless person with mental health issues costs the public system \$55,000 per year. If provided with housing and supports, one person would cost \$37,000 per year, saving the Province approximately \$211 million annually.⁹ Investments in affordable housing can reduce costs elsewhere in the human services system. Households that are forced to live in overcrowded or inadequate housing or in marginalized neighbourhoods are more likely to experience health problems and risks to safety, and to require greater social service support. At the extreme end of the spectrum, failure to invest in the housing system can result in people becoming homeless. A National Housing Strategy has the potential to strategically invest in housing in order to achieve not only social benefits but also fiscal savings in areas of federal, provincial and municipal jurisdictions.

Federal Role

Across the country, provincial and territorial governments are responsible for the delivery of affordable housing programs, however, in Ontario, it is important to acknowledge in the Strategy that it is the responsibility of municipal governments to deliver, albeit with the support of the

⁵ Ontario Non-Profit Housing Association, Funding sources for affordable housing development, accessed at <http://www.onpha.on.ca/AM/Template.cfm?Section=Funding#municipal_gov>.

⁶ Ontario Home Builders Association, Housing Issues Status Report, spring 2012.

⁷ Canadian Housing and Renewal Association.

⁸ Canadian Housing and Renewal Association.

⁹ The Homeless Hub Paper #3: The Real Cost of Homelessness.

provincial and federal governments. This has implications for roles and responsibilities between the federal, provincial, and municipal orders of government in Ontario.

The National Housing Strategy should clearly articulate the role that the federal government intends to play in Canada's housing system through a National Housing Strategy, in relation to provinces, territories, and municipal governments.

Just as we have municipal Service System Managers and a provincial System Steward, the federal government needs to define its role as a 'system enabler' to support provincial and territorial plans and by extension, municipal plans and priorities in Ontario.

More specifically, the following would be appropriate roles for the federal government.

As a Provider

Ontario's municipal governments have decades of experience providing social and affordable housing. Municipal governments fund and operate several types of housing, including supportive housing and social housing, and have vast experience partnering with non-profit housing providers to deliver housing. Municipalities are well positioned as Service System Managers for housing, but require ongoing support from other orders of government that collect income tax for income redistribution programs such as social housing to be effective and properly supported. Municipal governments pay for housing programs off the property tax base which was never intended to pay for income redistribution programs like social housing. The federal government can play a role to support the provision of services. It can do this through funding and also by making connections between housing and other related policy areas such as health. One example, is that housing could be identified as crucial to health service delivery as it is an important social determinant of health.

As a Funder

The federal government can play a critical role by providing needed capital investment to municipal governments, both via grants and low-cost financing, to support the creation of new affordable housing assets and the retrofit and renewal of aging social housing assets. The federal government's jurisdiction in tax policy can also support potential investment in much-needed new affordable and rental construction. As well, the federal government can be an important contributor of funding for homelessness prevention programs.

The federal government can play a role by making Crown lands available for new affordable housing development vis-à-vis the Canada Lands Company, which manages, redevelops, and buys and sells properties which could be used for affordable housing.

The federal government is constitutionally responsible for the provision of social programs to First Nations/Métis/Inuit peoples. As such, it is appropriate that the federal government provide funding for housing for Indigenous Peoples.

As a Policy Maker

Ontario municipal governments are pleased that the federal government is taking a step forward as a housing policy-maker by initiating the development of a National Housing Strategy. Municipal governments believe that housing priorities are best determined at the provincial and local levels to ensure that housing policy aligns with other social policy priorities including health, education, community services, and poverty reduction.

For example, the Ontario government has committed to ending homelessness within the next ten years. The Federal government can recognize this goal, and support it by committing to helping provinces and territories end chronic homelessness within the same time frame.

As a Regulator/Legislator

The federal responsibility for housing should be enshrined in legislation. The *Canada Health Act* could be used as a model for defining the federal role in legislation, as health care, like housing in most areas, is a provincial responsibility. The *Canada Health Act* outlines the importance of collaboration across orders of government, identifies desired outcomes, and lists principles which should underpin provincial programs in order to receive federal funding and achieve the identified outcomes.

The federal government could also legislate the National Housing Strategy and ensure it is permanent and permanently funded. Permanent funding would allow local implementers the confidence to plan appropriately, knowing funding is predictable and long-term. This could be done by amending the *National Housing Act* to legislate a permanent federal funding role. The purpose is indeed still relevant to current housing needs: “to promote housing affordability and choice, to facilitate access to, and competition and efficiency in the provision of, housing finance, to protect the availability of adequate funding for housing at low cost, and generally to contribute to the well-being of the housing sector in the national economy”.

The federal government is also responsible for a wide range of laws and regulations aimed at protecting the environment which affect the housing system, such as energy efficiency, greenhouse gas emissions, transportation, and infrastructure development. The federal government can balance the protection of the environment while ensuring that affordable and appropriate housing is available in all areas of Canada.

The federal government can also play a role to support housing security when individuals become unemployed due to labour market conditions beyond their control, through unemployment benefits, education and training initiatives in partnership with the provinces and territories, and other measures.

As a Monitor

Through market analysis and housing research activities at CMHC and Statistics Canada, the federal government can support municipal governments by monitoring key housing indicators relating to housing costs, housing supply and construction, and sharing data with provincial, territorial and municipal governments, and the public.

To fulfil these roles, the federal government will need to re-design an appropriate structure to implement a new National Housing Strategy using a ‘whole of government’ approach, starting with a review of the mandate of the role of the Canadian Mortgage and Housing Corporation (CMHC) and its relationships with other government departments and agencies.

Vision and Principles

The vision for housing in Canada must be people-focused, meaning all residents can see themselves reflected in it through a client-centred approach. By using the term “Canadians”, the proposed definition excludes people living in Canada who have not yet achieved citizenship. It could read “all persons residing in Canada”. The vision should aspire not only to meet the current needs of people in Canada, but provide an adequate range of choices for people to access appropriate housing at different points in their lives, and to work towards their housing goals.

The principles proposed by the Government of Canada to underpin a National Housing Strategy are high-level and AMO is supportive. From the AMO perspective, a National Housing Strategy must:

- address the full continuum of housing, including homelessness services, social housing, supportive housing, rental housing, and home ownership, with special attention paid to those most in need;
- ensure municipal system managers the flexibility address local and regionally-specific issues – a ‘one size fits all approach’ will not work;
- commit to federal permanent, predictable, and sustainable funding that supports both asset management and renewal;
- respect provincial and municipal jurisdiction by aligning with Ontario’s Long-term Affordable Housing Strategy, including supporting Ontario’s goal of ending chronic homelessness, and by extension supporting implementation of municipal housing and homelessness plans at the local level;
- focus on outcomes for people rather than specific programmatic approaches;
- support technological innovation in the housing sector;
- promote environmental sustainability and contribute to federal and provincial climate change goals;
- use a ‘whole of government’ approach to break down silos between federal departments and agencies and commitments beyond housing programs (e.g. health, income security), and;
- be matched with an action plan setting out clear targets, deliverables, timelines, and accountabilities, with appropriate funds needed to achieve them.

Regarding the proposed outcomes, they are broad and comprehensive. Further work will be needed to refine the outcomes and determine the appropriate indicators in conjunction with the provinces, territories, other stakeholders and the municipal sector in Ontario. It will be important that the outcomes be matched by the funding and appropriate programs necessary to achieve them.

Specific Recommendations

1. Dedicated, Permanent, Predictable and Sustainable Funding

The federal government should commit to dedicated, permanent, predictable, and sustainable funding for affordable housing.

Of pressing concern is the gradual decline of federal funds and the time limited nature of the investments. By 2033, all federal funding commitments and agreements will have expired and declined to zero for both capital and operating funding. Research has demonstrated that after the Operating Agreement subsidy ended, 40 percent of the housing units covered under agreements

would be non-viable without subsidy, while 80 percent of units covered under agreements would face the risk of not being able to operate under their current structure.¹⁰ At the very least, the federal government should commit to maintaining the existing levels of investment in housing. However, to address the need and plan over the long-term, Ontario's municipal service system managers require dedicated sources of funding that are permanent, predictable and sustainable in order to operationalize their local ten-year housing and homelessness plans. Just as the Federal Gas Tax program offers this guarantee for infrastructure projects, it is appropriate that housing is afforded the same.

Regarding the setting of funding levels, the federal government should assess the need for housing assistance in conjunction with the Provinces and Territories to determine the quantum required to meet the demand in a meaningful way. Reviews will be necessary on an ongoing basis to determine the right mix and level of funding.

2. Flexible, Outcomes-Based Program Approaches

The federal government should institute flexible, outcomes-based program approaches to funding affording housing and homelessness prevention.

As important as is the level of funding, it is also essential to consider the most effective means to flow the funding in a way that maximizes housing outcomes for residents of Canada. Housing challenges vary from community to community. In some areas, there is a particular shortage of rental housing. In others, home ownership is increasingly out of reach. In rural and northern areas, studies have shown that increasing the availability of supportive housing leads to better client outcomes and cost savings. For a National Housing Strategy to succeed, it is crucial to allow each community to tailor supports to respond to local needs. One size does not fit all.

The Investment in Affordable Housing (IAH) federal-provincial funding program is a good investment vehicle. Through this program, federal funding is cost matched by the Province and flowed through to all municipal Service System Managers in an annual allocation. It is based on a formula, not application based. While subject to program guidelines that determine eligible expenditures, the IAH affords a great deal of local flexibility to best meet community needs and focus on outcomes. It recognizes that 'one size does not fit all'. The flexibility afforded by the IAH funding program encourages innovation on the ground.

IAH should be the primary investment vehicle for new federal funding, rather than multiple streams of funding or those that are application based. Block funding approach with local flexibility is the best way to ensure that community needs are met according to strategic priorities informed by needs assessments that are outlined in municipal ten-year housing and homelessness plans. IAH should also be made permanent, to allow housing program implementers to do long-term planning and investment. Since the IAH funding program is currently only reviewed for extension every five years, long-term planning is difficult.

While the IAH program framework is a good one, further discussions are required to refine the program design. One area requiring examination is the 'use it or lose it' approach or, in other words, the inability to carry over funds from one fiscal year to the next. This makes it prohibitive to build larger housing projects in communities. It is suggested that the IAH program operate with the

¹⁰ Steve Pomeroy, Expiring Federal Housing Operating Agreements: Impacts and Implications for Providers and Service Managers, ONPHA Workshop, 2011.

same flexibility as other infrastructure programs, such as the Federal Gas Tax, which allows carry over from one fiscal year to the next or funding on a two-year basis.

Housing funding will be best utilized effectively to achieve the proposed outcomes if it is used broadly for asset management, renewal, and expansion. Phase 1 federal social infrastructure funds flowed through IAH were able to be used to address the capital repair backlog in the social housing portfolio. Phase 2 and Phase 3 infrastructure funds should be used to both sustain the existing stock and expand new affordable housing activities. In Ontario, there is an estimated capital repair backlog of \$1.5 billion in the social housing portfolio according to the Housing Services Corporation. While new housing is needed, there is also a risk that existing units may come out of use due to the state of capital repair.

3. Supporting the Continuum of Housing

The federal government should provide contributions to facilitate options along the continuum of housing in Canada's communities.

This should include:

- enacting tax measures to stimulate purpose built affordable rental housing by the private sector;
- making available surplus crown land at no cost;
- enhancing home ownership programs;
- supporting the establishment of the Canada Housing Finance Authority; and,
- facilitating technological solutions to addressing homelessness and housing need.

There are a number of actions and contributions that the federal government could take to facilitate affordable housing options along the continuum of housing. For example, tax measures could be enacted to stimulate new purpose built rental housing by the private sector. This could include tax credits and/or elimination of the GST on new affordable rental developments.

Land is among the most expensive components of new affordable housing development. The federal government should contribute crown lands as much as possible at no cost to affordable housing projects.

Home ownership remains out of reach for many first time homebuyers. The federal government should play a role to help increase rates of affordable home ownership.

The capital needs of Canada's housing sector for repair, redevelopment, and expansion is estimated at up to \$121 billion over the next ten years according to a recent feasibility study. Meeting this need for financing is well beyond the capacity of federal and provincial government lenders. The proposal for a Canadian Housing Finance Authority by Housing Partnership Canada, if financed by the federal government, would provide much needed access to private capital markets at low cost lending rates through a dedicated housing lending institution. It is important to emphasize that the authority would act as a complimentary lender for the housing sector, not as a replacement for government financing.

The need for a dedicated lending institution grows out of the current state of Canada's affordable and social housing sector:

- declining federal subsidies;
- facing a multi-billion-dollar unmet capital funding need;
- providers must leverage equity in existing assets but lack the tools to do so; and,
- infrastructure-focused capital funds have been difficult to access because they are geared toward sophisticated borrowers with large-scale infrastructure investments.

Most debt investors do not have the experience to understand the needs of social or affordable housing providers. At the same time, most housing providers do not have the experience or expertise in housing development, maintenance, and finance required to bridge the gap between housing providers and debt investors. The Canadian Housing Finance Authority could fill that gap.

The federal government should encourage and fund innovative pilot projects that advance technology based solutions to addressing homelessness and housing need. Examples might be: case manager IT systems to collect data and inform evidence-based policy decision making; innovative apps that connect homelessness persons to housing options and wrap around services; or, establishing social networks focusing on low-end mobile phones for people who are homeless.

It is important to note that different municipalities will have different needs along the housing continuum. Ensuring a broad range of federal support will provide a range of solutions that meet local community circumstances.

4. Assisting the Most Vulnerable and Preventing Homelessness

The federal government should act to help end chronic homelessness.

One of the proposed tenets of the National Housing Strategy is to help 'those most in need'. To do so, the Strategy should be developed in coordination with federal and provincial poverty reduction strategies in a 'whole of government' approach. The federal government should also endeavour, through a strong commitment and action, to helping end chronic homelessness in the country.

Enhanced funding is needed for homelessness prevention programs. In Ontario, the provincial government funds municipal governments and DSSABs to undertake homelessness prevention interventions through the Community Homelessness Prevention Initiative (CHPI). The federal government funds a separate stand-alone program to 22 Ontario communities through the Homelessness Partnering Strategy (HPS). There could be better integration and alignment of federal HPS and provincial CHPI funding programs with dispersion of funds into a wider set of communities than the 22 currently funded by the federal government.

Alignment is also needed with the provincial approach. The Ontario government requires that homelessness prevention programs funded through CHPI reflect a Housing First approach. The Ministry defines Housing First as follows:

"A Housing First approach is based on the principle that people are better able to move forward with their lives if they are first housed. As such, this approach aims to assist people who are homeless to obtain and maintain permanent, affordable housing and to assist those who are at risk of homelessness to remain housed. Housing is linked to flexible, appropriate support services using a people-centred approach according to people's needs". According to the Homeless Hub, "The basic underlying principle of Housing First is that people are better able to move forward

with their lives if they are first housed. This is as true for people experiencing homelessness and those with mental health and addictions issues as it is for anyone. Housing is provided first and then supports are provided including physical and mental health, education, employment, substance abuse and community connections”.

5. Indigenous Peoples

The federal government should develop specific housing and homelessness prevention initiatives for Indigenous Peoples, in consultation with Indigenous Peoples.

Indigenous Peoples are currently overrepresented among the homelessness population. The reasons are complex and specific housing interventions will be needed. Consultation should occur with Indigenous Peoples as to what is needed to address their unique circumstances. The federal government should examine policies that may lead to movement on/off reserve that contribute to homelessness.

6. Environmental Sustainability

The federal government should promote and support environmental sustainability of new and existing housing stock.

There is an opportunity to link financial and environmental sustainability. As part of its broader climate change mitigation efforts, the federal government should consider ways to continue to create more energy efficient housing projects. Considering that the buildings sector is the third largest emitter of greenhouse gases in Ontario, achieving governmental climate change goals will require taking advantage of initiatives related to building repair and construction. Energy efficiencies will also save money in the housing portfolio over the long term.

Funding for green retrofits of existing social housing will help to reduce carbon emissions and help address the capital repair backlog in the social housing portfolio at the same time. Standards for new building construction can also help achieve environmental sustainability goals. The federal government could also provide funding for a number of net zero emissions buildings to demonstrate the feasibility of alternative zero emissions building practices.

Implementation and Next Steps

It is important that a Strategy be followed by an implementation plan and funding, or the Strategy will not lead to the change it outlines. It must be outcomes-based, and tied to a timeline with measurable action items.

Once the design of the National Housing Strategy is more fully formed, the federal government should establish a working group to identify outcomes and indicators. These should align with provincial outcomes.

As this Strategy moves towards implementation, AMO understands that it will be funded by Phase 2 and Phase 3 of the federal social infrastructure funding. It will be important that this funding envelope include a substantial, dedicated carve-out for housing to allow meaningful progress towards a permanent solution to the affordable housing crisis in Canada’s municipalities, through the National Housing Strategy. It is important that the housing, community centres, arenas, and other social infrastructure priorities not have to compete with each other.

Additionally, as this Strategy moves forward, the federal government should continue to engage provinces, territories, as well as AMO, on an ongoing basis to inform how funding priorities are set and how the Strategy is designed and implemented. Given the unique situation in Ontario, where housing is a municipal responsibility, the municipal sector in Ontario needs a well-considered voice along with the Ontario provincial government. We are more than mere stakeholders. Municipal governments in Ontario are funders and deliverers of housing programs.

Conclusion

We are encouraged by the federal government's initiative to develop a National Housing Strategy. This is an important initiative and a chance to become a global leader in housing.

It is crucial that we get it right. Unless we see hard housing targets and resources as part of the new strategy, our ability to end homelessness and expand housing options for low and moderate-income Ontarians will be unsuccessful.

The cost of delayed or inaction will lead to more significant social and fiscal outcomes in coming years. We cannot afford to stifle innovative thinking. We also know that targeted, strategic investment in housing and homelessness prevention will lead to saving in other areas.

Ontario's municipal governments have a long history of working productively with the Ontario government. But our two orders of government cannot address Ontario's housing needs alone. We need enhanced federal engagement and to work together at all levels.

If any questions, or if more information is required about this submission, please contact:

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