



Build Canada Homes Feedback Submission

Aboriginal Housing Management Association

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August 28, 2025



Introduction

The Aboriginal Housing Management Association (AHMA) welcomes the opportunity to provide feedback on the design of the Build Canada Homes (BCH) program. As the province-wide umbrella organization for Indigenous housing providers in British Columbia, AHMA represents 48 members delivering culturally grounded housing and services to First Nations, Métis, and Inuit peoples living off-reserve. AHMA members manage 95% of all Indigenous housing units located off-reserve in BC. This includes over 6,000 units that provide homes to an estimated 10,000 Indigenous individuals and families living in urban, rural, and northern regions of British Columbia (BC).

Indigenous people are disproportionately represented among unhoused and precariously housed populations, yet continue to face systemic barriers in accessing federal housing programs. BCH's stated commitments to scaling deeply affordable supply, accelerating construction, leveraging public land, and partnering with Indigenous organizations are promising. However, unless Indigenous-specific pathways, governance participation, and flexible delivery models are embedded from the outset, there is a risk BCH will reproduce the systemic exclusion Indigenous housing providers have historically faced.

Understanding BC Indigenous Housing Needs

Decades of chronic underfunding, discriminatory policies, and the federal government's failure to uphold its fiduciary responsibilities have produced a severe housing and infrastructure gap for First Nations, Métis, and Inuit communities across British Columbia. Federal neglect of on-reserve housing has directly fueled off-reserve demand, as families need to move off reserve to urban and rural centres to access housing. Yet, the off-reserve supply of safe, affordable, and culturally appropriate housing has not kept pace, and limited funding for capital repairs of existing Indigenous housing further compounds the crisis. This infrastructure gap extends beyond housing to include education, healthcare, and other essential infrastructure - entrenching intergenerational inequality and limiting opportunities for community well-being.

Although inadequate housing conditions and shortages have been well documented for decades, responses have too often relied on short-term, crisis-oriented measures rather than strategic, sustainable investment. Existing federal and provincial funding mechanisms rarely allow for long-term planning or provide reliable operations and maintenance funding. This perpetuates cycles of disrepair, overcrowding, and homelessness, and leaves Indigenous housing providers without the ability to develop enduring solutions.

The impacts are stark. Indigenous Peoples are disproportionately represented among BC's unhoused population. The 2023 Report on Homeless Counts in BC found that 40% of respondents experiencing homelessness identified as Indigenous, rising to over 80% in some Northern communities. Contributing factors include lack of affordable, safe, and culturally appropriate housing; systemic discrimination; and



the intergenerational trauma caused by colonization, residential schools, and child welfare interventions.

Gender Based Violence and Housing Insecurity

Housing insecurity is especially acute for Indigenous women, girls, 2SLGBTQIA+, and gender-diverse peoples, who face disproportionately high rates of violence and risk of homelessness. Survivors of gender-based violence are often forced to choose between unsafe housing situations and homelessness due to a lack of available, culturally safe shelters and second-stage housing. Indigenous women are also more likely to experience systemic bias in tenancy laws and eviction processes, which can lead to faster eviction into homelessness. In remote and rural communities, the absence of transitional housing options means survivors often are forced to leave their home communities entirely to find safety, severing cultural and familial connections that are critical to healing.

Indigenous Youth and Housing Insecurity

Indigenous youth are particularly vulnerable to homelessness due to the ongoing overrepresentation of Indigenous children in the child welfare system, compounded by abrupt transitions out of care at age 19. Many face immediate housing instability upon aging out, with minimal access to safe, affordable options or culturally grounded support networks. The absence of youth-specific housing that integrates cultural mentorship, life skills, and wraparound services leaves young people at heightened risk of exploitation, trafficking, and long-term cycles of homelessness.

Intersectional Needs

For Indigenous people living with disabilities or chronic health conditions, housing insecurity is compounded by reduced access to employment, education, and disability-specific supports. These barriers intersect with racism, social profiling, and systemic discrimination encountered when attempting to access mainstream housing or health services. Service fragmentation between health, housing, and social systems further limits people's ability to meet basic needs. Many Indigenous people report avoiding services altogether after experiencing discrimination or harm, leaving them with few pathways to secure housing or stability.

Indigenous Concepts of Home and Homelessness

For Indigenous Peoples, the concept of "home" is not solely about shelter but is rooted in relationships to family, community, and the land. Disconnection from these relationships can constitute homelessness, even when a person has physical housing. In this context, solutions must be holistic, rooted in community self-determination, and inclusive of healing processes that restore cultural connections.

Current funding streams accessed by First Nations, Métis, and Inuit communities both on and off reserve often fail to reflect these realities. Program criteria, funding timelines, and evaluation frameworks are



typically designed for mainstream housing providers, resulting in misaligned expectations and limited support for the wraparound services essential to Indigenous housing success. Despite commitments made in Budget 2023, where \$4 billion was announced for Indigenous housing, most of these funds have not reached communities. While a portion has flowed to distinction-based First Nations and Métis partners, the \$2.8 billion specifically promised for Urban, Rural, and Northern Indigenous housing remains unallocated. These delays perpetuate underinvestment and make it impossible to address the urgent and growing off-reserve housing crisis.

Meeting Indigenous housing need in BC requires:

- Long-term, predictable funding that enables strategic planning and sustainable operations.
- Indigenous-led housing solutions that embed cultural supports, healing, and community connection.
- Dedicated Indigenous streams for housing related to gender-based violence, youth, and accessibility needs.
- Governance models that transfer decision-making power and resources directly to Indigenous communities and Indigenous housing providers.

Without these structural changes, initiatives like Build Canada Homes risk reinforcing historic inequities.

Opportunities to Address Indigenous Housing Needs

BCH represents a significant federal re-entry into direct affordable housing development, with the capacity to act as both financier and developer. For Indigenous housing, we are encouraged to see that BCH could:

- Reduce capital costs through the provision of federal lands and prefabrication efficiencies.
- Offer flexible financing and risk-mitigation tools that allow Indigenous housing providers to grow their portfolios.
- Create portfolio-bundling models and flexible program eligibility that enables small-to-mid-sized providers to participate.
- Integrate Indigenous housing priorities into long-term federal housing planning, aligned with BC's Urban, Rural, and Northern Indigenous Housing Strategy (URN).

Key Concerns and Gaps

1. Governance and Indigenous Decision-Making

Indigenous voices must be embedded in governance, not just consulted. Additionally, adherence to and compliance with UN Declaration on the Rights of Indigenous Peoples (UNDRIP), the MMIWG2S+ Calls for Justice and Truth and Reconciliation Commission's Calls to Action must be built into the governance framework as enforceable requirements, with clear mechanisms to



verify alignment before funds are released. Without these binding safeguards, there is a risk that Indigenous rights will be sidelined in implementation, undermining both federal and provincial legal obligations.

2. Eligibility and Scale Bias

A focus on 300+ unit projects risks excluding Indigenous providers, most of whom operate at a smaller scale. Eligibility criteria must allow pathways for smaller housing providers and those in rural or remote contexts. One option could be allowing for bundled, portfolio-based submissions from small or mid-sized organizations.

3. Regional Deployment

Without dedicated regional allocations, there is no guarantee Indigenous communities in BC, will receive proportional funding aligned with documented housing need.

4. Deep Affordability Standards

Deep affordability must be clearly defined and enforced with long term or permanent affordability requirements. Standards should account for the true costs of delivering supportive, transitional, and culturally safe housing.

5. Integration with existing Indigenous Strategies

BCH must coordinate with provincial and Indigenous-led strategies, including the Urban Rural and Northern Indigenous Housing Strategy (URN), to avoid fragmented investments and to ensure proportional, needs-based allocation.

6. Lack of Indigenous-Specific Streams or Tools

While the Market Sounding Guide mentions Indigenous organizations, it does not commit to Indigenous-specific funding streams or program design accommodations. AHMA could support BCH in developing programs, tools, or streams relevant to Indigenous housing in BC. AHMA's role as a partner and coordinating body would help to ensure BCH implementation in BC is equitable, culturally grounded, and consistent with Indigenous rights.

7. Construction Methodology Considerations

The program appears to favor modular, prefabricated, and 3D printed construction. While these approaches may accelerate delivery, they risk reproducing past failures in Indigenous contexts, where standardized and externally imposed housing often proved culturally inappropriate and unsustainable. Indigenous applications must not be disadvantaged for proposing alternative, community-driven designs that reflect cultural values, land-based practices, and local building traditions.



Recommendations

AHMA recommends that the final BCH program design:

1. Establish dedicated Indigenous funding streams or tools with criteria that reflect Indigenous housing realities and needs.
2. Include flexible portfolio approaches that enable small-to-mid-sized Indigenous providers and rural/remote contexts to access funding opportunities.
3. Allocate region-specific funding, with BC's share aligned to the BC URN targets and proportionate to Indigenous housing need.
4. Embed Indigenous representation in governance, ensuring decision-making power in program oversight and design.
5. Define and enforce deep affordability in a manner consistent with the cost structures of Indigenous-led housing, including wraparound supports.
6. Coordinate BCH delivery with existing Indigenous housing strategies and federal-provincial agreements to maximize impact.
7. Broaden construction innovation requirements to include Indigenous-led, community-driven designs that reflect cultural values, land-based practices, and local building traditions.
8. Allow shovel-ready projects that have already received provincial or federal pre-development funding to be eligible for BCH, regardless of construction methodology.
9. Require all funded projects to demonstrate compliance with UNDRIP, TRC Calls to Action, and the MMIWG2S+ Calls to Justice before funds are released, with transparent reporting mechanisms to ensure accountability.
10. Establish an ongoing engagement and evaluation framework, co-designed with Indigenous partners and housing providers, to monitor outcomes, ensure continuous alignment with Indigenous rights, and adapt program design based on lessons learned.
11. Collaborate with AHMA to ensure BCH implementation in BC is equitable, culturally grounded, and consistent with Indigenous rights.

Conclusion

Build Canada Homes has the potential to be a transformational investment in affordable housing if Indigenous voices, priorities, and delivery models are embedded from inception. AHMA urges the federal government to ensure that First Nations, Métis, and Inuit governments, organizations and communities are not merely partners in name, but equal decision-makers and beneficiaries in this landmark initiative.