



October 21, 2016

National Housing Strategy Team
Canada Mortgage and Housing Corporation (CMHC)
700 Montreal Rd
Ottawa ON K1A 0P7

Re: Including Healthy Housing within the National Housing Strategy

We write today as the **Canadian Partnership for Children's Health and Environment (CPCHE)** to urge the federal government to **ensure housing quality** as it tackles the challenges of quantity, accessibility and across-the-board affordability of housing within a National Housing Strategy.

CPCHE is a national collaboration of organizations with overlapping missions that have been working together for more than a decade to improve children's environmental health in Canada (www.healthyenvironmentforkids.ca). Our aim is to increase awareness, mobilize knowledge and catalyze action on children's environmental health issues, with a specific focus on preventing/reducing exposures to toxic chemicals and pollutants during the vulnerable stages of fetal and child development. CPCHE's rigorous adherence to facts and scientific evidence has positioned it as a respected source of information on children's environmental health issues.

Our input to the National Housing Strategy reflects our focus on key drivers of children's health and health inequities. These drivers include multiple aspects of the indoor environment where children spend upwards of 90 percent of their time. CPCHE has a long history of conducting research, public education and advocacy about the potential health risks children face from exposure to contaminants indoors that arise from diverse consumer products as well as the condition and location of housing.

These indoor exposure risks are well-documented in the scientific literature and include contaminants in indoor air and dust such as volatile organic compounds, lead, pesticide residues, flame retardants, bisphenol A, phthalates, and more. Also of concern are biological contaminants such as mould and naturally-occurring health risks such as radon. Similarly strong evidence confirms that these exposures are greater under conditions of poverty.

Unhealthy housing conditions, such as mould, lead, pests, inappropriate use of pesticides, poor air quality and excessive heat/cold, are preventable contributions to the burden of illness and stress that disproportionately affect people living on low income, with the toll heaviest on the most vulnerable — children, seniors and people with existing health conditions. The effects on physical and mental health of living in unhealthy housing, in turn, translate into the perpetuation of poverty and disadvantage and contribute to burgeoning chronic disease rates and associated health care costs. People whose unfit housing causes or contributes to their ill health, or children who grow up with brains and other organs that have been damaged by toxic exposures, are not able to achieve their full potential and are less able to participate as productive members of society. **Improving the housing stock such that all people can live in safe and healthy housing would be an important and meaningful intervention in curbing the cycle of poverty and promoting population health.**

This evidence about indoor environmental health risks, compounded by social inequity, motivated our [RentSafe](#) project. This intersectoral initiative, funded by the Ontario Trillium Foundation, aims to promote healthier rental housing conditions for people on low income and their families in both urban and rural communities in Ontario (project overview attached).

Since 2014, we have been working with multiple sectors — public health, legal aid, social services, municipal inspectors, housing providers and tenants — to get a clearer picture of (1) the challenges that exist for tenants experiencing unhealthy conditions in their housing, (2) how well equipped the “system” of health and social services agencies is to adequately respond to such concerns and (3) what real-world barriers and current (or potential) opportunities exist for all stakeholders, including housing providers, health and legal aid sectors, policy makers, frontline workers and community members, to work towards the attainment of healthier housing for all. We are engaging with diverse sectors and perspectives, as reflected in the membership of our RentSafe Advisory Committee (list attached).

RentSafe partner organizations have been carrying out baseline research to better understand low-income tenants’ experiences with unhealthy housing conditions and their efforts to get help, as well as the capacity and approaches of the various agencies that are, or could be, in a position to provide assistance and support. These efforts have included:

- **Focus groups with low-income tenants in urban and rural regions of Ontario**, with a total of 80 participants taking part in nine sessions convened in six communities in Ontario, led by Toronto Public Health, South Riverdale Community Health Centre, the Grey Bruce Health Unit and The Table Community Food Centre;
- **A survey of all 36 public health units in Ontario**, led by York Region Public Health, Grey Bruce Health Unit and the Ontario Public Health Association;
- **A survey of legal aid clinics across the province**, led by the Canadian Environmental Law Association, to which a total of 60 legal aid clinics including 139 clinic directors and staff responded;
- An ongoing **cross-provincial survey of frontline service providers**, including housing support workers, social workers, public health nurses and others, led by South Riverdale Community Health Centre; and
- A forthcoming **survey of small-scale landlords** across Ontario, led by the Centre for Environmental Health Equity and the Landlord Self-Help Centre.

The results to date from this baseline research paint a picture of an inadequate system of response and support for the legal, health-related and logistical needs of low-income tenants facing unfit housing conditions.

In response to the cross-Canada consultation towards a National Housing Strategy, **we therefore call on the federal government to ensure the *quality of housing stock in Canada, alongside the pressing need to ensure that all people have access to appropriate housing that they can afford***, including increased investment in social and rent-g geared-to-income housing.


We also urge the government to ensure the housing needs of Indigenous peoples living on- and off-reserve, taking into account the complex interplay of factors stemming from colonization, racism, the dynamics of on-reserve/off-reserve transitions, and the importance of housing that affirms and supports cultural heritage and identity.

Within this call for a priority focus on housing quality that supports health and well-being, we look to the federal government for leadership in the following specific areas:

- **establishment of evidence-informed guidelines for a broad range of indoor contaminants and conditions** (e.g., mould, air quality) such that provinces, territories and municipalities will have benchmarks against which to establish regulatory frameworks and local bylaws to ensure healthy housing conditions
- **funding, including tax incentives for housing providers, to prevent and remediate unhealthy housing conditions** (e.g., support for the radon mitigation tax credit proposed by the Green Budget Coalition, and other similar incentives)

We appreciate the opportunity to provide input on this issue of national importance, and we look forward to a robust and meaningful National Housing Strategy that will ensure that *all* children in Canada, regardless of circumstance, grow up in housing that contributes to, rather than impedes, their lifelong health and well-being.

Yours sincerely,



Erica W. Phipps
Executive Director, CPCHE

Canadian Partnership for Children’s Health and Environment (CPCHE) – Partner Organizations





RentSafe

A Collaborative Initiative to Address Unhealthy Housing Conditions Affecting Tenants on Low Income in Ontario

Project Overview



What is RentSafe?

RentSafe is an intersectoral initiative, led by the Canadian Partnership for Children's Health and Environment (CPCHE), to address unhealthy housing conditions affecting tenants living on low income in both urban and rural communities in Ontario. With active involvement of public health, legal aid, community health and other stakeholder organizations as well as tenants and housing providers, we aim to build awareness and capacity in the health, legal and social services sectors so that tenants, when faced with lead, mould, pests, pesticides, radon and other indoor health threats, are better able to get the support they need to achieve healthier living conditions for themselves and their families. This 3-year initiative, launched in December 2014, is funded by the Ontario Trillium Foundation and further supported by in-kind contributions from multiple project partners.

Why is RentSafe needed?

A growing body of scientific knowledge underscores the vital role that safe, healthy housing plays in preventing/reducing chronic health effects, supporting healthy child development and fostering physical and mental well-being. Low-income and marginalized tenants in Ontario experience not only housing insecurity but also significant indoor environmental health risks. Mould, lead, pesticides, pests, tobacco smoke, radon, noise, inadequate ventilation, excessive heat/cold, and chemicals from strong cleaners, renovation materials or fragranced products are among the housing-related factors that can affect residents' physical and/or mental health. Children, the elderly and people with existing medical conditions, including chemical sensitivities, are at the greatest risk. Children growing up in unhealthy housing are at risk of not reaching their full potential because of preventable damage to their developing bodies and brains. Unhealthy housing, therefore, serves to perpetuate and potentially increase health disparities and socio-economic inequities.

At present, there is insufficient capacity and coordination in the health, legal aid and social services sectors to effectively address housing-related risks to health and well-being in disadvantaged communities. Enhanced information and supports are needed to assist tenants and the service providers who work with them (e.g., legal aid staff, settlement workers, community and public health staff, tenants' advocates) in addressing the environmental health risks that exist in low-income housing.

What does RentSafe aim to achieve?

The primary aim of RentSafe is to improve knowledge, capacity and responsiveness within the health, legal aid and social service sectors to better address unhealthy housing conditions facing low-income tenants, as an important step towards the goal of creating healthier living conditions in low-income/marginalized communities and reducing housing-related health inequities.

Through the coordinated efforts of many people, organizations and sectors, RentSafe will lead to:

- ✍ **a more tenant-centred system of support and assistance on housing-related health risks**, including improved coordination among service provider organizations, enhanced staff training and more accurate referrals about where tenants can go for assistance;
- ✍ **increased knowledge and empowerment among low income tenants on housing-related health risks**, including how to seek and advocate for assistance and remediation; and

healthyenvironmentforkids.ca

2

RentSafe Project Team:

Kathleen Cooper, Canadian Environmental Law Association

Helen Doyle, Ontario Public Health Association (OPHA) Environmental Health Working Group / York Region Public Health

Bob Hart, Grey Bruce Health Unit

Lynn Marshall, Environmental Health Institute of Canada

Jeff Masuda, Centre for Environmental Health Equity (CEHE) / Queen's University

Jill McDowell, Olanna White, Toronto Public Health

Amanda McManaman, Grey Bruce Health Unit

Erica Phipps, Canadian Partnership for Children's Health and Environment (CPCHE)

Caryn Thompson, South Riverdale Community Health Centre

Beth Schilling, The Table Community Food Centre, Perth

Vittoria Vecchiarelli, York Region Public Health

RentSafe Advisory Committee:

John Anderson, ACORN - Toronto

Michael Blazer, Community Legal Education Ontario (CLEO)

Alaka Brahma, Thorncliffe Neighbourhood Office

David Brown, Landlord, Toronto and Bruce County

Keir Brownstone, Toronto Community Housing

Pat Burke, Municipal Licensing and Standards Investigation Services, City of Toronto

Kelley Bush, Radon Education and Awareness, Health Canada

Regina de la Campa, First Nations and Assisted Housing, Canadian Mortgage and Housing Corporation (CMHC)

Geordie Dent, Federation of Metro Tenants' Associations

Brenda Doyle, Municipal Law Enforcement / Property Standards, Town Of The Blue Mountains

James Dunn, McMaster Institute for Healthier Environments

Larisa Eibisch, Ontario College of Family Physicians Poverty Committee

Kathryn Latreille, Tenant, Perth, Ontario

Elizabeth Lee Ford-Jones, The Hospital for Sick Children / University of Toronto

Renee Griffin, Centre for Equality Rights in Accommodation (CERA)

Fahmida Islam Lisa, Tenant, Toronto, Ontario

Dania Majid, Advocacy Centre for Tenants Ontario (ACTO)

Don McBain, Ontario Aboriginal Housing Services

Stéphane Perron, Public Health Department of Montreal

Brandy Rogers, Tenant, Perth, Ontario

Lindy Samson, Children's Hospital of Eastern Ontario (CHEO) / University of Ottawa

Hans Schleibinger, National Research Council

Misty Schonauer, Tenant, Owen Sound, Ontario

Zana Strange, Tenant, Owen Sound, Ontario

Sherry Weese, Tenant, Toronto, Ontario

RentSafe is an intersectoral initiative, led by the **Canadian Partnership for Children's Health and Environment (CPCHE)**, that aims to address unhealthy housing conditions affecting low-income tenants in both urban and rural communities in Ontario. With active involvement of public health, legal aid, community health and other stakeholders as well as housing providers and tenants, **RentSafe** aims to build awareness and capacity in the health, legal and social services sectors so that low-income tenants, when faced with mould, lead, radon and other unhealthy housing conditions, are better able to get the support they need. This 3-year initiative, launched in December 2014, is funded by the **Ontario Trillium Foundation**, with the **Environmental Health Institute of Canada** serving as the lead CPCHE partner organization. The **RentSafe Project Team** is actively involved in implementing the **RentSafe** initiative. The role of the **RentSafe Advisory Committee** is to broaden the base of expertise and experience brought to bear on the project, and to facilitate sustained engagement of key organizations and sectors.

For more information:

Erica Phipps, Executive Director, CPCHE

erica@healthyenvironmentforkids.ca

www.healthyenvironmentforkids.ca/collections/rentsafe