

Edmonton Coalition on Housing and Homelessness

200, 12120-106 Avenue Edmonton Alberta T5N 0Z2
www.ecohh.ca

2022 February 16

City of Edmonton Executive Committee Agenda Item 6.1, Affordable housing exemptions

Edmonton Coalition on Housing and Homelessness (ECOHH) appreciates this first opportunity to share thoughts with a new City Council. We look forward to working together in the years ahead with the goal of every person in Edmonton having affordable, secure, and appropriate housing.

Along with many others in the city, we have an early positive impression of Council's commitment to this goal. We commend the fast action putting federal Rapid Housing Initiative funds to work with community partners, and your vigorous advocacy with the Government of Alberta to get funds for enhanced emergency shelter services over a cold winter. Later, during the meeting today, you will consider Item 6.4, your commitment to invest to have affordable housing built.

Your response to this report can reinforce the positive reputation of commitment to housing security for all that is developing—or can hurt it.

Our key messages to members of City Council as we review the report from administration on tax exemptions for affordable housing are that commitment is needed NOW to:

- (1) Leave all existing exemptions alone,**
- (2) Develop a policy for supportive housing—or all non-market housing—that assumes no action from the province, and**
- (3) Commit to do this with broad and deep consultation with organizations providing non-market housing and individuals directly impacted (by access to [adequate housing](#)¹)—in alignment with the TRC's 43rd [call to action](#)² and ratified human rights conventions³.**

We urge Councillors not to stop consideration of the report before them with the executive summary and first few pages. The most important content is found on the final two pages, where community perspective and GBA+ analysis is provided. The information in this part of the report moves the issue from a dollars and cents item in the City's budget—and one involving quite small amounts of money even then—to one of the moral & social responsibility of leaders for the most vulnerable and least powerful people in the City.

In recent years we have been hearing growing lip service to the human right to housing, but for many people it is much more than a legal and philosophical issue – it is the difference between a decent life and misery, day by day—and it is demonstrated in practical actions in policy and budgets, not in rhetoric.

The report you are receiving today misses this central issue. It seems driven by technical interest in an issue of assessment and taxation processes. It correctly identifies a significant problem with the silence of provincial legislation related to non-market housing and local taxation—but we urge that not be a distraction. To make this a

¹ "Adequate housing must provide more than four walls and a roof (p.8)." Meaning, "at a minimum, meet the following criteria": (1) Security of tenure; (2) Availability of services, materials, facilities and infrastructure; (3) Affordability; (4) Habitability; (5) Accessibility; (6) Location; (7) Cultural Adequacy ([pgs. 8-9](#)).

² "[Call to Action 43](#). We call upon federal, provincial, territorial, and municipal governments to fully adopt and implement the United Nations Declaration on the Rights of Indigenous Peoples [UNDRIP] as the framework for reconciliation (p.8)." Including Article 21.1 & Article 23 in [UNDRIP](#).

³ "Canada has ratified a number of human rights conventions including the UN Convention on the Rights of the Child (CRC), Convention on the Elimination of All forms of Racism (CERD), Convention for the Elimination of Discrimination Against Women (CEDAW), Convention on the Rights of Persons with Disabilities (CRPD), and UN Declaration on the Rights of Indigenous Peoples (the Declaration)—all of which also include a commitment to the right to adequate housing ([p.4](#))."

focus of your concern will lead into a long process trying to persuade the provincial government to make change, a process with uncertain results. Meanwhile the viability of organizations being able to provide needed housing will be eroded or destroyed.

The many negative consequences of moving ahead to remove existing exemptions and/or deny further ones are well described in the report and include organizations needing to:

- drop consideration of much-needed new developments or divest of existing ones,
- reduce staff and/or services,
- put off essential maintenance and renovations,
- increase rents- a direct path to homelessness for many on small fixed incomes, and
- operate in an increasingly unfair playing field between organizations with exemptions and those without.

These consequences more than outweigh the very small amount of additional revenue to be realized from taxing such properties.

Limitations on being able to move forward with improving and increasing the supply of non-market housing also carries significant extra fiscal and social costs that arise from people being unhoused or badly housed- for health care, emergency calls, family breakdown and more. No matter which order of government might carry these direct costs, they are ultimately costs for every one of us too

Opening up this issue will create uncertainty for social profit organizations that are already badly stretched by the pressures of the pandemic and declining access to charitable dollars and government grants and will create more peril for their operations. Resources and time will be taken up that could be better used for their core missions.

This report is unbalanced and fails to provide supporting information for some of its assertions, in addition to failing to clearly communicate the human dimension of the taxation issue it presents.

The best response from City Council will be to maintain existing exemptions and move forward to develop a compassionate and careful policy to ensure operators of non-market housing, especially where they also provide support services, can work confidently as partners with the City in pursuit of the goal of realizing in Edmonton the human right to an affordable, safe, healthy, and secure place to call home for every person

As an approach to taxation for affordable housing consistent with the City's larger commitment to housing security is developed, through a comprehensive process of consultation, ECOHH will look forward to bring our knowledge and experience and participate further.

[About ECOHH](#)

The Edmonton Coalition Housing and Homelessness (ECOHH) was created in 1986. Membership consists of social profit organizations and businesses, as well as individuals. Its mandate includes education and advocacy on housing security, including homelessness and affordable housing.

ECOHH provided leadership in the formation of the Edmonton Housing Trust Fund in 1999. This fund now operates as Homeward Trust and is part of a long-term initiative to provide quality affordable housing in Edmonton by investment in projects.

ECOHH presented an annual awareness event, Homefest, for ten years, and led the development of the public art sculpture honouring the importance of housing, located in Homeless Memorial Plaza, north of City Hall on 103A Avenue. ECOHH has presented an annual memorial service for people who have died because of housing challenges in their lives, since 2006.

ECOHH is a broad based voice to promote change in public policy, increase community knowledge, and share information on all aspects of housing security.

ECOHH's key messages are:

- Decent affordable housing is essential for all people.
- Good homes for all create strong healthy communities.
- Housing is more than four walls and a roof– it's homes, support, and community.
- Lack of decent affordable housing has negative consequences for everyone.
- In Alberta we have the resources, knowledge, and skills to make sure everyone has a decent place to call home in a strong healthy community.