



This submission responds to
the Canadian Federal Government's
invitation to provide feedback concerning
Build Canada Homes:
Quantity Must Be Balanced with Quality.

August 26, 2025

Please submit response, questions/comments to: info@canadiansforproperlybulthomes.com .

Founded in 2004, Canadians for Properly Built Homes (CPBH) is a national, not for profit, consumer advocacy corporation dedicated to healthy, safe, durable, energy efficient residential housing for Canadians, and is the only organization of its kind in Canada. Working for consumer awareness and protection, CPBH is run by a volunteer Board of Directors and is supported by a volunteer Advisory Council of industry experts and other key stakeholders. CPBH earned "partner" status with the Canadian Consumer Information Gateway (Industry Canada).

Website: www.canadiansforproperlybulthomes.com

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Quantity Must Be Balanced with Quality

Canadians for Properly Built Homes (CPBH) recognizes Canada's urgent need for more housing. But building homes quickly without ensuring quality will only worsen the crisis.

Page | 2

For most Canadians, a newly built home is the biggest purchase of their lives. Yet today, "housing quality" has no clear definition in Canada, and too often Building Codes - the bare minimum - are not even met. The result? Unsafe, costly, and sometimes uninhabitable newly built homes.

Key Problems:

- **No definition of housing quality.** CPBH has asked the Canada Mortgage and Housing Corporation (CMHC) for more than 15 years, but it still hasn't provided one.
- **Building Codes not enforced during construction.** When Code violations occur, occupants' health and safety are threatened. Repairs after occupancy cost up to 7x more than catching and properly fixing defects during construction.
 - Related data available to the public is scarce, but here is an example from the City of Toronto - CPBH's two-page statement: [Audit of Toronto Buildings Inspection Function \(PDF\)](#).
- **Factory-built homes lack oversight.** Federal housing plans rely heavily on factory-built homes, but current systems and inspections for installed homes typically are geared to traditional builds.

What Build Canada Homes Must Do:

1. **Define Housing Quality.**
Establish a national, standardized definition for newly built homes quality. This will help to align expectations, improve accountability, and ensure safe, sustainable housing.
2. **Ensure that Building Codes are Enforced During Construction across Canada.**
Work with all levels of government to ensure that all newly built homes meet at least the minimum Code requirements **before occupancy** - something not happening today. This will protect health, safety, and affordability - and increase consumer protection.
3. **Develop Oversight for Factory-Built Homes - including Installation - across Canada.**
Work with all levels of government to create clear systems and processes. This includes defining who the builder is, e.g., for permit purposes, and inspections that relate to installed factory-built homes. This will increase quality and consumer protection.

Why It Matters:

- **Safety first:** Homes with Code violations endanger the health and safety of Canadians living in these homes.
- **Affordability:** Building right from the outset prevents massive additional costs to repair later.
- **Trust in housing:** Canadians deserve confidence that their homes are healthy, safe, durable, energy efficient, and properly built.

**Continuing to simply delegate to other levels of government
is too risky.**

The Canadian Federal Government must lead.