

Questions for Ontario's Home Construction Regulatory Authority's (HCRA) Annual Meeting, Sept. 10, 2026

Submitted by

**Canadians for Properly Built Homes (CPBH)
Sept. 9, 2026**

Please send responses to: info@canadiansforproperlybuiltinhomes.com .

Founded in 2004, Canadians for Properly Built Homes (CPBH) is a national, independent, not for profit 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.

Website: www.canadiansforproperlybuiltinhomes.com

X/Twitter: @cpbh01

BlueSky: @cpbh01.bsky.social

Instagram: cpbh01

LinkedIn: <https://www.linkedin.com/company/canadians-for-properly-built-homes/?viewAsMember=true>

Facebook: <https://www.facebook.com/pages/Canadians-for-Properly-Built-Homes/1613240682226191>

Contents

1. Complaints about HCRA.....	2
2. HCRA providing trustworthy information to support informed homebuying decisions? 3	
3. Lack of response from HCRA re cost of holding a hybrid annual meeting	3
4. HCRA not licensing builders for rental apartment buildings	4
5. Complaints to HCRA against builders and sellers	5
6. HCRA's apparent financial challenges	5

1. Complaints about HCRA

Section 8(4) of HCRA's Administrative Agreement states: *"The Regulatory Authority's business plan shall set out the means by which complaints received by the Regulatory Authority related to the administration of the Delegated Provisions are managed and resolved and the Regulatory Authority's annual report shall account for how these complaints were responded to and resolved."*

Under the heading *"Complaints about the HCRA,"* HCRA's 2025–2026 Annual Report states that it received one complaint under its "Complaints About the HCRA" policy. However, the paragraph below that heading in that report refers to "additional complaints" about HCRA that were considered outside the policy's scope.

- a) For the one complaint that HCRA accepted as part of its policy scope, how was it responded to and resolved?
- b) How does HCRA believe its reporting in the HCRA's 2025–2026 Annual Report satisfies section 8(4) of the Administrative Agreement?
- c) How many complaints about HCRA were received in total?
- d) What were those complaints deemed not to be within the policy's scope?
- e) How were the complaints that HCRA deemed not to be within the policy's scope responded to and resolved?

2. HCRA providing trustworthy information to support informed homebuying decisions?

An HCRA September 2026 social media posts states: *"Buying a new home in Ontario? Access to trustworthy information is an important part of protecting consumers and supporting informed homebuying decisions...."*

Page | 3

Yet, despite:

- Former Minister McCharles' quote in 2013 in the Toronto Star saying that "Consumers should have easy access to information about a builder's record to help make informed buying decisions";
- Justice Cunningham's 2017 Tarion Review Report that included information that should be available to consumers regarding construction defects type; and
- repeated requests since HCRA opened its doors made by CPBH to HCRA regarding reporting Tarion-confirmed Ontario Building Code violations

the Ontario Builder Directory still does not disclose all building code violations confirmed by Tarion for all builders.

- a) Why has HCRA not made this information regarding confirmed building code violations publicly available via the Ontario Building Directory?
- b) Does HCRA agree that confirmed building code violations are important information that prospective buyers should have when making an informed homebuying decision?

3. Lack of response from HCRA re cost of holding a hybrid annual meeting

In a May 27, 2026 email, HCRA's Communications & Stakeholder Relations stated that *"The decision to continue with a virtual format reflects our commitment to fiscal responsibility"*. On May 27, 2026, CPBH wrote to Ms. Perkins, the CEO board chair, and among other things, the email said: *"...If HCRA ultimately decides to proceed with a virtual-only 2026 annual meeting, please advise what the estimated additional cost would be to hold the meeting in a hybrid format..."*. No response has been received by CPBH to that specific request.

- a) Why did Ms. Perkins not respond to that request, or at least ensure that HCRA provide the information requested?
- b) What is the estimated additional cost for HCRA to hold its annual meeting in a hybrid format?

4. HCRA not licensing builders for rental apartment buildings

HCRA's mandate as outlined in the HCRA 2025–2026 Annual Report says *"To protect consumers, the HCRA regulates new home builders and sellers in Ontario. In addition to licensing, it enforces professional standards for competence, good conduct and financial responsibility, protecting consumers with a fair, safe, informed marketplace..."*

On Mar. 5, 2025 CPBH was advised by an HCRA Customer Service Coordinator via email that "The HCRA does not licence builders for rental apartment buildings." We understand that this exclusion also includes purpose-built rental homes.

- a) HCRA's mandate states that it regulates *"new home builders and sellers in Ontario."* Why does this mandate statement not disclose that builders of purpose-built rental homes, if that is the case, and apartment buildings, are excluded from HCRA licensing and regulation?
- b) Does HCRA agree that describing its mandate as regulating *"new home builders and sellers in Ontario,"* without identifying this exclusion, could lead the public to believe that all companies constructing new residential units are subject to HCRA competency and conduct requirements?
- c) Approximately how many purpose-built rental units were constructed in Ontario during 2025–2026 by builders who were not required to be licensed by HCRA? Does HCRA collect or have access to this information?
- d) Who is responsible for confirming that builders of purpose-built rental buildings possess appropriate technical competence, financial responsibility and a record of good conduct before they are permitted to construct these buildings?
- e) If no Ontario regulator performs that function, does HCRA consider this to be a consumer-protection and public-safety gap?
- f) What protections are available to tenants when a newly constructed rental building contains serious construction defects or Ontario Building Code violations attributable to the builder?
- g) Where can prospective tenants or building owners obtain information about the qualifications, conduct history and construction record of a builder that constructs rental units but is not regulated by HCRA?
- h) If HCRA becomes aware of serious deficiencies or unsafe practices by a builder of rental housing, does it have a formal process for referring the matter to the municipality, the Ministry of Municipal Affairs and Housing or another responsible authority?
- i) Are builders of mixed-use or mixed-tenure projects—containing both condominium units for sale and purpose-built rental units—subject to HCRA oversight for the

- entire building or only the units intended for sale? How are shared structural and building systems treated?
- j) If a newly constructed rental building is later converted to condominium ownership, what licensing, disclosure and warranty protections apply, and who is accountable for defects originating during the original construction?
 - k) Given HCRA's stated mandate to protect consumers through "*a fair, safe, informed marketplace*," how does HCRA reconcile that commitment with a regulatory framework in which a company constructing hundreds of homes, perhaps thousands of homes, for tenants may not be required to demonstrate its competence, good conduct or financial responsibility to HCRA—or be included in the Ontario Builder Directory?

5. Complaints to HCRA against builders and sellers

The HCRA 2025–2026 Annual Report states that it received 1,269 complaints – 959 against licensees and 310 complaints against illegal builders and sellers. Yet our review of HCRA's public messaging found that HCRA appeared to give disproportionate prominence to illegal builders and sellers, even though licensed builders and sellers accounted for approximately 76% of all complaints received.

- a) Does HCRA agree that its public messaging gave disproportionate prominence to illegal builders and sellers over licensed builders during that period? If yes, why is that?
- b) Does HCRA allocate about 75% of its resources to dealing with issues related to licensed builders and sellers given the complaints HCRA received? If no, why not?

6. HCRA's apparent financial challenges

According to the financial statements in the HCRA 2025–2026 Annual Report:

- a) HCRA received a Province of Ontario grant of \$6.7 million. Is this grant repayable to the Province of Ontario?
- b) Board expenses increased by 23.4% during the year according– why is that?
- c) Consulting fees increased by 95.8% - why is that?

According to HCRA's compensation disclosures, the HCRA Registrar/CEO's (Ms. Moir) compensation increased by 11.3%.

- d) How can the HCRA board justify this increase, given HCRA's apparent financial challenges and HCRA's "commitment to fiscal responsibility"?