



Canadian Life & Health
Insurance Association
Association canadienne des
compagnies d'assurances
de personnes

August 29, 2025

Housing, Infrastructures and Communities Canada
180 Kent Street, Suite 1100
Ottawa, Ontario
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Via Email: bchengagement-mobilisationmc@infc.gc.ca

Re: Response to Housing, Infrastructures and Communities Canada Consultation on Build Canada Homes

The Canadian Life and Health Insurance Association (CLHIA) is pleased to provide its comments to the Housing, Infrastructures and Communities Canada consultation on Build Canada Homes (BCH).

Who we are

The CLHIA is the national trade association for life and health insurers in Canada. Our members account for 99 per cent of Canada's life and health insurance business. The industry provides a wide range of financial security products such as life insurance, annuities, and supplementary health insurance. Life and health insurers play a key role in providing financial security to Canadians.

As a substantial investor in the Canadian economy, the life and health insurance industry can play a key role in scaling up investments in Canada's infrastructure, including affordable housing. In 2024, Canadian life and health insurers have already invested \$50 billion in domestic infrastructure and the industry is able and wants to do more. To better leverage our industry's investment capacity, the government should consider the following recommendations:

1. Support for long-term financing projects

Scaling up investments in infrastructure, including affordable housing, is essential to building a resilient and globally competitive economy. As Canada faces growing economic and competitive pressures, the need to enhance investments in infrastructure, especially housing infrastructure, is more urgent than ever. There is a significant opportunity for institutional investors, such as those in the life and health insurance industry, to finance the federal government's efforts to scale up investment in affordable housing.

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Life insurers are ideal financial partners for long-term infrastructure projects, including P3s, as they can commit to long-term financing. This inherent structural advantage makes the industry an important and stable investor in long-term assets.

To leverage our industry's investment capacity, we recommend that BCH leverage long-term financing structures to bring in the life and health insurance industry's sustainable debt capacity to finance affordable housing. This can be accomplished by leveraging federal land and allowing private sector consortiums to bid for the opportunity to design, build, maintain, operate and finance affordable housing on the behalf of the Government of Canada.

2. Pooling Smaller Projects

It can be a challenge for governments, particularly at the municipal level, to attract sufficient bids to finance smaller projects. The federal government and its agencies (e.g., BCH, Canada Infrastructure Bank) could have a role in pooling small projects. BCH and the Canada Infrastructure Bank should work with municipalities to pool of smaller affordable housing projects, where appropriate.

3. Ensuring public investment agencies do not crowd out private capital

BCH should be in close collaboration with other public investment agencies, such as the Canada Infrastructure Bank, to ensure public investment agencies are not crowding out private capital. Public funds should not be used to finance infrastructure projects that could be financed by the private sector. Further, government should explore its role in creating the conditions necessary to incentivize private investment in climate resilience infrastructure required to protect Canadian homes.

We appreciate the opportunity to respond to the federal government's approach to Build Canada Homes.

Sincerely,

Sarah Hobbs
Vice-President, Policy
Canadian Life & Health Insurance Association