



Wednesday, December 4, 2024

Submission to Planning and Housing Committee

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**RE: Toronto Heat Safety Coalition Submission on PH17.5
Establishing a Framework to Address Excessive Indoor Temperatures in Leased Residential Premises**

The Toronto Heat Safety Coalition is writing to support the staff recommendation to the City of Toronto Planning and Housing Committee to take the next steps towards implementing a maximum temperature by-law, which would require that all rental units be maintained at a maximum of 26 degrees Celsius indoors. We look forward to the recommended report back on an implementation framework in Q4 2025.

The volume of research and evidence supporting a maximum indoor temperature standard as a public health measure is significant. The report appropriately notes that, “Given stakeholder feedback and relevant research available, staff are recommending instating a maximum indoor temperature standard of 26°C as a thermal safety and public health measure.”¹

As the climate crisis worsens, it is essential that the City of Toronto take steps to protect tenants from the health impacts of extreme heat. We commend staff on their recommendation to ensure that a maximum temperature standard apply in all rental units, which aligns with tenant, environmental and legal aid advocates who have been recommending policy changes to address excessive and dangerous indoor temperatures. In particular, we note that Recommendation 4 should be adopted and that cooling rooms are not an adequate substitute for in-suite cooling, but can be an additional measure.²

¹ See Carleton Grant, James Nowlan & Eileen de Villa, “Establishing a Framework to Address Excessive Indoor Temperatures in Leased Residential Premises” (22 November 2024) at 17, online (pdf): <toronto.ca/legdocs/mmis/2024/ph/bgrd/backgroundfile-250930.pdf> [Report].

² See e.g. Meade et al., “Efficacy of Cooling Centers for Mitigating Physiological Strain in Older Adults during Daylong Heat Exposure: A Laboratory-Based Heat Wave Simulation” 131:6 CID: 067003 <https://doi.org/10.1289/EHP11651> at 1.

We are, however, concerned about delay. We urge the Planning and Housing Committee to commit to accelerating the timeline for implementation of the maximum temperature by-law as much as possible, and to implement emergency in-suite cooling measures to be put in place this summer (as outlined by our Heat Safety Coalition [here](#)) to protect vulnerable tenants as we await a maximum temperature bylaw.

The Risks to Public Health are Urgent

The report accurately highlights the urgency of the health risks of extreme heat. The report points out the inequity of who is most impacted by extreme heat in our community. Residents living in leased residential premises without air conditioning, or other cooling equipment such as heat pumps, are at higher risk of experiencing heat-related health impacts.³ There is a disproportionate risk to people living in hotter neighbourhoods of the City of Toronto and older adults, infants and young children, people with chronic illness, and people with some disabilities.⁴ The location of communities of people that are more sensitive to heat or have a lower ability to cope or adapt often overlaps with the hottest areas of the city, putting people further at risk.⁵

Public Health Ontario determined that there is an increase in the risk of mortality when outdoor temperatures are approximately 26 degrees Celsius or higher.⁶

Expedite the Timeline for Implementation

The recommendation that City of Toronto staff report on implementation of the maximum temperature by-law by the end of 2025, with further steps and anticipated delays to implement the by-law, will mean that tenants are at risk of heat-related illness and death for far too long. We urge the City of Toronto to accelerate the timeline for implementation of this urgent public health policy.

Emergency, Temporary Cooling is Needed in Tenant Apartments

Tenants are most at risk if their apartments remain above 26 degrees Celsius during an extreme heat event.⁷ Along with an expedited timeline for implementation of the by-law, we note that tenants are in need of in-suite protections this summer. We are therefore recommending that a budget for a temporary, emergency free air conditioner program be put in place for summer 2025. Current programs for tenants to apply for free air conditioners are too limited and difficult to access.

³ Report, p 3.

⁴ Report, p 6.

⁵ Report, p 6.

⁶ Report, p 7.

⁷ Government of British Columbia, “Extreme Heat and Human Mortality: A Review of Heat-Related Deaths in B.C. in Summer 2021” (2022), online (pdf): <https://www2.gov.bc.ca/assets/gov/birth-adoption-death-marriage-and-divorce/deaths/coroners-service/death-review-panel/extreme_heat_death_review_panel_report.pdf> at 22.

Conclusion

We congratulate the City of Toronto on its call to implement a maximum temperature by-law of 26 degrees Celsius in all rental units, which would provide significant protection for tenants from the health impacts of extreme heat. We look forward to working with the Planning and Housing Committee and all city staff on implementing this policy.