Canadian Environmental Law Association
EQUITY. JUSTICE. HEALTH.

Submission to the Toronto Board of Health

Re: HL26.5 – Planning for Climate Change Monitoring to Understand Health Impacts and Support Resilience in Toronto

Submitted by: Canadian Environmental Law Association

Date: July 4, 2025

The Canadian Environmental Law Association (CELA) strongly supports the recommendations in agenda item HL26.5. As the climate crisis worsens, and the health impacts of climate change become more dire, it is critical to gather and share data to understand the scope of the problem.[1] CELA is looking forward to further engagement with Toronto Public Health (TPH) as it develops a comprehensive public health surveillance framework to address climate change health impacts.

CELA is a specialty legal aid clinic that protects public health and the environment by using legal tools, public education, and advocacy to address environmental harm and improve policy. Since 1970, we have focused on assisting low-income and vulnerable communities in accessing environmental justice.

TPH's focus on improving collection and publication of climate change data is both timely and necessary. As climate change accelerates the frequency and intensity of environmental hazards such as extreme heat, poor air quality, and vector-borne disease, municipalities must be equipped with tools that allow them to track and respond to these health impacts in real time.[2] A transparent, data-driven approach to monitoring these risks is essential for reducing harm and supporting adaptation, particularly for Toronto's most vulnerable communities.

---

[1] Public Health Agency of Canada, "What We Heard: Perspectives on Climate Change and Public Health" (11 August 2022), online: Canada.ca <https://www.canada.ca/en/public-health/corporate/publications/chief-public-health-officer-reports-state-public-health-canada/state-public-health-canada-2022/what-we-heard-perspectives-climate-change.html>.

[2] Library of Parliament (Canada), *Climate Change: Its Impact and Policy Implications* (Background Paper, Economics, Resources and International Affairs Division & Legal and Social Affairs Division, Publication No 2019-46-E, 31 January 2020) [pdf] *Parliament of Canada* <https://lop.parl.ca/sites/PublicWebsite/default/en_CA/ResearchPublications/201946E>.

We commend the proposal's inclusion of a public-facing dashboard and its proposed approach incorporating both quantitative metrics and qualitative indicators that capture community resilience and behavioral adaptation.[3]

To strengthen the proposal, CELA offers the following recommendations:

1. Include Data to Measure Environmental Conditions That Cause Harm to Health

The current focus of the proposal is on the ultimate mortality and morbidity impacts of climate change. We recommend broadening the focus of data collection to also include data that would measure environmental conditions being made worse by climate change. Some examples include indoor temperature and humidity data in public buildings and schools, or indoor air quality data during periods of poor air quality.

CELA recently published two reports on the impacts of extreme heat in schools and child care facilities.[4] We identified serious gaps in data and recommend the following data sets be collected by TPH or that TPH should coordinate with the Toronto-area public school boards to collect: (1) measurements of indoor temperature, humidity and carbon monoxide levels in every classroom, (2) data on how many classrooms and child care facilities do not currently have air conditioning, and (3) absenteeism rates during extreme heat events.

With respect to water quality, we recommend that TPH investigate how to incorporate an indicator that measures climate-related changes in the rate of lead leaching into drinking water, such as the impacts of rising temperature on lead leaching or changes to water sources and chemistry.

2. Tracking of Heat-Related Mortality and Morbidity

The current proposed approach to tracking heat-related mortality and morbidity is to use models. TPH has identified that health system data is not currently a fruitful source of information on climate change related morbidity and mortality.[5] CELA recommends that TPH engage with the health care sector in Toronto and determine how it can improve its data collection and reporting so as to better support an understanding of climate change related health inequities.

3. Center Environmental Justice and Health Equity

CELA agrees that equity must be a key consideration for climate change research, policy and action.[6] We recommend a particular focus on equity in the use of data for surveillance and in

---

[3] Toronto Public Health, *Report for Action: Planning for Climate Change Monitoring to Understand Health Impacts and Support Resilience in Toronto*, agenda item HL26.5 (20 June 2025) at 5, online: City of Toronto <https://www.toronto.ca/legdocs/mmis/2025/hl/bgrd/backgroundfile-256683.pdf> [*Report for Action*].

[4] Canadian Environmental Law Association, "Failing the Future: Extreme Heat in Schools and Child-Care Settings" (24 April 2025), online: CELA https://cela.ca/reports-failing-the-future-extreme-heat-in-schools-and-child-care-settings/.

[5] *Report for Action, supra* note 3 at 5.

[6] *Ibid* at 5.

reporting on the public-facing dashboard. We also recommend including maps to allow for better understanding of how climate risks are distributed across Toronto's communities.

CELA recommends that demographic data include income levels, family-type, housing type, available greenspace and tree cover, and proximity to industrial pollution sources.[7]

All of this data should be publicly available and accessible.

4. Establish Clear Data Governance Standards

The transparency and public availability of climate data is important to further environmental justice and health. We support the creation of a public dashboard.

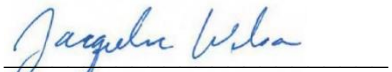
TPH should consider developing transparent protocols governing data collection, validation, sharing, and long-term stewardship of the data collected. Clear policies on data sources, privacy protections, frequency of updates, and public accessibility will build community trust and enable broader use of the platform for neighborhood planning and advocacy efforts.

5. Implement Structured Evaluation Cycles

Beyond the proposed annual updates, we recommend establishing formal three-to-five-year evaluation periods to assess whether the framework achieves its stated objectives. These reviews should examine indicator relevance, data quality, effectiveness of community engagement, and opportunities for methodological improvements. Regular evaluation will ensure the system remains responsive to evolving climate risks and emerging evidence.

CELA is looking forward to further engagement with TPH and the city to gain a better understanding of the disproportionate impacts of climate change in Toronto. We look forward to supporting the successful implementation of this initiative and remain available for ongoing consultation.

Sincerely,



Jacqueline Wilson
Counsel

Rhea Badhwar

---

[7] Statistics Canada, "Ethnocultural and socioeconomic disparities in exposure to residential greenness within urban Canada" (22 March 2022), online: Statistics Canada <https://www150.statcan.gc.ca/n1/pub/82-003-x/2021005/article/00001-eng.htm>.

Law Student