CELA Publication #1644

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Municipal Licensing & Standards
City of Toronto
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Re: Indoor Temperature Standards in Rental Housing in the City of Toronto

The Canadian Environmental Law Association (CELA) strongly supports the adoption of a maximum indoor temperature standard for all rental housing in Toronto. Climate change is an environmental, public health and equity crisis. We support efforts to protect tenants from the serious health and safety risks posed by extreme heat.

We urge the City of Toronto to ensure that a maximum indoor temperature standard is adopted prior to summer 2026. It must apply to all tenants' homes rather than solely to common rooms or cooling rooms. To be effective, equitable, and enforceable, the by-law must mandate that no rental unit exceed 26 degrees Celsius indoors during the summer months.

Public Health Evidence and Urgency

The public health consequences of extreme indoor heat are well understood. After the 2021 extreme heat event in British Columbia, a review by the B.C. Coroner found that 98% of the 619 people who died were indoors in their own homes.[1]

When Toronto Public Health inspectors measured indoor temperatures in 2-3 story buildings, they found temperatures dangerously ranging from 32°C to 39°C during an extreme heat event.[2]

Toronto is already experiencing longer and more intense heat waves due to climate change.[3] Tenants who are elderly, immunocompromised, living with disabilities, or caring for young children face disproportionate risks from extreme heat, consistent with Health Canada's identification of seniors, people with disabilities, individuals with pre-existing health conditions, and youth as populations at increased risk from climate-related health hazards.[4]

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[1] Government of British Columbia, "Extreme Heat and Human Mortality: A Review of Heat-Related Deaths in B.C. in Summer 2021" (7 June 2022), online: <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> ["Government of British Columbia"].
[2] City of Toronto, "Reducing Health Risk from Extreme Heat in Apartment Buildings" (11 June 2015), online: <https://www.toronto.ca/legdocs/mmis/2015/hl/bgrd/backgroundfile-81510.pdf>.
[3] Toronto and Region Conservation Authority, "Toronto's Current and Future Climate" (2024), online: <https://www.toronto.ca/wp-content/uploads/2024/12/949f-TorontosCurrentandFutureClimate-REPORT-Final.pdf>.
[4] Government of Canada, "Risks to health from climate change" (10 June 2024), online: <https://www.canada.ca/en/health-canada/services/climate-change-health/risks-to-health.html>.

Cooling Outside of the Home is Not Adequate

Protection must be provided in people's homes. Cooling rooms do not substitute for safe indoor conditions at home.

For tenants, particularly those who are elderly, have mobility challenges, disabilities, or respiratory problems, public cooling centres or common cooling rooms in buildings are not sufficient substitutes for safe indoor temperatures. Although public cooling centres are essential for unhoused individuals and outdoor workers, they are not an adequate solution for people living in rental units without active cooling:

- Heat waves increase the risk of morbidity and mortality due to respiratory and cardiovascular distress and disease.[5]

- The British Columbia Coroner's Report found that people with mobility issues may not be able to access cooling centres. Solutions bringing cooling to those who cannot easily leave their residences for health or mobility reasons is required.[6]

- Researchers looked at the physiological impacts of temporary periods of cooling during a heatwave and determined that the benefits of temporary cooling were transient. In a simulated 9-hour heat wave, older adults who had access to air conditioning for two hours saw temporary benefits but ultimately their core body temperatures were statistically equivalent with older adults who did not access air conditioning when they returned to a hot environment.[7]

- Long-term care advocates argued that common cooling rooms were "effectively useless" in long-term care homes, as most residents remained in their rooms and staff are unable to bring everyone down to shared spaces.[8]

Equity, Accessibility, and Tenant Protection

A maximum temperature standard in tenants' homes ensures that all tenants, regardless of age, health, mobility, or income, are afforded equal protection from the health impacts of extreme heat. This approach also advances the City's commitments under its climate adaptation and

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[5] Daniel O. Åström, Forsberg Bertil & Rocklöv Joacim, "Heat wave impact on morbidity and mortality in the elderly population: a review of recent studies" (2011) 69:2 Maturitas 99; Kristie L. Ebi et al., "Hot weather and heat extremes: health risks" (2021) 398:10301 The Lancet 698; Matthew Quick, "The impacts of extreme heat events on non-accidental, cardiovascular, and respiratory mortality: An analysis of 12 Canadian cities from 2000 to 2020" (19 June 2024), online: <https://www150.statcan.gc.ca/n1/pub/82-003-x/2024006/article/00001-eng.htm>.
[6] Government of British Columbia, *supra* note 1.
[7] Robert D. Meade et al., "Efficacy of Cooling Centers for Mitigating Physiological Strain in Older Adults during Daylong Heat Exposure: A Laboratory-Based Heat Wave Simulation" (2023) 131:6 Environmental Health Perspectives.
[8] Katherine DeClerq, "All Ontario long-term care homes now have air conditioning, but not all have them in resident rooms" (27 May 2021), online: <https://toronto.ctvnews.ca/all-ontario-long-term-care-homes-now-haveair-conditioning-but-not-all-have-them-in-residentrooms>.

equity frameworks by recognizing housing as a critical determinant of health and environmental justice.

Recommendations for Implementation

To ensure successful implementation, CELA respectfully recommends:

- The City should adopt a 26 °C maximum indoor temperature standard that applies to all rental units. Action should be taken to pass a by-law with this standard before the 2026 summer season.

- Any requirement for in-unit cooling must be accompanied by safeguards to prevent additional costs from being unfairly passed to tenants. Grants or financial assistance for landlords of low-income tenants and energy-efficient cooling such as heat pumps should be prioritized.

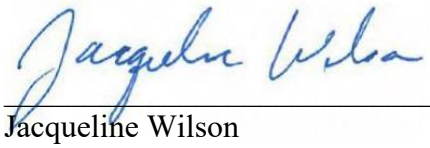
- Clear inspection and complaint mechanisms should be established.

Conclusion

CELA strongly urges the City of Toronto to adopt a maximum indoor temperature requirement of 26 °C in all rental units. Cooling rooms are not a substitute for safe living conditions. Protecting tenants in their homes is essential to preventing illness and death during extreme heat events.

We encourage Council to move forward decisively with this critical public health and climate adaptation measure.

Respectfully submitted,



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