



April 17, 2026

City of Kingston – City Council  
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**Re: ITEM 14 (Report Number 38) – Municipal Residential Air Conditioner Assistance Program**

The Canadian Environmental Law Association (“CELA”) strongly supports adoption of a residential air conditioner program for low-income seniors in Kingston.

Climate change is a public health and equity crisis. As heat waves become more frequent and dangerous in Kingston, access to in-home cooling is increasingly a matter of safety, especially for low-income tenants who are least able to protect themselves from rising temperatures. This pilot program recognizes that cooling is not a luxury – it is an essential public health intervention.

A. Background on Canadian Environmental Law Association

CELA is a specialty legal aid clinic dedicated to environmental equity, justice and health. Founded in 1970, CELA is one of the oldest environmental advocates for environmental protection in the country. With funding from Legal Aid Ontario, CELA provides free legal services relating to environmental justice in Ontario, including representing qualifying low-income and vulnerable or disadvantaged communities in litigation. CELA also works on environmental legal education and reform initiatives.

B. City Council Should Support a Residential Air-Conditioner Pilot Program

***Indoor Heat is a Serious Health Threat***

Various life threatening conditions can occur when the body cannot maintain its core temperature of approximately 36.6°C due to excessive external heat.<sup>1</sup> These include dehydration, cramps, heat exhaustion, and heat stroke.<sup>2</sup> During the summer of 2018 in Quebec, 86 heat-related deaths were recorded.<sup>3</sup> In British Columbia, between June 25 and July 1, 2021, 619 heat-related

<sup>1</sup> Government of British Columbia, “Extreme Heat and Human Mortality: A Review of Heat-Related Deaths in B.C. in Summer 2021” (June 7, 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](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 page 11.

<sup>2</sup> Government of British Columbia, “Extreme Heat and Human Mortality: A Review of Heat-Related Deaths in B.C. in Summer 2021” at page 11.

<sup>3</sup> Annick Poitras, “Extreme Heat Waves in Quebec”, online: <https://climatedata.ca/case-study/extreme-heat-waves-in-quebec/>.

deaths were recorded.<sup>4</sup> Extreme heat is a public health emergency and action must be taken by all municipalities to reduce heat-related deaths.

Equity concerns must be built into any policy measure to address extreme heat. Certain populations are more at risk of heat-related illnesses and death. These populations include seniors, infants and young children, individuals with chronic illnesses and mobility challenges, and individuals that are socially disadvantaged.

A report published by the Government of British Columbia, entitled “Extreme Heat and Human Mortality” found that it was vulnerable people who died during the 2021 extreme heat event:

- 90% of the 619 people who died in British Columbia during last year’s heat wave were over 60 years old.<sup>5</sup>
- 91% were registered with at least one chronic disease registry.<sup>6</sup>
- Deaths were higher among those living in socially or materially deprived neighbourhoods. Poor quality housing, homelessness and overall deprivation were identified as risk factors for increased mortality rate.<sup>7</sup>
- 98% of heat-related deaths occurred indoors. Most of the 619 people who died were in homes without adequate cooling systems.<sup>8</sup>

Likewise, an analysis of the deaths in Quebec during the 2018 heat wave made similar findings:

- Elderly people, those that are socially isolated, and those with chronic diseases or psychotic disorders were most vulnerable to heat.<sup>9</sup>
- The majority of the people who died resided in an urban heat island.<sup>10</sup>
- 8 of the 53 people who died in Montreal lived in a senior’s home.<sup>11</sup>
- Most of the people who died did not have access to air conditioning.<sup>12</sup>

Extreme heat is already a leading climate-related cause of death in Canada. For low-income seniors living in housing without cooling, indoor temperatures can quickly become dangerous.

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<sup>4</sup> Government of British Columbia, “Extreme Heat and Human Mortality: A Review of Heat-Related Deaths in B.C. in Summer 2021” at page 4.

<sup>5</sup> Government of British Columbia, “Extreme Heat and Human Mortality: A Review of Heat-Related Deaths in B.C. in Summer 2021” at page 13.

<sup>6</sup> Government of British Columbia, “Extreme Heat and Human Mortality: A Review of Heat-Related Deaths in B.C. in Summer 2021” at page 14.

<sup>7</sup> Government of British Columbia, “Extreme Heat and Human Mortality: A Review of Heat-Related Deaths in B.C. in Summer 2021” at page 17

<sup>8</sup> Government of British Columbia, “Extreme Heat and Human Mortality: A Review of Heat-Related Deaths in B.C. in Summer 2021” at page 5.

<sup>9</sup> Santé Montreal, “Heat Wave Summer 2018 in Montreal”, online: [https://santemontreal.qc.ca/fileadmin/fichiers/professionnels/DRSP/Directeur/Rapports/Resume\\_EnqueteChaleurMtl\\_2018\\_Ang\\_lais.pdf](https://santemontreal.qc.ca/fileadmin/fichiers/professionnels/DRSP/Directeur/Rapports/Resume_EnqueteChaleurMtl_2018_Ang_lais.pdf) at page 1

<sup>10</sup> Santé Montreal, “Heat Wave Summer 2018 in Montreal” at page 1.

<sup>11</sup> Center-Sud-de-l’Île-de-Montréal Integrated University Health and Social Services Center, “Heat Wave: July 2018 – Montreal Preliminary Assessment”, online: [https://santemontreal.qc.ca/fileadmin/fichiers/actualites/2018/07\\_juillet/BilanCanicule2018VF.pdf](https://santemontreal.qc.ca/fileadmin/fichiers/actualites/2018/07_juillet/BilanCanicule2018VF.pdf) at page 2.

<sup>12</sup> Santé Montreal, “Heat Wave Summer 2018 in Montreal” at page 1.

Research shows that air conditioning is one of the most effective tools for preventing heat-related mortality. A 2025 study published in JAMA Internal Medicine found that during extreme heat events, mortality rates were significantly higher in Ontario long-term care homes without air conditioning compared to homes with air conditioning. The study estimated that air conditioning mandates in Ontario long-term care facilities saved approximately 33 lives between 2020 and 2023, and that 131 deaths could have been prevented had the mandate been introduced a decade earlier.<sup>13</sup>

### ***Residential Air Conditioning Pilot Program is First Step to Address Extreme Heat in Tenant Housing***

We are writing City Council to strongly support adoption of Item 14, Report Number 38, Item 1, Option 2: the adoption of a \$17,000 residential air-conditioner pilot program.

Report Number 26-126 highlights that \$17,000, funded by the Environmental Reserve Fund, could fund approximately 35 air conditioning units for vulnerable Kingston seniors. United Way volunteers have offered to support the distribution and installation of the air conditioning units.<sup>14</sup>

The proposed program eligibility would be:

- Age 65 or older
- A resident of Kingston
- Low-Income (Statistics Canada after tax Low-Income Measure) plus 15%)
- Resident in a Multi-Residential unit
- Self-declaration if they were advised by a medical professional to acquire an air conditioner to address an existing medical condition.

This is a modest proposal to assess the viability of a free air conditioner program. City staff have appropriately recognized that the need for indoor cooling is far greater than 35 households. The issue is so urgent and the evidence is so well understood that further delay is not warranted. Any senior that receives an air conditioner will be safer and healthier this summer. City Council can then assess a broad expansion of this program.

### C. Conclusion

Although low-income communities across the City of Kingston are not responsible for climate change, they are disproportionately impacted by its effects. Climate change is causing extreme heat events to become more frequent, more lengthy and more severe. Extreme heat can be deadly, particularly in rental housing with no cooling infrastructure in place and where indoor temperatures soar above 26 degrees Celsius for long periods of time.

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<sup>13</sup> Gabrielle M. Katz et al., “Air Conditioning in Nursing Homes and Mortality During Extreme Heat”, JAMA Intern. Med., 2026; 186(2), 243-251.

<[https://jamanetwork.com/journals/jamainternalmedicine/fullarticle/2842680?utm\\_campaign=articlePDF&utm\\_medium=articlePDFlink&utm\\_source=articlePDF&utm\\_content=jamainternmed.2025.6595](https://jamanetwork.com/journals/jamainternalmedicine/fullarticle/2842680?utm_campaign=articlePDF&utm_medium=articlePDFlink&utm_source=articlePDF&utm_content=jamainternmed.2025.6595)>

<sup>14</sup> Report Number 26-126, p 8, Online at <[eScribe Agenda Package](#)>

Making air conditioning accessible to those who cannot afford it is only one part of the solution. In a warming climate, tenants need to be protected from extreme heat just like they are currently protected from extreme cold – by a municipal property standard which sets a maximum temperature of 26 degrees Celsius in all rental units.

This pilot program is an important first step to address the very serious health risks of indoor heat for low-income seniors living without air conditioning, and the unfairness of who is most impacted by climate change. We strongly support its adoption for summer 2026.

Yours Truly,

A handwritten signature in blue ink that reads "Jacqueline Wilson". The signature is fluid and cursive, with the first name being more prominent than the last.

Jacqueline Wilson  
Counsel  
Canadian Environmental Law Association