

Planning and Housing Committee

City of Toronto
100 Queen St W
Toronto, ON
M5H 2N2

December 04, 2024

PH17.5 - Establishing a Framework to Address Excessive Indoor Temperatures in Leased Residential Premises

Dear Planning and Housing Committee Members,

The Atmospheric Fund (TAF) is a regional climate agency based in the Greater Toronto and Hamilton Area (GTHA) supporting a net-zero future. We strongly support the proposed recommendations to address extreme heat exposure and improve thermal safety for tenants through the introduction of maximum temperature standards for leased residential buildings and cooling rooms. This initiative will support the City in achieving its TransformTO goals.

Stakeholder consultation is a crucial aspect of this process, and we support the City's commitment to consulting with tenants from communities most impacted by extreme heat, including residents in social housing, people with disabilities, and seniors, during the next phase of this process.

We also appreciate the City's intention to coordinate compliance and implementation timelines with the City's Building Emissions Performance Standards (BEPS) and the TransformTO Net Zero Strategy. This integrated approach will help foster greater integration between these policies and avoid the duplication of efforts.

Recommendations for Equitable Implementation

With the next staff report set for Q4 2025, we recommend including draft by-law language as part of the report. This will provide clarity for stakeholders, allow industry to plan better for oncoming changes, accelerate the policy development process, and enable better coordination with the City's BEPS. To inform the development of the by-law, we recommend the following:

- **Predictable, Phased Implementation:** Design the bylaw with a phased approach and provide support programs for building owners to facilitate compliance.
- **Education on Heat Pump Benefits:** Provide resources to help building owners understand the long-term benefits and cost savings of heat pump retrofits. These retrofits not only reduce emissions by enabling fuel switching but also offer a dual benefit of cooling spaces and addressing extreme heat.
- **Support for Vulnerable Communities:**
 - Identify and prioritize cooling solutions for the most vulnerable populations in the city.
 - Ensure round-the-clock access to cooling, with in-suite cooling solutions as a primary goal.

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- Define programs to assist low-income tenants with cooling costs and ensure landlords cannot pass additional costs to tenants without safeguards.
 - **Clear Landlord Responsibilities:** Outline specific responsibilities for landlords in maintaining and repairing cooling equipment, supported by a robust compliance framework.

Climate Co-Benefits

The building sector is the primary source of GHG emissions in Toronto, contributing [59% of the city-wide total in 2023](#). The installation of heat pumps, as part of fuel switching from natural gas to lower emission electricity, provides the complementary benefit of mitigating excessive indoor temperatures. **Installing heat pumps can provide a cooling system to buildings that do not already have one.**

Conclusion

We strongly support the City's efforts to introduce a maximum temperature standard of 26°C and urge Council to consider our recommendations to ensure equitable, effective, and climate-conscious implementation. Furthermore, we recommend that staff report back in Q4 2025 with language on a draft version of a maximum temperature by-law. Toronto has taken strong leadership on climate action, setting an example for municipalities across Ontario and Canada. We remain committed to supporting the City in achieving its climate targets and fostering a green, resilient community.

Sincerely,



Bryan Purcell
VP Policy & Programs, The Atmospheric Fund

About The Atmospheric Fund

The Atmospheric Fund (TAF) is a regional climate agency that invests in low-carbon solutions for the Greater Toronto and Hamilton Area (GTHA) and helps scale them up for broad implementation. We are experienced leaders and collaborate with stakeholders in the private, public, and non-profit sectors who have ideas and opportunities for reducing carbon emissions. Supported by endowment funds, we advance the most promising concepts by investing, providing grants, influencing policies, and running programs. We're particularly interested in ideas that offer benefits in addition to carbon reduction such as improving people's health, creating local jobs, boosting urban resiliency, and contributing to a fair society.