



# **MAXIMUM TEMPERATURE IN RENTAL UNITS PUBLIC CONSULTATION**

FINAL REPORT  
OCTOBER 31, 2025

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# OBJECTIVE

## **Implementing a maximum indoor air temperature requirement in Toronto rental units.**

Understanding the need to protect tenants from extreme indoor heat in the summer, in December 2024, Toronto City Council endorsed establishing a health-based maximum indoor air temperature requirement in rental units.

In summer 2025, the City commissioned Environics Research to conduct a series of consultation activities with the public regarding implementing a maximum indoor air temperature requirement of 26 degrees Celsius in leased residential premises and cooled amenity spaces in order to identify next steps in implementation.

As the climate continues to change, the risk of heat-related health impacts is expected to increase. This is especially concerning for tenants who don't have air conditioning or other cooling equipment. To ensure the implementation of this new by-law is informed by those that will be directly impacted, while reflecting the complexity of the issue and the diversity of perspectives, Environics consulted the following groups:

- Diverse groups of residents/tenants across the City of Toronto
- Landlords and property owners/managers including those operating RentSafeTO buildings
- Community organizations, Legal professionals and those representing vulnerable populations
- Medical professionals & healthcare practitioners
- Environmental organizations
- Subject-matter experts

# RESEARCH METHODS

## Engaging tenants facing a higher risk of heat-related impacts.

To reach tenants who face a higher risk of heat-related impacts and establish an open and honest environment for engagement, Environics collaborated with organizations working directly with tenants who are also seniors, immigrants, newcomers, 2SLGBTQIA+, and people with low-income, disabilities, or other health conditions to recruit participants for the consultation activities.

## Environics consulted a total of 59 individuals from impacted parties through a variety of consultation methods.

- **Pre-consultation interviews:** Six interviews were conducted in July 2025 with representatives of different impacted parties, including environmental and tenant advocacy organizations, and rental building associations, to inform the design of the consultation activities.
- **In-depth interviews:** Online interviews with 29 participants conducted from August to September 2025, including tenants, landlords, and property managers of various rental property types and sizes (from large corporations to small 'mom and pop' landlords), representatives from tenant or landlord associations, advocates representing marginalized and vulnerable tenant communities mentioned above, housing and environmental legal professionals, medical professionals, and green building professionals.
- **Focus groups:** Four group discussions were conducted with 24 participants:
  1. September 3 online via Zoom with 6 low- and moderate-income tenants
  2. September 4 at Environics' Toronto office with 6 property owners/managers
  3. September 4 at Environics' Toronto office with 8 tenants
  4. September 18 at the 519 with 4 tenants – this community session was hosted by the 519 in collaboration with Environics Research.

# RESEARCH METHODS CONT'D

## **The City of Toronto also hosted an open-link survey, which received 1,817 responses.**

The City hosted an open-link online survey on its website, between August 11 to September 8, 2025, to gather widespread feedback on the consultation topics.

Not all questions were mandatory so the survey was completed fully or partially (i.e., answered some of the questions but not all) by 1,733 property owners, property managers/ operators/ superintendents, landlords, landlord association, property management group, or building advocacy group representatives, tenants, tenant association members/representatives, and representatives of environmental or legal groups in Toronto. The final sample excludes 84 individuals who selected only homeowners or condo owners but were not landlords at the beginning of the survey, as they were terminated after answering the screening questions and answered none of the main body questions. **The profile of participants in the survey is presented at the back of this report.**

### **About this report.**

This report primarily focuses on the findings from the consultation activities conducted by Environics (i.e., the interviews and focus groups), with summaries of the perceptions of the participants toward each policy and action proposed by the City, including specific benefits, concerns, and suggestions. Direct quotations were also selected to contextualize and support the summaries. Findings from the open-link survey are complementary to the consultation findings. Although it can be useful to quantify perceptions, because the survey was open to the public via self-selection, the sample cannot be considered random or representative of the target audience. Direct quotations from some of the open-ended survey questions are also included to contextualize the survey results.

*NOTE: Throughout this report, the results of the open-link survey are based on those who answered the question (which in many cases is less than the entire sample).*

# POTENTIAL ACTIONS

The following items were presented to participants to gather their input on potential actions the City of Toronto may take to implement the maximum indoor air temperature standard.

## **1. Core measure: Mandating maximum temperature in at least one room per rental unit.**

City staff are exploring how to achieve a maximum indoor temperature requirement of 26 C in all rental units. This could mean that all rental units are required to have *at least one bedroom or living room* kept no higher than 26 degrees Celsius from June – September of each year.

## **2. Timeline: 2030 implementation of the standard.**

The City is considering a 2030 implementation of requiring every rental unit to meet the standard. This timeline aims to balance urgency with the time needed for building renovations, construction, and retrofits that may be needed to install active cooling equipment.

## **3. Interim measure: Mandating apartment buildings keep one indoor amenity space cool.**

As a more immediate step, City staff are considering requiring apartment buildings registered with RentSafeTO to keep an indoor amenity space, like a party room or a common room, cool during summer months (if they have one):

## **4. Building Stock Analysis: In-depth look at the costs and types of upgrades needed, and the impact on rent.**

City staff are considering the need for a more comprehensive look into the costs associated with renovations or retrofits that landlords will need to undertake to begin providing cooling. There is a need for a better understanding of what actions rental housing providers will take to comply with the Core Measure, how costs associated with these actions may vary across building/unit type, and how those costs will or will not be passed onto tenants (e.g., through lease turnover or AGI potential).

# EXECUTIVE SUMMARY: KEY TAKEAWAY

**Impacted parties support a thoughtful and practical implementation that avoids worsening existing challenges such as affordability and health issues.**

**The implementation timeline will need to consider varying levels of perceived urgency – some call for urgent solutions, others feel it can be more long-term.**

# EXECUTIVE SUMMARY

- 1 High support for the core measure, especially among tenants.**  
Tenants, community advocates, and subject-matter experts strongly support a maximum indoor air temperature in rental units. Their support is rooted in protecting public health and ensuring habitable living conditions now, and in the future. Although many community groups think the policy is necessary, rental housing providers express hesitancy and concern about the feasibility, signaling potential resistance.
- 2 Inclusion of accountability measures will be critical.**  
Multiple impacted parties were curious about which mechanisms will be put in place to monitor compliance and address concerns or unique situations that may arise once the standard is in place. Both tenants and housing providers want to see processes and channels in place for them to raise concerns, complaints, or issues with compliance.
- 3 Prioritize the most vulnerable through a phased approach.**  
Tenants understand that some of the changes required to implement the standard can take time, but they also express high urgency for solutions. They emphasized the need to prioritize those who are at higher risk of heat-related impacts, affordability and accessibility challenges, first.
- 4 Reflecting different types of housing can help with buy-in from housing providers.**  
Rental providers want the policy to reflect the diversity of Toronto's housing stock and include provisions for different types of housing. They see case-by-case flexibility as critical for guiding upgrades and ensuring the standard is implemented fairly across different building types. The case-by-case approach is especially important to small landlords who worry they cannot implement changes quickly enough for compliance.

# EXECUTIVE SUMMARY CONT'D

- 4 **Cost concerns are top-of-mind across impacted parties.**  
All groups agree costs are a critical barrier. Tenants worry about the impact on their cost of living (rent increases and utility bills) while landlords fear major renovation expenses and the impact on their profit margins. There is consensus that government subsidies and targeted supports will be essential to make the standard workable and equitable.
- 5 **Collaboration is seen as necessary for a sustainable implementation.**  
Participants worry about this standard being implemented in a silo; they urge the City to consider other complementary efforts and pursue collaborative approaches that pair active cooling with passive, sustainable measures to reduce reliance on more expensive and energy-intensive active cooling measures that also advances net-zero goals.
- 6 **Awareness and education are seen as beneficial for effective cooling.**  
Education campaigns for both tenants and housing providers are seen as key for achieving cool indoor temperatures in all units. Sharing best practices, education on passive cooling strategies, and guidance on how to adapt to extreme heat can increase effectiveness and support compliance.

# ACTION 1 CORE MEASURE

# Core Measure

## Overall Support: High

**Support for establishing a maximum indoor air temperature of 26°C in at least one room for all rental units is high. Tenants and community groups are more likely to be very supportive. Property managers and landlords are more likely to be unsupportive.**

### Reasons for support:

- Protecting health & safety during heat waves
- Ensuring equity, especially for vulnerable populations
- Increasing comfort and habitable living conditions
- Environmental benefits if green upgrades are encouraged

### Concerns/Reasons for lower support:

- 'One-size fits all' approach and feasibility of quickly carrying out associated renovations/retrofits in different dwelling types.
- Lack of clarity over who will bear the brunt of the costs associated with implementing and meeting the new standard
- Challenges with enforcement and monitoring compliance

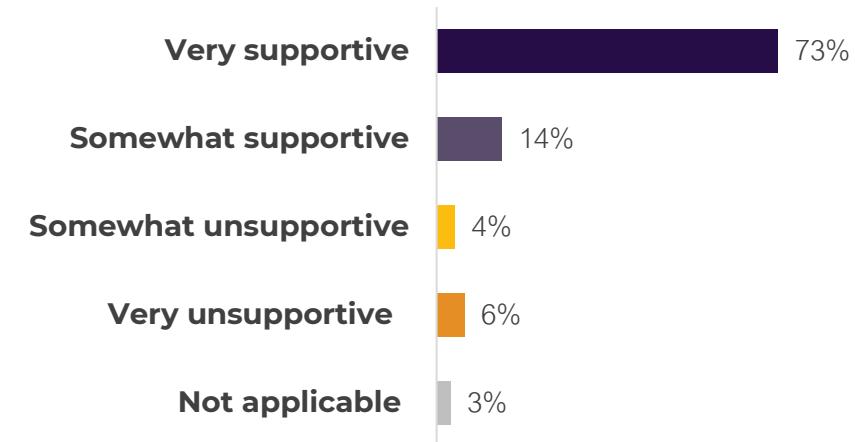
### Considerations for implementing the mandate:

- Phased approach to account for the variety of different dwelling types and technical limitations.
- Prioritizing vulnerable populations who are at higher risk
- Financial support for building upgrades and low-income tenants

### Level Of Support For 26°C

*City staff are exploring challenges and opportunities to achieve a maximum indoor temperature requirement of 26 degrees Celsius in all rental units by 2030. This could mean that all rental units have at least one room that is kept cool during the summer. It would most likely require upgrades (construction/renovations) to buildings that currently do not have cooling equipment, such as air conditioning. 5a. Please indicate your level of support.*

*Base: Those who responded to the question (n=1385).*



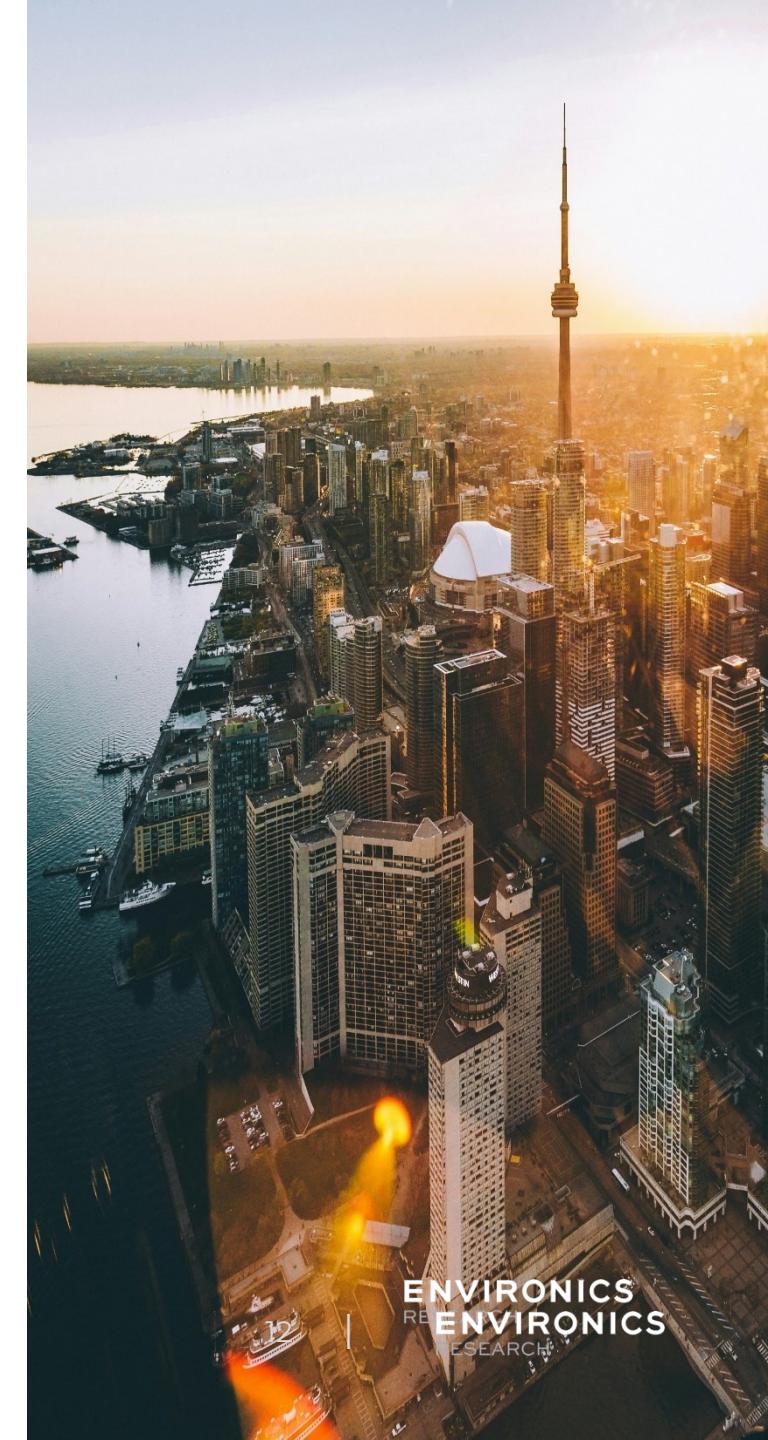
# Core Measure Key Benefits

**Support for the core measure is high – especially among residents, community groups, and medical professionals. Key benefits revolve around protecting human health and enabling comfortable living situations year-round.**

**Tenants see the core measure as a necessary step for habitable living conditions and protecting human health against climate impacts:** They think it will improve quality of life and prevent further health risks. Medical professionals and community organizations see extreme heat disproportionately impacting vulnerable populations. With the number of extreme heat events expected to increase, they see this measure as a way to prevent deaths and ensure safe, habitable, living conditions in homes. Many participants referenced the British Columbia (BC) heat dome deaths of 2021 as a warning, thinking a measure like this could help prevent what happened in BC.

**Legal professionals and community representatives have been advocating for a measure like this because it reduces the onus on tenants and promotes accountability of landlords:** They see this as a similar measure to the minimum indoor air temperature that protects tenants from extreme cold in the winter season, and appreciate the clarity and accountability that a set maximum temperature brings as a legal framework.

**While it is primarily a health-based measure, it is also associated with environmental benefits:** Many participants see this measure as complementary to the Toronto Net Zero Buildings initiative if a long-term, sustainable green retrofit approach is taken, which would improve cooling and reduce emissions.



# Core Measure Benefits: In Their Words

## Reasons For Support of the Maximum Indoor Air Temperature Mandate

“ Absolutely, there are benefits. I mean, climate change is real, and it's going to start really impacting us. Every winter and every summer, with snowfall and rain events; and with flooding events and extended heat. I think it's absolutely reasonable that the city provides a baseline.

It does nobody any good to wear out equipment because it's working so hard in order to maintain a temperature in a building that's leaking all over the place, and that's true for winter and for summer.

**VERBATIM SOURCE:** PROPERTY MANAGER

“ Technology changes, society's expectations change, and our environment also changes. Then those standards evolve, and we're at that point now, where climate change is making extreme heat a bigger and bigger risk to people. It makes perfect sense that our standards and expectations would change. And we also have all these technological solutions that we know exist, right?

**VERBATIM SOURCE:** LEGAL PROFESSIONAL

“ I think I'm mostly seeing positives. I mean, I think that in a changing climate situation, we are going to see more extreme heat days. That is going to lead to hospitalizations and or deaths.

**VERBATIM SOURCE:** LEGAL PROFESSIONAL

Is health protective, 26 degrees and lower. When the indoor air temperature is kept below that, we know that mortality drops.

Put a figure on preventable hospitalizations from heat related illness, which I think some studies are trying to do, and then you weigh it against the cost of providing air conditioning to all these units, I think it'll pay off in dividends.

**VERBATIM SOURCE:** MEDICAL PROFESSIONAL

“ I think it's a big benefit. When they had the air conditioning, you won't be so humid and damp. You won't get mold... And then they affect your health.

**VERBATIM SOURCE:** TENANT

# Core Measure Concerns & Considerations

Overall support for the core measure is high but there are concerns over how the measure will be implemented. Cost, feasibility, and enforcement are top of mind for all impacted parties. Concerns of all types were strongest among property managers and landlords.

## Cost Concerns: VERY HIGH

All impacted parties expressed concerns over how meeting this standard will be funded.

### Tenant/Community Organization Concerns:

- Costs associated with this standard could harm affordability and worsen the cost-of-living
- Investment in cooling equipment could result in above-guideline rent increases
- Additional utility expenses will be incurred when using new cooling equipment
- Complicated criteria and long wait times for any potential government support for vulnerable tenants

### Landlord/Property Manager Concerns

- Scale and scope of upgrades needed to comply with the standard
- Tenant displacement as a result of major construction, especially for landlords of multi-unit rental houses
- Difficulties in applying and enforcing above-guideline rent increases to cover the investments in renovations and retrofits
- Ongoing maintenance costs and profitability over time



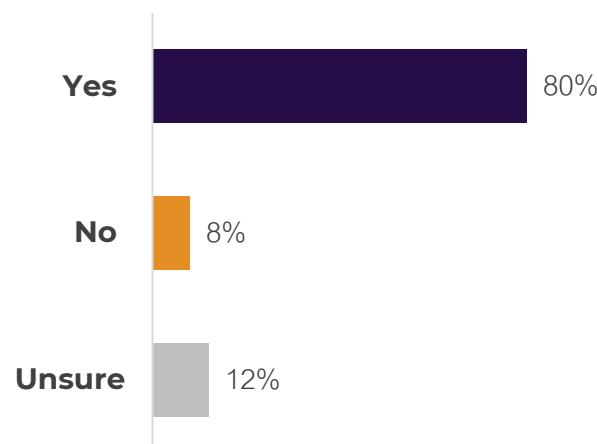
# Core Measure Cost Concerns

**Most landlords (80%) say they will try to pass the costs of meeting the standard onto tenants, however; many tenants are not supportive of the costs being passed down to them.**

## Landlord Intent to Pass Costs To Tenants

6c. Would you or your organization seek to pass costs to tenants as a result of undertaking these measures?

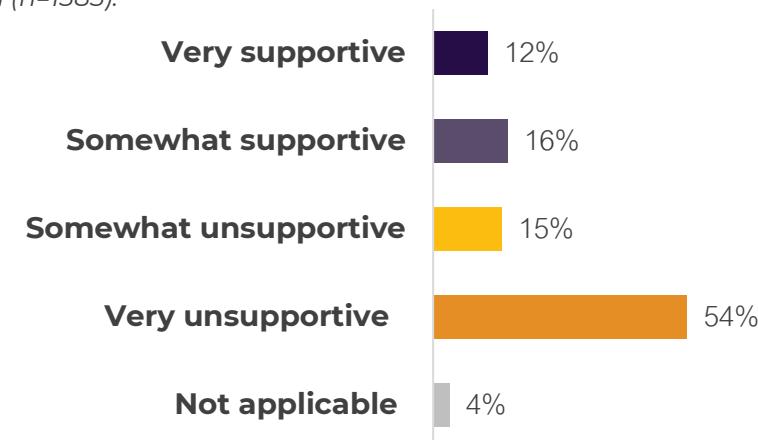
Base: Property owner, property manager/operator/superintendent, landlord, landlord association, property management group, and building advocate representative who responded to this question (n=110).



## Tenant Reaction to Raising Rent Above Rent-Control

5b. For certain types of eligible capital costs (e.g., significant renovation), property owners/landlords may apply to the Landlord and Tenant Board to raise the rent above the rent-controlled guideline amount. Please indicate your level of support given this possibility.

Base: Tenant or tenant association member/representative who responded to this question (n=1385).



# Core Measure Passing Costs To Tenants

## Ways That Housing Providers Plan to Passed Costs to Tenants

6d. How would you seek to pass these costs?

Base: Property owner, property manager/operator/superintendent, landlord, landlord association, property management group, and building advocate representative who responded to this question (n=59).

“Expectation is that the City would allow for rent increases for this ABOVE & BEYOND the current permitted increases. Annual permitted rate increase should be consistent with the cost of the equipment divided by expected useful life, PLUS cost of maintenance & electricity each year.

**VERBATIM SOURCE:** LANDLORD

“Any way legally we can. We're not a charity. We make our money from property rental. That pays our bills.

**VERBATIM SOURCE:** PROPERTY OWNER

## Reasons For Being Unsupportive Of Passing Costs To Tenants

5b. Please explain why.

Base: Tenant or tenant association member/representative who responded “Somewhat Unsupportive” or “Very Unsupportive” to 5b (n=955).

“The buildings most in need of climate retrofits are the oldest ones with the lowest income tenants. These buildings are in many cases already paid off and the cost of retrofits should not be borne by tenants already buckling under the pressures of a cost of living crisis. In my opinion provision of a safe temperature range falls under the landlord's responsibility to keep the unit in a safe and habitable condition, and anything less means a tenant is not getting what they are paying for.

**VERBATIM SOURCE:** TENANT ASSOCIATION MEMBER/REPRESENTATIVE

“Increasing rent for something that's needed in the long run doesn't sound right.

**VERBATIM SOURCE:** TENANT

# Core Measure **Other Concerns & Considerations**

**In addition to cost implications, concerns about feasibility and enforcement are common.**

## **Feasibility Concerns: HIGH**

- Housing providers are worried about a 'one-size-fits-all' approach as upgrade needs vary across dwelling types.
- Landlords and tenants of multi-unit rental houses do not think that implementing the requirement in only one room applies to them, as each room is often a unit.
- Building owners and managers raised challenges with the technical feasibility of cooling all units in older buildings.
- All impacted parties are concerned over the increased reliance on electricity and the strain on the capacity of individual units, buildings, and the City's electricity grid as a whole. Many worried what would happen if a brownout occurred during a heatwave.

## **Enforcement Concerns: MODERATE**

Both tenants and landlords expressed concerns about the policy being difficult to enforce evenly.

- They raised questions as to who would be responsible for monitoring compliance and how they could issue complaints for non-compliance.
- Both parties are curious how this policy will work during heatwaves in case temperatures rise above the maximum.
- They worry about the City's capacity to handle complaints.
- Landlords also worry about being fined or facing consequences because a tenant prefers a warmer than the maximum indoor temperature.



# Core Measure Concerns: In Their Words

## Feasibility and Enforcement Concerns

“ And portables do not work. We've used them for now two years. They double our hydro bill, and we pay the hydro, not the landlord. It's always blowing. The power's going out, and we have to restart.

**VERBATIM SOURCE:** TENANT

“ The legacy buildings, which make up 90% of the stock, don't have it (central air control)... So, that would mean quite significant upgrades, renovations, and there are a lot of considerations and costs with that as well.

**VERBATIM SOURCE:** PROPERTY OWNER/MANAGER

“ What about any processes for tenants to be able to raise complaints? There's the RentSafeTO system and they're pretty good with their turnarounds right now. But if the system has more added to its plate around cooling, the wait times are going to increase.

**VERBATIM SOURCE:** TENANT

“ And they pull out a thermometer and say it exceeds 26 degrees in this room, but the inspector sees a portable air conditioning unit on the floor, not in use. So, then, who would a penalty be assessed to? The owner?

**VERBATIM SOURCE:** PROPERTY OWNER/MANAGER

“ Even central air conditioning systems can break down. There probably needs to be better guidance and better protection from the city for property managers to do what they should do to restore it.

**VERBATIM SOURCE:** TENANT

“ We don't do a lot of full unit displacements. It's difficult because there's nowhere for them (tenants) to go. We have never required tenants to vacate in order to do repairs. We wait till turnover.

**VERBATIM SOURCE:** PROPERTY OWNER/MANAGER

# Core Measure Suggestions

**While discussing their concerns, participants also shared their ideas for supporting the implementation of the core measure or making the implementation more equitable.**

## **1. Phased approach prioritizing those who are most at-risk**

This could be a large undertaking, so prioritizing those who need solutions more urgently might be more practical. Rental housing providers support a phased approach because they see it as a way to account for building diversity and technical limitations. Some property managers think focusing on everyone at once is excessive, but support focusing on those who need cooling but cannot access or afford it themselves.

## **2. Subsidies for both tenants and housing providers**

Both sides want subsidies to offset the cost of implementing and using active cooling. Some think it unreasonable to pit cost/health against each other. Many stress that financial support for building upgrades and low-income tenants may be required for a fair and successful implementation. Participants think collaborating with other government departments could increase access to government funding.

## **3. Utilize existing infrastructure/processes to implement and enforce**

Some participants suggested using processes that are already in place to help with the implementation. For example, looking at how the minimum temperature requirement in the winter was implemented and enforced as a model. It was suggested to use RentSafeTO inspections to help with enforcement and monitoring progress – they said the inspectors could be educated on the policy and check for compliance during their regular inspections.



# Core Measure Suggestions Cont'd.

## **4. Tenant awareness and education to increase intended outcomes**

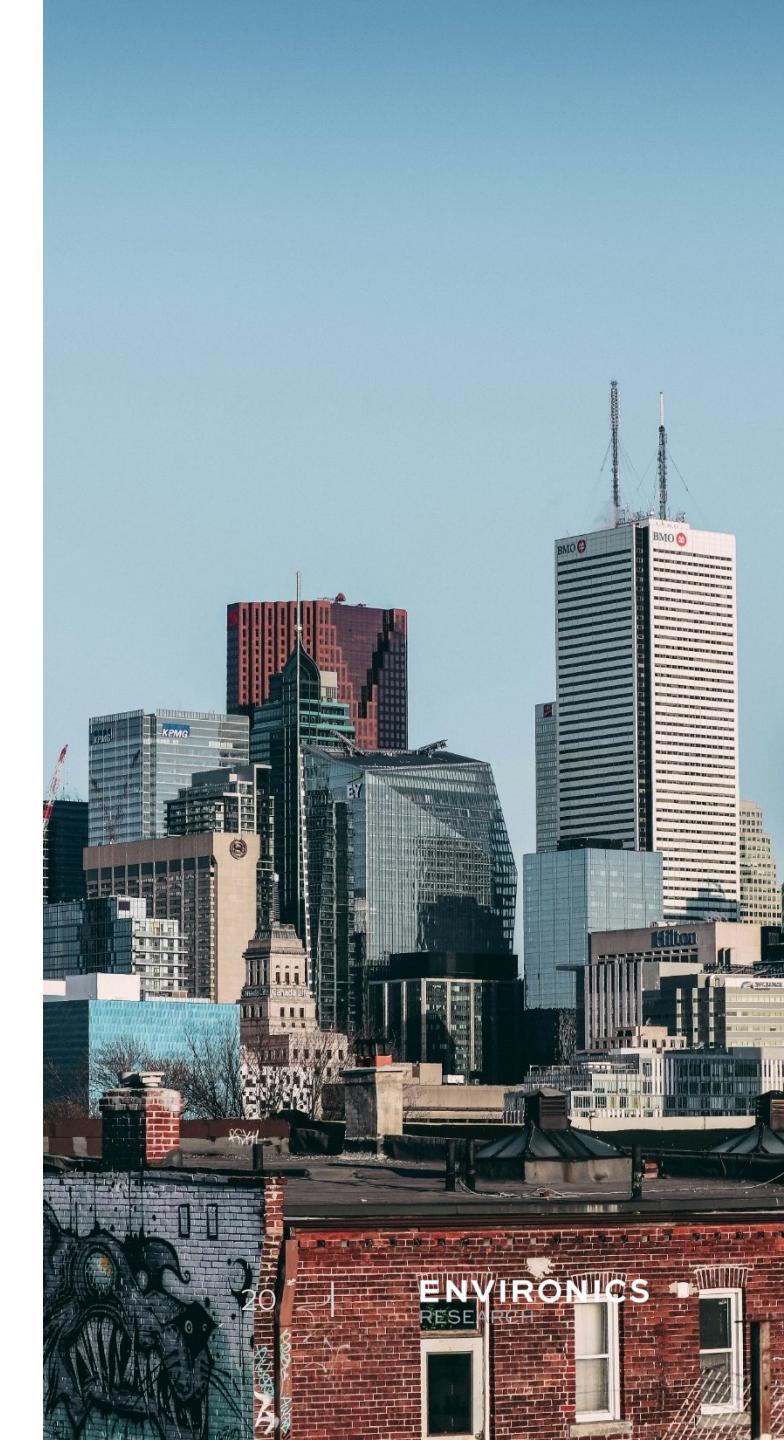
Landlords recognize that not all tenants are aware of actions they can take to reduce excessive heat in their homes. They think education on how to handle high temperatures (i.e., use of windows, ovens, etc.) should be a key part of this initiative. Tenants also saw the value in learning more about best practices and passive cooling measures they can take themselves.

## **5. Incentivize environmentally friendly actions**

Though support for this policy is high among tenants, they also do not want to see negative impacts on the environment. Many participants see the value in incentivizing upgrades like heat pumps instead of widely installing AC units, but acknowledge the cost implications and other factors that will influence the possible upgrades. Similarly, participants think the City should invest in passive cooling to reduce the reliance on active cooling measures.

## **6. Build accountability into the plan**

Some tenants worry that landlords/property managers won't take sufficient action, or will find loopholes if the policy does not include accountability. They think it will be important for landlords to have to include proof of progress or proof of upgrades being made.



# Core Measure Suggestions: In Their Words

## Suggestions for Making the Implementation More Practical and Equitable

“A short term solution will be at least getting one unit by next summer, with an air conditioning option available, and then they can work on getting the air conditioning or the cooling the whole unit in a couple of years after that.

**VERBATIM SOURCE:** TENANT ADVOCATE

“None of this can be in isolation of one another, so if you're doing something at the municipal level, you really need to work with the provincial government on this... I think there are programs that exist, but we need to figure out how to work together here.

**VERBATIM SOURCE:** LEGAL PROFESSIONAL

“Because it's a massive task, if you can start adding to their (landlords) plate that they need to have the resources to be able to do that... There needs to be more (operators/superintendents) on the ground, showing up at doors, holding the accountability to one.

**VERBATIM SOURCE:** TENANT

“There are a lot of changes to the built environment that can be made that don't involve installing air conditioners that will cool down apartment buildings, like a green roof.

**VERBATIM SOURCE:** MEDICAL PROFESSIONAL

“Whenever the City passes a bylaw, they don't really take into account small landlords... It would be important for implementing something like this to make sure that there are considerations that make it more possible for small landlords.

**VERBATIM SOURCE:** LANDLORD

“Residents got educated when we started sorting garbage, right? It has been a success in other aspects, so this can be the success as well.

**VERBATIM SOURCE:** PROPERTY OWNER/MANAGER

# ACTION 2 2030 IMPLEMENTATION

# 2030 Implementation Support Level: Divided

**The public is generally unsatisfied with a 2030 implementation timeline – with different impacted parties expressing strong opinions on opposite sides of the spectrum, tenants think 2030 is too far, while housing providers think 2030 is too soon.**

## Reasons for sooner implementation:

- Urgent need for improvements before next summer (2026)
- Progress helps prevent health impacts
- Seeing solutions and ideal outcomes sooner

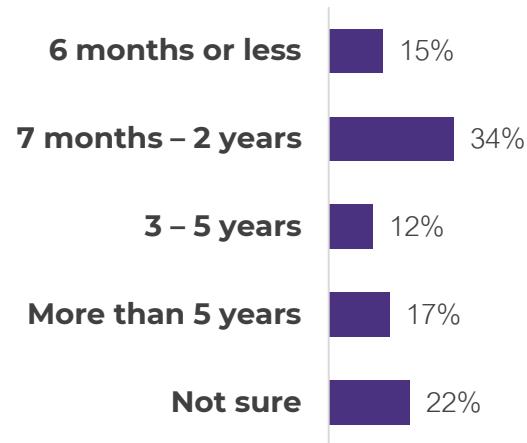
## Reasons for later implementation:

- More time to strategize and create plans that make sense in the long-term, or complement other initiatives like Net Zero Building Emissions
- More time for intensive constructions or upgrades to be completed

## Length Of Implementation

6e. How long would these measures take to fully implement?

Base: Property owner, property manager/operator/superintendent, landlord, landlord association, property management group, and building advocate representative who responded to this question (n=108).



# 2030 Implementation Reasons For Sooner

## **“2030 is too far” viewpoint common among tenants and advocates.**

While it is seen as a long-term and forward-looking measure, it is also seen as very urgent. Tenants have had varying levels of challenges with extreme heat but those who have experienced the impacts first-hand say they need to see solutions like this being put in place as soon as possible. Many participants referenced the BC heat dome deaths of 2021 as a warning, thinking a measure like this could help prevent what happened in British Columbia. They worry that landlords won't act until closer to 2030, leaving them with 5 years with minimal progress or solutions.

As a result, tenants and advocates widely support the need for a firm, enforceable timeline and urge immediate actions. Some tenants wish changes could happen “as soon as possible.” Advocacy for an enforceable measure and timeline is often paired with calls for social supports to avoid negative impacts on the most vulnerable residents.

They also caution that widespread adoption of air conditioning, without careful planning and support, could potentially undermine environmental goals and deepen the root causes of environmental injustice.



Ideally, I know this takes time to create the bylaw. There are consultations involved, etc. We've been fighting for this for years. Ideally, I would like to see the City [to] work on it throughout the winter and spring so that by the next heat wave, we have a solid plan in place so that there can be better protections.

Even young people, because we have no air conditioning, they can't sleep at night; it's not just the seniors. You need the rest, but you can't, because it's too hot to sleep. So, it needs to be done soon.

5 years? We already know from this past summer how hot it's been.

**VERBATIM SOURCE:** TENANT



I have anecdotes in my emails that came from people being like... I'm really struggling. I can't breathe. I have COPD. I need cool air. I'm seeing these on the ground all day, every day, from people, and there is such a sense of urgency.

**VERBATIM SOURCE:** MEDICAL PROFESSIONAL

# 2030 Implementation Reasons For Later

## **“2030 is too soon” viewpoint common among rental providers.**

Overall, rental housing providers think 5 years is not enough time to understand what changes need to be made, create a plan, and complete the construction that might be necessary to comply with the maximum indoor air temperature requirement. RentSafeTO Property owners and managers think that 2030 doesn't give enough time to renovate older rental buildings lacking modern infrastructure, which make up the majority of their portfolios.

Instead of enforcing a “one-size-fits-all” deadline, many recommend phased approaches to reflect the technical and financial realities of diverse building stock and operational challenges. Small landlords also highlight the overwhelming administrative and financial burdens they may face without City support.

“It really would depend on the type of building and the unit. So some might be very well insulated. Some could have heat pumps or something like that. And there are other strategies like passive versus active strategies, that can be used to reduce [heat risks].

**VERBATIM SOURCE:** PROPERTY OWNER/MANAGER

I would say that is going to vary greatly depending on the small landlord's personal circumstances. I don't think I really have a specific answer in terms of a specific timeline. But I think kind of imposing a strict deadline and having enforcement or penalties would definitely be problematic for our community, because they just don't have the money up front.

**VERBATIM SOURCE:** LANDLORD

“Depending on the extent of the work, sometimes we leave the tenant in place, and other times we just move the entire family out. And from that point, it can take from 1 to 3 months (to renovate several units). So, it's a significant period of time

**VERBATIM SOURCE:** PROPERTY MANAGER

# ACTION 3 INTERIM MEASURE

# Interim Measure Perceived Impact: Low

Cooled amenity spaces in apartment buildings received high support among survey respondents, but the consultation discussions revealed more nuance: although tenants think cooled amenity spaces are nice to have, they do not consider them a real solution to extreme indoor temperatures.

## Reasons for support:

- Immediate relief during heat waves
- Located in buildings
- Social/community benefits, especially for seniors
- Quicker/lower cost implementation compared to core measure, especially for buildings that have a suitable amenity space.

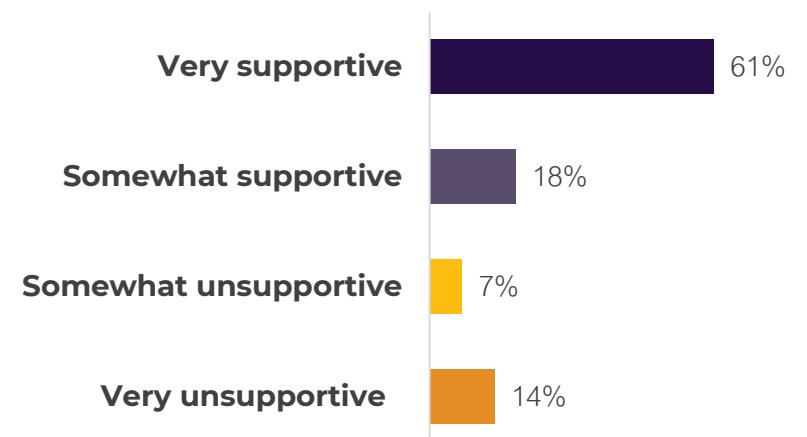
## Concerns/Reasons for low support:

- Accessibility, lack of comfort/privacy
- Perceived effectiveness and usage
- Capacity – one amenity space for a whole building
- Not all buildings have a suitable amenity space, so these tenants would still need to leave their building for relief
- Many buildings meet this criterion already, so it is not seen as much of an improvement to the status quo

On the contrary, landlords and property managers were quite supportive of cooled amenity spaces and less likely to raise any concerns.

## Level of Support for Cooled Amenity Spaces

4b. City staff are considering requiring apartment buildings registered with RentSafeTO that have an indoor amenity space, to keep one space (like a party room or a fitness centre) cooled (at or under 26 degrees Celsius) during the summer months. The space would be available for tenants of the building to use to temporarily cool down. This would be mandatory as of Summer 2026 and would be the first step towards establishing a maximum indoor temperature requirement in rental units. Please indicate your level of support for this potential requirement. Base: Tenant, owner, and manager/operator/superintendent of a RentSafeTO building who responded to this question (n=834).



# Interim Measure Perceived Usage: Low To Moderate

Although 54% of survey respondents say they would use cooled amenity spaces in apartments, tenants in the consultation expect limited usage depending on how comfortable and accessible the amenity spaces are. Those who already have access to amenity spaces reported minimal use.

**Perceived Benefits:** In addition to improved safety and health, cooled amenity spaces are seen to provide social benefits if implemented well, as they could promote a sense of community among residents.

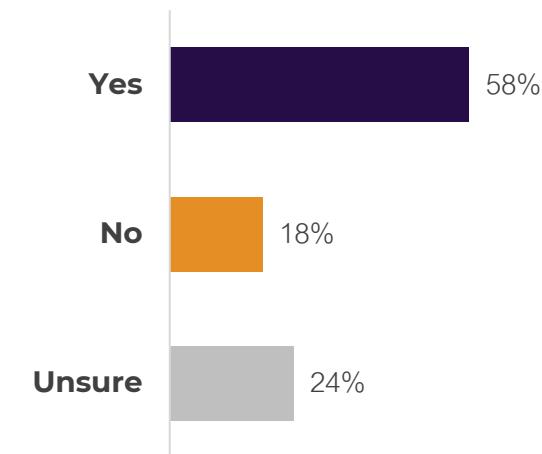
**Barriers to usage:** Tenants expect limited use because they do not think it's practical or realistic to spend their day in a cooled amenity space. Practical considerations, such as delaying work/life commitments, capacity, and a lack of privacy and comfort, are largely raised by tenants. Furthermore, cooled amenity spaces are not seen as inclusive or accessible to those who need them most. Access to these could be difficult for seniors, people receiving home care, and persons with disabilities.

Since cooled amenity spaces also do not prevent overnight heat risks, some participants expressed concern about this interim measure replacing or delaying the core measure. Respondents urge the City to communicate clearly that cooled amenity spaces are only an interim measure, while quickly advancing in-unit cooling.

## Perceived Usage Of Cooled Amenity Spaces

4c. If you are a tenant of a RentSafeTO building, would you use the cooled space?

Base: Tenant of a RentSafeTO building who responded to this question (n=644).



# Interim Measure Concerns: In Their Words

**The cooled amenity spaces are perceived as an insufficient interim solution with accessibility, capacity, and usage limitations. Potential social benefits are mentioned by a few.**

“Instead of coming and doing inspections to make sure landlords are complying with a bylaw like this (mandating the common room), they could put those efforts and money, quite frankly, into assisting landlords, or maybe assisting tenants by providing them with portable AC units.

**VERBATIM SOURCE:** LANDLORD

“Mandating a common place.... should not even be considered, because the most vulnerable people are isolated seniors with disabilities, who will not move into a common space for a variety of reasons.

**VERBATIM SOURCE:** MEDICAL PROFESSIONAL

I really am afraid that landlords might drag this out, citing various barriers and obstacles, and that will become the default norm, which is to have a cooling room.

**VERBATIM SOURCE:** LEGAL PROFESSIONAL

“We have a cooling area in our building. the chairs are hard plastic. It's not a solution. We have seniors who have heart conditions. We have people who are fairly handicapped, so going to those rooms is really out of their ability.

**VERBATIM SOURCE:** TENANT

We're talking about saving lives here, so we're just talking about preventing people from going to the hospital, preventing people from dying, and a cooling room will not fit even a full floor of people, let alone an entire building.

**VERBATIM SOURCE:** TENANT ASSOCIATION

“up to 90 people seating room. And how often do residents use that room?... I mean, all these years, I haven't seen a huge usage of that room.

**VERBATIM SOURCE:** PROPERTY MANAGER

# Interim Measure Concerns: In Their Words

## Reasons For Being Unsupportive Of Cooled Amenity Spaces

4b. Please explain why.

Base: Tenant, owner, and manager/operator/superintendent of a RentSafeTO building who responded "Somewhat Unsupportive" or "Very Unsupportive" to 4b (n=174).

**“** Because tenants should not have to leave their unit in order to cool down, it's a baseline minimum solution to prevent overheating but it's not a feasible long term solution to support daily life. Air Conditioning should be available in all units during summer just as heat is available in the winter months.

**VERBATIM SOURCE:** TENANT

**“** Utilities are paid by the Landlord. This would be an added expense and responsibility. Tenants are supposed to pay to use air conditioning units. Some are refusing to pay. The onus is on the landlord.

**VERBATIM SOURCE:** LANDLORD

**“** This has the unintended risk of removing rental units to bring in a common area cooling space. There are safety concerns as well. Completely unclear how this would be possible within small walk up buildings without common spaces...other than hallways.

**VERBATIM SOURCE:** PROPERTY OWNER

**“** The entire building cannot convene in a single room space to cool down. Each unit needs controlled temperature. Also, tenants have pets that are suffering from extreme heat in the units. Lastly, temperatures overnight are unbearable and disrupt sleep. A cooled space does not solve the problem of an overheating unit at night.

**VERBATIM SOURCE:** TENANT

# Interim Measure Suggestions

Although consultation respondents generally see cooled amenity spaces in apartments as a partial step that offers limited and temporary relief, particularly for the most vulnerable, they suggested ways to make them more inviting and increase usage.

## **Awareness:**

Tenants say they could benefit from knowing about the cooled amenity spaces and the hours of operation. They think it would be useful to not only put posters around buildings, but also to have volunteers or building staff knock on doors and personally invite tenants to the cooled amenity spaces during heat waves.

## **Amenities:**

Tenants express that cooled amenity spaces should be comfortable if they are meant to be places where people can spend hours. Comfortable chairs / seating arrangements and some amenities like TV, coffee machine, good Wi-Fi, etc. can help make the spaces more inviting and practical for people to spend time. The spaces should also be suitable for high volumes of people, as well as accessible to families, children, and seniors.

## **Programming:**

Noting that it may not be ideal for people to spend time in a shared space, especially if they are feeling unwell, some tenants think that it's important to focus on the community and social benefits of cooled amenity spaces. Organizing events or programming to get people there by having a committee or volunteers in the building can help make the spaces feel inviting. This could be especially beneficial for seniors who are dealing with social isolation.



# Interim Measure Benefits & Suggestions: In Their Words

## Perceived Social And Other Benefits And Suggestions On Maximizing Utility

“ I think what I see as good is, obviously it would be a space that's cool for people to go to, and it would be a cheaper sort of measure for landlords than having to put cooling in every unit in their building. And it would be more accessible for most people than the city's cooling centers. I think that it has a lot of benefits from a community building perspective too, because it gives the residents a space to gather.

**VERBATIM SOURCE:** LEGAL PROFESSIONAL

“ Seniors that are socially isolated are even more vulnerable in heat emergencies. So, social connections are a huge concern. Even if you have an amenity room in the building, a senior might need some sort of support or assistance coming down, or someone to check in on them. So, I think that's one aspect that should be considered.

The groups of volunteers that I work with try to knock on doors and get people down, but you do need that mobilization, and somebody to spark that, or something a little bit organized to try to get those seniors who are a little bit more vulnerable to those spaces.

**VERBATIM SOURCE:** TENANT

“ I know that there are a couple of communities where there's a social space or a common space in the building that has air conditioning, and I know one in particular where people definitely do utilize it. It's helpful if you can have a cooling space in the same building, versus having to get out when it's already hot out.

I would use a cooling room in my room because I am very integrated in my community. I want to make that room usable. I love organizing activities...I would also use it to leverage building capacity and community. And make it inviting, because that increases the safety of it, amplifies our voices.

**VERBATIM SOURCE:** TENANT

# ACTION 4

# BUILDING STOCK ANALYSIS

# Building Stock Analysis

## Types Of Cooling Measures

According to rental housing providers, providing portable AC units will be the most common method for meeting the maximum indoor air temperature in-units. However, many are unsure what the best way to meet the standard is and are open to other measures.

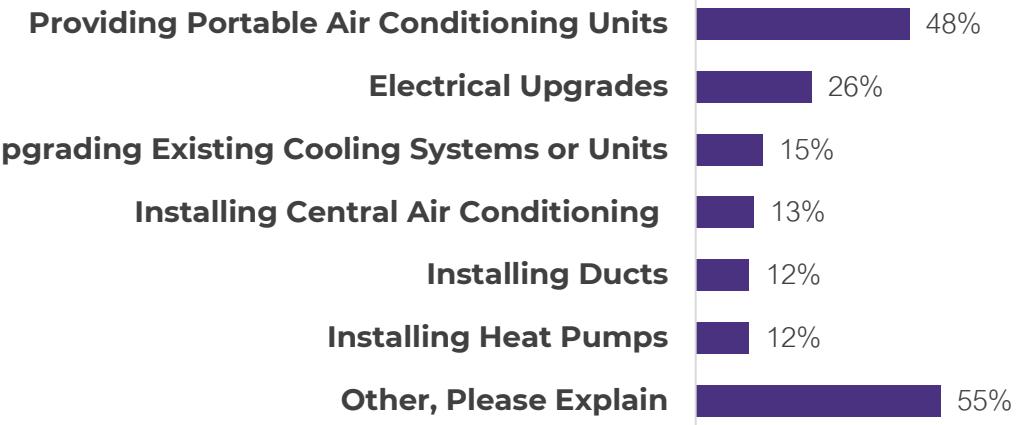
Providing portable AC units was seen as the quickest and least burdensome way to provide individual units with cooling. However, both housing providers and tenants expressed concerns with mass provision of portable AC units – namely electrical constraints and storage of the AC units after summer. Tenants who currently use portable ACs mentioned they are not always effective, especially during heatwaves.

Those who selected 'Other Measures' in the survey are either worried about the scale and scope of upgrades that would be necessary to comply with the new standard, or less supportive of the core measure overall. Small landlords worry that the level of construction needed – especially for older, multi-unit dwellings will put them out of business. Some owners/managers of larger building stock expressed lower support because they prefer the responsibility to fall on tenants, and they worry about the cost of providing cooling measures at scale.

### Active Cooling Measures To Keep At 26°C Or Under

6a. If this temperature requirement comes into effect, what active cooling measures\* would you take for the rental units that you are responsible for to be kept at or under 26 degrees Celsius during the summer months? \*Select all that apply.

Base: Property owner, property manager/operator/superintendent, landlord, landlord association, property management group, and building advocate representative who responded to this question (n=110).



\*Total is over 100% due to this question allowing more than one answer.

# Building Stock Analysis

## Other Measures: In Their Words

### Reasons For Not Selecting The Provided Measures To Keep At 26°C Or Under

6a. If this temperature requirement comes into effect, what active cooling measures\* would you take for the rental units that you are responsible for to be kept at or under 26 degrees Celsius during the summer months? \*Select all that apply.

Base: Property owner, property manager/operator/superintendent, landlord, landlord association, property management group, and building advocate representative who selected “Other, Please Explain” (n=60).

“ I will sell my property to a large corporation since this will only financially ruin small landlords.

**VERBATIM SOURCE:** PROPERTY OWNER

“ I am not sure what would even be available as an option. Majority of rental buildings in Toronto are built in the 60's 80's without central air cooling. to install such a system would be such a significant undertaking that it would need to trigger an AGI and rental increases.

**VERBATIM SOURCE:** PROPERTY MANAGER/OPERATOR/SUPERINTENDENT

“ There is no Central air conditioning in this small old building. Current tenants use their own AC equipment and they have their own individual Hydro bills. Hydro bills that are original to the building since 1951, which is one of the few [buildings] remaining in Toronto, I think that has individual hydrometers. I've had no complaints except from the tenants who are upset that the city of Toronto requires me to put fixtures in the windows that don't allow the windows to open any more.

**VERBATIM SOURCE:** PROPERTY OWNER

“ Tenants are free to install air conditioners provided they use a qualified tradesperson to do so. Forcing landlords to pay is unfair especially as most of our properties have very low rents.

**VERBATIM SOURCE:** PROPERTY OWNER

# Building Stock Analysis Support: Mixed

**Rental housing providers see value in getting guidance on what cooling measures to implement. Support for the Building Stock Analysis among housing providers depends on its utility in guiding their plans to meet the standard.**

## Reasons for support:

- Guidance on the type of upgrades and investments that are needed to meet the standard.
- Accounting for the diversity of dwelling types that need to be considered in meeting the maximum indoor air temperature.
- More informed plans - tenants and members of community organizations think the Building Stock analysis can guide better long-term decisions, such as investing in greener cooling measures, and add credibility to the plans that their housing providers commit to.

## Reasons for concern:

- It could be an expensive undertaking that does not provide the guidance they need. In which case housing providers and several tenant advocates would prefer funding for the Stock Analysis to be spent on providing financial support for meeting the standard.



We need a series of supports to make sure that it's easier for landlords to actually implement that indoor cooling. That means upgrades to electrical systems...

**VERBATIM SOURCE: TENANT**



If you're doing an actual assessment, you have to bespoke it. The capacity and cost of doing an assessment like that to actually make it useful doesn't seem possible.

**VERBATIM SOURCE: PROPERTY OWNER/MANAGER**



People are concerned about the demand on the electricity grid. From an equity standpoint and from an environmental standpoint, what we would support is heat pumps.

**VERBATIM SOURCE: LEGAL & MEDICAL PROFESSIONAL**

# Building Stock Analysis

## Ideal Stock Analysis

### Participants' Criteria for a Useful Building Stock Analysis

**1. Targeted Support/Case-by-Case Assessment:** With the variety of different dwelling types across the City, rental housing providers are looking to know how the measure would impact their exact type of rental units. Furthermore, each owner/manager believes the guidance needs to be tailored to each building/dwelling. Equity advocates, legal experts, and tenant representatives echo the need for case-by-case assessment.

**2. Guidance from subject-matter experts:** Impacted parties see value in getting advice from engineers and other knowledgeable parties. They commonly voice concerns with the current infrastructure limits and worry about the electrical capacity of buildings and Toronto overall and see major green upgrades and retrofits as the sustainable answer to heat risks. There is a strong call for clearer guidance from the City, ensuring that the transition is feasible and equitable for all parties involved.

**3. Cost-Benefit Analysis:** Rental housing providers want to understand the implications of implementing cooling measures at scale and the impact on their lease agreements.

“

I think it would just be nice if someone from the city were to actually come here and look around the building and see what's going on, so they can understand this building doesn't have that, and they'd be able to report back saying we can do this and this for the building, but we can't do this and this.

Because what we want is real solutions, like retrofitting all buildings and having a central air conditioner, or something like a new technology that can use green energy to cool.

**VERBATIM SOURCE:** TENANT ADVOCATE

“

As an example, we have a major retrofit of a building where we require additional power. In collaboration with Toronto Hydro, there are redesigns, a new transformer, and a bunch of electrical infrastructure work. That's a multi year project for a single building. So, if you try and scale that up to every building, there isn't the capacity for Toronto Hydro to navigate replacing all that infrastructure to allow for those things to happen in that kind of time.

**VERBATIM SOURCE:** PROPERTY OWNER/MANAGER

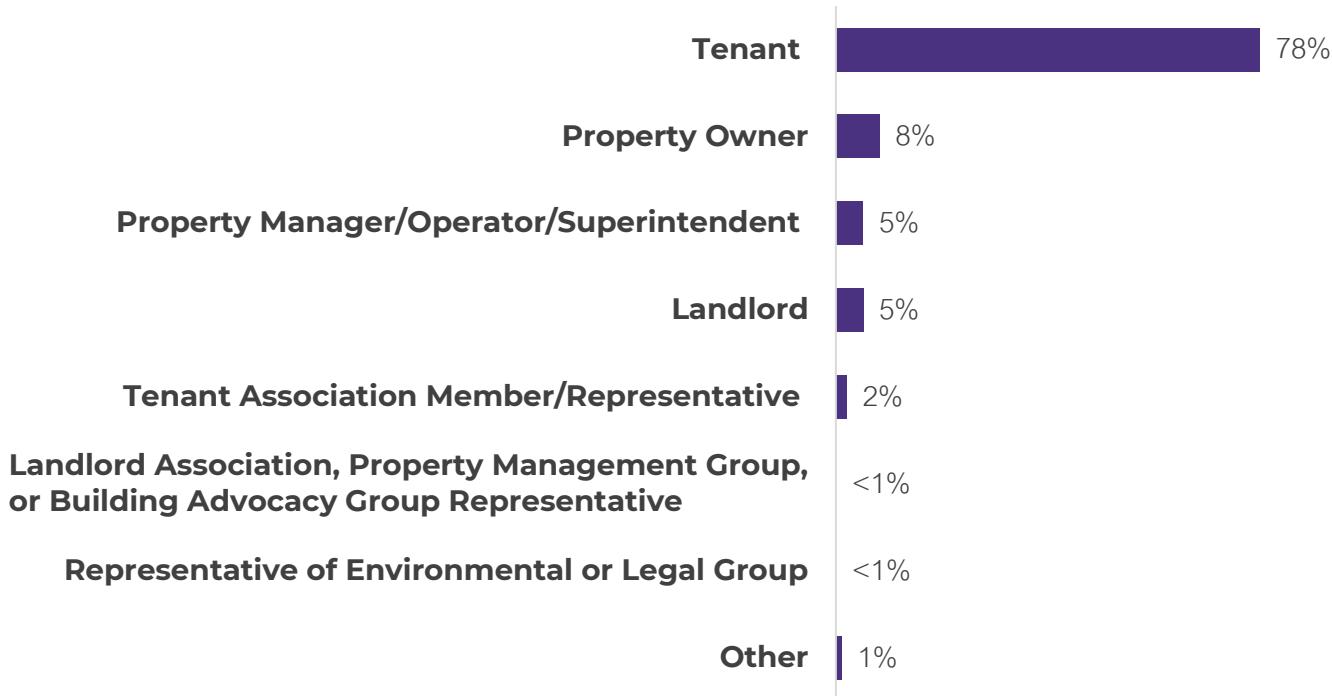
# APPENDIX

# Open Link Survey Demographics



## \*Which of the following best describes you?

Base: All qualified respondents (n=1733).

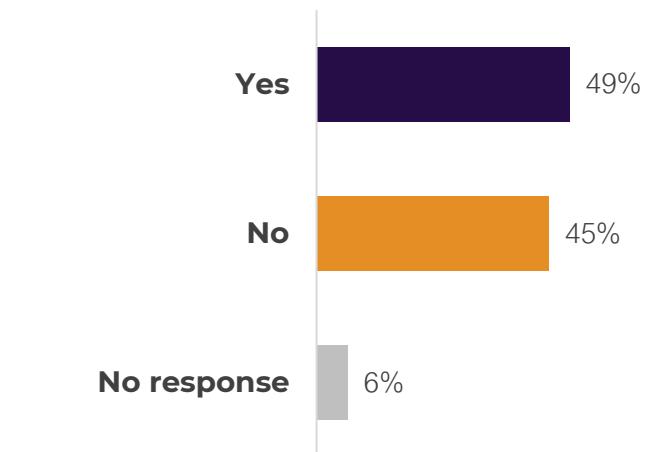


\*Total is over 100% due to this question allowing more than one answer.



## RentSafeTO Tenant, Owner, Manager/Operator/Superintendent

Base: All qualified respondents (n=1733).



# Core Measure Concerns: In Their Words

## More Quotes on Feasibility and Enforcement Concerns

“ Because these are old buildings, and these are old electrical systems, and they have limits. It is quite kind of funny that 70% of my unit is on one fuse... You could put technically two ACs in the living room or the dining area, because of the way the electrical layout is, but half of the living room and the two bedrooms are on the same fuse.

**VERBATIM SOURCE:** TENANT

“ I have a three bedroom... Now the portable only does one room, and it's so massive. Very inefficient.

**VERBATIM SOURCE:** TENANT

“ I think it's a great idea, but your biggest challenge is going to be that, based on the number of residents in Toronto, and the sheer number of buildings that this is going to need to be implemented in, you don't have the enforcement there.

**VERBATIM SOURCE:** TENANT

“ Noted the concerns with the electricity grid. Not just the electricity grid, but also the buildings themselves. Toronto Hydro provides a feed, typically in the basement of the building, that provides all the electricity consumed by the entire building. A lot of the buildings are at 100% capacity.

**VERBATIM SOURCE:** PROPERTY OWNER/MANAGER

“ And say you had to manage in one room, right ? But then it's too hot in the other part of the department; there are so many ways this can be messy, right?

**VERBATIM SOURCE:** PROPERTY OWNER/MANAGER

“ I had one member who operates a building largely of seniors. She has a letter from her residents saying, don't air condition our units, and we don't want it. It's too cold already. I constantly have a senior resident complain to us that our air conditioning is way too cold.

**VERBATIM SOURCE:** PROPERTY OWNER/MANAGER

# Core Measure Concerns: In Their Words

## More Quotes on Feasibility and Enforcement Concerns Cont'd

“A lot of people don't have time to spend reading bylaws and calling the city, etc. There's also the fear factor that many tenants experience. They tend to feel like there are intimidation tactics if you call the city to complain.

Because the landlords are going to drag their feet on it, because it's an expense, and then the tenants are going to file with 311, and subsequently the enforcement is going to be overwhelmed.

Unless they (the City) have a dedicated unit to ensure, or make that part of the RentSafeTO inspection, and give them a timeline for the landlord to do it, the landlords are going to wait till the last possible moment to do the expense.

**VERBATIM SOURCE:** TENANT

“We don't have storage facilities for hundreds of these things (portable AC units) in our own building. So, who's going to take care of that? The landlord has the obligation to maintain, so we're not even talking about maintaining thousands and thousands of ACs! Now there are ongoing costs...The amount of service work that would be required to support it is going to be huge.

**VERBATIM SOURCE:** PROPERTY OWNER/MANAGER

“We don't do a lot of full unit displacements. It's difficult because there's nowhere for them (tenants) to go. We have never required tenants to vacate in order to do repairs. We wait till turnover.

**VERBATIM SOURCE:** PROPERTY OWNER/MANAGER

# Core Measure Suggestions: In Their Words

## More Quotes on Suggestions for Making the Implementation More Practical and Equitable

“ Kind of educating people on how they can manage things themselves in their spaces... I do think resident engagement in a city led program [has] come up and been talked about as a first step.

**VERBATIM SOURCE:** PROPERTY OWNER/MANAGER

“ I think you have to subsidize it. I think it's unfair to have that cost fall onto tenants... When you think of the health costs of extreme heat, if someone's going to choose to have that happen versus pay for cooling, that's a really sad decision to have to make.

**VERBATIM SOURCE:** MEDICAL PROFESSIONAL

“ We need to be talking about what a building level cooling system looks like. And if you tie up the cooling with decarbonization, like, if you put in a heat pump that works year round, it heats in the winter and cools in the summer. What you can also be doing is decreasing the heating costs. you can offset some of the additional costs from the air conditioning by decreasing the heating costs with the heat pump.

**VERBATIM SOURCE:** TENANT ADVOCATE

“ Ideally, what I would like to see, though, is a complete retrofit of these buildings. I don't think you can really implement cooling technologies without really overhauling the entire building... I think you need to look at more energy efficient technologies, and I don't think necessarily air conditioners are the only way to go. There are heat pumps that can be used for.

**VERBATIM SOURCE:** LEGAL PROFESSIONAL

“ There could also be another level of funding the city can get from the federal government in terms of helping the property managers to retrofit.

**VERBATIM SOURCE:** TENANT

“ I think it would depend on property, but if you're looking at a maximum of 26 degrees, you're probably going to need either heat pump or an air conditioning system of some sort, and then it will depend on how old the property is and the ductwork.

**VERBATIM SOURCE:** LANDLORD

# Feedback Submitted To MLS Strong Support For Core Measure

As part of the consultation, the public also submitted feedback to the City's Municipal Licensing and Standards (MLS) Division regarding the maximum indoor air temperature implementation.

## Strong support for core measure across groups:

- Tenants, medical and legal professionals express strong support, citing personal hardship due to extreme heat and highlighting heat risks for vulnerable populations.
- Many emphasize that the maximum indoor temperature should apply year-round, not just summer, due to the health risks from extended heat periods.
- Some landlords openly support the measure to put tenant safety and health as a priority.

## Considerations for core measure:

- Many stress that building upgrades could result in above guideline rent increases and the need for the government to prevent these to avoid penalizing tenants for safety improvements.
- Concerns are also raised about balancing enforcement with keeping older, affordable buildings viable, as major renovations may incentivize landlords to demolish them.

## Opposition to partial measures:

- Respondents widely oppose requiring cooling only in amenity spaces, as these do not benefit tenants who are sleeping, caring for children, or dealing with health issues in their units.

“

Having suffered the heat in a third floor attic apartment and in a basement apartment both with no air conditioning while caring for small children who desperately needed a more moderate temperature, I am joining the call for a maximum temperature in all apartments.

Providing one cool room or relying on city cooling places is unsustainable (as well as unattainable for many folks with mobility issues).

**VERBATIM SOURCE:** TENANT

“

The health and safety of my tenants and all Toronto tenants must be priority one for the city. With an ever increasing number of heat alerts caused by the climate crisis, it's time the city provided all Torontonians with protection from extreme heat in their homes.

**VERBATIM SOURCE:** LANDLORD

“

Many tenants live in older buildings with faulty heating and cooling systems... Building upgrades to provide cooling should be ineligible for above guideline rent increases.

**VERBATIM SOURCE:** MEDICAL PROFESSIONAL



## ORGANIZATION ACKNOWLEDGEMENT

Envirionics would like to thank representatives from the following organizations\* for contributing to the consultation:

- Canadian Association of Physicians for the Environment (CAPE)
- Canadian Centre for Housing Rights (CCHR)
- Ecojustice
- Green Building Canada
- Income Security Advocacy Centre (ISAC)
- Landlord's Self-Help Centre (LSHC)
- Low-Income Energy Network (LIEN)
- NORC Innovation Centre
- ODSP Action Coalition
- Phoenix Place
- Seniors for Climate Action Now (SCAN)
- Small Ownership Landlords of Ontario (SOLO)
- Toronto ACORN
- Toronto Environmental Alliance (TEA)

\*The list is organized in alphabetical order, which is not exhaustive and may not include all those who contributed.

# Thank you.

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