

December 8, 2025

Executive Committee, Toronto City Hall
100 Queen Street West
Toronto, M5H 2N2

RE: EX28.3 - Towards Implementing a Maximum Indoor Temperature Requirement for Rental Units and Cooling Rooms

Dear Members of the Executive Committee,

Toronto Environmental Alliance strongly supports the Mayor's motion to bring a maximum temperature bylaw for consideration by July 2026. We strongly support additional measures to ensure that the most vulnerable are protected from extreme heat — especially measures that improve affordability and also cut the carbon emissions that are accelerating extreme heat events.

Climate change is expected to bring more extreme heat to the City of Toronto. In fact, this past summer, the City of Toronto experienced one of the hottest summers on record, with 71% more hot days over 30°C than average. This is a major public health hazard, as experience from heat events in cities around the world such as the BC Heat Dome of 2021 show that during extreme heat events, the majority of fatalities occur indoors — often in peoples' own homes. The vast majority of the cool spaces in the City's heat Relief network close overnight, or have limited hours, making access to cooling at home a necessity.

This is why the Toronto Environmental Alliance strongly supports a Maximum Temperature Bylaw that sets indoor temperatures at no greater than 26°C, and why Toronto Environmental Alliance is working with a coalition of tenant, legal, and health groups in the Toronto Heat Safety Coalition to advocate for it.¹

In addition to supporting shifting a Max Heat Bylaw decision to July 2026 instead of 2027, **Toronto Environmental Alliance also strongly supports the following:**

1) Ensuring that a bylaw sets Max Indoor Temperatures at the Unit level.

TEA recognizes that cooling rooms may be necessary as a temporary heat relief measure. However, because of various issues such as access, capacity, and safety, a Max Heat Bylaw must be set at the unit level. Tenants cannot sleep in one common cool space per building - we must work towards ensuring

¹ To read more about the Toronto Heat Safety Coalition, click here:
<https://www.torontoenvironment.org/new-coalition-calls-on-city-to-protect-toronto-tenants-from-extreme-heat>

that everyone has a safe home to sleep in during heat waves.

2) Expansion of City's Existing Cooling Program

TEA was very pleased to see and to have been consulted on the City's Indoor Cooling program, which provided cooling units for almost 500 income eligible seniors across the City. We were also pleased to see that the City's program installs these units directly. TEA hopes that this program continues in 2026, and funding is provided to expand the program. We also hope that City of Toronto staff will look into providing and installing unit-sized heat pumps, which, in addition to working as cooling units, would help heat their homes with far fewer emissions than gas, boilers, or radiant electric heat, and would place less strain on the electrical grid in summer as they cool spaces more efficiently.

3) Provide Tenants and Landlords Financial Supports

In order to best protect and minimize the financial impact on tenants, both tenants and landlords must be provided with more financial supports to convert older, heat-prone buildings into cooler, less carbon-intensive ones. TEA strongly supports the City working with other levels of government and the financial sector to implement and enhance funding and financing programs to provide cooling and other forms of climate-related building performance requirements for tenants.

4) Greater Emphasis on Non-Mechanical Cooling

Cooling can be enhanced with passive tools like awnings, shade, green roofs, and other more cost-effective options. Like most cities, Toronto suffers from the urban heat island effect, where the concentration of heat-holding materials like asphalt make downtown Toronto hotter than greener areas outside the City core. TEA strongly supports integrating building-level ambient cooling methods like shade and heat reflectivity. TEA also supports improving Toronto's green spaces and the literal greening of concrete infrastructure to reduce the heat island effect — which, if done well, could reduce stormwater and improve the City's walking, cycling, and transit rates.

TEA also continues to support the many other aspects of the 2024 letter we signed alongside other members of the Toronto Heat Safety Coalition, which we have attached as an appendix to this letter here. We encourage the City to implement these as well.

Sincerely,



How-Sen Chong
Climate Campaigner, Toronto Environmental Alliance

Actions Needed to Protect Toronto Tenants from Extreme Heat

Toronto Heat Safety

The City of Toronto must act now to prevent harmful health impacts and potential loss of life this summer from extreme heat, and accelerate the process to set an adequate temperature by-law for all rental units in Toronto.

ACORN, Advocacy Centre for the Elderly, Advocacy Centre for Tenants Ontario (ACTO), ARCH Disability Law Centre (ARCH), Canadian Association of Physicians for the Environment (CAPE), Canadian Environmental Law Association (CELA), Climate Justice Toronto, Climate Resilience to Extreme Weather (CREW), Low-Income Energy Network, Seniors for Climate Action Now! - Toronto, and Toronto Environmental Alliance call on the City of Toronto to implement the following actions to protect tenants from extreme heat:

1. **Establish an adequate temperature by-law by 2025** that will ensure that all residential rental units in the city can be kept at a temperature of no greater than 26° C. Another summer should not go by without the by-law being in place to protect tenants.
2. **Implement a program to provide and install free heat-pumps or air conditioners** to income-eligible tenants and seniors in Toronto.
3. **Provide income-eligible tenants with financial support** to cover any additional, ongoing utilities costs associated with using new active cooling infrastructure.
4. Expand current funding assistance programs to **provide landlords with funding to make capital expenditures** to upgrade buildings to be energy efficient and include active cooling infrastructure. The funding *must* stipulate that the costs of these capital upgrades cannot be passed on to tenants.
5. **Direct Toronto Public Health to track heat-related death and emergency room visits** related to exposure to heat during extreme heat events.
6. **Implement emergency measures:**
 - **Mandate that temporary cooling spaces** are air-conditioned and available in all apartment buildings.
 - **Equip public and community spaces** - such as community centres, schools and libraries - to serve as cool spaces in the most impacted communities during extreme and prolonged heat waves.
 - **Provide free TTC rides on extreme heat days** to allow for mobile cooling and to make it easier for people suffering from heat to travel to cool public and community spaces.
 - **Protect vulnerable tenants in case of infrastructure failures**, such as ensuring there are backup power generators for apartments so that seniors and people with mobility devices are able to leave hot apartments during a heatwave-induced power outage.

Background Information

The Danger of Extreme Heat

Extreme heat is a serious and escalating public health emergency. Extreme heat is especially dangerous for elderly people, people with disabilities, people with certain pre-existing medical conditions or taking some medication, children, low-income tenants, and more isolated individuals.

The human body also requires cooling at night, and buildings that retain the heat of a hot day can be very hazardous or even fatal to human health.¹

Modeling from the City of Toronto forecasts that the number of days where the temperature exceeds 30 degrees Celsius will triple by 2040-2050, increasing from 20 days to 66 days every year.²

In Ontario, between 1996 and 2010, each five degrees Celsius increase in temperature during the summer was associated with a 2.5 percent increase in death, with a particular link to respiratory deaths.³

During the 2021 extreme heat event in British Columbia, the majority of deaths occurred inside people's homes. According to Dr. Sarah Henderson of the BC Centre of Disease Control, "People don't die because it is hot outside; they die because it is hot inside."⁴ 98% of the deaths that occurred during the BC extreme heat event occurred indoors.⁵

Recent City Actions

Toronto City Council requested a staff report on an adequate temperature by-law that was due in the first quarter of this year.⁶ However, that report has not yet been released.

The Toronto Board of Health has also instructed the Medical Officer of Health to begin monitoring climate change health impacts in the City. However, the first report on the climate change health surveillance framework is not due back to the Board of Health until the beginning of 2025.⁷

The City of Toronto currently has a by-law preventing tenants of multi-residential buildings from opening their windows more than 10 centimeters wide,⁸ which limits tenants' ability to cool their homes at night.

¹ "Why nighttime heat can be so dangerous – and why it's getting worse." CNN, June 2023.

<https://www.cnn.com/2023/06/30/weather/nighttime-heat-danger-climate-change-xpn-scn/index.html>

² Source: "Public Health Impacts of Climate Change in Toronto: A Path Forward for Responding to the Climate Crisis" Toronto Board of Health, <https://www.toronto.ca/legdocs/mmis/2023/hl/bgrd/backgroundfile-240681.pdf>, page 4

³ ibid. (see above, page 4)

⁴ Source: "Surviving the heat: The impacts of the 2021 western heat dome in Canada". Government of Canada.

<https://science.gc.ca/site/science/en/blogs/science-health/surviving-heat-impacts-2021-western-heat-dome-canada>

⁵ Source: "Extreme Heat and Human Mortality: A Review of Heat-Related Deaths in B.C. in Summer 2021". Report to the Chief Coroner of British Columbia, June 2022, 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, p5

⁶ In June 2023, Toronto City Council adopted Item MM7.8: Request to Implement an Adequate Temperature By-law, calling for a report from staff by Q1 2024. <https://secure.toronto.ca/council/agenda-item.do?item=2023.MM7.8>

⁷ Source: HL8.3 - Public Health Impacts of Climate Change in Toronto: A Path Forward for Responding to the Climate Crisis, <https://secure.toronto.ca/council/agenda-item.do?item=2023.HL8.3>

⁸ Source: City of Toronto By-Law No. 930-2000, S.21 E <https://www.toronto.ca/legdocs/bylaws/2000/law0930.pdf>

About Toronto Heat Safety

The following organizations have endorsed this call to action



ACORN (Association of Community Organizations for Reform Now) is a multi-issue, membership-based community union of low- and moderate-income people that has over 177,000 members organized into 30 neighbourhood chapters in 10 regions across 6 provinces.



Advocacy Centre for the Elderly (ACE) is a specialty community legal clinic committed to upholding the rights of low-income seniors. Its purpose is to improve the quality of life of seniors by providing direct legal assistance, public legal education, law reform, community development, and community organizing.



Advocacy Centre for Tenants Ontario (ACTO) is a specialty community legal clinic with a mandate to advance and protect the interests of low-income tenants.



ARCH Disability Law Centre is a specialty community legal clinic dedicated to defending and advancing the equality rights, entitlements, fundamental freedoms, and inclusion of persons with disabilities in Ontario.



Canadian Association of Physicians for the Environment (CAPE) supports physicians to be advocates for healthier environments and ecosystems and takes action to enable health for all by engaging with governments, running campaigns, conducting research, and drawing media attention to key issues.



Canadian Environmental Law Association (CELIA) is a legal aid clinic dedicated to environmental equity, justice, and health. Founded in 1970, CELIA is one of the oldest advocates for environmental protection in the country.



Climate Justice Toronto (CJTO) is a membership-led democratic organization fighting for transformative class-based climate action in Toronto and beyond.



Community Resilience to Extreme Weather (CREW) inspires, enables, and supports community-led multi-generational, multi-stakeholder networking that increases awareness of local climate change impacts and promotes local resiliencies, especially for the more vulnerable.



Low-Income Energy Network (LIEN) is a joint program of CELA and ACTO and envisions an Ontario where everyone has equitable access to conservation and financial assistance programs and services to meet their basic energy needs affordably and sustainably.



Seniors for Climate Action Now! (SCAN) - Toronto is a seniors' climate action group that is democratic, accountable, equitable, and participatory. SCAN! informs and mobilizes seniors in order to prevent more climate catastrophes.



Toronto Environmental Alliance (TEA) has campaigned locally to find solutions to Toronto's urban environmental problems for over 35 years and advocates on behalf of all Torontonians for a green, healthy, and equitable city.