



11 May 2026

**Re.: EX31.2 - Update on Tenant Supports and Heat-related Directives: Standardizing the Air Conditioner Benefit (Pilot)**

Dear Mayor Chow and Members of the Executive Committee,

On behalf of the Ontario Regional Committee of the Canadian Association of Physicians for the Environment (CAPE Ontario) we respectfully submit these comments regarding the City of Toronto's update on tenant supports and heat-related directives. CAPE is a non-partisan, physician-led organization with over 5,000 supporters in the province of Ontario who are focused on the intersections between human and environmental health and committed to advancing policies that protect both.

We acknowledge the City's plan to expand and standardize the Air Conditioner Benefit pilot program. This will bring relief to a proportion of Toronto's most vulnerable residents who do not otherwise have access to cooling during heatwaves. We are also pleased to see that the standardized program will include installation support as this will remove a significant barrier to access.

However, while the expansion of the air conditioner program is welcome, it is insufficient in the face of the public health threat posed by climate-driven extreme heat events. **To address this threat, we urgently need an enforceable maximum heat by-law in all rental units in Toronto.** Only such a by-law can properly address the population-wide threat posed by extreme heat and, importantly, protect the most vulnerable.

In December 2025, members of this committee voted in favour of a motion to direct MLS "to report back to the appropriate Committee no later than May 2026 **with [not on]** a proposed Maximum Temperature By-law for rental units." Yet, no bylaw has been brought forward and we are concerned that while the report accompanying this item states that staff are continuing to work on a report on a heat by-law, that will include measures to protect tenants from Above Guideline rent increases, no timeline has been given. Further, the requirement to draft a bylaw has been dropped.

We are deeply concerned that this delay in bringing forward a by-law will cost tenants their health—and potentially their lives. The climate crisis, primarily driven by the burning of fossil fuels, is accelerating and extreme heat events are becoming more frequent and intense and pose serious, well-documented risks. [1]

In summer 2025, we saw unprecedented extreme heat events in Ontario and Toronto [2]. In Toronto, six heat waves were recorded by August 24, 2025 [3]. There are a multitude of serious physical and mental health risks from prolonged exposure to extreme heat, including death in severe cases [4]. All these health impacts of extreme heat are amplified by social and economic inequalities, as illustrated below:

- Increased risk of morbidity and mortality due to pre-existing respiratory and cardiovascular distress and disease [5-7]
- Dehydration can exacerbate cardiovascular disease and risks acute kidney injury [6]
- Older adults are at higher risk of mortality, especially during extended heat events, due to their diminished physiological capacity to thermoregulate [9]
- Chronic heat stress can increase levels of stress, anxiety, and cognitive impairment, with increased higher impact on infants, older adults, and individuals with pre-existing medical conditions [11]
- People with disabilities, those who work outside, children, people who are unhoused, pregnant people, and those who are incarcerated are at highest risk of extreme heat events [12]

The 2021 British Columbia Heat Dome was a preventable tragedy [13]. Municipalities need to step up to protect our most vulnerable neighbours. Social determinants of health such as housing, income, racialization, and social isolation, are intrinsically connected with how vulnerable an individual is to the effects of extreme heat [14,15]. The 2021 British Columbia Heat Dome resulted in 619 deaths, almost all of which occurred indoors and among individuals who lacked access to adequate cooling in their homes. Approximately 90% of those who died from extreme heat related causes were adults of 60 years old or above and 98% of died indoors. [16]

This coming year and the following, we are facing a super-charged El Nino event which will drive more extreme heat events around the world and while the effects in Toronto are, as yet, unclear, we need to be prepared.[18] Meanwhile, the projections for heat events in the city – up to 66 days with maximum temperatures above 30C by the 2040s – make it clear that the lives and health of Torontonians will increasingly be at risk if we fail to act. [19]

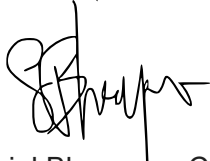
**We cannot afford more delay. Air conditioner programs and the provision of cooling places are welcome, but insufficient.** As has been shown time and time again, the cost of inaction is the lives of those who are made most vulnerable to heat by social and economic policies.

**We therefore call on Toronto City Council to require that a maximum heat by-law of 26°C indoors in all rental units to protect renters be brought forward in 2027.** The City should also ensure that appropriate funding is in place to guard against rent increases and protect renters from bearing the costs of climate-safe housing [20]. In addition, we recommend that you work with Toronto Public Health to include projected future health and economic consequences if a maximum temperature bylaw is not implemented.

Sincerely,



Dr. Mili Roy, CAPE Ontario co-chair



Dr. Sehjal Bhargava, CAPE Ontario co-chair



Dr. Samantha Green, CAPE President

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