

May 15, 2026

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

Dear Members of Toronto City Council,

**Toronto Environmental Alliance strongly supports the expansion and standardization of the City's Air Conditioner Benefit.** We are pleased to see its expansion to cover an additional 2400 tenant households in 2026. We are also pleased to see the program's integration with other Cooling Benefit programs such as the ones with ODSP. This will protect lives during summer heatwaves, and will significantly reduce the strain on the City's emergency paramedic and medical services during dangerous heat events.

**However, the report fails to fulfill Council's direction to include a proposed maximum indoor temperature bylaw. It has now been almost 10 years since Council first directed staff to consider such a bylaw in 2017.** This bylaw is needed to protect tenants from very real, dangerous, and proven health impacts from indoor heat. Council must accelerate the pace of this work by setting a clear timeline for its consideration alongside tenant support programs.

**We support the proposed amendment** to continue work to develop a maximum temperature bylaw and report back after considering key examples of municipalities who have tailored a maximum temperature bylaw to their local jurisdictions. **TEA also calls on the City to develop and implement more tenant support mechanisms as part of this ongoing work.** We recognize that the recent Air Conditioner Benefit and Renoviction Bylaw are already key supports that help counter some of the cost and landlord issues that may be associated with such a bylaw, and encourage the City to build on these effective approaches.

## **(1) Support and Recommendations for Air Conditioner Benefit**

The proposed expansion of the Air Conditioner Benefit is a much-needed and positive step forward for tenants and Toronto's capacity to deal with extreme heat. This program will leverage existing funds and social programs to provide cooling, such as the ODSP cooling benefit, and opens up cooling to new households previously unable to access it.

In the past, many programs to provide indoor cooling were missing a major step: actually installing cooling units. This was a barrier for many vulnerable tenants including seniors. The City's AC pilot has taken this extra step, making this program much more accessible for those unable to select, deliver, or install an air conditioner unit themselves. There are also significant cost savings resulting from the ability to bulk purchase and install units.

In future years, TEA encourages the City to explore how the infrastructure and design of the AC Benefit program can also be used to install heat pumps for vulnerable tenants — which could have the dual benefit of providing both indoor cooling in the summer, and cut heating costs for both tenants and landlords in winter. We also suggest integrating more existing social benefit or energy funding sources (eg Save on Energy) that could apply to either AC units or heat pumps.

## **(2) The need for a Maximum Heat Bylaw, more tenant protections, and affordability supports.**

When extreme heat kills, most of those fatalities happen indoors. During the 2021 B.C. Heat Dome, 98% of fatalities occurred indoors — often inside peoples' own homes. With extreme heat events escalating each summer in Toronto, indoor cooling is no longer a luxury.

[The first motion](#)<sup>1</sup> that we are aware of requesting a report on a maximum temperature bylaw was passed in 2017. It has now been almost a decade, and Council is still requesting more study and information. We are extremely concerned that the pace of Council's ongoing debate on this issue has stalled, resulting in the same debate coming back year after year with little progress.

Toronto has multiple jurisdictions to learn from. We recommend doing the work to research, problem-solve, and find pathways to adapt recently implemented municipal bylaws and programs to suit Toronto's unique circumstances.

The City of New Westminster [recently voted to move forward with a Maximum Heat bylaw](#),<sup>2</sup> after tragically losing many residents during the 2021 BC Heat Dome. In fact, their Medical

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<sup>1</sup> <https://www.toronto.ca/legdocs/mmis/2017/mm/bgrd/backgroundfile-107593.pdf>

<sup>2</sup> <https://www.cbc.ca/news/canada/british-columbia/new-westminster-bc-maximum-heat-bylaw-9.7150150>

Officer of Health recommended that they [make the bylaw even stronger](#)<sup>3</sup> than staff recommended. This bylaw is expected to enter a third and final reading before summer 2026.

Also notably, New York City has implemented [Int 0994-2024](#)<sup>4</sup>, an ordinance that sets a Maximum Indoor Heat requirement for all rental bedrooms by 2030. While the New York bylaw should not be cookie-cutter applied to Toronto, it does several things right, including ensuring that both tenants and the municipal government are notified of any additional costs. And it sends an unambiguous signal to all building owners and landlords that cooling is not a luxury.

### **(3) More tenant supports and affordability mechanisms for retrofits are needed.**

**TEA is also pleased to see the City move ahead with tenant supports that address costs and landlord issues that can block indoor cooling.** In addition to the expanded AC Benefit, TEA is pleased to see that the Renovictions Bylaw has come into force, which should significantly reduce the ability of unscrupulous landlords to use any required upgrades such as indoor cooling as an excuse to evict existing tenants only to relist units at significantly higher rates.

The City should also consider [implementing the measures](#)<sup>5</sup> already presented to Toronto City Council from TEA and various tenant organizations in 2025, including:

- Transparency measures to ensure tenants are informed about real retrofit costs, retrofit savings, and the supports and legal protections available to tenants before and during energy, decarbonization or extreme weather upgrades
- Enhancement of existing City low-interest loan programs for MURBs that already prohibit Above Guideline Rent Increases, such as the Hi-Riz program;
- Strong advocacy for more retrofit financing solutions from the federal and provincial governments and their agencies, including grants and low- or zero-interest loans;
- Support program(s), including legal support, for tenants facing Above Guideline Rent Increases from energy efficiency, decarbonization, and extreme weather upgrades.

<sup>3</sup> <https://www.freshetnews.ca/medical-health-officer-offers-input-into-new-westminsters-new-cooling-bylaw-for-apartments/>

<sup>4</sup> <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6788510&GUID=156F95BB-CA74-44F3-A07B-A0E54EA0C10F#:~:text=HEAT%2C%20COOLING%2C%20AND%20HOT%20WATER.2.>

<sup>5</sup> <https://www.toronto.ca/legdocs/mmis/2025/ie/comm/communicationfile-200745.pdf>

**In conclusion**, TEA applauds the AC Benefit expansion. We strongly believe that a maximum temperature bylaw and tenant supports are required as basic heat safety measures in Toronto.

Sincerely,

A handwritten signature in black ink, appearing to read 'How-Sen Chong', is placed on a light yellow rectangular background.

How-Sen Chong,  
Climate Campaigner  
Toronto Environmental Alliance