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City Council
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RE: CC42.12 - Follow Up on 2026.EX31.2: Framework for Implementing a Maximum Indoor Temperature By-law

I am pleased to submit these comments on behalf of The 519 Church Street Community Centre. We appreciate the Council's attention to the urgent need to protect Toronto residents from avoidable death and injury from extreme indoor heat. As a City of Toronto Agency and a centre serving communities disproportionately affected by the climate crisis, we appreciate the work of our City partners to develop overdue responses to deadly heat. Addressing extreme heat is important to The 519 because we serve nearly every community identified in City strategies and existing research as facing heightened heat exposure and vulnerability.¹

We encourage Council to set a definite and ambitious timeline for the development and presentation of a bylaw to prohibit unsafe heat in rental units, in collaboration with tenants and their advocates. We note that Council has been considering this question since at least 2007, when the Board of Health first recommended a such standard.² Council has considered reports, recommendations, and directions on the topic of such standards in at least ten of the last 14 years (2012-2025).³ In this time, summers in midlatitude cities like Toronto have continued to get longer and hotter.⁴ Statistics Canada data suggest heat waves are already causing excess deaths among Toronto seniors.⁵ The City's Climate Risk and Vulnerability Assessment calls heat "Toronto's most urgent climate threat,"⁶ and warns "[e]xposure to dangerous levels of heat will [continue to] amplify over time."⁷ And the multi-Division report of November 2024 warned: "Past extreme heat events in Canada have resulted in most deaths occurring due to unsafe indoor temperatures."⁸

¹ Letter re: 2025.EX28.3, <https://www.toronto.ca/legdocs/mmis/2025/ex/comm/communicationfile-199642.pdf>.

² 2007.LS6.5, <https://secure.toronto.ca/council/agenda-item.do?item=2007.LS6.5#>.

³ 2012.MM25.31, <https://secure.toronto.ca/council/agenda-item.do?item=2012.MM25.31>; 2015.HL5.5, <https://secure.toronto.ca/council/agenda-item.do?item=2015.HL5.5>; 2015.TD1.3, <https://secure.toronto.ca/council/agenda-item.do?item=2015.TD1.3>; 2015.HL8.5, <https://secure.toronto.ca/council/agenda-item.do?item=2015.HL8.5>; 2016.TD2.1, <https://secure.toronto.ca/council/agenda-item.do?item=2016.TD2.1>; 2016.LS10.1, <https://secure.toronto.ca/council/agenda-item.do?item=2016.LS10.1>; 2017.MM32.50, <https://secure.toronto.ca/council/agenda-item.do?item=2017.MM32.50>; 2018.LS25.1, <https://secure.toronto.ca/council/agenda-item.do?item=2018.LS25.1>; 2018.MM39.32, <https://secure.toronto.ca/council/agenda-item.do?item=2018.MM39.32>; 2019.HL3.5, <https://secure.toronto.ca/council/agenda-item.do?item=2019.HL3.5>; 2021.MM35.19, <https://secure.toronto.ca/council/agenda-item.do?item=2021.MM35.19>; 2023.MM7.8, <https://secure.toronto.ca/council/agenda-item.do?item=2023.MM7.8>; 2024.PH17.5, <https://secure.toronto.ca/council/agenda-item.do?item=2024.PH17.5>; 2025.EX28.3, <https://secure.toronto.ca/council/agenda-item.do?item=2025.EX28.3>.

⁴ Scott T.J. et al., Summers over land and ocean are becoming longer, transitioning faster, and accumulating more heat, *Environ. Res. Lett.* 21 074009 (2026), <https://iopscience.iop.org/article/10.1088/1748-9326/ae5724/meta>.

⁵ Statistics Canada, The Impacts of Extreme Heat Events on Non-Accidental, Cardiovascular, and Respiratory Mortality: An Analysis of 12 Canadian Cities from 2000 to 2020, *Health Reports* 35(6):1-15 (June 19, 2024), <https://www150.statcan.gc.ca/n1/en/pub/82-003-x/2024006/article/00001-eng.pdf>.

⁶ Sustainability Solutions Group, City of Toronto Climate Change Risk and Vulnerability Assessment (CCRA): Technical Report, p. 8-9 (Nov. 2025), <https://ssg.coop/toronto-assesses-climate-risks-and-learns-about-vulnerabilities/>.

⁷ EX28.4, Report of the Executive Director, Strengthening the City's Heat Relief Strategy, p. 6 (Nov. 25, 2025), <https://www.toronto.ca/legdocs/mmis/2025/ex/bgrd/backgroundfile-260580.pdf>.

⁸ 2024.PH17.5, Report, p. 7 (Nov. 22, 2024), <https://secure.toronto.ca/council/agenda-item.do?item=2024.PH17.5>.

City staff have identified over a dozen, varied North American jurisdictions with maximum indoor temperature standards for existing buildings adopted at various points over the last 30 years.⁹ Since then, cities as diverse as New York City and New Westminster, BC have taken action.¹⁰ As our Housing Minister's office has affirmed, "Municipalities can implement maximum temperature bylaws as they see fit."¹¹ Toronto should chart a clear path and timeline to do so, while investing in incentives and tenant supports, and exploring additional revenue and financing options.

Council should also consider ensuring a tenant voice in the approval of alternative compliance pathways, through a community review board.¹² Finally, we note that any analysis of potential costs is incomplete if it does not include analysis of the morbidity, mortality, and economic costs of *not* passing a safe temperature standard for rental units.¹³ We encourage Council to consider directing that such an analysis be included in the next staff report on this topic.

Conclusion.

In our city today, cooling is not a luxury. The City's human rights obligations demand that a structure we call a home give protection from the elements that is adequate to sustain life and health. Appreciating the complexities of implementing a new bylaw, we consider that no one should be charged rent for a dwelling that exposes them to danger, when clear solutions exist.

We reiterate our appreciation of the efforts of Division staff to advance plans to protect residents from life-threatening heat. We look forward to collaborating with you, together with other community partners, to advance the transformational actions needed to preserve the lives, health, and fundamental human rights of Toronto's residents in the critical years ahead.

Thank you for your consideration.

Sincerely,



Harper Jean Tobin
Director, Community Resilience Project

⁹ 2026.CC42.12, Attachment 1 - Jurisdictional Scan (June 23, 2026), <https://www.toronto.ca/legdocs/mmis/2026/cc/bgrd/backgroundfile-288656.pdf>.

¹⁰ N.Y.C. L.L. 2026/023 (Jan. 17, 2026), <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6788510&GUID=156F95BB-CA74-44F3-A07B-A0E54EA0C10E>; New Westminster Bus. Reg. and Lic. (Rental Units) Bylaw No. 6926, 2004, Amdt. Bylaw No. 8556 (June 8, 2026), <https://pub-newwestcity.escrimemeetings.com/Meeting.aspx?id=c3ae1d1f-cc28-42e7-818e-6b3b2a1b4ade>; see also Cirt od New Westminster, Cooling Requirements for Rental Units (June 2026), <https://www.newwestcity.ca/cooling-requirements>.

¹¹ Michael McBean, New bill would protect Ontario renters from extreme heat, *Ottawa Citizen* (June 10, 2026), <https://ottawacitizen.com/news/home-heat-dangers-mckenney-bill>.

¹² See City of Boston, BERDO Review Board, <https://www.boston.gov/departments/environment/berdo-review-board#about>.

¹³ See J. Boudreault, et al., Projecting the overall heat-related health burden and associated economic costs in a climate change context in Quebec, *Canada. Sci Total Environ.* 2025 Jan 1;958:178022, doi: 10.1016/j.scitotenv.2024.178022; Canadian Climate Institute, *The case for adapting to extreme heat: Costs of the 2021 B.C. heat wave* (2023), <https://climateinstitute.ca/reports/extreme-heat-in-canada>; Canadian Climate Institute, *The Health Costs of Climate Change: How Canada can adapt, prepare, and save lives* (2021), https://climateinstitute.ca/wp-content/uploads/2021/06/ClimateChoices_Health-report_Final_June2021.pdf.