



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

May 6, 2026

Dear Members of the Mayor's Executive Committee,

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

Please accept this submission in lieu of a deputation regarding the City of Toronto's 2026 update on tenant supports and heat-related directives.

I am writing on behalf of the Low-Income Energy Network (LIEN), a joint program of Advocacy Centre for Tenants Ontario (ACTO) and Canadian Environmental Law Association (CELA), funded by Legal Aid Ontario. LIEN advocates for affordable and sustainable energy solutions for low-income households, working to ensure that energy policies advance both climate goals and social equity. LIEN focuses on the intersection of housing, energy affordability, and health, with a particular emphasis on the disproportionate impacts of extreme temperatures – both cold and heat – on vulnerable households. For several years, LIEN has been advocating for a maximum indoor temperature bylaw in Toronto as a critical public health and housing protection measure in the face of climate change, highlighting that extreme heat poses a dangerous and potentially fatal risk, particularly for vulnerable tenants.

I wish to formally acknowledge and commend the City for expanding and standardizing the Air Conditioner Benefit pilot program. Providing free portable air conditioning units, along with installation support, will make a tangible difference in the lives of many residents who would otherwise be unable to afford relief during increasingly frequent heat events. Access to in-unit cooling is a critical determinant of health during extreme heat events, and the City's investment reflects a growing recognition that extreme indoor temperatures are not merely uncomfortable, but a serious public health concern.

However, while the expansion of this program is both necessary and welcome, it is not sufficient as a standalone measure to address the scale and urgency of extreme heat risk in Toronto's rental housing stock.

The new requirement for buildings without air conditioning to provide a cooled indoor amenity space (cooling room) should be understood as a temporary and limited stopgap. From an implementation perspective, many buildings will encounter significant constraints, including inadequate infrastructure, limited common space, electrical capacity limitations, and operational challenges in maintaining temperatures at or below 26°C during sustained heat events. From a public health perspective, cooling rooms are inherently insufficient: they rely on tenants being

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physically able to leave their units, navigate shared spaces, and remain there for extended periods. This is not feasible for many residents, including older adults, individuals with disabilities or chronic illness, caregivers, and those at heightened risk of heat-related harm.

Empirical evidence underscores the seriousness of this issue. Heat-related morbidity and mortality are closely linked to sustained exposure to high indoor temperatures. During extreme heat events, indoor environments can exceed outdoor temperatures, particularly in older high-rise buildings with poor insulation and ventilation. Without access to adequate in-unit cooling, tenants face elevated risks of dehydration, heat exhaustion, heat stroke, and exacerbation of cardiovascular and respiratory conditions. These risks are not hypothetical; they are well-documented in public health literature and have resulted in preventable deaths in comparable urban contexts.

For these reasons, I urge the Committee to prioritize the development and implementation of a maximum indoor temperature bylaw applicable to all rental units in Toronto. Establishing a clear, enforceable upper temperature limit would align cooling with existing heat standards, recognizing it as an essential housing and health protection rather than a discretionary amenity. Such a bylaw would provide regulatory clarity, support consistent enforcement, and create a baseline level of protection for all tenants.

Importantly, this approach is both feasible and precedented. Other jurisdictions have successfully implemented maximum indoor temperature standards or equivalent cooling requirements, demonstrating that regulatory frameworks can be designed to balance tenant protection with operational considerations for landlords.

Time is a critical factor. Climate projections indicate that Toronto will continue to experience an increase in the frequency, duration, and intensity of extreme heat events. Each summer without comprehensive indoor temperature protections compounds the risk to vulnerable populations. While incremental measures, such as cooling rooms and limited distribution of portable air conditioners, provide short-term mitigation, they do not address the systemic nature of the problem.

A maximum indoor temperature bylaw is the only viable, scalable, and equitable solution to ensure that all tenants are protected from the health impacts of extreme indoor heat. I respectfully urge the Committee to act with urgency in advancing this policy.

Thank you for your consideration of this submission and for your ongoing work to address climate-related health risks in Toronto's housing system.

Sincerely,
Low-Income Energy Network



Zee Bhanji
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