



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

May 7, 2026

Dear Members of the Mayor's Executive Committee,

Re: Agenda Item EX31.2 –Standardizing the Air Conditioner Benefit (Pilot)

On behalf of the Advocacy Centre for Tenants Ontario (ACTO), we are writing to express our support for the efforts of the Toronto Heat Coalition and express our concern that city staff is not recommending further tenant supports, most notably the immediate establishment of a maximum indoor temperature bylaw for rental housing in Toronto.

ACTO would first like to acknowledge and commend the City for expanding and standardizing the Air Conditioner Benefit pilot program. The provision of up to 2400 portable air conditioning units and installation support for low-income tenants is an important and necessary step toward protecting residents during increasingly frequent and severe heat events. Access to cooling is no longer a matter of comfort; it is a matter of housing security, public health and climate resilience.

At the same time, the City's proposed requirement for cooling rooms in apartment buildings without air conditioning must be understood as a temporary and limited measure rather than a long-term solution. Cooling rooms may provide some relief during heat emergencies, but they cannot substitute for safe indoor temperatures within tenants' homes. Many tenants (including seniors, people with disabilities, individuals with chronic illnesses or mental health issues, families with young children and those with mobility limitations) may be unable to leave their units or spend extended periods in shared common spaces during extreme heat events.

Importantly, cooling rooms do not address the underlying reality that in recent years, due to climate change, many rental units in Toronto become dangerously hot during the summer months. Older apartment buildings, particularly high-rise towers with poor ventilation and insulation, can trap heat for prolonged periods, exposing tenants to serious health risks. As climate change intensifies, these conditions will only worsen. Extreme indoor heat contributes to dehydration, respiratory distress, cardiovascular complications, and heat-related illness, with disproportionate impacts on low-income, elderly and marginalized tenants.

Toronto already recognizes minimum heat standards as essential to habitable housing during winter months. The City must now recognize protection from extreme indoor heat as an equally necessary component of safe and adequate housing. On December 16 and 17, 2025, Council adopted EX28.3 directing staff to report back to the appropriate committee no later than this month on a Maximum Temperature By-law and offer recommendations to prevent above guideline rent increases (“AGI”) passed on to tenants. However, it appears that this report is absent from the staff report and that there is no commitment to report back on a bylaw in the future.

We understand the concern of some staff and Councillors that a bylaw could result in an AGI for tenants. However, ACTO has created a municipal brief for municipalities that outlines mitigation strategies where improving building standards, whether to reduce carbon emissions or to comply with a Maximum Indoor Temperature By-law would not result in an AGI. <https://www.acto.ca/production/wp-content/uploads/2025/12/BEPS-Housing-Affordability-and-Sustainability.pdf>

ACTO therefore urges the Mayor’s Executive Committee and City Council to move urgently toward the implementation of a clear and enforceable Maximum Indoor Temperature By-law applicable to all rental housing across Toronto. Such a bylaw would establish a consistent baseline of protection for tenants, provide greater accountability, and would align the City’s housing policies with its public health and climate adaptation objectives.

We appreciate the City’s ongoing work to address heat-related risks and support vulnerable tenants. Long-term, sustainable tenant protection requires systemic solutions. A maximum indoor temperature bylaw is a necessary next step to ensure that all Toronto residents can live in homes that are safe, healthy and habitable during extreme heat, regardless of their income, location and tenure.

Thank you for your consideration.

Sincerely,

ADVOCACY CENTRE FOR TENANTS ONTARIO

A handwritten signature in blue ink, appearing to read 'Douglas Kwan', with a long horizontal flourish extending to the right.

Douglas Kwan
Director of Advocacy and Legal Services