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Executive Committee
Toronto City Hall
100 Queen Street West
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**Re: EX31.2 – Update on Tenant Supports and Heat-Related Directives:
Standardizing the Air Conditioner Benefit (Pilot)**

Monday, May 11, 2026

Madam Mayor and Executive Committee,

On behalf of the Advocacy Centre for the Elderly (ACE), we write in strong support of the development and implementation of a maximum heat bylaw in the City of Toronto.

ACE is a specialty community legal clinic dedicated to advancing the rights of low-income older adults. We see firsthand the disproportionate impact of extreme heat on older adults—particularly those living in retirement homes, long-term care homes, and rental housing without access to adequate in-suite cooling.

We commend the City's Air Conditioner Assistance Program pilot, launched in 2025 and expanded in 2026. ACE supports the city staff's current recommendation of adding an additional \$1.06 million to the existing \$1 million in 2026 funding for portable air conditioners across the ACAP, the Hardship Fund and the Ontario Works Discretionary Benefit Program.

The ACAP has improved access to cooling and helped vulnerable older adults remain safely in their homes.

However, emergency-response measures and benefit programs cannot substitute for enforceable housing standards. A tenant's ability to survive extreme heat should not depend on winning a pilot lottery, navigating a complex application process, or leaving their apartment during dangerous weather conditions.

These programs do not address the underlying structural issue: the absence of enforceable indoor temperature standards.

Extreme heat protection cannot depend on voluntary uptake. It must be guaranteed. Safe indoor temperatures should be treated as a basic housing standard.

A maximum heat bylaw is necessary to ensure consistent, enforceable protections for tenants across Toronto.

Lessons from Delayed Action

Ontario has previously failed to act on known risks to vulnerable populations.

The delayed implementation of fire sprinklers in retirement and long-term care homes is a clear example.

- In 1996, nine residents died in a fire at Meadowcroft Place in Mississauga. The building had no sprinklers.
- A coroner recommended sprinklers in all homes¹.
- The recommendation was not implemented.
- Additional fatal fires led to repeated inquests and the same recommendations.
- Sprinklers were not mandated until 2012²—more than 15 years later.
- Compliance timelines extended to 2019 for retirement homes and 2025 for long-term care homes. The deadlines for non-compliant long-term care homes were later extended to July 1, 2026³.

Throughout this period, the risk was well known. Experts warned. Coroners recommended action. Governments delayed.

And residents died while implementation was delayed.

This was not a failure of knowledge.
It was a failure of action.

¹ Mississauga.com “Fatal blaze raises questions” by Mississauga News (January 21, 2009) online: https://www.mississauga.com/news/fatal-blaze-raises-questions/article_3bbd0ff0-571e-5745-95b8-925d920e47b6.html

² Bill 54, Fire Protection and Prevention Amendment Act (Retrofitting of Retirement Homes with Automatic Sprinklers), 2012 – online: <https://www.ola.org/en/legislative-business/bills/parliament-40/session-1/bill-54>

³ O. Reg. 505/24: COMPLIANCE EXTENSION FOR LONG-TERM CARE HOMES (December 6, 2024), online: <https://www.ontario.ca/laws/regulation/r24505>

Extreme Heat is a Known and Growing Risk

Extreme heat now presents a comparable and escalating threat.

- In 2018, Montréal experienced approximately 66 heat-related deaths⁴.
- In 2021, Vancouver experienced approximately 619 deaths during their heat dome.⁵
 - Approximately 98% of these deaths occurred indoors, often in homes without adequate cooling.
 - 90% of these deaths were over the age of 60.

Older adults are disproportionately affected due to physiological vulnerability, fixed incomes, mobility limitations, social isolation, and chronic illness.

Extreme heat is now one of the deadliest climate-related risks in Canada.

It is also preventable.

Cooling Saves Lives

Evidence confirms what frontline providers already know.

The study “*Air Conditioning in Nursing Homes and Mortality During Extreme Heat*” (JAMA Internal Medicine) found that in-suite cooling reduces heat-related mortality by 8%⁶.

Access to cooling also reduces:

- Hospitalizations
- Heat-related illness and injury
- Strain on emergency services

⁴ Global News “66 Montrealers died from extreme heat during 2018 heat wave” by Brittany Henriques online: <https://globalnews.ca/news/5279502/66-montrealers-died-from-extreme-heat-during-2018-heat-wave/>

⁵ Government of British Columbia, “Extreme Heat and Human Mortality: A Review of Heat-Related Deaths in B.C. in Summer 2021” (June 7, 2022) at 5, online: <[Extreme Heat Death Review Panel Report](#)>. (“Extreme Heat Death Review Panel”)

⁶ Gabrielle M. Katz et al., “Air Conditioning in Nursing Homes and Mortality During Extreme Heat”, JAMA Intern. Med., 2026; 186(2), 243-251

Access to cooling is not a luxury. Safe indoor temperatures should be treated no differently than access to heat, electricity, or running water. It is a basic health and safety requirement.

Band-Aid Measures Are Not Enough

Cooling rooms and common areas are not a solution.

Many buildings that lack in-suite cooling also lack usable common spaces. City reporting indicates that only approximately 15% of RentSafeTO buildings have a room that could function as a cooling space.

Even where they exist, cooling rooms are inaccessible to many:

- Older adults with mobility issues
- Individuals with disabilities
- Tenants who are socially isolated or medically fragile

Research shows they are inconsistently used and offer limited protection during prolonged heat events.

Older adults cannot be expected to spend days sheltering in hallways, lobbies, or temporary cooling centres during prolonged heat events.

This is not simply a housing finance issue. It is a preventable public health disaster.

The Need for a Maximum Heat Bylaw

ACE supports the City moving forward immediately with a maximum heat bylaw that includes:

1. Enforceable Indoor Temperature Standards

- Require all residential rental units to maintain indoor temperatures at or below 26°C
- Move toward implementation without unnecessary delay

2. Stronger Building Standards and Design

- Require active cooling systems (e.g., central air, heat pumps) in new multi-residential developments

- Mandate passive cooling measures, including:
 - Cross-ventilation design
 - Shading features such as awnings and exterior shading
 - Green infrastructure (e.g., rooftop and façade greenery)

3. Retrofit and Tenant Protection Measures

- Continue to expand free AC distribution and installation programs for low-income tenants
- Expand retrofit funding programs tied to strong tenant protections (no above-guideline rent increases tied to upgrades)
- Prioritize retrofits in buildings housing large numbers of older adults and medically vulnerable tenants
- Coordinate retrofit programs across agencies and community partners to ensure no gaps in access

4. Climate-Responsive Infrastructure

- Accelerate building decarbonization
- Reduce reliance on gas and oil systems that contribute to long-term heat risk

The City’s Own Findings Support Immediate Regulatory Action

The May 2026 staff report⁷ confirms several critical findings that support immediate implementation of a maximum heat bylaw.

The report acknowledges:

- Extreme heat is “one of the City of Toronto’s most urgent climate hazards”
- Older adults are among the populations most vulnerable to heat-related illness and death
- Approximately 54% of private-market rental units and 67% of non-market rental units in Toronto do not have landlord-provided air conditioning. City data further shows that 84% of units without air conditioning are located in apartment buildings

⁷ City of Toronto “Standardizing the Air Conditioner Benefit (Pilot)” (May 8, 2026) online: <https://www.toronto.ca/legdocs/mmis/2026/ex/bgrd/backgroundfile-286810.pdf>

three storeys or higher, representing nearly half of Toronto's private-market rental housing stock

These findings demonstrate that the issue is systemic and cannot be addressed solely through voluntary or emergency-response programs.

The report also notes that approximately 90% of private-market landlords consulted indicated they would seek to pass cooling retrofit costs onto tenants.

ACE submits that this is not a rationale for delaying implementation of a maximum heat bylaw. Rather, it demonstrates the urgent need for the following:

- strong anti-displacement protections, including protections already reflected in Toronto's Rental Renovation Licence Bylaw,
- restrictions on above-guideline rent increases related to cooling retrofits,
- and targeted public retrofit funding tied to tenant protections.

Housing affordability and heat safety must not be treated as competing priorities.

Conclusion

The risk is known. The evidence is clear. The solutions exist.

Toronto does not need another summer of consultation before taking action.

What remains is the decision to act.

The City has already acknowledged the danger.

The question now is whether Toronto regulates heat before mass preventable deaths occur here—or after.

Toronto does not need another coroner's inquest to justify action. The evidence already exists.

Toronto has the opportunity to lead.

To prevent avoidable deaths.

To protect its most vulnerable residents.

We urge Council to:

- Pass a maximum heat bylaw without delay
- Establish firm, enforceable standards

- Avoid prolonged timelines and repeated extensions
- Support the Mayor's leadership on this issue
- Act now—while action still saves lives

Toronto does not need another preventable tragedy to justify action.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Kimber-lee Wargalla', written in a cursive style.

Kimber-lee Wargalla (she/her)
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