

From: [Arnold Margulis](#)
To: [Board of Health](#)
Subject: [External Sender] My comments for 2026.HL32.2 on May 4, 2026 Board of Health (amended)
Date: May 4, 2026 8:31:15 AM

To the City Clerk:

Please add my comments to the agenda for the May 4, 2026 Board of Health meeting on item 2026.HL32.2, Service Agreements Awarded and Executed by the Medical Officer of Health for 2026

I understand that my comments and the personal information in this email will form part of the public record and that my name will be listed as a correspondent on agendas and minutes of City Council or its committees. Also, I understand that agendas and minutes are posted online and my name may be indexed by search engines like Google.

I REQUEST TO MAKE THESE COMMENTS AVAILABLE TO GENERAL PUBLIC BY POSTING DOWNLOAD LINK.

Comments:

Dear Board of Health members!

During Feb 23, 2026 Board session, item **HL30.10 - Formal Request for a Comprehensive Review of Toronto Public Health's Role and Responsibilities in Regulating Indoor Air Quality** was carried based on ongoing public concerns of TPH failing to regulate and enforce healthy levels of Indoor Air Quality (IAQ), primarily in Public Schools and Toronto residential rental properties where half of local residents currently live. This item requested the Medical Officer of Health not only review current status of IAQ guidelines and enforcement practices and report back by Q3 2026, but also "to engage with relevant stakeholders and community partners".

I further suggest to use this time till the above time more productively, and establish a **Pilot Project in improving IAQ enforcement practices** starting from June 01, 2026 based on one TPH Healthy Environment Enforcement Unit. That would allow to not only report the status quo, but also propose significant improvements in local IAQ enforcement by Q3 2026 by analyzing & testing required improvements and cooperation contracts with other government agencies and community partners.

I suggest the implement the following components of the Pilot Project:

I. Toronto Public Health - Healthy Environment Unit IAQ Enforcement Pilot Project

1. Ensure proper training of TPH *Healthy Environment Units* inspectors in residential buildings design, pipes run-out, and HVAC equipment typical design and layout aiming to prevent possible indoor air contamination and enforce existing indoor air quality standards.

This may require signing Continuing Education contracts on training and curriculum

development with *UofT Schools of Public Health and Civil Engineering*, or *TMU School of Occupational and Public Health*, and both local universities *Continuing Education* divisions.

2. Identify local suppliers and equip TPH Healthy Environments Units inspectors with portable modern Air Quality Meters that accurately measure not only Particulate Matter (PM) and CO₂, but also presence and concentration of Volatile Organic Compounds (VOC), as many such compounds tremendously degrade residents health leading to non-treatable deceases, with both PM and VOC being equal contributors.
3. Establish regular equipment borrowing pattern by the Healthy Environment Units from Public Health Ontario [Indoor Air Quality Equipment Loan Program](#), and sign corresponding contracts to train the inspectors in use of such equipment.
4. Establish Cooperation contracts with Provincial Environment Enforcement Units, including *ON Ministry of Environment, Conservation and Parks* [Toronto District Office](#) and [Laboratory Services Branch](#) specialized in testing the City Outdoor Air Quality (OAQ) to partner in quick analyses of indoor air quality overnight and at inspection taken samples from Toronto residential buildings and schools aiming to subsequently create similar TPH Laboratory to analyze local IAQ.
5. Establish a Night Shift for TPS Healthy Environment Unit Pilot Project inspectors with limited staffing, at least one inspector per a local unit, similar to MLS Noise Enforcement team night shift. Current TPH enforcement 9 to 5 inspection schedule is grossly inadequate, since indoor and outdoor air contamination or air quality degradation often purposely happens at night when inspectors are not usually available.
6. Choose for the Pilot Project a TPH Healthy Environment Unit located in heavily populated area with close proximity to industrial pollution zones, for example North York Unit located near industrial zone north of Steeles Ave.
7. Significantly improve, make more transparent, comprehensive and competent the TPH current Complaints and Feedback Procedures to ensure accumulation of public feedback about the Pilot Project outcomes. It is critical to publish TPH staff names and contact info responsible for such Feedback and Complaints processing.

II. Toronto Public Health jointly with the City Manager and other Law Enforcement Partners

1. Develop and oversee *Joint Inspection Guidelines* aiming to ensure cooperation framework of relevant City By-law and law Enforcement Units in enforcing Healthy Environment Laws and Standards, by-laws, practices, manuals and regulations. That includes joint work of TPH, MLS & RentSafeTO, Toronto Water, Toronto Building, Toronto Police, Toronto Fire Services, Ambulance and other relevant city departments.
2. Ensure independent inspections of alleged purposeful water and indoor air contamination by the city inspectors and specialized contractors reporting to the City Manager or its designates and department heads instead of landlords themselves, which often results in reported violations cover-up and retaliation & reprisal to complaining tenants.

Thank you,
Arnold Margulis
Toronto Resident