



July 10, 2026

Councillor Chris Moise

Chair, Board of Health

City of Toronto

Sent by email: Councillor_Moise@toronto.ca; macy.parakh@toronto.ca; boh@toronto.ca

Re: Item HL34.4, Public Health Role in Indoor Air Quality

Dear Councillor Moise and Members of the Board of Health,

The Ontario Society of Professional Engineers (OSPE) welcomes the opportunity to comment on Toronto Public Health's (TPH) report, Public Health Role in Indoor Air Quality, ahead of the Board's meeting on July 13, 2026. OSPE's Indoor Air Quality (IAQ) Advisory Committee, chaired by Joseph Fox, P.Eng., participated in TPH's consultation process in April and May 2026, and we appreciate TPH's continued engagement with our members and with Clean Indoor Air Toronto on this file.

OSPE supports the report's overall direction, including its recognition that indoor air quality affects respiratory and cardiovascular health, that oversight is distributed across multiple orders of government, and that TPH's role is properly focused on public communication, collaboration, and requesting provincial action. We offer the following three comments for the Board's consideration.

1. Recommendation 4 should call for an updated Ontario Building Code

The report correctly notes that TPH does not have the authority to mandate ventilation performance requirements or to apply ASHRAE standards such as Standard 241, and that this authority rests with the Province through the Ontario Building Code. However, Recommendation 4 does not ask the Province to exercise that authority by updating the Building Code itself. It requests wildfire smoke supports, interventions in schools and child

care settings, and expanded access to portable air cleaners, but stops short of a Building Code update.

OSPE recommends that the Board amend Recommendation 4 to include a request that the Province of Ontario update the Ontario Building Code to incorporate ASHRAE Standard 241, Control of Infectious Aerosols, and ASHRAE Guideline 44-2024, along with current guidance from Health Canada and other expert bodies. Voluntary standards only become enforceable when adopted by an authority, and the Building Code is the most direct lever available to the Province for doing so.

2. The report should reflect Health Canada's CO2 and symptom-reporting guidance

The report references CO2 monitoring as a ventilation indicator and cites Health Canada's Residential Indoor Air Quality Guidelines, which set a long-term (24-hour) exposure limit of 1000 ppm for CO2. This is accurate but incomplete. Health Canada's separate Guidance for Indoor Air Quality Professionals also finds that individuals exposed to CO2 concentrations above approximately 800 ppm are more likely to report mucous-membrane and respiratory symptoms than those exposed to lower levels. We recommend the report be amended to include this finding.

OSPE has taken the position that a sub-800 ppm CO2 target is a prudent operational target for many settings. We note this is consistent with the distinction between IAQ that is adequate, meaning compliant with ASHRAE 62.1/62.2 as reflected in OSPE's 2022 space-specific targets, and IAQ that is good, which is better reflected by the sub-800 ppm range Health Canada associates with reduced symptom reporting. We would welcome the opportunity to work with TPH to ensure this distinction, and the underlying Health Canada evidence, is clearly reflected in future public communication on this topic.

3. Ontario's absence of a classroom CO2 threshold is an opportunity for TPH leadership

The report notes that Ontario does not currently have a province-wide requirement for CO2 monitoring in schools, a classroom action threshold, or standardized public reporting, and that Bill 140, Improving Air Quality for Our Children Act, 2023, did not pass. OSPE's 2022 IAQ Advisory Group report already sets out space-specific CO2 targets, including for elementary and secondary classrooms, that could serve as a starting reference point for TPH and the Province as this gap is considered further. We would welcome a discussion with TPH staff on how OSPE's existing guidance might support this work.

Conclusion

OSPE thanks the Board and TPH for their continued attention to indoor air quality in Toronto. We would be pleased to have a representative of our IAQ Advisory Committee available to speak to these comments at the July 13 meeting, and we remain available to meet with TPH staff to discuss the report further, as we understand Clean Indoor Air Toronto has also requested.

Please do not hesitate to contact us if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, reading "Sandro Perruzza". The signature is written in a cursive style with a large, looped 'S' and a stylized 'P'.

Sandro Perruzza

Chief Executive Officer