

July 10, 2026

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

HL34.4 - Public Health Role in Indoor Air Quality

To Chair Moise, and Board of Health members:

Established in Thorncliffe Park in the 1980s, the Leaside Towers Tenants Association of Thorncliffe Park (LTTA) is a volunteer, resident-led group that represents over 2,500 Torontonians residing at 85 and 95 Thorncliffe Park Drive on concerns relating to their rental apartment tenancies, as well as matters of broader importance to the community.

The LTTA would like to bring to the Board's attention that tenants are not in control of the indoor air quality of their homes, landlords are.

In-suite, many tenants in Toronto have heating units or HVAC units that also include a filter. Replacing these filters is also the responsibility of the landlord. Tenants are not the owners of the units.

It has been the observation of the LTTA that there appears to be no legal obligation for landlords to replace filters on a periodic basis, for example semi-annually or annually.

As a result, tenants can go years without filter replacement, suffering poorer indoor air quality as a result.

Additionally, mechanical rooms (a.k.a. boiler rooms) in multi-unit residential apartment buildings are not accessible to tenants, meaning that tenants are not aware how frequently the landlord is replacing the building's filters. Similarly, even whether filters in common areas are being replaced.

The LTTA is not aware of any legal obligations for landlords to replace mechanical room filters, or common area filters, on a periodic basis, for example semi-annually or annually. There also does not seem to be an obligation for the landlord to advise tenants in advance of the work, or of the completion of the work.

Recommendations

1. The LTTA suggests a friendly amendment to the Medical Officer of Health's recommendations, as follows:
 2. *The Board of Health request the Medical Officer of Health to continue collaborating with Toronto school boards and other relevant community partners, **including landlords and tenant associations**, to support the distribution of public health guidance on preventing transmission of respiratory viruses.*
2. The LTTA would like the City of Toronto to pass a filter replacement bylaw, providing tenants with certainty that landlords are required to replace in-unit filters, mechanical room filters, and common area filters annually, at a minimum, and that tenants have a right to be notified as it affects their health.

Potential airborne transmission of SARS-COV-2 through bathroom ventilation ducts associated with an outbreak in a residential building in Santander, Spain, 2020 ([Peer-Reviewed, Scientific Study](#))

The LTTA is concerned that there was potential airborne transmission of SARS-COV-2 through bathroom ventilation ducts in Toronto apartment buildings, affecting seniors, families, and essential workers.

While we are not scientists or building ventilation engineers, the bathroom vertical ventilation duct system that scientists attributed to a Covid outbreak in Santander, Spain in 2020 appears to be the same, or similar, to our apartment building complex, which was opened in 1970/71.

From the outset of the pandemic, the LTTA and our property manager worked together to proactively encourage tenants to wear masks in all common areas of our building. Notices were posted in common areas and delivered to apartment units, stating that masks were available at the security desks. We distributed thousands of masks and, as a result, the adoption rate was very high at Leaside Towers.

Lots of Leaside Towers tenants still ended up getting Covid, of course. Many were frontline workers. But many seniors living in the building, who were getting their groceries delivered and not really going out, also got Covid too.

Over time, more than a few seniors voiced their concerns that they suspected the ventilation system in their bathroom as the culprit. Some even knew their upstairs neighbour and told us they believed their Covid infections overlapped.

To this day, we have no idea if our seniors were correct or not.

It is quite a scary thought that an individual might do everything perfectly in terms of public health guidance during an airborne virus epidemic or pandemic while at work, at school, while grocery shopping, or while riding public transit, and end up being infected by a dangerous airborne virus inside of the privacy of their home – not from a public space interaction – but because of the design of their home's ventilation system.

Home is a place where tenants should feel safe and, a place where public health officials and government officials assured us that we would be safe.

That might not be equally true statement for all Torontonians though, in particular possibly for tenants in older apartment buildings.

And, it has been suggested that airborne transmission might not be limited to Covid and could even include the transmission of measles, et cetera, for the type of bathroom ventilation system in the Santander, Spain 2020 study.

Recommendations

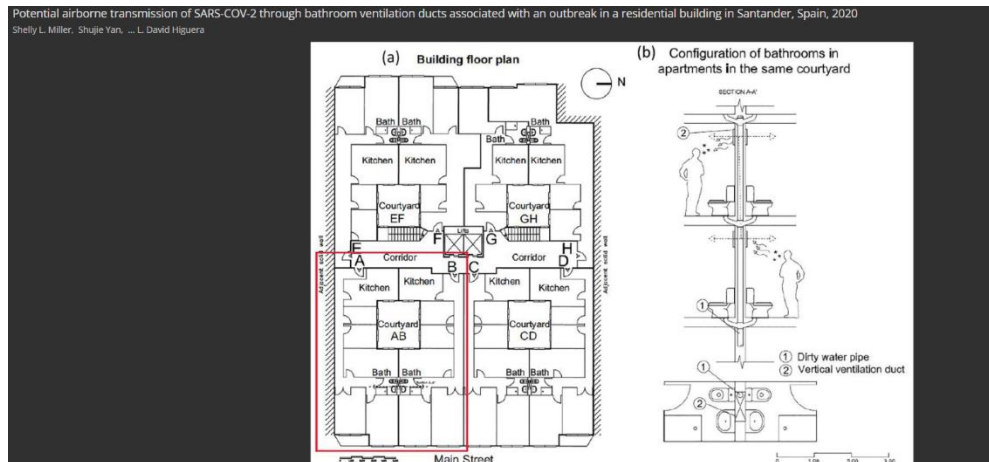
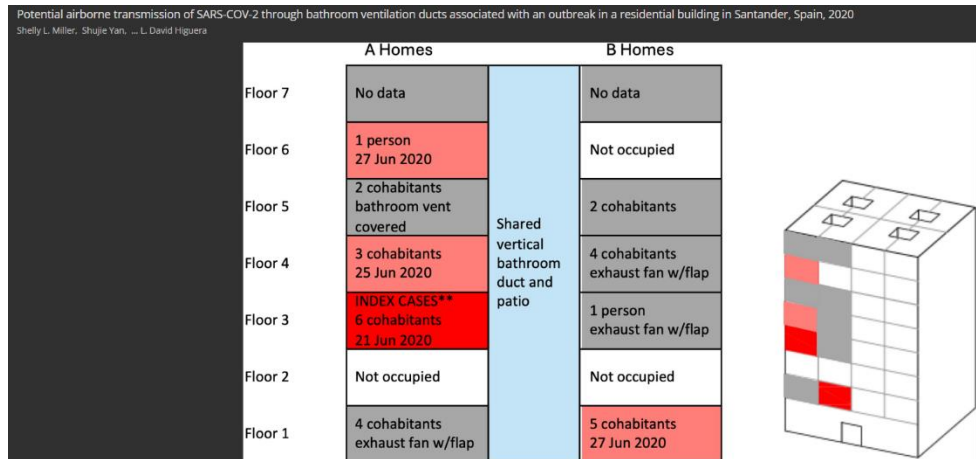
Recognizing that much of Toronto's purpose-built rental housing stock is quite old, the LTTA would like the Board of Health to:

1. Conduct a survey of multi-unit residential building owners to confirm the number of buildings, number of units, and estimated number of residents who have this type, or a similar type, of vertical ventilation duct system.
2. Make recommendations to mitigate the danger to tenants who are identified as at risk, (retrofits, for example), and work with the City of Toronto and the Province of Ontario, if applicable, to bring these recommendations into law.

Thank you,

Jason Ash, Co-chair

Leaside Towers Tenants Association



Resources

Peer-Reviewed Study:

[Potential airborne transmission of SARS-COV-2 through bathroom ventilation ducts associated with an outbreak in a residential building in Santander, Spain, 2020](#)

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News Releases:

[Virus in the vents: Study traces COVID spread in high-rise apartment \(May 15, 2026\)](#)

[Diseases can spread between apartments via shared ventilation, study shows:](#)

[A detailed analysis of airflow in a high-rise found COVID spread through bathroom vents \(May 13. 2026\)](#)