

July 10, 2026

TO Toronto Public Health
RE: Comment on Indoor Air Quality Report

Background

The Canadian Environmental Law Association (CELA) is a legal aid clinic established in 1970 for the purpose of using and improving existing laws to protect low-income people from environmental harm. As an Ontario legal aid clinic, CELA's top priority is to represent low-income individuals and communities. CELA is a founding member of the Low-Income Energy Network (LIEN).

The Advocacy Centre for Tenants Ontario (ACTO) is a legal aid clinic which works for the advancement of human rights and justice in housing for low-income Ontarians through legal advice and representation, law reform, community organizing, training, and education. ACTO is also a founding member of LIEN.

LIEN is a joint program of ACTO and CELA and is funded by Legal Aid Ontario. Its vision is an Ontario where everyone has equitable access to conservation and financial assistance programs and services to meet their basic energy needs affordably and sustainably.

Indoor Air Quality is a Serious Health Risk

Across Toronto, many residents – especially those living in older, poorly maintained rental buildings – are exposed daily to poor air quality and inadequate ventilation, due to aging HVAC systems and a lack of air conditioning. These conditions are far more common in low-income housing, rooming houses, and other forms of sub-standard housing, where tenants often have little power to demand improvements. As a result, those already facing social and economic inequities are disproportionately burdened by poor indoor air quality.

Without proper ventilation, harmful air pollution from both indoor and outdoor sources can build up inside homes. Climate change has made this problem far more severe: heat waves, wildfire smoke, and poor air quality days are becoming more frequent and intense each year. Residents of inadequately ventilated buildings – many of whom are seniors, people with disabilities, newcomers, and low-income families – are left with no safe refuge from extreme heat or polluted air. These risks do not end with the summer months. During colder weather, when people are forced to remain indoors, poor ventilation significantly increases the spread of airborne illnesses, as seen during the major surge in influenza cases beginning in December 2025.

Indoor air quality (IAQ) can also be seriously impacted by pollutants released into the environment from consumer products. These pollutants may include lead, mercury, Volatile Organic Compounds (VOCs), flame retardants and PFAS substances. Many of these substances, such as flame retardants, are released over time from some products. They can be measured in

dust, which exemplifies their high mobility and reach upon release into the environment. These pollutants are frequently left out of the IAQ conversation but must be considered due to their persistent, long-term presence in the environment once released, and their association with many chronic illnesses, including respiratory disease, heart disease, cancer, and other potentially fatal conditions.¹

The Canadian Partnership for Children’s Health and Environment’s (CPCHE) Healthy Environments for Learning Day 2024 campaign was focused on improving indoor air quality in schools and childcare settings. It included a scan of indoor air quality support programs in Canada and noted that municipalities have a key role to play in addressing indoor air quality.²

CELA, ACTO, and LIEN Support the Creation of City of Toronto Indoor Air Quality Guidelines

We strongly support the focus on indoor air quality by Toronto Public Health (TPH), with a particular focus on protecting health and advancing equity.³ We encourage moving forward with further research, involvement, and progress in this area.

However, along with the focus on necessary provincial action, we urge TPH to work with the City of Toronto on further action at the municipal level on indoor air quality. CELA, ACTO and LIEN support the creation of city-wide indoor air quality guidance that follows the latest recommendations from Health Canada,⁴ the American Society of Heating, Refrigeration, and Air Conditioning Engineers (ASHRAE),⁵ and Ontario Society of Professional Engineers (OSPE).⁶ Although the City of Toronto has an IAQ policy for its own offices, there is no comprehensive and broad IAQ guidance for residents in Toronto’s aging housing stock or other local environments.⁷

¹ United States Environmental Protection Agency, “Introduction to Indoor Air Quality” (last modified 19 March 2026), online: <epa.gov/indoor-air-quality-iaq/introduction-indoor-air-quality#causes>.

² Canadian Partnership for Children’s Health and Environment and Canadian Environmental Law Association, “An Environmental Scan of Indoor Air Quality Support Programs for Schools and Child Care Settings in Canada” (April 2024), online (pdf): <healthyenvironmentforkids.ca/wp-content/uploads/2024/04/CPCHE-CELA-HELD-2024-Policy-Scan_FINAL_EN.pdf> at 14.

³ Medical Officer of Health, *Public health Role in Indoor Air Quality* (Toronto: 2026), online (pdf): <toronto.ca/legdocs/mmis/2026/hl/bgrd/backgroundfile-288817.pdf> at 4 [*MOH Report*].

⁴ Health Canada, “Guidance for indoor air quality professionals” (last modified 23 September 2025), online: <canada.ca/en/health-canada/services/publications/healthy-living/guidance-indoor-air-quality-professionals.html>.

⁵ ASHRAE, “ASHRAE Standard 241, *Control of Infectious Aerosols*” (last visited 9 July 2026), online: <ashrae.org/technical-resources/bookstore/ashrae-standard-241-control-of-infectious-aerosols>; ASHRAE, “Guideline 44-2024” (last visited 9 July 2026), online (pdf): <ashrae.org/file%20library/about/government%20affairs/public%20policy%20resources/guideline-44-2024-fact-sheet.pdf>.

⁶ Ontario Society of Professional Engineers, “2025 Special Topics in Indoor Air Quality Reports” (last visited 9 July, 2026), online: <ospe.on.ca/advocacy/government-relations/indoor-air-quality/>.

⁷ City of Toronto, “Indoor Air Quality (IAQ) Policy For Office Environments” (last modified 13 March 2025), online: <toronto.ca/city-government/accountability-operations-customer-service/city-administration/corporate-policies/people-equity-policies/indoor-air-quality-iaq-policy-for-office-environments/>.

We agree with the sources of indoor air pollution identified by TPH but recommend inclusion and consideration of other indoor air quality exposures from consumer products,⁸ and accordingly, an increased focus on monitoring and testing dust in environments where high-risk populations are found, such as childcare settings, elderly care settings, etc.

We therefore recommend the following amendments to Recommendation 1:

- The Medical Officer of Health should work with the Board of Health and the City of Toronto to adopt broadly applicable guidance on indoor air quality.
- The Medical Officer of Health should work with Toronto Public Health and Municipal Licensing & Standards on indoor air quality standards for rental housing, under the City's authority for property standards.⁹

Communications

We support TPH's efforts to communicate more extensively about the risks of poor indoor air quality and tips to reduce exposure. Those communications should reflect the hierarchy of actions identified in Health Canada's guidance, including first to remove contaminant sources, followed by ventilation and filtration. We also recommend developing a robust communications plan with input from disproportionately impacted communities. Many actions to address poor indoor air quality require not only education but resources. Tenants may be limited in how they can address indoor air quality in their homes. Communications efforts will need to be reflective of input from disproportionately impacted communities, sustained, and targeted to be effective.

Conclusion

CELA, ACTO and LIEN are strongly supportive of TPH's focus on improving indoor air quality for disproportionately impacted communities in Toronto. We encourage TPH to work with the City of Toronto to develop broad indoor air quality guidance and property standards to improve indoor air quality in rental properties. We look forward to continued efforts and engagement to ensure that the health and safety of low-income people in Toronto is better protected from the serious health risks of poor indoor air quality.

Sincerely,



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⁸ *Supra* note 3 at 11.

⁹ *Building Code Act*, SO 1992, c 23, s 15.1(3).



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