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Dr. Michael Finkelstein
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Tuesday, September 16, 2025

RE: Cooling Rooms in context of Maximum Heat Bylaw

To: Ginny Adey, Cecelia Fernandez, and Dr. Michael Finkelstein:

Extreme heat in Toronto is a serious public health risk, especially for people and communities that are more vulnerable to heat. **We are strongly supportive of the City of Toronto's efforts to implement a by-law which would set a maximum indoor temperature standard of 26 degrees Celsius in all rental units.** When approximately 619 people died as a result of the tragic extreme heat event in 2021 in British Columbia, the Chief Coroner of British Columbia explicitly identified high indoor temperatures as the primary cause of injury and death during this extreme heat event.[1]

We are, however, concerned about recent surveys and communications from the City of Toronto and from public consultation contractors that suggest that public cooling rooms in a residential building could be used to meet a building's requirements for a future 26°C Maximum Temperature Bylaw, potentially for a period of several years or longer. Evidence to date does not support cooling rooms as a sufficient sole solution to extreme heat in residential buildings.

While we do support the implementation of public cooling rooms, we do so only within the context of a unit-level Maximum Temperature Bylaw. We strongly oppose any policy that would

[1] 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 22

consider public cooling rooms as sufficient by themselves to meet a landlord's responsibilities under a Maximum Temperature Bylaw.

The implementation of cooling rooms in residential buildings as additional, supplemental measures, or as part of short-term, interim measures could provide heat relief as we move towards cooling every unit in the City. However, cooling rooms are inaccessible for many of the people most vulnerable to heat, including people who are socially isolated, seniors, and people with disabilities. For example, people who have mobility disabilities may experience accessibility issues in a shared cooling room and people who are immunocompromised or have Multiple Chemical Sensitivities may experience barriers in a shared space. Therefore, they cannot be seen as solely sufficient means for meeting an entire building's Max Temperature Bylaw requirements.

This concern is not theoretical. It is reinforced by what long-term care advocates have observed: the band-aid approach of relying on common cooling rooms, rather than in-unit cooling, proved "effectively useless,"[2] as most long-term care residents remained in their rooms and staff were unable to bring everyone down to shared spaces. The same barriers—limited mobility, chronic illness, and fear of crowded environments—apply equally to seniors and other vulnerable tenants in Toronto's residential buildings. In addition, without in-unit cooling, residents are left to endure dangerously hot nighttime conditions. Research shows that heat-related sleep disruption in older adults significantly impairs health, memory, and cognitive function, further compounding existing vulnerabilities.[3]

As well, in the time since we submitted our initial heat relief recommendations, there has been growing concern that limited access to cooling is not an effective public health intervention to protect people from the effects of heat. A recent systematic literature review in *Oxford Open Climate Change* concluded:

> "Mechanistically, cooling centres have intuitive appeal as an intervention to protect public health during adverse hot weather. … However, the available data did not allow the authors to identify how long or at what time of day a visit to a cooling environment was most effective (considering the potential dangers of nighttime heat stress) or how to promote use of cooled spaces (especially by the most vulnerable). **Whilst we know cool environments reduce heat stress it is not clear that cooling centres are an effective, efficient or equitable means to achieve this for a given population, especially with regards to protecting those most vulnerable to adverse heat**."[4] [emphasis added]

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[2] All Ontario long-term care homes now have air conditioning, but not all have them in resident rooms." CTV News https://www.ctvnews.ca/toronto/article/all-ontario-long-term-care-homes-now-have-air-conditioning-but-not-all-have-them-in-resident-rooms/

[3] The combined effects of sleep and extreme heat exposure on cognitive function among older adults. Ecotoxicol Environ Saf. 2025 Jan 1:289:117683. doi: 10.1016/j.ecoenv.2025.117683. Epub 2025 Jan 7. https://pubmed.ncbi.nlm.nih.gov/39778314/

[4] Public health effectiveness of cooling centres during periods of adverse hot weather: a systematic literature review. 2025. Vol. 5, Iss. 1. Oxford Open Climate Change. DOI: 10.1093/oxfclm/kgaf020. URL: https://doi.org/10.1093/oxfclm/kgaf020

Studies also suggest that the positive effects of temporary exposure to public cooling rooms on the human body may not last. In one of the few studies on the topic, researchers cautioned that the benefits of short-term cooling such as reduction in the strain on the heart are transient. In a 2023 study, researchers found that in a 9-hour heat wave simulation, the positive effects of two hours in a temporary cooling room dissipated 2 hours after leaving the cooling room.[5]

Every person in Toronto should be safe from the impacts of extreme heat in their homes. In order to be effective and to prevent a tragedy in Toronto, a maximum temperature by-law must include cooling and a maximum indoor temperature standard at the unit level. Not doing so would very likely jeopardize the health and well-being of Torontonians, particularly those in vulnerable circumstances.

We would be pleased to meet to discuss how best to move forward with a Maximum Temperature Bylaw which would protect tenants most at risk from extreme heat.

Signed,

Advocacy Centre for the Elderly
Advocacy Centre for Tenants Ontario
ARCH Disability Law Centre
Canadian Association of Physicians for the Environment
Canadian Environmental Law Association
Low-Income Energy Network
Seniors of Climate Action Now! Toronto
Toronto ACORN
Toronto Environmental Alliance
The 519

Cc:
Olivia Chow, Mayor of Toronto
Councillor Gord Perks, Chair of Housing and Planning Committee
Councillor Paula Fletcher, Chair of Infrastructure and Environment Committee

[5] Efficacy of Cooling Centers for Mitigating Physiological Strain in Older Adults during Daylong HEat Exposure: A Laboratory-Based Heat Wave Simulation. Jun 2023. Environ Health Perspec. DOI: DOI: 10.1289/EHP11651. URL: https://pubmed.ncbi.nlm.nih.gov/37262028/