August 15, 2023

Hon. Steve Clark
Minister of Municipal Affairs and Housing
College Park 17th Flr, 777 Bay St
Toronto, ON M7A 2J3
minister.mah@ontario.ca

Hon. François-Philippe Champagne
Minister of Innovation, Science and Industry
House of Commons
Ottawa, ON K1A 0A6
francois-philippe.champagne@parl.gc.ca

Dear Ministers Clark and Champagne,

Re: alPHa Resolution A23-03 - Improving Indoor Air Quality to Prevent Infections and Promote Respiratory Health

On behalf of the Association of Local Public Health Agencies (alPHa) and its Council of Ontario Medical Officers of Health, Boards of Health Section and Affiliate Organizations, I am writing to introduce the above-named resolution, that was passed by our membership at our 2023 Annual Conference.

As the COVID-19 pandemic unfolded, the relationship between indoor air quality and its transmission became apparent. Indoor congregate locations were quickly identified as the highest-risk settings for transmission, and simple measures such as ventilation and filtration were quickly identified as effective interventions to reduce that risk.

This has of course led to a robust conversation about the wide range of health and other benefits that would follow the codifying of standards for indoor air quality and itemizing the means to achieve them. We are therefore calling on decision makers at the provincial and federal levels to update building codes, explore policy levers and incentives, and engage with stakeholders in various sectors to ensure that clean indoor air is an expectation for the wellbeing of anyone breathing it.

We invite you to examine the additional details and rationale that are included in the attached resolution, and we would welcome an opportunity to meet with you and your staff to discuss them further. To schedule a meeting, please have your staff contact Loretta Ryan, Executive Director, alPHa, at loretta@alphaweb.org or 647-325-9594.

Sincerely,

Dr. Charles Gardner,
President

Copy: Hon. Sylvia Jones, Minister of Health
Iain Stewart, President, National Research Council
Dr. Kieran Moore, Chief Medical Officer of Health, Ontario
Elizabeth Walker, Executive Lead, Office of the Chief Medical Officer of Health

Encl.
The Association of Local Public Health Agencies (aPHa) is a not-for-profit organization that provides leadership to Ontario’s boards of health. aPHa represents all of Ontario’s 34 boards of health, medical officers and associate medical officers of health, and senior public health managers in each of the public health disciplines – nursing, inspections, nutrition, dentistry, health promotion, epidemiology, and business administration. As public health leaders, aPHa advises and lends expertise to members on the governance, administration, and management of health units. The Association also collaborates with governments and other health organizations, advocating for a strong, effective, and efficient public health system in the province. Through policy analysis, discussion, collaboration, and advocacy, aPHa’s members and staff act to promote public health policies that form a strong foundation for the improvement of health promotion and protection, disease prevention and surveillance services in all of Ontario’s communities.
RESOLUTION A23-03

TITLE: Improving Indoor Air Quality to Prevent Infections and Promote Respiratory Health

SPONSOR: Niagara Region Public Health, Peterborough Public Health

WHEREAS The Association of Local Public Health Agencies (alPHa) previously resolved on June 12, 2001 (Resolution A01-12) to petition the Province of Ontario to establish indoor air quality standards to protect the respiratory health of students.

WHEREAS The intense scientific inquiry conducted during the COVID-19 pandemic has discovered that COVID-19 can spread through the airborne route, and that new understanding around the role of aerosols in infection transmission has made it much more probable that other respiratory infections have a larger airborne transmission component than previously understood.

WHEREAS Canadians spend 90% of their time indoors, and indoor public settings such as food premises, meeting halls, athletics facilities, and congregate living settings have been some of the highest risk settings for COVID-19 transmission during the pandemic.

WHEREAS COVID-19 has emerged as the third leading cause of death in Canada, so measures that can reduce its transmission could have sizable impacts on health.

WHEREAS Improved indoor air quality would have additional positive benefits in terms of preventing lung disease, asthma attacks, and cancers.

WHEREAS Retrofitting indoor air handling equipment to improve air quality would also be an opportunity to move to more efficient air handling systems which would support environmental sustainability which would have its own health benefits.

WHEREAS The current Ontario Building Code includes only a requirement for minimum number of air exchanges, but not more detailed air quality standards, and no standards designed to protect individuals from infection risk.

WHEREAS Improved indoor air quality presents an opportunity for a universal, policy-driven, systems-level intervention to prevent respiratory infections, rather than reliance on individual behaviours within inequitable contexts.

WHEREAS Improved indoor air quality has been associated with improved academic performance in school, and improved productivity in workplaces.

WHEREAS Certain indoor air quality improvement strategies may require investments, however, others including natural ventilation strategies can be no or low cost.
WHEREAS Investments in indoor air quality are likely to achieve substantial economic savings through reducing infections, enhancing workplace/public safety, preventing absenteeism, and keeping the Ontario economy open for business.

NOW THEREFORE BE IT RESOLVED that the Association of Local Public Health Agencies (alPHa) calls on the Federal and Provincial governments to update building codes by incorporating higher standards of air quality such that respiratory diseases, especially COVID-19 and other emerging infections, can be sustainably mitigated in all new buildings, with regular updates to these building codes as best available evidence evolves;

AND FURTHER that alPHa encourages Municipal governments and First Nations governments to consider policy levers to improve indoor air quality in their regions, and particularly to assess and improve of indoor air quality in their own public facilities;

AND FURTHER that alPHa calls on the Federal and Provincial governments to create funds, incentives, and educational campaigns to support small businesses and other organizations in upgrading their HVAC systems, and/or otherwise improving their indoor air quality by using best practices and implementing technological advancements so that clean air becomes the norm in these spaces;

AND FURTHER that alPHa encourages members to liaise with other sectors (e.g. environmental engineers, municipal building departments, the business community, etc.) to fully understand how changes could be implemented in indoor public and residential settings and explore opportunities for improvement.