



**Submission Regarding:
Standard Lease Template Consultation
Ontario Ministry of Municipal Affairs
Ontario Ministry of Housing
Proposal # 17-MHO006**
<http://www.mah.gov.on.ca/Page16600.aspx>

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Prevent Cancer Now is a Canadian national civil society organization that works to stop cancer before it starts, with scientific research, education and advocacy. We are pleased to submit the following comments regarding the Ontario Standard Lease Template Consultation, section D. *Rights, responsibilities and prohibited conditions*.

Prevent Cancer Now recommends that consistent with the Ontario and Canadian Human Rights Codes, smoking of tobacco and cannabis be banned in multi-unit buildings, and smoking permitted only in detached shelters, at a significant distance from any building containing multiple dwelling units (e.g. adjacent to roads, or a minimum of 10m from doors or windows). Smoking is addictive, so smokers should be supported to quit.

We support Ontario government actions to reduce or eliminate regular exposure to environmental toxins and carcinogens and as such maintain that:

- Currently, many residents of multi-unit dwellings are exposed to second hand smoke on regular basis. This represents important air quality, and health and safety issues affecting residents and visitors;
- Second hand smoke from combustible products such as cigarettes, cigars, and cannabis is an established health hazard. Smoke increases risks of cancers of the lung, mouth, throat, larynx, esophagus, bladder, kidney, pancreas and cervix. Exposure to smoke also impairs child development and increases risks of chronic diseases (e.g. cardiovascular, kidney and neurological disease);
- "Reasonable enjoyment" of one's home cannot over-ride others' right to clean air and healthy living spaces. Smoke cannot be contained, and second hand smoke infiltrates adjoining units and hallways.
- Particulates and chemicals in smoke deposit on surfaces and toxicants can linger over the long term, affecting health, enjoyment of one's living space and property value;
- Second hand smoke is a human carcinogen, and as such smoking should be banned throughout multi-residential buildings. As an offence under the *Residential Tenancies Act*, prohibition would translate into a more timely and effective solution to protect both current and future tenants from exposure and the related detrimental health outcomes.

The Ontario government has been progressive in its approach to many toxicants with, for example, the Cosmetic Pesticide Ban Act, and phasing out coal for power generation. The standard lease template is an opportunity to support public health further, by eliminating exposure to second-hand smoke in multi-residential buildings. *Prevent Cancer Now* encourages the government to take this important step for Public Health.

Sincerely,

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