

## **CHH Odour Control & Education Plan for Multi-Unit Buildings**

### **Introduction**

This Odour Control and Education Plan supports the Smoke Free Ontario Act, 2017 and draft CHH Smoke-Free Living Policy implementation. Plan options take into account impending legislation legalizing non-medicinal cannabis.

In early June 2018, the issue of odour mitigation, especially cannabis, drove Toronto Community Housing to bring together a number of larger municipal social housing providers including Ottawa, Peel and Hamilton to problem solve and develop a collaborative strategy. These discussions have informed the three odour mitigation options presented.

Essentially the landlord is obligated to pay for any odour mitigation/accommodation necessary for residents and their neighbours based on human rights legislation.

### **Option 1: Status Quo**

Currently, CHH responds to smoking complaints as per CHH complaints policy. Although CHH has an internal transfer policy that residents can utilize for changing medical conditions, CHH currently does not have any smoke-free buildings to offer. There have been limited instances where CHH has supplied an air purifier system for the individual being impacted by second-hand smoke.

Odour mitigation for second-hand smoke in common areas such as lobbies and common rooms does not involve air filtration or purification. Smoking is illegal in these areas and enforcement is the tool of choice often identified through the CHH complaint process.

Status quo also includes posting required by the Smoke-Free Ontario Act. Signs must be posted at all entrances and exits, and within indoor common areas.

**Risk:** Low - Medium

It is unknown whether there will be an increase in smoking with cannabis legalization or additional complaints.

**Timeline:** Immediate

**Costs:** Costs will rise if complaints increase

### **Option 2: Air Filtration & Purifier Systems**

Commercial cannabis production guidelines require HEPA 13 air filtration/purifier systems, but no regulations or guidelines have been developed for residential use of tobacco and cannabis smoke and odours. The Ontario Non-Profit Housing Association (ONPHA) suggests installing ventilation fans and air purifiers.

HEPA 13 systems are available scaled for residential use and offer the best option for residential odour mitigation. The commercial cost of a HEPA13 air filtration/purifier necessary for a 300 – 500 ft<sup>2</sup> residential unit is \$500 - \$800. Approximately 1600 residential units would require HEPA13 units and an ongoing supply of filters that require changing every 3-6 months, which cost approximately \$300 per filter change. Costing is based on an estimated 22% uptake/need comprised of 20% smokers plus 2% impacted by odour and second-hand smoke requiring mitigation.

**Risk:** Medium - High

CHH residents who live in rent-geared-to-income units do not have the ability to purchase units or filters. This creates a medium to high risk if the expectation is tenants will pay these costs. The risk also remains medium to high if CHH covers these costs as they are almost \$2 million for the first year and almost \$1 million each year thereafter. CHH's funding envelope could not easily cover these costs.

**Timeline:** City of Hamilton procurement policies must be followed and the costs involved would require a RFP process. It is estimated the option would begin to be implemented within one quarter from the date of approval.

**Costs:**

HEPA 13 Units	\$1,040,000
Annual Filters	\$960,000*

\*Ongoing annual costs.

### **Option 3: Enhanced Status Quo**

This option builds on CHH's current complaints process. All of the elements of Option 1 are included with the addition of an enhanced education and support around odour mitigation and smoking cessation. This will be achieved through partnership with public health and community agencies.

Enhanced education and support will be achieved through:

1. Communications with residents regarding the new Smoke-Free Ontario Act including FAQ, Housing Matters newsletter (mid-Sept.), mail-out blast
2. Communications with residents regarding odour mitigation techniques – workshops, educational information and recommendations on 'how to be a good neighbour'
3. Staff training on how to deal with nuisance complaints
  - a. Develop skill in giving negative information with positive uptake and understanding
4. Development of toolkits for property managers to
  - a. Know how to intervene in smoking complaints
  - b. Standardize our response to smoking complaints including process maps, communication style, verbal and written warning letters
  - c. Take action during annual inspections

5. Smoking cessation supports:
  - a. Public Health pop-ups and handouts
  - b. Free Nicotine Replacement Therapy and supports through Public Health Services
6. Enhanced enforcement of Smoke-Free Ontario Act
  - a. Remove ashtrays and benches outside buildings with the exception of seniors buildings to discourage smoking and loitering

This option also includes making physical changes to our building environments. Maintenance can turn up the make-up air units in hallways, which pressurizes hallways to keep odours contained in units.

**Risk:** Low – Medium

Since the work will be accomplished through in-kind contributions and current resources, no additional budget will be required to achieve this option. While, enhanced education and supports can potentially reduce smoking in the long term, it does not guarantee odour mitigation in the short term.

**Timeline:** Immediate

**Cost:** In kind contributions, no additions to budget

**Recommendation:**

Option 3. It is cost and resource effective and places responsibility of odour mitigation directly on residents with the support of CHH.