

**March 26, 2025**

Toronto City Hall  
100 Queen Street West  
Toronto, Ontario  
M5H 2N2

**RE: 2025.IE19.8 - Proposed Amendments to Municipal Code Chapter 367, Building Emissions Performance**

Dear Members of Toronto City Council,

**In the face of economic uncertainty from the United States, Toronto Environmental Alliance is writing to remind Toronto City Council of the importance of setting clear Building Emission Performance Standards that will support local jobs while making Toronto more competitive in more diverse international markets.**

**Making our buildings greener supports local economic activity and jobs while making the operation of buildings more affordable.** Clear, predictable standards for iteratively increasing energy efficiency can spark a thriving retrofit economy, which not only creates lasting local green jobs and expertise, but also provides economic resilience for contexts where there is slower activity for new builds. These are some of the reasons why Building Performance Standards are quickly becoming standard practice in jurisdictions around the world, including New York, Washington DC, Vancouver, and the entire European Union.<sup>1</sup>

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<sup>1</sup> In 2024 the European Parliament passed a Building Energy Performance directive that sets in motion the implementation of building performance standards throughout the European Union. Source: [https://ec.europa.eu/commission/presscorner/detail/en/qanda\\_24\\_1966](https://ec.europa.eu/commission/presscorner/detail/en/qanda_24_1966)

**Cutting building emissions is also becoming more urgent as Toronto looks to diversify overseas markets.** The European Union and the UK are already planning carbon border adjustments that would increase costs to imports that do not meet EU and UK climate regulations.<sup>2</sup> Because 56% of Toronto's community emissions comes from buildings,<sup>3</sup> setting Building Emissions Performance Standards is one of the key tools at the City's disposal to cut emissions from the buildings sector.

**TEA very strongly supports the implementation of a strong Building Emissions Performance Standard.** This report recommends a delay in the timeline for buildings to report their current energy and emissions. While TEA recognizes that hiccups in the process are bound to happen, Toronto risks setbacks on receiving the significant benefits of BEPS and losing our reputational leadership if delays become excessive. We look forward to the staff report later this year that will set performance compliance timelines for buildings across Toronto.

Jurisdictions around the world are showing that a strong Building Emissions Performance Standard is part and parcel of a modern city. TEA is encouraged by the dedication and work that the City and City staff are placing on this important issue.

Sincerely,



How-Sen Chong  
Climate Campaigner  
Toronto Environmental Alliance

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<sup>2</sup> These are known as Carbon Border Adjustment Mechanisms. The EU's compliance is expected to begin in 2026. Source: <https://trade.ec.europa.eu/access-to-markets/en/news/carbon-border-adjustment-mechanism-cbam>

<sup>3</sup> Source: <https://www.toronto.ca/wp-content/uploads/2024/12/9270-2022-SBEI-Report.pdf>, page 21