

**June 11, 2025**

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

**RE: 2025.IE22.9 — TransformTO Net Zero Strategy - 2024 Annual Report on Implementation Progress**

Dear Members of the Infrastructure and Environment Committee,

Toronto Environmental Alliance is strongly in support of the City's TransformTO plan to go Net Zero by 2040. TEA shares the concerns raised in City staff reports that Toronto is not on track to meet our 2025 climate targets. However, swift transformative action could mean that Toronto meets our 2030 emissions targets. We outline some of these potential actions below.

**1. Rapid and significant reduction in fossil (natural) gas use in buildings**

Fossil gas — usually marketed as 'natural gas' — emits over 50% of the City of Toronto's community greenhouse gas emissions. **There is no way to significantly reduce emissions in Toronto without strong action to reduce burning fossil gas in buildings - both new and existing. Toronto Environmental Alliance strongly endorses the implementation of a Building Emissions Performance Standard (BEPS), which we are expecting staff to submit to this committee in Q4 of this year.** New York, Boston, Vancouver, and Seattle have already implemented Building Emissions Performance Standards, and cities like Montreal, Chicago, Philadelphia, Washington DC, San Francisco, as well as the entire European Union are developing BEPS in their communities as well. In addition, **the City of Toronto must protect and advance the Toronto Green Standard** and should implement Version 5 of the award-winning policy so that it begins in 2026 on schedule.

## **2. Increase access to low carbon transportation options.**

Toronto is still too hard to get around without a private vehicle. In order to get more into more space efficient, cost efficient, and healthier forms of transportation, **Toronto needs to accelerate transit and active transportation improvements.** One immediate action this Council can take is to **implement RapidTO transit-only surface lanes in order to move people more efficiently through our city with less carbon pollution.**

**Implementing dedicated transit and cycling lanes are positive steps in reconsidering how we allocate road space.** Cities like New York, Paris, and Montreal have been very successful in providing a greater diversity of road types, with some streets dedicated just to pedestrians, others mostly for transit, and yet others for bikes or cars. **The City of Toronto must join global cities and continue to dedicate more road space to transit, cyclists, and pedestrians.** This is a far more efficient way to move large numbers of people when compared to a car, the average of which has just 1.5 occupants and requires at least 10-20 meters of additional lane space when in motion to avoid hitting the vehicle in front of it.

## **3. Dramatically increase the production and storage of electricity inside Toronto's borders.**

Over the past several emissions inventories, one of the key reasons cited for the City's rise in emissions has been an increase in the emissions from the province's electricity grid. While the City of Toronto does not have full control over the provincial electricity grid, **the City of Toronto and Toronto Hydro must work together to accelerate the reduction of barriers and the increase of incentives for building managers and owners to produce and store electricity on-site.**

## **4. Advocate on behalf of all Cities to the provincial and federal governments.**

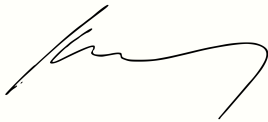
The very first TransformTO reports made it very clear that the City of Toronto does not, itself, have all the resources necessary to bring about the significant changes that we need. However, as the largest city in Canada, with significant economic and political importance, Toronto can advocate for policies and programs that would benefit all Ontarians and all Canadians. For example, to cut emissions, we need significant financing to help buildings cut their emissions, which is an area that both the provincial and federal governments have the responsibility to assist with.

## 5. Improve Carbon Accountability

TEA is very pleased to see that for the first time, all city departments are participating in the City's Carbon Budgeting process. We fully support the continued implementation of this work. However, **we are concerned that the City is still not taking a more holistic approach to carbon emissions assessments.** For example, in recent weeks, the City of Toronto has been doing waste consultations with documents implying that incinerating garbage, including plastic, could be a solution for carbon emissions. Calling the burning of garbage a 'climate solution' is an incineration industry talking point that does not acknowledge that plastic is a high carbon, fossil fuel material. In addition to emitting highly toxic gaseous chemicals, *burning plastic also produces more carbon emissions than coal.* Plastic would not produce noticeable amounts of emissions in landfill. The best way to both reduce waste and reduce emissions would be to double down on the waste reduction and circular economy initiatives that have already been passed by council.

The City of Toronto has taken strong steps forward on climate action in 2024. Yet it cannot be denied that the City is not on track to meet our 2025 climate goals. Toronto needs to implement transformative policies that will cut emissions, protect residents, and make life better for everyone in the City.

Sincerely,



How-Sen Chong  
Climate Campaigner  
Toronto Environmental Alliance