

Infrastructure and Environment Committee  
City of Toronto  
100 Queen St W  
Toronto, ON

December 4, 2025

**RE: IE26.3 – TransformTO Net Zero Strategy: Action Plan (2026–2030)**

To Mayor Chow and Members of the Infrastructure and Environment Committee,

On behalf of the **Toronto 2030 District**, I am writing regarding the TransformTO Net Zero Plan. We are disappointed to see the removal of Toronto's Building Emissions Performance Standards (BEPS) from the plan. We are supportive of maintaining a BEPS framework within the City's climate strategy, and we strongly encourage the continuation of broad, meaningful consultation with the full range of building-sector stakeholders to progress this work.

The Toronto 2030 District is a collaborative, member-based public–private partnership focused on accelerating the decarbonization of commercial and institutional buildings. Our members include building owners, managers, architects, engineers, utilities, academic partners, and technology and service providers working together to reduce emissions, share best practices, and pilot practical retrofit pathways for the city's diverse building stock.

Because buildings represent the majority of Toronto's emissions, a comprehensive approach to the decarbonization of existing buildings is essential. Without a clear framework such as BEPS, Toronto has no viable path to meeting the TransformTO climate targets. At the same time, we recognize that BEPS will only succeed if shaped through inclusive, transparent, and technically grounded consultation with building owners.

Maintaining BEPS in the climate plan will enable:

- **Clarity and predictability** for building owners, investors, and tenants planning long-term retrofit decisions.
- **Meaningful engagement** with mid-size and smaller building owners who often lack capacity and risk being left out of policy design.
- **Opportunities for training, workforce development, and high-quality job creation**, which benefit Toronto's communities and economy.
- **Identification of practical implementation pathways** that reflect Toronto's diverse building typologies and ownership structures.

We also want to underscore the importance of communicating that climate action and affordability are not opposing goals. A focussed approach with solutions and financing protects owners from escalating risks and drives stable local economic activity. A BEPS framework—designed collaboratively—can support both climate and affordability objectives.

For these reasons, we respectfully ask Council to:

1. **Retain Building Emissions Performance Standards (BEPS) as a core element of the TransformTO Action Plan**, recognizing its essential role in reducing emissions from existing buildings.
2. **Commit to a continued broad, transparent, and technically informed consultation process** that includes building owners and managers of all sizes, tenants, labour, utilities, community partners, and industry experts.
3. **Provide clarity on timelines, scope, and next steps** so that stakeholders can proactively plan and invest in building upgrades.

Toronto faces dual climate and fiscal challenges, and we see a well-designed BEPS as an opportunity to address both. The City has an opportunity to lead not only in climate ambition, but also in collaborative policy design. The Toronto 2030 District and our members stand ready to support the City through consultation, data insights, and practical implementation expertise from across the building sector.

**We urge you -- Mayor Chow and members of the Infrastructure and Environment Committee -- to resume consultations and approve a BEPS bylaw no later than Q2 of 2026.**

Sincerely,

A handwritten signature in black ink, appearing to read "Julia St Michael". The signature is fluid and cursive, with the first name "Julia" being more prominent.

**Julia St Michael**  
**Executive Director, Toronto 2030 District**  
**juliasmichael@2030districts.org**