

December 3, 2025

Infrastructure and Environment Committee

City of Toronto

100 Queen St W

Toronto, ON

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

Dear Councillor Paul Fletcher:

My name is Raidin Blue, I am an Analyst with the Pembina Institute, and I am writing to you as the Chair of the Infrastructure and Environment Committee. The Pembina Institute is a national clean energy think-tank dedicated to advancing credible, actionable solutions for a safe climate and thriving communities. My role involves supporting deep retrofits as practical solutions that ensure Canadian homes and buildings are safe, healthy, low-carbon, and affordable to heat and cool.

I encourage the Infrastructure and Environment Committee to reprioritize the Building Emissions Performance Standards bylaw. After two years of stakeholder consultation, the BEPS bylaw was expected to be discussed this December at the Infrastructure and Environment Committee, but the bylaw has not been brought forward for consideration.

The BEPS bylaw has potential to transform the building retrofit market in Toronto; it would spur deeper decarbonization and emerge a suite of non-energy benefits. The non-energy benefits of deep retrofits include health and safety improvements, enhanced resilience, better insurance coverage, increased affordability, and contributions to grid services. These non-energy benefits of deep retrofits are real, these non-energy benefits are measurable, and these non-energy benefits matter.

According to the City of Toronto's *2023 Sector-Based Emissions Inventory*, buildings are Toronto's largest source of greenhouse gases, accounting for 55% of emissions. As such, an emissions performance standard for existing buildings is the single most effective policy to lower GHG emissions in Toronto. As reported in the *TransformTO Net Zero Strategy: Action Plan (2026-2030)*, the city will not be meeting its 2030 target of 65% reduction in GHG emissions.

If the City of Toronto is to meet its goal of net zero by 2040, the Infrastructure and Environment Committee must reprioritize the BEPS bylaw and bring it to Council. Thank you for taking the

time to read and consider this letter. I look forward to continuing to support the City of Toronto in reaching its climate goals.

Yours sincerely,

Raidin Blue

Raidin Blue,
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cc:

Mayor Olivia Chow
Members of the Infrastructure and Environment Committee
Councillor Rachel Chernos Lin
Councillor Mike Colle
Councillor Amber Morley
Councillor James Pasternak
Councillor Anthony Perruzza
Councillor Dianne Saxe