



December 3, 2025

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

Dear Mayor Chow and members of the Infrastructure & Environment Committee,

I am commenting on behalf of Toronto350, a grassroots climate justice group, regarding the TransformTO Net Zero Plan. We urge the committee to deliver a strong TransformTO Net Zero Strategy Action Plan. Acting and spending now will help mitigate some of the effects of climate change, and drastically reduce future costs to residents.

We are disappointed to see the removal of Toronto's Building Emissions Performance Standards (BEPS) from the plan. We feel it is integral to Toronto achieving its emissions reduction targets.

A BEPS bylaw would mean better buildings across Toronto. It presents an immediate opportunity to stimulate local economic opportunities in the construction sector, create value for building owners, and improve living conditions and affordability for tenants.

As buildings represent 59% of Toronto's emissions, there is no viable path to meeting TransformTO climate targets without BEPS.

We are sensitive to concerns regarding the potential impact on affordability. However, we are confident that by maximizing current funding and financing, and through coordination with other levels of government to provide additional strategic support for building owners and operators who are facing market challenges, those risks will be mitigated.

Toronto faces both climate and fiscal challenges, and we see a well-designed BEPS as an opportunity to address both. **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 and to deliver a strong TransformTO Net Zero Strategy Action Plan that has Toronto meet its emissions reductions targets.**

Sincerely,

Amelia Rose Khan, on behalf of Toronto350

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