



December 3, 2025

Chair Paula Fletcher and Members of the
Infrastructure & Environment Committee
City Hall, 100 Queen Street West
Toronto, Ontario
M5H 2N2

Dear Councillor Fletcher and Committee Members:

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

I am writing as President of the Toronto Industry Network (TIN). TIN was established in 2002 to provide a voice for Toronto's manufacturers at City Hall and Queen's Park. Our members produce paper and food products, silicone, chemicals, welding equipment, vaccines, concrete, petroleum products, plastic pipe, fibreglass insulation, road building materials, gelatin, etc. Many of these products are used directly by Torontonians, the city or are exported, creating wealth for the city.

We strive to create a competitive and sustainable business environment that fosters investment and growth to strengthen Toronto, an objective which has become increasingly important in light of the trade challenges and other ongoing uncertainties.

Our recommendation is that reporting requirements for manufacturers under the current or succeeding by-laws for emissions standards be eliminated or at least that manufacturers be exempt on a permanent basis.

As stated, the rationale for not proceeding with the Building and Emissions Standard at this time is due to *"recent actions taken at the global, national and provincial level have created significant affordability and economic competitiveness challenges for Toronto's residents and businesses."* The decision not to proceed is consistent with the call to cut Red Tape, and the Mayor's Economic Action Plan to prioritize global competitiveness.

TIN is pleased that the City has decided, for now at least, not to proceed any further with this initiative. Efforts to fight climate change are commendable, but the staff report recognizes, quite rightly, that there are other priorities at this time that are placing some environmental initiatives on the back burner. That said, TIN members are keenly aware of their environmental stewardship responsibilities, not only because they are following mandates set by international, national and provincial bodies and levels of government, but because the market place – their customers – expects them to.

In this economic 'moment' of greater attention to the need for a more productive and competitive national economy, TIN does not believe that having to report and/or comply with similar criteria set by the City is a productive use of time and resource, whether it is under the current or a subsequent by-law. The cost benefit to industry here in Toronto for an additional level of compliance and/or reporting is not there. Both should be eliminated, now, permanently.

Thank you for the opportunity to present our views.

Sincerely,



Craig McLuckie
President, Toronto Industry Network
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