

Dec 3rd, 2025

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

Dear Members of the Infrastructure and Environment Committee,

Toronto Environmental Alliance (TEA) continues to be a strong supporter of Toronto's actions and commitments to address the climate crisis and protect residents from its impacts.

We ask you today to maintain that commitment by building on the 5-year action plan for TransformTO, and continuing to work on important climate tools that the City has already invested substantial resources into to make buildings more climate-safe.

The TransformTO 5-year plan before you should be applauded for its commitment to leading by example with a carbon budget and tangible action to decarbonize the City's own facilities and vehicles. However, we are concerned that it will not make a significant impact on Toronto's largest source of emissions: buildings.

TEA is calling for the following actions to be taken to address this:

- Recommit to a clear and updated timeline and next steps for Building Emissions Performance Standards (BEPS) in the City of Toronto, and acknowledge its role as a key driver of climate progress in the next decade
- Formally request funding support for building retrofits from other levels of government, recognizing the economic and employment benefits retrofits will bring
- Continue work to improve and develop City-led support programs and policies to enable building retrofits while addressing affordability, and continue engagement with tenants and building owners/managers throughout this process

We acknowledge that the City's climate action tools have been slowed or outright blocked by provincial attacks and federal lack of funding. But local polling shows that Torontonians want you to stay the course, and specifically, that 84% of Torontonians support their local government bringing in green building requirements as a climate tool.¹

Torontonians understand what we are facing - recent floods, heatwaves, and wildfire smoke has made this very clear. We will support and celebrate a path forward that takes reasonable steps within the City's grasp.

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https://assets.nationbuilder.com/toenviro/pages/6287/attachments/original/1761162362/TEA_-_Abacus_Green_buildings_polling_Oct_2025.pdf?1761162362

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Fortunately, the building emissions performance standards (BEPS) policy that City Council directed staff to develop for large existing buildings is possible, reasonable, and within the City's legislative authority.

Initial proposals for this policy were described recently in the Toronto Star as "modest," with 85% of existing buildings already meeting the requirements in the initial stage in 2030, a longer timeline for multi-residential buildings, and a complete exemption for single-family homes.²

The item before you today includes supportive comments from an extremely broad range of voices. There are letters from building owners and managers (eg BOMA Toronto), from banks, real estate investors, from think tanks, energy consultants, from local community centres, from environmental groups, tenants, from businesses like Mitsubishi - all stating their willingness to continue engaging with staff to build an effective and feasible policy for existing buildings. It is rare that a coalition so broad agrees on one thing, demonstrating that now is not the time to give up on this work.

There is also an undeniable need for policies that drive local jobs and economic activity in the coming years. The City of Toronto's 2021 Net Zero Existing Buildings Strategy states that retrofitting Toronto's buildings could add \$140 billion in local economic activity and create an estimated 8500 direct, full-time retrofit jobs over the next 25 years. Put simply, we can put Toronto to work fixing up the buildings where we live and work. This is city building in its most literal and powerful sense.

We understand the need to take time to develop this policy and the programs necessary to support it. We ask that you continue what is working - deep engagement with industry, utilities, tenants, building owners, community groups, labour voices, and others to build a path forward with a strong foundation of support.

Thank you for your commitment to building a more climate-safe city. We look forward to working alongside the City to support the implementation of this plan, and hope you will see the grassroots climate movement as allies in this work.

Sincerely,



Sarah Buchanan
Campaigns Director, Toronto Environmental Alliance

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https://www.thestar.com/news/gta/why-toronto-won-t-meet-its-climate-crisis-targets-to-cut-the-city-s-biggest/article_807a05f6-ae12-40a8-8fe2-01a255fbc372.html