

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,

We are writing on behalf of Toronto Home Energy Network (THE Network), our Partner Communities and the hundreds of homeowners we support across Toronto regarding the TransformTO Net Zero Plan. We are deeply concerned about the decision to remove Building Emissions Performance Standards (BEPS) from the action plan.

THE Network supports homeowners in transitioning off gas to electricity with an emphasis on heat pump adoption through community-driven programs across Toronto. While BEPS in its current proposed form does not directly regulate single-family homes, it provides an essential signal to all Toronto property owners that emissions reduction is a shared responsibility and a municipal priority. The absence of BEPS for larger buildings inevitably pushes any future requirements for smaller properties further into the future, making Toronto's overall climate targets increasingly unattainable.

BEPS represents the critical regulatory signal that Toronto's property owners need now. The timeline for planning, financing, and executing emissions-reducing retrofits is measured in years, not months. Property owners across all building types require clear, consistent policy direction to make informed decisions about capital investments, engage qualified contractors, and coordinate building improvements with natural equipment replacement cycles. Without BEPS, property owners face uncertainty that delays action and perpetuates reliance on fossil fuel infrastructure.

The homeowners we work with have made personal investments to reduce their emissions. They are not asking for exemptions or delays, they are proactively doing their part to reduce the 58% of Toronto's emissions that come from buildings. In the immediate term, establishing BEPS, even voluntarily for low density buildings, would recognize these homeowners, and highlight as an example those homes that have achieved the targeted energy efficiency and carbon emissions. The absence of BEPS

undermines the efforts of those who have already acted and sends a discouraging signal to those planning to take action.

Implementing BEPS is a critical issue for today, not a future concern. Every year without clear requirements represents another year of locked-in emissions, missed planning opportunities, and emergency equipment replacements that default to fossil fuel systems. Property owners need adequate time to comply, but that timeline must begin with policy certainty.

We understand the need to balance implementation challenges with affordability concerns. However, the costs of inaction (climate impacts, infrastructure strain, and the increasing difficulty of meeting TransformTO targets) far exceed the costs of a well-designed BEPS framework. The absence of greater financial incentives, a consumer carbon price and other supportive signals, makes the message that BEPS would deliver even more critical.

Without BEPS, there is no viable path to meeting our climate commitments. We urge Mayor Chow and members of the Infrastructure and Environment Committee to resume consultations and demonstrate Toronto climate leadership by implementing BEPS as soon as possible.

Sincerely,

Eve Wyatt  
Chair, Toronto Home Energy Network

Paul Dowsett  
Vice-Chair, Toronto Home Energy  
Network

### Partner Communities

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