

December 3, 2025

Infrastructure and Environment Committee
City of Toronto
100 Queen St W
Toronto, Ontario

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

To: Mayor Chow and Members of the Infrastructure and Environment Committee,

I am writing to you today on behalf of Enerlife Consulting Inc. (Enerlife) regarding the TransformTO Net Zero Plan. As a leader in energy transition planning and implementation for large building owners, we are concerned to see the apparent removal of Toronto's Building Emissions Performance Standards (BEPS) from the plan.

I am the President of Enerlife and a professional engineer with over 40 years' experience in commercial buildings, specializing in energy efficiency and decarbonization. Enerlife is a North American leader in energy and emissions reduction for commercial, institutional and multi-residential buildings. We provide advisory and project management services to hundreds of building owners, working on thousands of buildings in Ontario, across Canada and in the United States. We have worked with the City of Toronto for more than two decades on many of your world class energy efficiency programs. We work in New York City and see firsthand the impact of Local Law 97, their carbon cap regulation. We represent the Building Owners and Managers Association (BOMA Toronto and Ottawa) in energy policy related hearings at the Ontario Energy Board (OEB), and are well versed in the effectiveness of alternative regulatory tools.

Buildings represent 59% of Toronto's emissions. Without definitive action from commercial building owners, there is no viable path to meeting TransformTO climate targets. The anticipated BEPS bylaw would be an important lever, leading to better buildings across Toronto. Now is a critical moment to stimulate local economic opportunities in the construction sector, create value for building owners, and improve living conditions and affordability for tenants. Improving Toronto's building stock will result in more satisfied tenants, increased resilience, and would bring us to the same level as other cities like New York, Boston, and Vancouver. In my professional opinion, BEPS can play a decisive role in meeting the City's climate goals.

I urge you to continue consultations, with a view to approving a BEPS bylaw no later than Q2 of 2026, in time to make a meaningful contribution to 2030 emissions reduction targets. I will be pleased to answer questions and provide supporting data for this recommendation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ian Jarvis', with a stylized flourish at the end.

Ian Jarvis, P. Eng

President, Enerlife Consulting Inc.

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