



ERA Architects Inc.
#600-625 Church St
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December 03, 2025

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

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

Dear Mayor Chow and Members of the Infrastructure and Environment Committee,

We are writing to you today on behalf of the Tower Renewal Partnership and ERA Architects Inc regarding the TransformTO Net Zero Plan. We understand that the Toronto's Building Emissions Performance Standards (BEPS) will be removed from the plan which will represent a huge setback on Toronto's reaching any significant advancement on climate goals.

A BEPS bylaw would mean 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.

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

Through the Tower Renewal Partnership we have identified that the acceleration of municipal regulation is a step in the right direction in supporting the Retrofit Construction. ERA as a proven leader in adaptive re-use and deep retrofit of existing post-war towers consistently delivers services to support the retrofit industry. But we rely on regulation to set the pace and scale we need to plan, invest, and ensure workforce and supply-chain readiness to support building owners in planning and implementing upgrades. A BEPS policy in Toronto provides the driver for growth and reliability that our local industry needs at a critical time.

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.



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Toronto faces dual climate and fiscal challenges, and we see a well-designed BEPS as an opportunity to address both. Mayor Chow and members of the Infrastructure and Environment Committee we urge you to resume consultations and approve a BEPS bylaw no later than Q2 of 2026.

Sincerely,

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