



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

December 3, 2025

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

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

We respectfully submit these comments on behalf of the Ontario chapter of the Canadian Association of the Physicians for the Environment (CAPE). CAPE is a non-partisan, physician-led organization committed to advancing environmental and health justice, with over 150 physician and healthcare workers and over 3,500 supporters across Toronto.

We are grateful for the work of Environment, Climate and Forestry staff in developing the Net Zero Strategy Action Plan (2026- 2030), but we are deeply concerned that the strategy is not being accompanied by a Building Emissions Performance Standards (BEPS) policy. BEPS is necessary to the success of Toronto's TransformTO Net-Zero strategy; it also promises to deliver wide-ranging benefits for health, affordability and the economy. We therefore urge you to bring a BEPS bylaw forward and support its passage as soon as possible.

BEPS is needed for Toronto's TransformTO Net-Zero strategy to succeed and we must not delay its implementation. With buildings responsible for over 56% of our emissions, primarily from the burning of fossil gas for heating, we will not reach our net-zero climate target without BEPS. Staff have been working on this policy for two years. As the climate crisis worsens, with significant impacts on the health, lives and livelihoods of Toronto's residents, BEPS must be brought forward now. A BEPs policy would set steadily increasing limits on pollution from buildings over time and set us on a pathway to reduced pollution, improved health, safer climate-ready buildings, and a growing green economy.

In addition to reducing emissions, by requiring upgrades and improvements to buildings BEPS will help protect residents from health harms, including the increasing threat of climate-related health harms. This is particularly the case for low-income, newcomer, and racialized communities, many of whom live in older, less well-maintained housing. For example, upgrading buildings with high-quality insulation, air sealing, high-performance windows, and shading to



increase energy efficiency will also offer protection from extreme heat which is already causing approximately [250 premature deaths](#) a year in Toronto. Further, fuel switching from gas to electricity will improve indoor air quality and substantially lower asthma rates, especially in [children](#). Research shows that gas stoves contribute to approximately [one in eight cases of childhood asthma](#). And the installation of heat pumps with air-cleaning filters will reduce exposure to wildfire smoke which is becoming a significant health problem as the climate crisis worsens. More broadly, reducing energy demand, especially while Toronto depends on gas-fired power, will improve outdoor air quality for everyone.

In addition to these immediate health benefits, BEPS would bring substantial economic benefits to Toronto residents by reducing energy costs. This, in turn, can also improve health outcomes by preventing families from having to choose between heating or cooling their homes and essentials such as food or medication. Reliable access to these necessities supports better health, reduces mental stress, and enhances overall quality of life.

BEPS would also provide a much-needed boost to job creation. The Atmospheric Fund estimates the policy would lead to the creation of up to 7000 local jobs in retrofitting and energy efficiency. These positions could be filled through the creation of targeted training programs for members of equity-owned communities, particularly for Toronto's youth who are experiencing high rates of unemployment. This, in turn, would reduce the mental and social stress of unemployment and ensure the development of a more inclusive green economy.

Looking ahead, BEPS will need to be accompanied by measures to protect tenants. Toronto's new renovation by-law can be followed by regulations that ensure building owners who receive financial support for energy-efficiency upgrades be prohibited from applying for above-guideline rent increases. We recommend that regulations be put in place that would require tenant participation in all green retrofit planning through Community Accountability Boards and that building owners be required to prioritize retrofit projects that do not displace residents. In addition, we note that there are [numerous financial supports](#) in place for building operators who may need assistance.

The climate crisis is a public health crisis, and it requires that governments act with the urgency this emergency demands. For the health and well-being of Toronto's residents, we need Toronto's TransformTO Net-Zero strategy to be the strongest it can be, and this requires a strong BEPs policy. While other jurisdictions are moving ahead on BEPS, Toronto must not be left



behind. We therefore urge you to move forward with Building Emissions Performance Standards Policy without further delay.

Respectfully,

Dr. Mili Roy and Dr. Sehjal Bhargava,
on behalf of CAPE Ontario
on@cape.ca