

Karen Mergler

Toronto, Ontario

December 3, 2025

Infrastructure and Environment Committee (IEC)
Toronto City Hall
100 Queen Street West,
Toronto ON M5H 2N2

Attention: Mayor Chow and the Members of the IEC

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

Dear Mayor Chow and Infrastructure and Environment Committee Members

I am writing to you to express my personal position on the recently published Transform TO Net Zero Strategy for 2026 to 2030. I have also signed another communication to the Committee from my group Don Valley West for Environmental Action.

Upon reading the plan, I was disturbed to find out that Toronto may be unable to reach its targets to reduce emissions. It seems that these goals have now become aspirational, and I am sincerely hoping that the City will be able to find solutions that will bring us back to the original committed targets.

I applaud City staff for the serious intent that is embedded throughout the Action Plan and for developing it through an equity lens. Especially of merit are the intentions of enhanced youth engagement and the Black-led climate actions grants program.

However, a serious omission from the Action Plan is the Building Emissions Performance Standards (BEPS) by-law. This by-law is crucial to anchoring the five-year plan.

As someone with LEED training who spent almost forty years working in the multi-residential sector, both in rental and in condominium buildings, I fully support the approach that the City would be taking in having this by-law in place. What gets measured gets managed, and making building owners responsible for controlling the emissions from their operations makes very good sense.

Throughout my career, I watched the progression of many energy savings projects, from lighting retrofits to HVAC equipment replacements, as Boards of Directors of condominium corporations worked to bring energy optimization to their buildings. These measures were primarily a means to save on operating costs while completing required capital/reserve fund projects, but had the added benefit of reducing carbon emissions well before we found out that we had reached a critical stage of damage and disruption created by climate change.

There are many other techniques and technologies for retrofits that will help Toronto reduce its emissions of 55% in the buildings sector and contribute to reducing the emissions of 47% created by natural gas. Recently I have seen opportunities for buildings to be reclad for energy efficiency, to have outdated heating equipment replaced with heat pumps, which will provide both heating and cooling (a big plus for apartment building owners who may be faced with the prospect of satisfying the

requirements of a maximum heat by-law), to install geothermal, small wind turbines and solar, including solar cladding, and for improving insulation. Many of these projects would benefit both residential and commercial buildings. The projects come with costs that can be recovered through the energy savings gained in a payback period, and could create a great return on investment. Other benefits include cleaner air, better comfort for employees and for residents, including those who are members of equity-deserving groups, from more responsive heating and air conditioning systems, easier equipment maintenance and the creation of up to 7000 local green jobs (including for youth) that cannot be exported.

If pushback from building owners has resulted in the BEPS bylaw being removed from the Action Plan, the City should consider incentivizing building retrofits by way of loans and grants, and offer training to building operations staff so that they can transition seamlessly into a new age of carbon free building systems. The Federal and Provincial governments should provide funding for these initiatives; the effects of climate change are a national (and international) problem. All three levels of government should be aware that public support for green building requirements is high and they should consider that they will benefit from a return on investment for any financial support that they provide to building owners by way of avoiding the costs of damaging climate-change related events that would be curtailed as a result of a concerted effort to reduce emissions.

Building Emissions Performance Standards are widely underway in major centers across the globe. Toronto has been a leader in sustainability initiatives that help to fight the deleterious effects of climate change. Despite the challenges that City staff have cited in the Action Plan, I ask the City to revive the plans for, and to pass, the BEPS by-law so that we can be confident that Toronto will reach net zero emissions by 2040.

Thank you for your consideration.

Yours very truly
Karen Mergler
Ward 15 Constituent

Cc: Rachel Chernos Lin, Councillor Ward 15