

December 3, 2025

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

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

**RE: IE26.3 - TransformTO Net Zero Strategy: Action Plan (2026-2030) and the Indefinite Pause of Engagement on the Building Emissions Performance Standard (BEPS) Bylaw**

Further to BOMA Toronto's response to this matter and on behalf of the Building Owners and Managers Association of Canada (BOMA Canada), I would like to express our appreciation for the City of Toronto's ongoing commitment to engage the commercial real estate (CRE) community on policies and initiatives that directly impact our sector. The City's continued willingness to collaborate meaningfully with building owners, managers and operators is essential as we work together toward a more sustainable and resilient Toronto.

We were encouraged to see the City followed one of the key recommendations brought forward through the BOMA BPS Advisory Council to ensure that any Building Emissions Performance Standard (BEPS) bylaw is grounded in both scientific evidence and the operational and financial realities that govern the CRE sector. This is an important step toward developing an effective and implementable policy framework.

However, we must express concern regarding the City's recent decision to indefinitely pause engagement on the development of the BEPS bylaw, as well as the way this decision was communicated. If the City's intention is to delay the implementation of the BEPS bylaw, pending further investigation, it is reasonable and valid approach. The way the announcement reached the public and the business community created uncertainty at a time when clarity and stability are needed. Many of our member organizations remain deeply committed to advancing building performance, investing in retrofits, and implementing low-emission measures as part of their long-term strategies to support the low-carbon transition.

Progressive BEPS policies, developed in partnership with industry, can play a critical role in supporting and accelerating these efforts. Pausing this work indefinitely risks undermining the confidence of building owners, operators, and investors in the City's long-term climate goals and, more broadly, in the credibility of the TransformTO Net Zero Strategy. This uncertainty also has implications for Toronto's global competitiveness, particularly in attracting investment and positioning the city as a leader in sustainable, high-performing buildings.

BOMA and our members remain ready to collaborate with the City to identify pathways that are both ambitious and practical. We strongly encourage Council to provide clear direction on the future of the BEPS initiative and to reaffirm its commitment to collaborative, evidence-based policy development.

Thank you for your attention to this matter and for your continued partnership with the commercial real estate community. We look forward to ongoing engagement in support of a thriving, low-carbon Toronto.

Regards,



**Bala Gnanam**

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