



FEDERATION OF
METRO TENANTS'
ASSOCIATIONS

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

The Federation of Metro Tenants Associations (FMTA) reiterates its support for implementing a Building Emissions Performance Standard (BEPS) bylaw in Toronto, and for including Multi-Unit Residential Buildings (MURBs) in the version expected in December 2025. We support this initiative as it is about more than protecting our environment—it's about making homes healthier and more affordable to live in.

Right now, the widespread use of [Above Guideline Rent Increases \(AGIs\) for energy retrofits](#) is deeply flawed and unjust for tenants. Landlords frequently benefit financially from these retrofits while tenants bear the cost. A well-designed BEPS for rental buildings can change this: improving living conditions, reducing emissions, and protecting tenants from having climate action used as an excuse to raise rents. AGIs are a primary driver of affordable housing loss in Toronto, with a 107% increase over two decades. The process to challenge an AGI is inaccessible, complex, and requires legal support tenants simply don't have. This is urgent when 40% of Toronto renter households already spend 30% or more of their income on shelter.

Therefore, we strongly recommend that the BEPS bylaw expected in December 2025 adopt the following:

- A compliance date for MURBs of 2033, conditional on a mandatory Council review in 2027 to guarantee no cost pass-downs to tenants.
- That the 2027 review be presented with concrete solutions to eliminate these pass-downs, including:
 - A City commitment to support all efforts within its authority to ban AGIs linked to retrofits.
 - Enhancement of existing low-interest City loan programs that prohibit AGIs.
 - Advocacy for provincial regulation mandating landlords pursue available government funds before applying for an AGI.
 - Support for retrofit financing solutions like grants and zero-interest loans.

- A City-led or non-profit heat pump retrofit program to restrain AGIs.
- Alternative compliance pathways for social/affordable housing providers.
- Increased City-led tenant support programs, including legal aid, for those facing AGIs.
- A systemic AGI litigation fund to build protective case law.
- Tenant transparency measures on real retrofit costs and savings.
- A schedule for future standards on indoor air quality, ventilation, and flood protection.

Ensuring MURBs are included in this bylaw would make a huge difference in the lives of everyday tenants across the City. Tenants—who are already bearing the inequitable cost of climate inaction—need the additional protections this framework can provide.

We urge you to seize this opportunity to pass a BEPS bylaw that truly protects both our climate and our city's tenants.

Thank you so much for your time and consideration.

Yaroslava Montenegro
Executive Director
Federation of Metro Tenants' Associations
PO Box 73102 Wood St.
Toronto, ON, M4Y 2W5
fmta@torontotenants.org
www.torontotenants.org