

Clean Indoor Air Toronto

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Infrastructure & Environment Committee
Toronto City Hall
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December 4, 2025

To the Infrastructure & Environment Committee of the City of Toronto;

Re: IEC26.3 TransformTO Net Zero Strategy: Action Plan (2026-2030)

We are strong supporters of the City of Toronto's climate action plans. However, we are greatly concerned over the removal of the Building Emissions Performance Standards (BEPS) from the City of Toronto's TransformTO Net Zero Plan. The removal of BEPS greatly weakens the Net Zero Plan and makes it unlikely that Toronto can meet the Net Zero target date of 2040.

Toronto's buildings are estimated to contribute around 59% of the city's emissions, due to reliance on fossil fuels. Reduction of emissions using various technologies, including conversion to heat pumps, is not only cost-effective and energy efficient, but it also removes a major source of indoor air pollution. Burning fossil fuels like natural gas and heating oil creates harmful pollution, including particulates, nitrogen dioxide, carbon monoxide, incomplete products of combustion, and volatile organic compounds (VOCs).¹ Natural gas and other fossil fuels contain benzene and other aromatic compounds, which are known carcinogens. Low level leakage from gas-burning appliances means that methane, benzene and other aromatic compounds enter the indoor environment.²

Many Toronto buildings lack mechanical ventilation and air conditioning, meaning they are not resilient to the impacts of climate change-related events, including wildfire smoke and extreme heat. Many Toronto buildings that do have mechanical ventilation do not comply with ASHRAE Standard 62.1, the current ventilation standard upon which the Ontario *Building Code* relies.^{3,4} Even for those buildings that do comply with ASHRAE Standard 62.1, the current standard is outdated and is not designed to handle the fine particulates from burning fossil fuels indoors, wildfire smoke, other pollutants now commonly found indoors, like PFAS and microplastics, and airborne pathogens.⁵

Access to clean, safe-to-breathe indoor air is not equitable across the city. It should come as no surprise that buildings which lack adequate ventilation are typically found in lower income communities. Poor ventilation means poor indoor air quality; chronic exposure to poor indoor air quality is associated with higher rates of disease and poor health.⁶⁻⁹ The City of Toronto has an indoor air quality policy for its office-based employees¹⁰, but this policy does not extend to all of Toronto's buildings, creating an inequitable access to clean air.

All of these factors mean that without a program to accelerate HVAC upgrades and retrofits, people who work or reside in buildings lacking adequate ventilation and air conditioning will continue to be impacted by

chronic exposure to indoor air pollution, air pollution from climate change and the urban environment, and extreme heat.

The City of Toronto has the power to address this inequity and improve access to clean indoor air for all residents. The TransformTO Net Zero Plan and BEPS provide the opportunity to not only upgrade HVAC systems reduce emissions and reliance on fossil fuels and become more energy efficient, but also to improve ventilation and air filtration at the same time. Weakening the city's Net Zero Plan by removal of BEPS will actively harm Toronto's residents, especially vulnerable sectors and marginalized communities, ensuring that people who lack access to good indoor air quality will continue to be affected by a higher burden of poor health relative to those who live and work in spaces with good indoor air quality. Staying the course with the City's Net Zero Plan and enacting BEPS as a bylaw can help to protect the health of the people of Toronto right now, and into the future. It will also help to reduce the systemic barrier that poor indoor air quality presents and create a more equitable living environment.

We urge the Infrastructure & Environment Committee to pass a motion for City Council to pass BEPS as a bylaw, as it is an integral part of the TransformTO Net Zero Strategy. At the same time, we also urge the Committee to incorporate an indoor air policy that includes IAQ monitoring to ensure indoor air is clean and safe to breathe. It would also help to protect Toronto residents from the spread of airborne diseases. Taking action now will protect the health of Toronto's residents, especially vulnerable sectors, and make the city more resilient to the impacts of climate change and any future pandemic, while improving accessibility to good indoor air quality.

Yours sincerely,

Louise Hidinger, Ph.D.
Clean Indoor Air Toronto

Abbreviations

BEPS, Building Emissions Performance Standards; ASHRAE, American Society of Heating, Refrigeration, and Air-Conditioning Engineers; HVAC, heating, ventilation and air conditioning; IAQ, indoor air quality; PFAS, per- and polyfluoroalkyl substances.

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