

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

December 2, 2025

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

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

I am writing to you today on behalf of BOMA Toronto to show our support for a coherent plan to collaborate with the commercial real estate (CRE) industry to reduce greenhouse gas (GHG) emissions recognizing the importance of buildings in achieving the TransformTO GHG reduction goals.

Buildings represent 59% of Toronto's emissions, and without ongoing collaboration and support from the CRE sector with the City, there is no viable path to meeting TransformTO climate targets. A Building Emissions Performance Standard is an important tool to help achieve these goals, and we believe that with thoughtful design and implementation, it can drive meaningful progress while supporting the competitiveness of Toronto's CRE sector.

The members of BOMA Toronto include the leaders in the CRE industry that will be impacted by any regulations including a Building Emissions Performance Standard. Our members can plan and budget for investment in retrofits but expect an even playing field in the commercial sector, ample time, and flexibility for compliance. Improving Toronto's building stock through any regulations will result in more satisfied tenants, increased resilience, and would bring us to the same level as other cities like New York, Boston, and Vancouver.

BOMA Toronto and many of our individual members have been engaged in the consultation process in developing the Buildings Emissions Performance Standards. We welcome the opportunity to further engage with City staff to discuss industry needs, policy options and potential implementation strategies through industry collaboration. We encourage the City to maintain an open and collaborative engagement process with stakeholders to ensure the bylaw achieves its intended climate and economic benefits.

Sincerely,



Susan Allen  
President and Chief Executive Officer  
BOMA Toronto