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

December 3, 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 on behalf of the Real Property Association of Canada (REALPAC) to express our support for a coherent, collaborative approach between the City of Toronto and the commercial real estate (CRE) sector to reduce greenhouse gas (GHG) emissions, aligned with TransformTO's climate goals.

The members of REALPAC include the leaders in the CRE industry who will be impacted by a Building Performance Standard (BPS). With thoughtful design and effective implementation, such a standard can achieve meaningful progress while preserving the competitiveness and economic health of Toronto's CRE industry.

REALPAC's recent publication, [\*Building Performance Standards: Recommendations for Canadian Policy Makers\*](#), provides guidance on the design principles and implementation considerations required for effective BPS policies across Canada. We encourage the City to give this content thorough consideration, as it reflects key priorities and concerns of the commercial real estate sector. Recommendations include: (i) focusing on the most material emissions sources under the building owner's control, (ii) using real data to set targets, (iii) aligning requirements across jurisdictions, and (iv) considering costs and benefits across impacted stakeholders.

Our members are committed to planning for and implementing the retrofits and operational improvements needed to reduce emissions. At the same time, they expect a predictable regulatory environment and a level playing field pertaining to GHG emissions, consistent with other cities such as Vancouver, New York, and Boston.

REALPAC and our members welcome continued engagement with City staff to ensure a future BPS is focused, credible, aligned, and capable of delivering meaningful emissions reductions while preserving the competitiveness and economic health of Toronto's CRE industry.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Brooks", with a long horizontal line extending to the right.

Michael Brooks  
Chief Executive Officer  
Real Property Association of Canada