

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

The Toronto & York Region Labour Council is a labour body representing over 200,000 working people in more than 150 locals and unions across the region from every sector of the economy. For over 150 years, the Labour Council has worked tirelessly to represent its members, and all working people, in the struggle for economic, social, racial, and environmental justice.

We are writing with support for the positive aspects of the Transform TO plans for the next five years (including TTC electrification, greening city buildings, maintaining and expanding the Toronto Green Standard, and more), and a shared sense of disappointment and frustration to hear that the City of Toronto will likely not hit its various emission reductions targets laid out in the TransformTO Net Zero Strategy.

In particular, we were disappointed to see one of the most hopeful and economically beneficial policies the City can deliver for workers, the Building Emissions Performance Standards (BEPS) program has not been brought forward at this time as part of the TransformTO 5-year plan. As has been noted by others, the BEPS program is an important step towards achieving the City's goals, reigning in emissions from buildings in Toronto — the single greatest contributor to our emissions.

When introduced, BEPS will lead to job creation across a variety of sectors, with the City estimating the program would lead to over 80,000 person years of work in a variety of industries. This would include good, union jobs in construction, an industry being hard hit by the economic downturn caused by Trump's tariff war, and exacerbated by the policy-of-posturing from higher orders of government.

During other periods of economic downturn, the City has turned to retrofit programs as part of the solution. The Better Building Partnership from the 1990s reduced greenhouse gases, created countless hours of construction work for the trades thus creating good jobs and addressing the long lay-off list in the construction trades caused by the economic downturn, resulted in savings for the buildings, and stimulated local economic growth.

Bringing forward the BEPS program would be an important step toward solutions for working people's pressing concerns — both economic and environmental. We look forward to see its work being advanced soon for the good of all in Toronto. In the meantime, the City of Toronto plans to uphold Toronto Green Standard performance measures, which will help in reducing natural gas use in buildings — another program currently being threatened by the province.

As is noted in the report, in large part, these changes to the plan are being implemented because international, federal, and provincial actors are all walking away from their shared obligations to ensure a livable, sustainable world for all working people.

At the federal level, the Carney Liberal government has walked back from climate policies undertaken by previous administrations. In addition, they have shamefully advanced policies to expand Canada's dependence on fossil fuels, including signing agreements to construct new pipelines, in a reckless abandonment of climate priorities. Further, the devastating austerity regime instituted by the fall 2025 budget will serve as cuts-in-kind by slashing programs which advance our climate goals. Worse still, various pieces of legislation being advanced by the federal government will make further destruction of our environment ever easier, removing

consultations, restrictions, and regulations, and trampling of the rights of Canadian workers and Indigenous Peoples.

Provincially, the Ford Government has used its govern-by-decree blitzkrieg to erode environmental protections and democratic rights at an even faster pace than its federal counterparts. While this assault on working people is not new, Ford's phoney "Captain Canada" persona has allowed him to intensify his pro-corporate program, including by cutting the ability for municipalities to institute environmental standards to fatten the profits of his developer friends.

These climate betrayals from higher orders of government happen against the backdrop of an increasingly intensifying climate catastrophe. Working people are already suffering from the effects of climate change, with heat exhaustion, smoke inhalation, floods, and other severe health and safety consequences already ramping up. This is in addition to the threat to jobs and livelihoods, as climate change disrupts global supply chains and incinerates whole towns and industries.

It is because of the intense impacts of climate change experienced by the working class and vulnerable communities that policies for climate action are popular. While working people have certainly refocused their attention to the immediate threats to their families, the ongoing cost-of-living crisis, actions to tackle climate change, including building alternative energy sources, retrofitting buildings, and constructing more public transit, remain extremely popular.

The good news is that these popular policies address both the climate crisis and the cost-of-living crisis at the same time. Building transit, upgrading our infrastructure, and cleaning up our environment creates more jobs in the local community than any of the policies being advanced by higher orders of government, all while building a livable future for future generations of workers. Contrary to the zero-sum rhetoric advanced by politicians and paid lobbyists, taking climate action is a win-win approach for working people.

Despite the broad public support for these policies and programs, the reality is, in Toronto, many of these actions will not be taken because of the increasing lack of political or economic democracy in the City caused by actions taken by the Province to limit municipal autonomy. While municipal governments have always been creatures of the province, the escalating attacks from the Ford government have seen some of the most basic democratic norms eroded. Increasingly, municipal government decisions have been overturned, their regulations ripped up, and their governing powers removed completely. In the long term, working people in Toronto will need to fight to restore and expand democracy in our city, and for every municipality, to ensure it is the will of the people which governs, not the pocketbooks of corporate lobbyists.

The fight for environmental justice is first and foremost a fight for working people and vulnerable communities in Toronto and across the world. The Toronto & York Region Labour Council maintains its commitment to advancing the goals of environmental justice in its work, and we look forward to continuing to work alongside our allies and the City to achieve them.

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