



Toronto **Community** **Benefits** Network

December 4, 2025

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

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

Mayor Chow and Members of the Infrastructure and Environment Committee,

On behalf of the Toronto Community Benefits Network, I am writing to convey our unequivocal support for the TransformTO Net Zero Strategy: Action Plan. As a coalition advancing equity, diversity, and inclusion in infrastructure and construction, TCBN has actively participated in the city's extensive consultation processes and recognizes the substantial benefits this plan delivers for historically disadvantaged and equity-deserving communities. We commend City staff for their diligence and leadership.

We are encouraged by the continued implementation of the Toronto Green Standards despite political pressures. However, we are incredibly disappointed that progress on a Building Emissions Performance Standard (BEPS) has stalled, and we must underscore the urgent need for a clear, mandatory, and equitable regulatory framework to reduce emissions from existing buildings. Without it, Toronto will not meet its 2030 or 2040 climate commitments.

This is both a climate necessity and a generational economic opportunity. When designed with an intentional community benefits lens, TransformTO can drive inclusive workforce development, expand access to good jobs and economic opportunities for Black, Indigenous and equity-deserving groups across the city. Deep retrofits, energy-efficiency upgrades, and low-carbon construction will generate sustained demand for skilled trades, green technologies, and local businesses, benefits that must be equitably shared.

Given that most buildings standing in 2040 already exist and represent Toronto's largest source of emissions, regulation is essential. A mandatory framework will:

- Ensure the scale of action required cannot be deferred.
- Create market certainty that fuels job creation, local business growth, and equitable pathways to good jobs and training opportunities
- Improve affordability, resilience, and health outcomes for vulnerable residents; and
- Position Toronto alongside global leaders such as New York and Vancouver, who have tied emissions regulation to green economic development.

Toronto is at a decisive moment. Advancing TransformTO alongside BEPS will allow the City to cut emissions, enhance resilience, and deliver thousands of accessible, high-quality jobs.

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We urge Mayor Chow and the Infrastructure and Environment Committee to:

1. **Re-commit to a clear and updated timeline** for BEPS in the City of Toronto, and acknowledge its role as a key driver of climate progress over the next decade.
2. **Resume consultations** with industry, civil society, and professional associations to finalize a BEPS and a suite of support that balances climate ambition with economic feasibility.
3. Work with key stakeholders including community, labour, academic and industry stakeholders to co-develop a **Green Jobs Strategy** as part of the Net Zero Strategy Action Plan (2026-2030). This plan should prioritize decent work, equitable pathways, mobility and training to jobs and opportunities in the sector
4. **Report back** with:
 - a. A phased-in BEPS beginning with large commercial buildings, expanding to mid-size commercial and multi-residential buildings.
 - b. A summary of stakeholder input, including measures ensuring affordability and tenant protections.
 - c. An implementation plan outlining compliance, enforcement, and available technical and financial support.

Thank you for your leadership and commitment to a sustainable and inclusive Toronto. TCBN stands ready to support further dialogue and engagement as this critical work advances.

Attached to this letter is a recent TCBN report ***Building a New Green Jobs Strategy for Toronto*** with analysis, recommendations and case studies from Vancouver and New York.



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Executive Director



Toronto Community
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Building a New Green Jobs Strategy for Toronto: Analysis and Recommendation



Aman Nair
Toronto Community Benefits Network

September 2025

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Introduction

Municipalities around the world have increasingly shifted much of their policy focus towards addressing the challenges that have emerged from the rapid progression of global climate change. The realities of climate change's impacts have forced cities to not only have dedicated policies around environmental considerations, such as air quality, flooding and heat, but also required them to consider the necessity for a climate lens when dealing with historical issues such as economic and social inequality. As cities attempt to navigate these challenges, the concept of a 'green economy' or a 'green jobs ecosystem' has emerged as a possible pathway to ensure equitable, safe and sustainable economic growth and development. Green jobs, at their core, represent a means whereby cities can



mitigate the immediate harms associated with climate change while also ensuring a type of economic growth that improves the conditions of all city residents - particularly historically and economically vulnerable communities.

This report aims to help develop a dedicated green jobs strategy for the city of Toronto. The report begins with a review of existing policies and assesses the extent to which the city of Toronto's current climate strategies account for this concept of 'green jobs' and the 'green economy.' Subsequently it uses key insights gained from stakeholder interviews to form actionable policy recommendations.





Methodology

This report begins first with a policy scan of existing policies instituted at the municipal level within Toronto. It examines these policies and assesses their impact, successes and limitations over the past years.

Following this, we undertook multiple stakeholder interviews with community bodies, academics, civil society organisations, city officials and private businesses to identify how they conceptualise of green jobs and what they see as the priorities within the City of Toronto.

Finally, we conducted two case studies of New York City and Vancouver to glean insights and learnings from these contexts that can be applied in the case of Toronto.

Unpacking Toronto's Existing Green Jobs Policies: A Background

The first step of this report focuses on understanding how Toronto has historically conceptualised green jobs, and what this means for future policymaking.

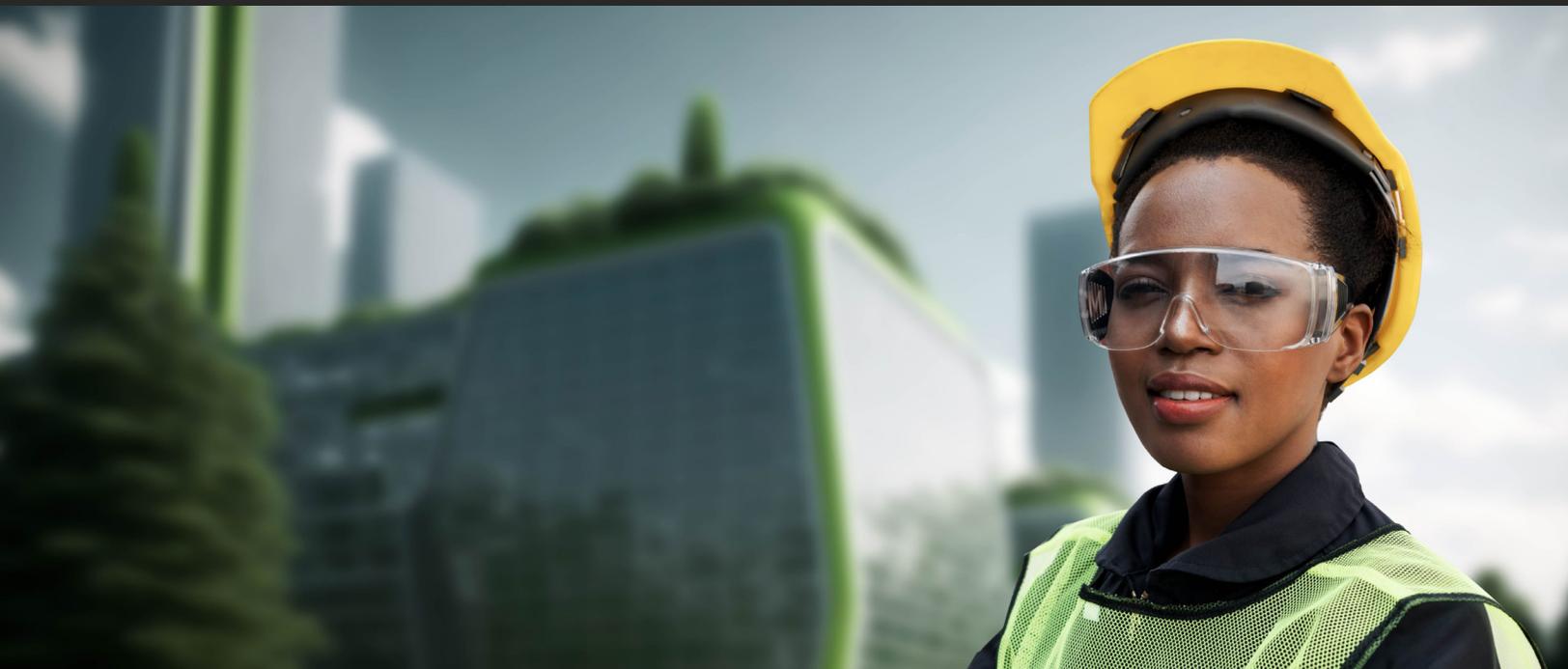
Green Jobs, Green Sectors and the Green Economy: Unpacking Definitional Uncertainty

At present, the city of Toronto defines Green Industry as “Companies and supporting organizations that provides goods and services that:

Support the managing, maintaining or remediating damage to the environment caused by human activity or which reduces the extraction of new resources

from the natural environment through the repurposing of previously extracted materials.

Have a low impact on the environment or which significantly lowers the impact when compared to equivalent products that have a similar function in buildings, transportation, and the energy supply.”





The city of Toronto’s policy documents build on this definition by dividing the Green Industry into 6 Green Sectors.

Sector	Description	Example
Bio-Economy	Grow, maintain, harvest, prepare and utilize biomass in non-industry standard types of products or service offerings. This excludes food, life sciences and conventional building and construction activities.	w4,105.5
Clean Energy	Provide renewable energy, energy storage, smart grid, or energy efficiency technologies and services that are not integrated directly into buildings (covered below).	Solar, district energy systems, energy storage

Green Buildings	Follow building practices with materials and processes that are environmentally responsible and use significantly less energy or resources at all stages of a building's lifecycle (siting, design, construction, operation, maintenance, renovation, and demolition).	Heat pumps, energy efficient windows, smart building technologies, green roofs
Resource Management and Environmental Protection	Sustainable use, either through management or development, of natural resources and activities that are intended to prevent, reduce, or eliminate pollution or other forms of environmental degradation	Water treatment and waste treatment plants, recycling, air pollution, soil remediation, carbon capture
Sustainable Transportation	Move people and goods by modes that have low environmental impact or are less environmentally impactful than the standard for that mode. Environmental impacts include using less energy, lower emissions or lower life cycle costs.	EVs, micromobility, rail transport, public transit
Others	Primarily provide support across several green sectors	Research/incubator centres like MaRS, agencies like TAF and the Ontario Environmental Industries Association, green capital and venture capital firms

Executive Summary

In recent years the concept of the Green Economy and Green Jobs have emerged as a series of occupations and economic activities focused on mitigating the impact of and adapting to climate change effects. At the municipal level, the proliferation of Green Jobs represents an opportunity to simultaneously achieve decarbonisation and economic growth. Keeping the benefits of these Green

Jobs in mind, this report outlines a pathway towards developing a Green Jobs Strategy for the City of Toronto. Through a mix of policy analysis, stakeholder interviews, and case studies, this report outlines the current state of Toronto's Green Jobs policies, highlights existing limitations and proposes recommendations to move forward.



Unpacking Toronto's Green Jobs Policies: A background

- Toronto currently does not possess a definition for Green Jobs but rather provides a definition for 'Green Industry' that is focused on companies and organisations that either directly manage or mitigate environmental damage or which have a lower impact on the environment than their counterparts. Based on this definition, the city has divided the Green Industry into 6 sectors – Bioeconomy, Clean Energy, Green Buildings, Resource Management and Environmental Protection, Sustainable Transportation and others.
- At present, there is limited data on the true size of the Green Industry within Toronto. Data from the city of Toronto has estimated that the number of green jobs in the city stood at approximately 60,700 as of 2019, contributing an estimated \$6.55 billion to Toronto's GDP in 2018, though no subsequent macro level data has been collected or analysed since.
- At the policy level, despite not possessing a dedicated Green Jobs policy, the city has released multiple environmental and decarbonisation policies that touch on Green Jobs.





Key Challenges **With Existing Policies**

Despite the presence of multiple policies that address Green Jobs within the city, there remain key gaps.

1

Currently, the city does not possess a comprehensive definition of Green Jobs, relying instead of the concept of a Green Industry and Green Sectors.

This raises clear questions as to what constitutes a green job and whether all occupations within a business that is within a green sector can be considered a green job.

Moreover, the city's current definition can be overly technical in its focus and overlooks smaller scale, community oriented Green Jobs and Green Businesses as well as underemphasize the impact of traditionally non-polluting sectors.

2

At present there is a paucity of GTA wide data relating to Green Jobs and the Green Industry, which makes both policy development and program assessment challenging.

3

The current conceptualisation of the green economy and green industry within Toronto excludes multiple small-scale efforts instituted by community residents, organisations and businesses.



4

The presence of convoluted and unharmonized legacy regulations across the sub-regions of the GTA has created a situation that has potentially limited the demand for green services within certain key sectors - which has a cascading effect on the demand for green jobs within the city.

5

There is at present an absence of consistent industry-government collaboration around the development of green economy and green jobs policies at the city level.

Despite overarching commitments to facilitate socio-economic equity through the process of decarbonisation, policies have failed to carve out specific considerations for marginalised communities such as women, racialised individuals and working-class youth when considering Green Jobs and Green Industry.

6

Existing policies focus heavily on developing the economic conditions necessary to catalyse Green businesses and start-ups, resulting in less attention being paid to ensuring consistent and predictable worker participation in the city's green economy.

7

Finally, an associated point was the absence of a long-term vision for workers and young people who are exploring the possibility of entering occupations within the Green Sector.



КОНСТРУКЦИОННО-МОНТАЖНОЕ ПРЕДПРИЯТИЕ

Recommendations

Drawing from the insights gained through our analysis, we put forth the following recommendations to help shape Toronto's Green Jobs Strategy:

- **Policy Development:**

These recommendations focus on efforts that can be taken by city officials to develop a comprehensive strategy to facilitate the growth of green jobs in Toronto.

- a. Reconceptualise the existing definition of Green Industry and Green Sectors to accurately portray the types of businesses present within the city. Expand the definition to include Green Jobs as well.
- b. Conduct a comprehensive review of the regulatory landscape across all sub-regions of the GTA relating to green jobs and green services.
- c. Commit to more robust and frequent data collection around Green Jobs
- d. Develop a dedicated Green Jobs Plan
- e. Focus on the use of Green Jobs to address issues of systemic inequality



Recommendations

- **Community**

Empowerment: These recommendations centre around the active participation and feedback of community voices in developing green jobs.

- a. Building decentralised participatory programs that allow residents and communities to control the types of green jobs and green businesses that they would like to see in their neighbourhoods.
- b. Address the disconnect between local communities and city officials working on issues of green jobs, environmentalism and sustainability by meeting people where they are.
- c. Recognise and work towards mitigating the socio-economic inequities between neighbourhoods

- **Workforce**

Development: Any Green Economy Plan developed for the city must expressly ensure that workforce development is a substantial priority.

- a. In particular, emphasis should be placed on developing education pathways and job opportunities for youth who are set to become the next generation of green workers. City government can explore establishing purpose-built partnerships with school boards, colleges and universities to facilitate such worker upskilling and education. Cities like New York can be viewed as examples that have successfully implemented such strategies.
- b. The city should look to leverage existing labour bodies and other community organisations that are involved in creating worker upskilling pathways and foster collaborations that can best utilise these programs.
- c. The city must apportion dedicated funding towards green workforce development to ensure that it remains a key priority over the long term,
- d. Finally, the use of evidence-based tools such as social procurement agreements and community benefits agreements can help operationalise some of the needed green workforce development.

Recommendations



Coalition Building:

- Developing entities that can bring together various public and private actors under the banner of promoting the green jobs will be needed going forward. While Toronto has previously suggested developing such organisations, progress has been slow. Lessons can be learnt from the case of Vancouver where the Zero Emission Innovation Centre has been developed through the collaboration of the federal government, municipal government, NGOs and education institutes.

Case Studies

Having identified and analysed the relevant policies in the Toronto context, we turned our attention to other cities within Canada and around the world to collate a series of learnings and best practices. In doing so, we focused predominantly on two case studies: New York and Vancouver. Both of these provide key insights that can be transplanted into Toronto.

New York City

New York city has emerged over the past decade as a global leader in the context of green economic transformation and green job development. Its policies adopt a dual focus on catalysing business investment while simultaneously developing the workforce necessary for the Green Economy.

Like Toronto, New York represents the financial capital of its nation as well as the most populous city. Both cities, have a history of developing broad policies to address climate change as a whole, and have positioned the development of Green Jobs as a key part of that wider mandate. At the same time, both cities also look to utilise their green jobs strategy as mechanism whereby they can address existing socio-economic inequities present within the city. Given these similarities, New York forms a valuable case study that is analogous to Toronto.

Unpacking New York's Policies

The Green Economy Action Plan

Unveiled in 2024, the Green Economy Plan was a strategy instituted through a collaboration between the New York City Economic Development Corporation (and the Mayor's Office of Talent and Workforce Development). The plan is centred around a series of commitments that seek to grow the number of Green Jobs within NYC from the current level of 133,000 to

Unpacking New York's Policies

The Green Economy Action Plan

400,000 by 2040. Such a growth would see the annual green economy contributions rise from 24 billion USD in the present day to 87 billion by 2040.

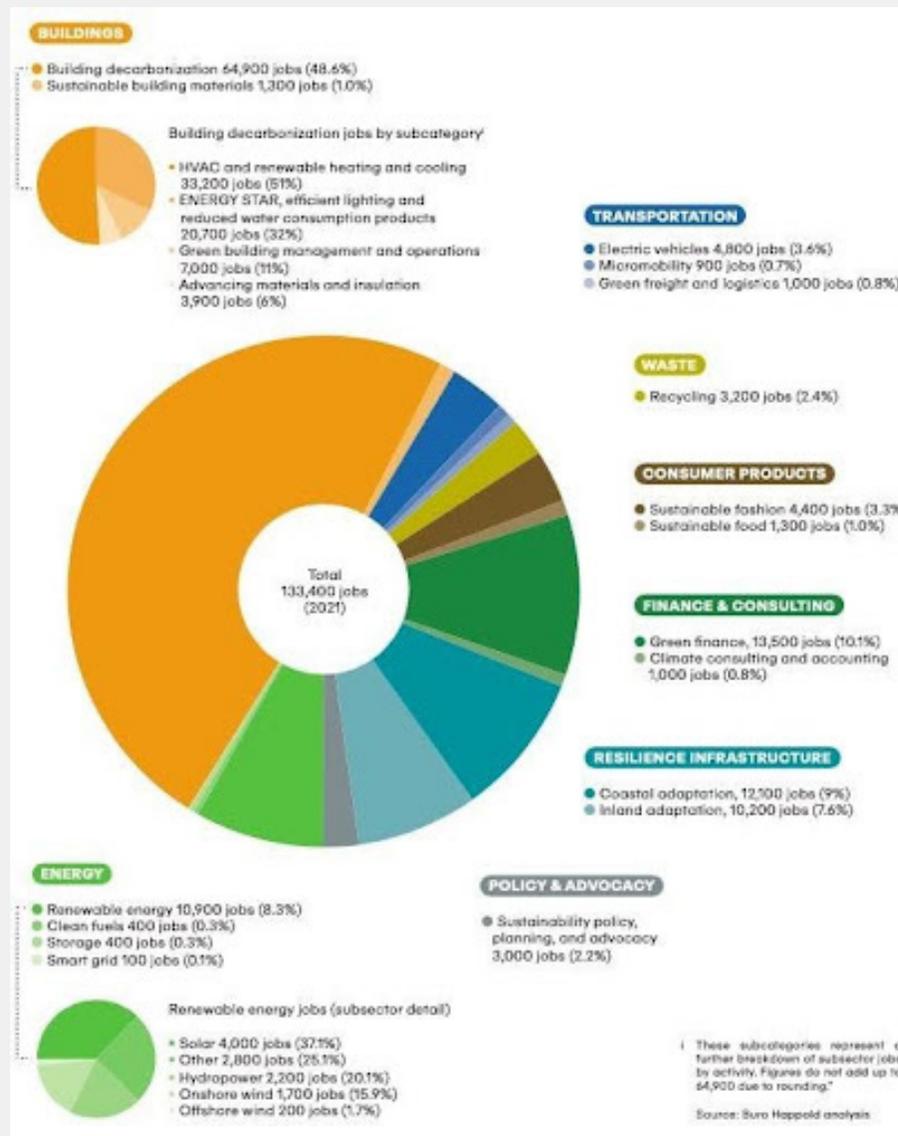
At the outset, the plan defines the Green Economy as “the ecosystem of activities that have emerged since the turn of the century that directly and intentionally contribute to achieving our climate goals.”

The report goes on to clarify the types of jobs that are included within this definition of the Green Economy, noting that it consists of both “all jobs in green companies and organizations whose primary mission directly advances climate goals (e.g., all jobs within a solar company, ranging from a Solar PV installer to HR managers) [as well as] a subset of jobs in other companies and organizations that directly help advance climate goals (e.g., financial analysts working on renewable energy deals at a traditional bank.)”



Unpacking New York's Policies

The Green Economy Action Plan



A key characteristic of this strategy is its focus on building socio-economic equity and developing the concept of “Green Collar Jobs.” The strategy outlines twenty-one ‘Focus occupations’ that it defines as being “unique or critical to the green economy, requiring green economy-specific skills and knowledge.

Without these occupations, the workforce will not be well positioned to undertake the work required to achieve our climate goals; [These occupations]

Unpacking New York's Policies

The Green Economy Action Plan

Allow for economic mobility, as they pay family-sustaining wages, or are pathways into occupations that pay family sustaining wages; [They] Are expected to increase in demand.” These focus occupations have all been earmarked as paying a ‘family sustaining wage’ and many of them have also been identified as being accessible to individuals who do not possess a college degree.

These jobs, therefore, become viable tools that can be leveraged to address existing income inequality within New York City.

Having identified these occupations, and the power of Green Jobs more broadly, the strategy also makes concrete commitments focused workforce development and worker training to enter into the Green Economy.

The strategy outlines 63 concrete commitments that will be undertaken by the city that cover a range of actions such as developing green training centres, focusing on community based hiring and place based strategies for worker sourcing, making use of a 600 million USD investment into NYC Public Schools, City University of New York, and the Department of Youth & Community Development to create pathways for young people into the Green economy, emphasising pathways for pre-apprenticeship and apprenticeship training to connect residents with green trades jobs, and building partnerships with industry and academia to facilitate green innovation.



Case Studies

Unpacking New York's Policies

Local Law 97

While the Green Economy Action plan outlines a broad framework and pathway for developing the Green Economy, Local Law 97 is a municipal ordinance that compels buildings over 25,000 square feet to slash emissions by 40% by 2030 and 80% by 2050. At present, over two-thirds of greenhouse gas emissions in NYC come from buildings alone – with the sector responsible for a significant portion of Green Jobs present in NYC.

The mandating of emission reductions by the city has the ability to catalyse the demand for green products and services – creating an increase in the demand for green jobs and retrofitting services. Estimates from the city have suggested that Local Law 97 is expected to create 26,700 jobs by 2030 encompassing everything from energy auditors to HVAC retrofit specialists and construction managers.

To assist with implementation, the city has instituted a 'NYC Accelerator' that focuses on providing information and guidance to individuals and businesses that are looking to assess their compliance with Local Law 97 and provides information around requirements, standards and financing options.

Assessing New York's Successes and Challenges

The policies instituted by NYC represent a clear attempt to develop a comprehensive pathway towards growing the Green Economy in the short and medium term.

They have been conceptualised keeping in mind both the necessity for immediate climate action as well as the need for job creation to function as a tool for economic equity.

Early data from the Center for an Urban Future has

(Cont) Assessing New York’s Successes and Challenges

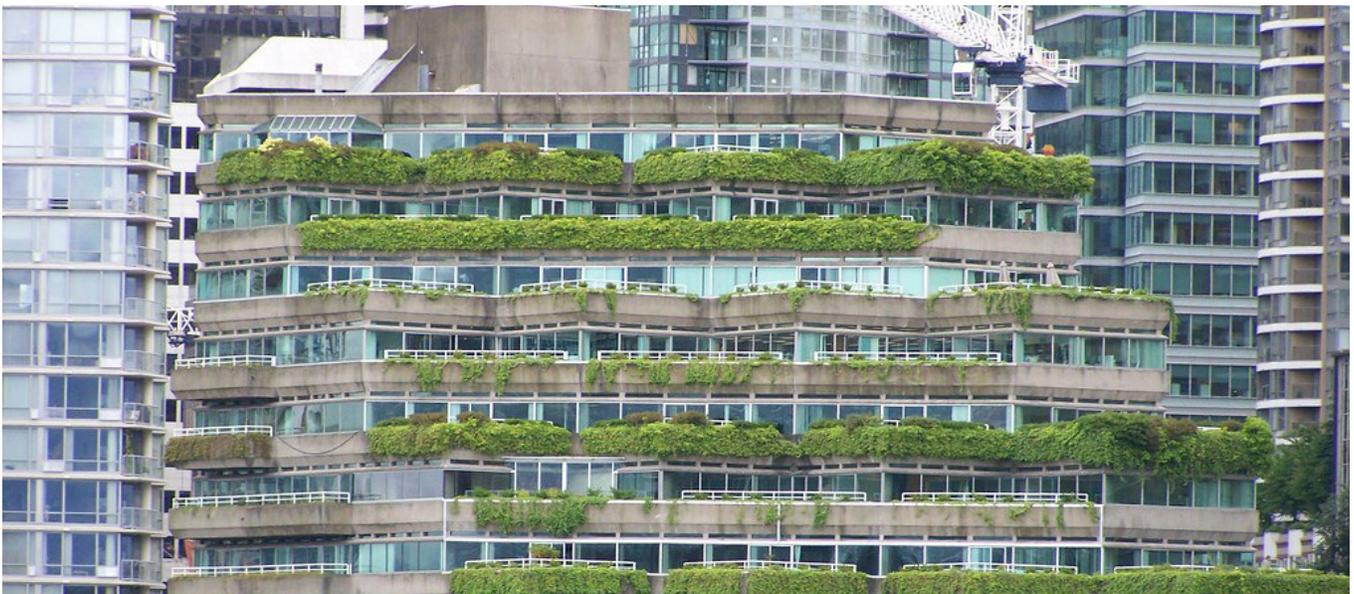
highlighted initial growth in Green Jobs within the city – noting that 2023 saw 22,070 unique job postings for green jobs, a 12.8 increase from the number of listings for Green Jobs in 2019.

While this is clearly, a positive, it underscores an important consideration associated with the Green Action Plan; only about 75,000 of the proposed 400,000 Green Jobs mentioned in the plan will be newly created jobs. Rather, the majority of those 400,000 jobs will be existing jobs that will become significantly ‘greener’ over the next fifteen years.

More concerningly, data from the NYC region has shown that green jobs postings declined between 2022 and 2023 – making it clear that the continued growth of green industries cannot be taken for granted and requires consistent, deliberate effort.

In addition, evidence from New York has revealed a number of key challenges around the costs associated with decarbonisation, the inability for municipal government to effectively enforce mandatory emissions standards, limited consumer awareness about decarbonisation solutions and limited use of city provided assistance tools, and challenges financing decarbonisation solutions.

If NYC is to achieve its goal of delivering 400,000 Green Jobs by 2040 these challenges will have to be addressed sooner rather than later.



Case Studies

Vancouver

As one of Canada's largest cities, alongside Toronto, there are many key similarities that make it an ideal case study to draw insights from. Notably, Vancouver – like Toronto – has a history of municipal level policy development and implementation.

Similar to Toronto, it faces the same governance structure and must work in conjunction with the provincial and federal governments.

Finally, both cities have prioritised the concept of green jobs within their policy development, though in different manners – as will be demonstrated.

Vancouver Zero Emissions Economic Transition Action Plan

In 2020, the City of Vancouver approved the Climate Emergency Action Plan (CEAP) which called for an increased focus on immediate climate action and a reduction in city Greenhouse Gas Emissions by half by 2030.

In line with the provisions of the Plan, the City Council directed the Vancouver Economic Commission to develop an economic plan or strategy that highlighted the economic opportunities and challenges associated with the CEAP.

Following on from this directive, the Vancouver Economic Commission released the Zero Emissions Economic Transition Action Plan (ZEETAP) in 2022. ZEETAP has emerged as a roadmap aligning economic development with the climate emergency. It has four key economic goals:

- Maximizing the economic opportunities of climate action
- Minimizing the challenges and costs of taking climate action

(Cont)Vancouver

Zero Emissions Economic Transition Action Plan

- Accelerating voluntary action to address climate change
- Championing equity and justice in all aspects of climate action and economic development

ZEETAP was a ground-breaking policy, being the first one globally to focus solely on the economic considerations associated with decarbonisation efforts.

Where other policies have been instituted with the primary consideration of emissions reduction, the ZEETAP instead treats the 'zero emissions' framing as the given regulatory environment and develops solutions for businesses accordingly.

ZEETAP is comprised of 6 key directives:

- Make climate solutions and their Impacts just and equitable
- Make it easier to get climate information
- Make it easier to access and buy climate solutions
- Make climate solutions more affordable
- Make climate solutions more profitable
- Make climate solutions scale

Each of these directives is accompanied by a headline indicator as well as two sub-indicators – each of which have an assigned metric. By establishing these metrics, the city is able to better collect data around the efficacy of instituted strategies and determine whether it is on track to meet its goals.

Level of Indicator	Category	Metric
Direction 1 – Make climate solutions and their impacts more just and equitable		
Headline indicator:	Diversity	% of people of diverse backgrounds in green jobs
Sub-indicators:	Wages	Average salary of green jobs
Sub-indicators:	Growth	% growth rate of green jobs
Direction 2 – Make it easier to get climate information		
Headline indicator:	TBD	TBD
Sub-indicators:	Participation	# of attendees to VEC and partnered programming
Sub-indicators:	Access	# of downloads and views on relevant resources
Direction 3 – Make climate solutions easier to access and buy		
Headline indicator:	Sentiment	Sentiment data from businesses on the availability and access to climate solutions
Sub-indicators:	Participation	# of attendees to VEC and partnered programming
Sub-indicators:	Access	# of downloads and views on relevant resources
Direction 4 – Make climate solutions more affordable		
Headline indicator:	Sentiment	Sentiment data from businesses on the costs of climate solutions
Sub-indicators:	Participation	# of attendees to VEC and partnered programming
Sub-indicators:	Access	# of downloads and views on relevant resources
Direction 5 – Make climate solutions more profitable		
Headline indicator:	TBD	TBD
Sub-indicators:	Participation	# of attendees to VEC and partnered programming
Sub-indicators:	Access	# of downloads and views on relevant resources
Direction 6 – Make climate solutions scale		
Headline indicator:	Uptake	# of businesses greening their operations
Sub-indicators:	Participation	# of attendees to VEC and partnered programming
Sub-indicators:	Access	# of downloads and views on relevant resources

Figure 3: ZEETAP’s Headline Indicators and Metrics (Source: ZEETAP)

An important characteristic of the ZEETAP was its express adoption of the ‘just transition’ framing. The concept of just transitions has been defined by the International Labour organisation as “Greening the economy in a way that is as fair and inclusive as possible to everyone concerned, creating decent work opportunities and leaving no one behind.”

This focus expressly puts the needs of vulnerable workers at the forefront of the city’s economic and climate agenda – with a focus on ensuring that workers in sectors that are at risk of economic contraction as a result of climate policy are able to find alternative employment opportunities.

An Analysis of Vancouver's Policies

The ZEETAP was a pioneering policy in the context of municipal climate action, with its express emphasis on the economic considerations, opportunities and challenges associated with climate change at the city level. However, despite its contribution, its developing department (the Vancouver Economic Commission) was discontinued by the city in 2024 and replaced with a new Business and Economy division which has not followed up on some of the actions scheduled in the plan.

Nonetheless, there appears to be significant growth in the case of Green Jobs in Vancouver. Evidence from the C40 has noted that Metro Vancouver has around 116,000 'direct' green jobs. In addition, the metro region has around 68,000 'indirect', which include work such as education or accounting that is undertaken in support of direct positive environmental benefit. The construction sector constituted the largest provider of these jobs, contributing around 40,000 jobs. Despite this general growth in Green Jobs, there is still an absence of evidence or data around the efficacy of specific projects or programs instituted under the ZEETAP.

