



December 3, 2025

Mayor Olivia Chow
Toronto, ON
M5H 2N2
Sent by email

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

Dear Mayor Chow and Members of the Infrastructure and Environment Committee,

On behalf of the Canada Green Building Council (CAGBC), a national, not-for-profit, industry-led organization representing over 800 member companies across the green building value chain, we write to express our support for a well-designed, collaborative and a best practice, Building Emissions Performance Standard (BEPS) in Toronto.

The green building sector is a significant economic driver in Ontario, generating \$33 billion in GDP in 2024 and employing over 210,000 workers. Regulations on emissions disclosure and reporting would support the growth of the sector while achieving TransformTO climate targets and maintaining Toronto's economic competitiveness in a rapidly changing market.

Other jurisdictions, such as Quebec—which is creating a province-wide building performance standard—and Canadian cities like Vancouver are progressing with similar regulations. Toronto needs to stimulate retrofits to avoid falling behind in attracting investment and satisfying tenant demand for low-carbon spaces. According to JLL research, Toronto's low-carbon office space supply-demand gap could grow to 59% by 2030.

A transparent and predictable regulatory framework is vital to enhancing the value of the green building value chain. Toronto faces climate and fiscal issues, and well-designed regulation can boost local economy and benefit green buildings. We urge the City to resume consultations, focusing on credible Building Energy Performance Standards (BEPS) aligned with leading regions. We also recommend that the city engage the provincial government to promote harmonization at the provincial level.

CAGBC and our members welcome ongoing engagement with City staff to ensure Toronto's achieves meaningful emissions reductions while protecting the city's economic health and competitiveness.

Sincerely,

Thomas Mueller
President & CEO
Canada Green Building Council