

2026



LOW-INCOME
ENERGY NETWORK

FOCUS GROUP FINDINGS

**Tenant-centred priorities for equitable
Building Emissions Performance Standards**

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The Low-Income Energy Network (LIEN) is a joint program of the Advocacy Centre for Tenants Ontario (ACTO) and the Canadian Environmental Law Association (CELA).

As part of its ongoing work on Building Emissions Performance Standards (BEPS), with support from The Atmospheric Fund (TAF), LIEN hosted a virtual focus group in August 2026 with organizations working directly with low-income and vulnerable tenants.

Facilitated by Zee Bhanji, LIEN's Stakeholder Engagement and Energy Policy Analyst, the session used an interactive Zoom whiteboard to encourage participants to share their experiences, identify priorities and build on one another's ideas in real time.



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1. Executive Summary

As the City of Toronto develops Building Emissions Performance Standards (BEPS) to reduce emissions from existing buildings, the Low-Income Energy Network (LIEN) convened a virtual focus group in August 2026 with organizations that support low-income and vulnerable tenants to identify what an equitable BEPS policy must include. The session produced a clear and consistent message: participants support building decarbonization, but believe BEPS will only be equitable and successful if tenant affordability, housing stability, health, accessibility and meaningful participation are built into implementation from the outset.

Across the six exercises, participants repeatedly identified five interconnected themes:

- Prevent tenants from bearing retrofit costs;
- Protect tenants from renovictions, above-guideline increases (AGIs), displacement and construction-related disruption;
- Ensure retrofits improve health, safety and access to cooling;
- Provide transparent, accessible communication and meaningful tenant engagement throughout the retrofit process; and
- Provide organizations serving low-income tenants with the funding, information, training and coordination needed to support implementation.

Importantly, these findings are the product of a structured, participatory co-design process in which participants collectively identified, tested and prioritized tenant-centred policy measures; the full methodology and interactive exercises are described in Appendix A.

The results also point to a strong role for government in attaching tenant protections to public funding and financing, monitoring outcomes such as rents and utility costs, and ensuring accountability when protections are not followed. Participants emphasized that tenant protections should not be treated as an add-on to BEPS; they should be conditions of implementation.

THE CENTRAL QUESTION

How can BEPS deliver the necessary climate and emissions reductions while protecting low-income and vulnerable tenants and strengthening housing affordability and security?

2. Findings at a Glance

Theme	What participants emphasized	Examples from the whiteboard
Affordability & cost protection	Tenants should not pay for decarbonization through higher rents or utility bills.	No AGIs; no retrofit-related rent/utility increases; savings passed to tenants.
Housing stability & minimizing disruption	Retrofits must not cause evictions, renovictions, homelessness or undue disruption.	No renovictions; vacancy control; landlord covers moving/disruption costs; accessible buildings and respite spaces during construction.
Health, safety & cooling	BEPS should improve living conditions, including heat, air quality and access to cooling.	Cooling access; indoor/outdoor air quality; mold remediation; safe housing.
Participation & transparency	Tenants need meaningful involvement before, during and after retrofits.	Frequent consultation; tenant priorities in decisions; transparent project/funding information.
Implementation capacity	Tenant-serving organizations need resources and clear municipal coordination.	Outreach funding; training; plain-language tools; central city contact; legal support.

3. Detailed Findings

3.1 Affordability and protection from retrofit costs

Affordability was one of the strongest cross-cutting concerns. Participants said that the benefits of building efficiency should not come at the expense of tenants' ability to afford their homes. They called for explicit protections against rent increases and AGIs associated with energy and climate upgrades, as well as protection against increased utility costs when buildings switch from gas to electric systems.

Key implications for BEPS implementation:

- Retrofit-related AGIs and other rent increases should be prohibited or otherwise prevented for affected tenants.
- BEPS financing and incentives should be conditional on enforceable tenant protections.
- Utility impacts should be monitored, particularly where tenants pay for electricity separately from rent.
- Where retrofits reduce operating costs, participants want the savings to benefit tenants rather than simply being retained by building owners.
- Baseline and post-retrofit utility and rental-cost data should be collected to identify unintended affordability impacts.



3.2 Housing stability and anti-displacement protections

Participants consistently linked equitable retrofits with housing stability. They identified renovictions, unnecessary evictions, temporary displacement and disruption as major risks. The desired outcome was explicit: tenants should not become homeless or lose their homes because a building is being upgraded.

Key implications for BEPS implementation:

- No renovictions or evictions resulting from BEPS-related upgrades.
- Landlords should cover reasonable moving, temporary accommodation and disruption-related costs where displacement is unavoidable.
- Tenants should be consulted and prioritized when temporary displacement is required, with timing shaped around tenants' needs where possible.
- Participants also raised vacancy control and stronger municipal tools to prevent rent increases linked to upgrades.

3.3 Health, safety, climate resilience and cooling

Participants framed BEPS not only as a climate policy but also as an opportunity to improve health and housing conditions. They identified extreme heat, indoor air quality, wildfire smoke, mold and access to heating and cooling as important tenant outcomes.

Key implications for BEPS implementation:

- Energy upgrades should be paired with health and safety remediation, such as mold removal.
- Access to cooling should be treated as a core tenant outcome of building improvements.
- Indoor and outdoor air quality should be monitored as part of evaluating BEPS outcomes.
- Climate resilience should be integrated into tenants' rights and building upgrade decisions.
- Tenants should be able to access and control their heating and cooling systems and receive practical instruction on new equipment.

3.4 Meaningful tenant engagement, communication and transparency

Participants distinguished meaningful engagement from simply notifying tenants. They wanted tenants and tenant organizations involved throughout the retrofit process, with accessible information, opportunities to influence decisions and clear accountability.

Key implications for BEPS implementation:

- Engage tenants before decisions are finalized and throughout design, construction and post-retrofit stages.
- Use building- and neighbourhood-level tenant organizations and outreach specialists; a single email to tenants was viewed as insufficient.
- Provide clear timelines, progress updates, project details, funding information and explanations of expected impacts.
- Establish a designated tenant liaison or go-to contact for questions and concerns.
- Provide communication and materials in tenants' first languages and in accessible formats.
- Build in human rights accommodations, including language, disability and accessibility needs.
- Provide in-person, step-by-step assistance with new equipment and provide translated, accessible materials for later reference.

3.5 Minimizing construction disruption

Participants emphasized that the retrofit process itself can create harm. They called for sufficient notice, careful scheduling, accessible buildings during construction, support for people with disabilities and service animals, and places where tenants can temporarily escape construction noise and disruption.

Key implications for BEPS implementation:

- Require adequate advance notice and clear timelines for construction activities, including anticipated disruptions.
- Maintain accessibility and essential services throughout construction, with appropriate accommodations for tenants with disabilities, mobility limitations and service animals.
- Provide temporary respite spaces where tenants can escape excessive noise and other construction-related disruptions.

3.6 Capacity of tenant-serving organizations

The focus group identified community organizations and legal clinics as essential implementation infrastructure. Participants said organizations need advance information and dedicated resources to respond effectively to tenants' questions and concerns.

Participants identified the following supports:

- Funding for deep tenant outreach, including door-knocking, phone calls, meetings and engagement events.
- Time away from regular operations to support retrofit-related outreach and tenant assistance.
- Advance notice of building retrofit activity so organizations can prepare for tenant inquiries.
- Technical information and training for legal clinics and tenant-serving organizations.
- Plain-language toolkits, fact sheets and step-by-step guides for tenants.
- A central city staff person or office to coordinate information and referrals.
- Legal support for challenges involving poor practices or non-compliance.
- Translation services, language surveys and accessible educational materials.



3.7 Protections across the retrofit lifecycle

Participants identified policies and protections that should apply at three distinct stages of the retrofit process, recognizing that tenant risks and needs differ before, during and after a building upgrade.

Before retrofit

- Advance notice
- Accessible and multilingual information
- Independent advice for tenants
- Consultation

During retrofit

- Protection from renovictions
- Temporary accommodation where required
- Maintaining cooling
- Disability accommodations
- Complaint mechanisms

After retrofit

- Protection from unaffordable rent increases
- Affordable utilities
- Indoor comfort standards
- Building performance reporting
- Post-retrofit tenant feedback



3.8 Stress-testing protections for equity gaps

Participants tested the proposed protections against the circumstances of three tenants: a low-income senior experiencing a major retrofit, a newcomer family facing language barriers, and a tenant who relies on medical equipment. The exercise reinforced the importance of tailoring protections to different tenant needs, including communication in tenants' first languages, in-person support with new equipment, access to cooling and reliable electricity for tenants who depend on medical devices, and accessible buildings and temporary accommodation for seniors and people with disabilities during construction. These considerations are reflected in Section 5, where participants identified accessibility and appropriate accommodations as a priority requirement for Toronto's BEPS policy.

4. Roles and Responsibilities Identified by Participants

Participants assigned responsibilities across levels of government, building owners, utilities and community organizations. The discussion did not suggest that any single actor can deliver equitable BEPS alone.

Actor	Participant-identified responsibilities
City/municipalities	Set and enforce tenant protections; increase targeted low-income funding; improve communication; consider bylaws or building-permit mechanisms to prevent upgrade-related AGIs; coordinate with landlords and tenant groups; support enforcement.
Province	Strengthen affordability supports such as OESP; strengthen tenant protections under the <i>Residential Tenancies Act</i> , including limits on retrofit-related AGIs and vacancy control; support funding and program eligibility for renters.
Federal government	Support recapitalization and expansion of housing/energy retrofit funding, including programs that can benefit renters and low-income buildings.
Building owners/landlords	Provide safe housing; engage tenants; communicate clearly; meet tenant-protection requirements; cover disruption costs where appropriate; understand and meet their responsibilities under BEPS.
Utilities	Make consumption data available and support baseline/post-retrofit monitoring; coordinate where energy-system changes affect tenant bills.
Community organizations / legal clinics	Conduct tenant outreach and education; provide legal and technical support; connect tenants to resources; participate in implementation and monitoring.

5. Five Priority Requirements for Toronto's BEPS Policy

The final exercise asked participants to identify only five requirements. The responses clustered around the following five priorities, which are presented thematically rather than in order of votes received. The numbers shown below reflect the vote counts displayed on the whiteboard where applicable; they should be interpreted as an indication of emphasis within the exercise, not as a statistically representative ranking.

1. **Protect affordability — especially prohibit AGIs:** 4 votes shown for “no AGIs”; participants also called for rental-cost monitoring and protection from retrofit-related utility increases.
2. **Ensure access to cooling and protect tenant health:** 4 votes shown for including cooling with energy upgrades; health, air quality and climate resilience were recurring outcomes.
3. **Ensure accessibility and appropriate accommodations:** 3 votes shown; participants emphasized language access, disability-related accommodations and respect for tenants' human rights.
4. **Minimize disruption to tenants:** 3 votes shown; this included construction disruption, displacement and communication throughout the upgrade process.
5. **Make tenant affordability and health protections integral to Greenhouse Gas (GHG) requirements:** 5 votes shown for incorporating tenant needs such as affordability and health protections into GHG reduction requirements.

The final exercise also reinforced that BEPS must remain effective at reducing GHG emissions. Participants explicitly identified stringency/effectiveness of emissions reductions as a priority, indicating that tenant protections and climate ambition were viewed as complementary rather than competing goals.

6. Implications and Actionable Recommendations

Drawing on the focus group's findings, LIEN has identified the following recommendations to help guide the equitable implementation of Toronto's BEPS policy:

1. Make tenant protections conditions of public funding, financing and incentives. Agreements should specify protections and consequences for non-compliance.
2. Establish a tenant affordability monitoring framework covering rents and utility costs before, during and after retrofits.
3. Prevent BEPS-related renovictions, evictions and AGIs, and ensure tenants do not bear costs associated with temporary displacement or construction disruption.
4. Treat cooling, indoor air quality, extreme heat protection and health/safety remediation as explicit tenant benefits and performance outcomes.
5. Create a formal tenant engagement standard requiring early, ongoing and meaningful participation, rather than one-way notification.
6. Fund community-based tenant outreach and legal/technical capacity, recognizing that trusted organizations are necessary to reach tenants effectively.
7. Provide a centralized municipal coordination and referral function, with plain-language materials, multilingual resources and clear escalation pathways.
8. Collect and make available building-level baseline and post-retrofit energy/utility data, with appropriate privacy safeguards, so tenant impacts can be assessed.
9. Develop clear accountability mechanisms for landlords and program participants, including monitoring and consequences where tenant protections are not followed.
10. Maintain strong GHG-reduction requirements while explicitly integrating tenant affordability, health, safety and housing-stability outcomes into BEPS design and evaluation.

7. Methodology and Limitations

This report analyzes the results of LIEN's virtual whiteboard focus group session, held in August 2026. The session included six interactive exercises covering:

1. Desired outcomes if BEPS succeeds for low-income tenants;
2. Tenant protections before, during and after retrofits;
3. Stress-testing tenant protections against different tenant circumstances;
4. Organizational supports needed for implementation;
5. Roles and responsibilities among key actors; and
6. The five most important requirements for Toronto's BEPS policy.

The whiteboard records individual sticky notes and, in some cases, visible vote/stack counts. The results are qualitative and reflect the perspectives of focus group participants. They should not be presented as a representative survey of all Toronto tenants or all tenant-serving organizations. Spelling, shorthand and minor wording inconsistencies in the original board have been normalized in this report without changing the substantive meaning.

Where a vote count is not clearly associated with a specific response, this report does not assign one. The analysis therefore emphasizes recurring themes and actionable recommendations rather than attempting to produce a quantitative ranking of every comment.

THE BOTTOM LINE

Participants want BEPS to deliver both climate action and tenant protection. They see equitable implementation as requiring strong affordability and housing-stability safeguards, health and cooling benefits, meaningful tenant participation, and sustained resources for the organizations that support low-income tenants.

Appendix A. Focus Group Methodology and Interactive Exercises

Purpose and Participants

The focus group brought together organizations with direct experience supporting low-income and vulnerable tenants, including community legal clinics, tenant organizations, housing advocates, social service agencies, and climate, energy and environmental organizations. The session was designed to draw on participants' practical and policy expertise to help identify the measures required for an equitable implementation of BEPS.

Interactive Whiteboard Exercises

The session used an interactive virtual whiteboard to facilitate participant input, discussion and prioritization. Participants added virtual sticky notes, built on one another's ideas and worked collectively to identify actionable recommendations.

Exercise 1: What Does Success Look Like?

Participants were asked to imagine Toronto ten years in the future, after BEPS had been fully implemented and had been successful for low-income tenants. They considered what should be true across five areas:

- Housing stability
- Health
- Energy affordability
- Climate
- Tenant rights

The exercise was intended to establish a shared vision of what successful and equitable BEPS implementation would look like.

Exercise 2: What Protections Must BEPS Guarantee?

Participants identified policies and protections that should apply at three stages of the retrofit process:

- Before retrofit
- During retrofit
- After retrofit

Participants were asked to identify policies and protections rather than simply describe problems. The full set of protections identified at each stage is presented in Section 3.7.

Exercise 3: Stress-Testing Protections

Participants were asked to test the proposed protections against different tenant circumstances, including:

- A low-income senior experiencing a major building retrofit
- A newcomer family facing language barriers
- A tenant who relies on medical equipment

The purpose was to identify equity gaps that might otherwise be overlooked.

Exercise 4: What Supports Will Organizations Need?

Participants identified the supports that community organizations would require to effectively assist tenants during BEPS implementation. Areas explored included:

- Information
- Funding
- Legal
- Coordination
- Capacity

Exercise 5: Who Is Responsible?

Participants considered the respective responsibilities of key actors involved in BEPS implementation, including:

- City of Toronto
- Province of Ontario
- Federal government
- Building owners
- Utilities
- Community organizations

The objective was to develop a governance map identifying who should be responsible for different elements of equitable BEPS implementation.

Exercise 6: Prioritizing Recommendations

Finally, participants were asked to identify their five highest-priority requirements for Toronto's BEPS policy. Recommendations were grouped thematically and participants used a dot-voting exercise to identify the priorities that should form the basis of an equitable BEPS policy agenda.

The resulting priorities provide an important basis for the recommendations presented in the main body of this report.



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