



Planning & Growth Management Committee
10th floor, West Tower, City Hall
100 Queen Street West Toronto, ON
M5H 2N2

**Re: Toronto Green Standard Review and Update
Planning and Growth Management Committee Item PG23.9 for October 12, 2017**

Dear Planning and Growth Management Committee Members,

Environmental Defence strongly supports adoption of the Toronto Green Standard Version 3 performance measures. These targets will not only cement Toronto's standing as a leader at the forefront of green development, but will also present a consistent, achievable, and clear framework for the building industry to move forward into a low carbon future.

In Toronto, heating, cooling and lighting our buildings produces more than 50 per cent of our carbon emissions. In addition, our population is projected to grow by over 35 per cent by 2050. **We need an achievable plan to cut our building-related emissions, and we need to implement it now.**

TGS v3.0 provides a carefully considered pathway to reduce our emissions without major impacts on construction costs. These standards also make Toronto's buildings more affordable with lower energy costs, more resilient, and more comfortable.

The building industry has the capability to deliver on these targets, and even to build near-zero and net-zero emissions buildings now. They also have the ability to transition to more effective absolute performance targets, as is currently recommended as an optional measure in Tier 1. **We would recommend taking this plan one step further by making absolute performance targets mandatory, not optional, by 2020.**

Our current 'reference' or 'percentage better than' system expresses targets based on percentage energy efficiency improvement above the Ontario Building Code. This has been found to have limited success in actually reducing energy use in buildings, and can create confusion among the industry when standards are revised. In contrast, moving to an absolute target based on actual performance is a much more consistent and effective way to express a building's efficiency, and to compare efficiency between buildings.

We look forward to approval of this important step in the broader TransformTO framework.

Sincerely,

Keith Brooks
Programs Director
Environmental Defence