



## SUSTAINABLE BUILDINGS CANADA

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October 10, 2017

Nancy Martins  
10th floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

Dear Ms. Martins,

Sustainable Buildings Canada (SBC) is pleased to lend its support to the implementation of the Toronto Green Standard, version 3. SBC was formed as an independent non-government organization in 2003 with a mandate to promote and support greater energy and environmental performance in buildings. SBC has a history of supporting codes and standards that foster energy savings and lower greenhouse gas emissions. Members of our organization worked closely with City staff in the development of the original TGS and have followed the development of the new standard with great interest.

In 2016, we undertook an exercise to explore the various market factors that might influence the rapid adoption of net-zero buildings. We engaged over 100 industry professionals from the design, construction and development communities in a series of workshops where barriers and solutions were identified. Several leading developers were in attendance and shared a common voice that most purchasers are not asking for high performance buildings and as such developers are provided no motivation to build beyond current code requirements. One of the solutions identified to overcome this critical barrier was to raise the bar with respect to minimum levels of energy performance.

With TGSv3, the City is presented with a powerful opportunity to apply this lever in a meaningful way. Much laudable work has gone into the development of TGSv3, which has resulted in a new set of performance metrics - Energy Use Intensity (EUI), Green House Gas Intensity (GHGi), and Thermal Demand Energy Intensity (TEDI). For Tier 1 of the TGSv3, a fourth metric – 15% better than Code is also contemplated. We feel that the implementation of all the metrics and the benchmarks that have been set for each represent a significant step towards the types of low energy and low GHG footprint buildings that the City should require. We would also support the use of a staged approach to implementation to allow the development community time to react to the new standards.

We stand ready to assist in the roll-out of the TGSv3 and note that our design workshops and efforts related to the 2030 District initiative represent excellent vehicles to assist in that roll-out. Please include our organization in the list of those who believe that adopting the proposed standards and encouraging builders to achieve greater levels of environmental performance represents an excellent direction that the City can take in leading the market to lower carbon solutions.

Sincerely,

Michael Singleton  
Executive Director  
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