

July 5, 2021

Re: IE23.1 Net Zero Existing Buildings Strategy

To Infrastructure and Environment Committee,

Toronto Environmental Alliance (TEA) strongly supports the adoption and implementation of the Net Zero Existing Buildings Strategy. This strategy is essential for meeting the City's climate emergency commitments as well as getting to net zero emissions by 2050 or sooner. The proposed actions within the strategy provide a pathway to decarbonize Toronto's aging existing building stock, as well as outline co-benefits like improved tenant health and comfort, climate resilience, and local green job creation. We commend city staff and the numerous industry stakeholders who have been involved in this policy development process.

However, we believe that a more holistic approach to existing buildings is needed, which includes the preservation of affordable rental housing, anti-displacement policies, climate resilience and emergency preparedness. In this vein, TEA has several recommendations to strengthen the implementation of the Net Zero Existing Buildings Strategy that emphasize social equity and mitigate potential harms to low-income tenants.

Action 1: Require Annual Performance Reporting & Public Disclosure

The City should immediately begin collecting and analyzing more building performance data and capital plan details that could be acquired using existing reporting structures, tools and by-laws including (but not limited to) any buildings that:

- are owned, leased, or operated by the City of Toronto
- are financially supported by the City of Toronto in any way (not just through retrofit programs) including rate-based utility or service discounts, incentives, property tax breaks, grants, low-interest loans, etc.
- are regulated by the City of Toronto including all multi-residential buildings that must adhere to the Apartment Buildings By-Law and all industrial, commercial and institutional facilities that report to the Environmental Reporting & Disclosure By-Law.
- are required to pay taxes under the Municipal Land Transfer Tax

We also recommend collecting data on the age and performance of the heating and cooling systems in existing buildings. This is already collected by RentSafeTO for apartment buildings and rooming houses (it is a bit surprising to us that RentSafeTO is not mentioned anywhere in the strategy).

Action 3: Require Energy Audits and Retro-commissioning

TEA supports the proposed action to require building tune-ups using mandating energy audits and retro-commissioning to identify what upgrades and capital plans are needed for savings, emission reductions, improving occupant comfort and health as well as increasing building resilience. Many of these aging buildings will likely replace heating systems and other capital assets like windows prior to enforceable performance targets and tune-ups being introduced in Toronto. With increased likelihood of severe weather events with a warming climate, residents need livable indoor spaces that can withstand power outages or extreme heat.

Action 4: Provide & Support Financing and Funding

We support the intention to “explore the subsidization of relocation costs for tenants during major retrofit activities” but would highly recommend that the City’s EED align this with the Housing Secretariat’s renovations strategy and anti-displacement regulations that will protect tenants.

Action 7: Build awareness and capacity of home and building owners

Throughout the Strategy, there are several references to the potential for retrofit costs to be passed down from building owners to residents, which can result in negative impacts on housing affordability. This is a serious consideration that the City cannot take lightly. TEA feels there was inadequate consultation with tenants and affordable housing advocates in the development of this strategy.

It is important to note that the Strategy explicitly mentions “*potential harms associated with retrofits when done at the wrong time or in the wrong way can be avoided (i.e. co-harms)*” such as “*Increased energy insecurity for low-income households via higher energy bills*” and “*Increased risk of “renovictions” that price lower-income households out of affordable housing*” (page 21). Although the Strategy was developed to directly address these co-harms, TEA believes that our recommendations will add a layer of accountability and further community engagement that is necessary for the next phase of implementation.

TEA recommends that the Retrofit Strategy incorporate ACORN’s core retrofit recommendations ([Reference](#)):

1. Improve tenant protections to prevent AGIs (above-guideline rent increases) as a result of building or energy retrofits;
2. Fund energy and building retrofits for low-income tenants;
3. Mandate deep tenant engagement in apartment building energy retrofit projects.

General recommendations

Moving forward, the City’s Environment & Energy Division (EED) should have a clear and well resourced mandate to work across departments with Toronto Public Health, City Planning, MLS, the Housing Secretariat and with related governing bodies such as Planning & Housing Committee, Preservation of Affordable Housing Subcommittee and Tenant Advisory Committee to maximize retrofit benefits for tenants and eliminate harms through proactive people-centred measures.

We also recommend that the City of Toronto develop a **Climate and Equity Working Group**, like the City of Vancouver has done, to ensure community voices are included in the dialogue about policy and program changes in our city that affect them. TEA would be interested in joining such a group, or any other task force that may be maintained (or established) to work towards retrofit policy development and implementation.

As the City works to develop an equity lens for climate-related decision making and ‘builds back better’ post-pandemic, it has become more critical than ever to incorporate priorities such as healthier buildings, deeply affordable housing, and workforce pathways for equity-seeking groups and Indigenous peoples. TEA is looking forward to working with you further to achieve a healthy, resilient, and zero emissions city for all.

Sincerely,



Diana Yoon
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Toronto Environmental Alliance