

**SUBMITTED TO INFRASTRUCTURE AND ENVIRONMENT COMMITTEE  
DEPUTATION ON ITEM: IE23.1 Net Zero Existing Buildings Strategy**



**Comments by the ClimateFast Retrofit Planning Committee - JULY 5, 2021**

I am writing on behalf of the Retrofit Planning Committee of ClimateFast, a volunteer organization promoting climate action, with members located mostly in the Greater Toronto Area (GTA).

We have reviewed the recently released reports on the Net Zero Existing Buildings Strategy, and commend the City's extensive work on this issue. It is absolutely essential that this City implement a strong program of retrofit and energy conservation across all building sectors regardless of pushback that we anticipate from those with vested interests in the maintenance of the status quo. Safeguarding Toronto's future as a livable city requires courage and determination on the part of all its elected leaders.

**We strongly support these recommendations.**

However, we have five areas of concern that we hope you will consider when you deliberate on these reports prior to referring them to Council:

1. The staff report quotes one of the key insights from the Net Zero Existing Buildings Strategy: "The City does not have all of the authorities needed to unilaterally implement the ExB Strategy in full." (p.3) For example, under Action #1 (p.4), the staff report recommends that City Council request the Government of Ontario to amend its Reporting of Energy Consumption and Water Use regulation. Under Action #9 (p.6), the staff report lists ten items that City Council is directed to request from the Government of Ontario and its agencies, including the Ontario Energy Board and the Independent Electricity System Operator.

If the cooperation of the Province is not forthcoming in these and other areas, there are multiple references to opportunities to use municipal bylaws in innovative ways to achieve much of what must be delivered if we are to meet Toronto's emissions reduction targets. We ask this Committee to recommend that Council task the relevant departments and the City Solicitor to test the limits of bylaw authority to enable the City to implement the actions called for in the strategy. While the City should continue to apply pressure on the Province to enable additional

powers, the foundation for that advocacy will be much strengthened if the City demonstrates that it has made all possible use of its existing authority.

2. We continue to be concerned about the role of utilities like Enbridge and Toronto Hydro in the implementation of the strategy. Because electrification and energy efficiency are at the heart of this strategy, Toronto Hydro should be mandated to deliver a wider range of programs and services, including large-scale financing and utility-based repayment programs for building owners. Enbridge would appear to have a conflict of interest in that its business is delivering natural gas and it will almost certainly resist efforts to promote a fuel shift. Given that this situation is likely to play out across the country as Canada decarbonizes, Enbridge may be willing to consider changing its business model to include such services as district heating and cooling and decentralized energy generation from renewable resources.

3. We have not been able to find recommendations in the reports related to the supply side of decarbonization, including banning the sale of emission-generating equipment or appliances. The recently released Net Zero Report by the International Energy Agency calls for an end to the sale of fossil fuel burning boilers by 2025. We would like to see a similar set of deadlines for the City of Toronto.

4. We believe that a fuel switch is the most cost-effective way to bring down emissions in Toronto, but we don't see a timeline for disconnecting public or private buildings from natural gas. The IEA Report calls for 20% of existing buildings to be net zero by 2030; 50% by 2040; and 85% by 2050. A similar set of deadlines should be in place for getting Toronto off gas.

5. The staff report to City Council recommending actions to implement the Net Zero Existing Buildings Strategy addresses only five of the strategy's nine recommended actions. Missing are:

- Action 4: Provide integrated retrofit support;
- Action 5: Expand and enhance retrofit financing;
- Action 7: Build awareness and capacity of home and building owners for emissions reduction strategies and supports; and
- Action 8: Support workforce development and training.

We call the committee's attention to these omissions, which constitute key components of the strategy, and suggest that the committee require department staff to identify actions needed for their implementation.

**We applaud the City's serious approach to the existential challenge of fighting climate change and urge the implementation of the recommendations before you today.** We hope that the Committee will consider the above areas of concern in its deliberations and urge the City to dedicate the financial and human resources needed for full and timely implementation.

Thank you for your consideration.

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