



City of Toronto Planning and Housing Committee
phc@toronto.ca

Re: Support for the adoption of the Toronto Green Standard Version 4

Dear Toronto Planning and Housing Committee:

Efficiency Canada is the national voice for an energy efficient economy. We envision a future where Canada uses energy efficiency to its fullest potential. This means maximizing the benefits of energy efficiency resulting in a sustainable environment, a productive economy, and a just and equitable society.

One aspect of our work is to reduce energy waste and greenhouse gas emissions through Canada's building codes framework including the development of the national model codes, their adoption by provinces and territories, and the implementation of Green Development Standards in municipalities across the country. We are uniquely positioned to observe how leading municipalities like the City of Toronto are rapidly cutting emissions.

We are writing to you today to support the adoption of the Toronto Green Standard Version 4 and request the City continue in this positive direction with stronger incentives for projects that meet the tier 2 and 3 requirements.

[Green Development Standards bring immediate benefits](#)

Near-zero new buildings by 2030 are a central pillar of TransformTO's Pathway to a Low-Carbon Future and the adoption of TGS V4 is the type of immediate climate action that can help put a stop to rising buildings emissions in the City.

Moreover, the proposed updates in Toronto Green Standard Version 4 will advance other City strategies, contribute to economic prosperity, environmental health, cultural vibrancy and social well-being. New buildings approved today will be part of our city for the next century and it is critical that we commit to constructing healthy, resilient, efficient buildings now and avoid costly retrofits of these same buildings in the coming years.

[Municipalities cannot wait for more stringent codes and standards](#)

With respect to national model codes, tiered or step codes that progressively increase energy performance are coming within the *proposed* 2020 model codes. However, there are three points that highlight the continued need for Green Development Standards:

1. First, it will be several years until municipalities in Ontario have tiered codes available to them. The proposed 2020 national model codes remain under development and need to go through the provincial adoption process. However, immediate action is needed, and green development standards deliver effective action.
2. Next, there is no guarantee that the energy performance of the national model codes will be connected to the energy and emission reduction objectives of ambitious municipalities like the City



of Toronto, particularly given that the national model codes do not consider carbon emissions from buildings in any form.

3. Finally, national model codes, and provincial building codes, must provide a regulatory framework for communities with varying levels of capacity and ambitions. Green development standards are and will continue to be an important tool for forward thinking communities to fulfill their energy and emissions objectives to the unique level of capacity within their own community.

The proposed updates in Toronto Green Standard Version 4 signals to senior levels of government that the City of Toronto, and communities like it, desire immediate action and places significant pressure on senior levels of government to develop and implement the types of building codes communities like the City are asking for.

An act of municipal leadership

Mandatory Green Development Standards are amongst the most powerful climate action communities can take to achieve a healthy, net-zero future and a significant step towards acting on TransformTO.

Buildings are responsible for 59% of Toronto's carbon emissions and it is crucial to get emissions from new construction under control and avoid locking in high energy, high emissions buildings for decades to come. Green Development Standards are the best tool to ensure each new building constructed is healthy, resilient, efficient and an enduring asset to the community.

Led by leaders such as the City of Toronto, Green Development Standards have become an important hallmark of the responsible, future-focused development and a much-needed act of municipal leadership.

We would be pleased to discuss further how the Toronto Green Standard has, and will continue to, generate employment in the clean-energy economy, stimulate innovative clean technology and help the buildings sector demonstrate the City of Toronto's leadership in Canada's transition to a low-carbon future.

Sincerely,

Kevin Lockhart
Efficient Buildings Lead, Efficiency Canada

cc:

- Councillor Ana Bailão, councillor_bailao@toronto.ca
- Councillor Brad Bradford, councillor_bradford@toronto.ca
- Councillor Paula Fletcher, councillor_fletcher@toronto.ca
- Councillor Frances Nunziata, councillor_nunziata@toronto.ca
- Councillor Gord Perks, councillor_perks@toronto.ca
- Councillor Kristyn Wong-Tam, councillor_wongtam@toronto.ca