



June 25, 2021

To: phc@toronto.ca

Re: PH25.17 TGS Update

Dear Toronto Planning and Housing Committee:

Buildings are responsible for 59% of Toronto's carbon emissions. Transform TO's Pathway to a Low-Carbon Future identifies that 100% of new buildings must be built to near-zero emissions by 2030 and given recent, increased 2030 climate targets, this timeline should be further accelerated.

The adoption of leading Green Development Standards is the most powerful climate action we can take to curb increasing emissions. In addition to limiting carbon emissions with population growth, it also reduces the burden on the number of future buildings that need to be retrofitted to meet Toronto's 2050 emission targets. New buildings approved today will be part of our city for many decades to come.

The proposed updates in Toronto Green Standard Version 4 are one important step towards meeting our climate goals.

Specifically we see benefit in the following strategies:

- **Energy and GHG Targets**
 - We support the new minimum performance requirements; the construction industry has the solutions to meet these targets.
 - We support the separation of greenhouse gas emission targets (GHGI) from energy efficiency targets (TEDI and TEUI). Having to achieve all three performance metrics to be recognized for a particular tier level discourages projects from pursuing excellence in just GHG emissions, which can often be the most cost-effective metric and it is the most critical for climate impact.
 - Voluntary uptake of current Tier 2 requirements has been limited due to a lack of suitable incentives; we recommend that incentives for achieving increased tiers be updated for all tier levels and also include flexibility to not require an "all or nothing" approach. For example, projects pursuing zero carbon performance can be incentivized without having to meet all Tier 2 or Tier 3 requirements.

- **Embodied Carbon and LCA**
 - The mandate to require Materials Emissions Assessment and Life Cycle Assessments for new construction projects functions to increase accountability and transparency in the construction supply chain and provide the much needed data in order to include carbon as a decision making factor during procurement.
 - We are seeing the industry respond quickly to similar requirements that have been in place in Vancouver for 4 years.

- Other jurisdictions such as the Government of Canada and Waterfront Toronto have recently added requirements for LCA which is helping to drive manufacturers and suppliers to validate the impact of the materials they produce.
- EllisDon is starting to ask for product specific Environmental Product Declarations on our projects, and looking toward Life Cycle Assessments in order to evaluate our emissions at the project level.

- Construction Waste Management
 - Shifting to a maximum generation per GFA target shifts the focus to reducing waste, instead of simply trying to manage waste through diversion is an important step to achieving the ultimate goal of zero waste processes.
 - We expect this will be a challenging shift for the industry but is an important step to increase accountability in the waste we produce as an industry.

We strongly support the adoption of the Toronto Green Standard Version 4 and request the City move forward with stronger incentives for projects that meet the ambitious tier 2 and 3 requirements.

Sincerely,

EllisDon Corporation

A handwritten signature in blue ink, appearing to read 'AA', with a small blue mark to the right.

Andrew Anderson, P. Eng.
Senior Vice President / Toronto Area Manager