

June 25, 2021

To Planning & Housing Committee Members,

Re: PH 25.17- Toronto Green Standard Version 4

We are writing to express our support for version 4 of the Toronto Green Standard. The TGS is an important and valuable tool for achieving multiple Toronto strategies to make our city more livable, sustainable and healthy.

### **Meeting our Climate Emergency Commitments**

The effective implementation of the TGS is critical for Toronto to achieve its climate emergency commitment to become a net-zero city by 2050 or sooner, and to achieve its 2030 greenhouse gas reduction target. Progressively increasing requirements for buildings through a tiered system is a key strategy for addressing Toronto's largest source of carbon emissions (59% are from buildings).

The TGS Version 4 update provides an important step forward in moving our city towards net zero buildings, and we are encouraged to see the inclusion of the new Tier 2 and 3 requirement to conduct a materials emissions assessment of the upfront embodied carbon of structural and envelope components. With mandatory 2030 performance targets for all buildings on the horizon, it is vital that the City closely monitor participation in the voluntary tiers, and review measures frequently to ensure Toronto stays on track with a zero emissions pathway.

### **Improving Waste and the Circular Economy**

The TGS includes some important changes, but has room for improvement when it comes to waste management and incorporation of circular economy principles. Creating a regenerative circular economy is a key part of meeting our climate goals, since waste reduction and diversion does more than just prevent the greenhouse gas emissions from landfill, but has a much bigger impact upstream in avoided energy and resource use, processing and transport.

Providing adequate accessible space for building users to be able to sort and divert waste is fundamental to meet our waste reduction goals. However, the requirements in Tier 1 and Tier 2 refer only to current waste diversion streams required by the Province or provided by the City, but do not plan for future diversion streams. When it comes to building design and construction waste, we are encouraged that Tier 2 promotes reuse, salvage and sustainable material choices, but it could also go further to promote design for disassembly or future adaptation to new building uses.



Circularity in design and construction is a growing area of study around the world, and as Toronto has been recognized internationally for commitments to facilitating a Circular Economy, there is growing expertise and knowledge within the City and its stakeholders. We urge the City to work to investigate opportunities to further integrate circular principles and sustainable materials management into future revisions and standards.

### **Recommendations / Conclusion**

We encourage Council to adopt the proposed TGS Version 4 and the tiers that move our city towards zero emission buildings. We urge Council to look for opportunities to more deeply integrate waste diversion and circular economy principles to future revisions of the standard. In addition, we strongly recommend that staff establish a schedule for assessing and reporting on progress for all tiers, aligned with TransformTO reporting and on track with the City's zero emissions pathway and 2030 target. We also want to re-emphasize the equity impacts; if intentional, these requirements have the potential to reduce heating and cooling costs in the long term and increase climate resilience for our neighbourhoods and public spaces.

We look forward to opportunities to contribute ideas and support for visions for an even greener standard in the near future.

Sincerely,

A handwritten signature in black ink, appearing to read "Emily J. Alfred".

Emily J. Alfred  
Waste Campaigner  
Toronto Environmental Alliance