



Canada Green Building Council
Every Building Greener

Conseil du bâtiment durable du Canada
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June 28, 2021

Re: Letter of Support for the Toronto Green Standard

Dear Toronto City Council,

The Canada Green Building Council (CaGBC) is pleased to provide a letter supporting the Toronto Green Standard (TGS) updates. As the voice of Canada's green building sector, CaGBC works with its members and stakeholders to advance green and sustainable building practices. As such, the CaGBC has an interest in building codes that offer advances in sustainability.

The TGS is a progressive code that aligns with CaGBC's efforts to accelerate the transformation to energy-efficient, healthy green buildings, homes, and communities. The Toronto Zero Emissions Framework, enforced through the TGS, is synergistic with CaGBC's Zero Carbon Building Standard (ZCB Standard), which provides a proven pathway for almost any building to achieve zero carbon, as both share similar metrics and goals.

The CaGBC endorses the TGS's increase in energy performance and emissions reduction for both operational and embodied carbon. Building operations represent about 17 per cent of Canada's carbon emissions, with construction and materials representing a further 11 per cent. By incrementally raising the bar on emissions, the TGS supports the building industry's transition to zero carbon by providing the opportunity to plan with predictability, invest in the skills and resources needed, and work towards making zero carbon building the norm. Delaying updates could impact the momentum established with the building industry for zero carbon building and delay needed investments in capacity building required to meet the goals of TransformTO.

The TGS's enhanced requirements concerning embodied carbon in new building construction also address where the vast majority (74 per cent between now and 2030) of emissions are expected to emanate. Embodied carbon is especially relevant in Ontario and Toronto, where emissions associated with building operations are continually reduced by the establishment of a cleaner distribution grid and on-site non-emitting sources. Over the past year, CaGBC has worked closely with City of Toronto staff to ensure synergies between the embodied carbon reporting methodologies of the ZCB Standard and the TGS to support broader market awareness and uptake.

The required transition to zero carbon building, as supported by the TGS, builds on opportunities for industry growth and job creation. Such growth is possible, as CaGBC's *Making the Case for Building to Zero Carbon* report confirmed that zero carbon buildings are technically feasible and financially viable. Zero carbon buildings on average can provide a positive financial return over a 25-year life-cycle, inclusive of carbon pollution pricing, and require only a modest capital cost premium. It is expected that the financial return on zero carbon buildings will only grow as the cost of carbon rises, and these buildings will mitigate future costs for utilities and retrofits. CaGBC also anticipates that zero carbon building will directly contribute to job creation. Specifically, if Ontario meets its emission reduction targets, green building jobs in Ontario could almost triple from 230,000 workers to more than 620,000 by 2030 – and green building will contribute \$60.8 billion to the province's GDP.



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In addition to being financially viable and driving job creation, recent examples of zero carbon building in Toronto show that developers and operators of buildings are ready to accelerate to zero. For instance, Scotia Plaza's 40 King St. W. was recognized as the largest zero carbon building in Canada and the first to certify under Zero Carbon Building – Performance v2. It is also one of the first major office towers in Canada to achieve LEED Platinum certification. Other notable buildings in the GTHA, such as Mohawk College's The Joyce Centre for Partnership and Innovation, Humber College's Building Nx, and The Cora Group's Evolv1 project, have already certified to the ZCB Standard.

The proposed updates to the TSG will only serve to further advance green and sustainable building practices while helping accelerate the transformation to zero carbon buildings.

We look forward to continuing our collaboration with the City of Toronto to make zero carbon buildings the norm.

Sincerely,



Brent Gilmour
Chief Commercial Officer
Canada Green Building Council (CaGBC)

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