June 17, 2015

Parks and Environment Committee
10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Councillor Michelle Berardinetti, Chair
Ms. Carol Kaustinen, Committee Administrator

Councillor Berardinetti, Ms. Kaustinen,

The Greater Toronto Chapter of the Canada Green Building Council strongly supports the proposed Energy Reporting and Benchmarking Policy for large buildings. We are excited that the Province is now considering implementing this policy across Ontario, which will further enhance the policy impacts. However, if the Province does not move forward with a benchmarking policy, the City should take a leadership role and implement it via a city bylaw as originally planned.

Better building performance will be key to economic and environmental success in the 21st century. However, there is currently little hard information available on real estate energy or water costs or greenhouse gas emissions to inform real estate purchase or leasing decisions, or to help utilities and governments craft effective conservation policies and programs. Currently Canada has no wide building “nutrition label” to benchmark building energy and GHG performance; the result is that there is little awareness of building emissions and waste, and weak economic and policy drivers to improve performance.

There is now broad experience from Europe, Australia, China and the United States that building benchmarking, labeling and transparency can benefit many stakeholders in the following ways:
• Informs market purchase, lease, investment and management decisions with energy & GHG performance,
• Provides accurate data to measure, track and manage building energy use and cost,
• Identifies and spurs investment in buildings with the most cost-effective savings opportunities,
• Bolsters market competition, highlighting industry leaders and laggards,
• Informs policy, capital and asset management decision-making, and
• Increases demand for and fosters clean technology jobs and skills at low cost.

The Chapter and its members are ready to support the City's and the Province’s efforts with research, information and outreach to ensure the benchmarking policy and implementation program reduces emissions and operating costs, while minimizing costs and burdens on stakeholders and the City. Chapter representatives have already attended several of the stakeholder consultation events held by the Province and the City and we have appreciated the opportunities to provide input to the policy development process.

Sincerely,

Michael Parker
Chair

Hazel Farley
Executive Director