October 6, 2017

City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Planning and Growth Management Committee
Re: PG23.9 Toronto Green Standard Review and Update

Dear Planning and Growth Management Committee,

The Greater Toronto Chapter of the Canada Green Building Council (CaGBC) supports the adoption of the Toronto Green Standard (TGS) Version 3 performance measures as shown in Attachment 2, 3, and 4 of the meeting materials. We congratulate the City Planning Division, working in partnership with The Atmospheric Fund (TAF), on the development of the City of Toronto’s Zero Emissions Building Framework, and we would encourage the adoption of this Framework into the next revision of the Toronto Green Standard. We applaud the City and TAF on the release of this report, as well as the previous work done in the Global Best Practices in Energy Policy Study. Together, these identify an effective means of updating the TGS greenhouse gas (GHG) and energy efficiency measures which is feasible for the construction industry and simultaneously addresses the City’s climate, energy and resilience goals.

Since its 2010 adoption by Toronto City Council, the TGS has established Toronto as a leader in energy efficiency and green development guidelines. Revising these standards by evolving the requirements will help new design and construction align with the City’s ambitious target of reducing GHG emissions by 80 percent of 1990 levels by 2050, while also improving the quality of its built form. The report describes how the City of Toronto can help reduce demand placed on provincial power generation infrastructure by increasing renewable and district energy generation, translating into reduced GHG emissions across the city. It is a pathway that focuses on the impacts of new construction, improving buildings’ resilience to climate change, and increasing the level of quality and performance of the built
environment. We support the approach, performance metrics, and targets set out in this report as they are well aligned with our vision and mission at the CaGBC.

The Chapter acknowledges and supports the leadership of the City of Toronto in adopting higher requirements for its new buildings to achieve near/net zero GHG emission levels of performance by 2030, ushering in the next generation of high performance buildings. In alignment, both the Province of Ontario\(^1\) and the federal government\(^2\) have identified a need to build to net zero levels of performance. Indeed, if all new large buildings in Canada were built to achieve a net zero carbon level of performance between now and 2030, GHG emissions from this sector would be reduced by 17 percent from 2005 levels, eliminating 7.5 megatonnes of GHG emissions annually by 2030.\(^3\)

CaGBC’s new Zero Carbon Building Standard\(^4\) (ZCB) aligns with the intent of the proposed performance targets and standard revisions. The ZCB uses a GHG intensity metric in conjunction with other measures such as a total energy use intensity metric and a thermal energy demand intensity metric to encourage the use of building envelope design strategies to deliver superior energy performance and provide greater resilience, just as the revised TGS lays out. Together, these measures encourage higher energy performance, drive choices about the types of energy that are used in buildings, and encourage renewable energy generation both onsite and offsite for buildings.

As the largest city in Canada, the City of Toronto will be seen as a frontrunner in establishing a performance target-based approach with linked metrics as outlined in the Zero Emissions Building Framework within the TGS. These metrics align with energy benchmarking and reporting requirements, and provide a longer-term, predictable process for the construction industry while achieving the city-wide emissions reduction goals.

With our growing membership base and our relationships with key stakeholders in Southern Ontario, the CaGBC is well positioned to assist the City with outreach and stakeholder engagement. CaGBC will boost the work of the City through our certification programs, education courses, community outreach and specialised expertise in the green building construction sector. Supporting the growth and development of knowledgeable professionals is in our core mandate; and as the CaGBC rolls out its own Zero Carbon Building Initiative\(^5\), there will be an upswing in interest and training opportunities which will build industry capacity in high performance design and construction.

\(^5\) CaGBC, Zero Carbon Building Initiative. [https://www.cagbc.org/zerocarbon](https://www.cagbc.org/zerocarbon).
As the largest green building member-based network in the GTA, the Toronto Chapter and its members commend the City Planning Division for undertaking these important research activities and spending the time to thoughtfully and thoroughly design a pathway forward for the City’s new construction and development. CaGBC-GTC recommends that City Council approves and adopts the Framework into the next revision of the Toronto Green Standard (Version 3, 2018). We champion collaborative approaches to driving climate change action and we would welcome future partnership opportunities with the City to educate and engage with stakeholders to move toward a more resilient and higher-performing built environment.

Sincerely,

Andy Schonberger, P. Eng.
Chair, Leadership Board