



Toronto City Council
councilmeeting@toronto.ca

Re: TransformTO Net Zero Strategy - Investing in Toronto's Net-Zero Future

Dear Council Members:

Efficiency Canada is the national voice for an energy efficient economy. We envision a future where Canada uses energy efficiency to its fullest potential. This means maximizing the benefits of energy efficiency resulting in a sustainable environment, a productive economy, and a just and equitable society.

One aspect of our work is to reduce energy waste and greenhouse gas emissions in Canada's buildings sector through innovative municipal policy frameworks and investments. We are uniquely positioned to observe how leading municipalities like the City of Toronto are rapidly cutting emissions.

We are writing to you today to express our support for the City's TransformTO Net Zero Strategy, specifically, the Strategy's bold recommendations to decarbonize Toronto's buildings sector.

The recommendations below reflect our support for the TransformTO Net Zero Strategy while providing suggestions to bolster the effectiveness of the Strategy.

[Accelerate TGS to align with zero emissions by 2030](#)

The City of Toronto has long held a target for new buildings, as set in the Toronto Green Standard (TGS), to be near zero emissions by 2030. Nonetheless, the timelines established in 2017 are now misaligned with this objective as they do not recognize lags in the development process that will see Version 6, which requires near zero emissions, implemented in 2032 at the earliest.

Efficiency Canada supports the Infrastructure and Investment Committee's (IEC) recommendation to accelerate the Toronto Green Standard schedule to implement TGS V5 in 2025, and TGS V6 in 2028, and explore stronger incentives for the current tier 2 and tier 3.

[Encourage our provincial government to adopt stringent building energy codes](#)

Building energy codes affect have come to be recognized as the quickest, cheapest and cleanest way to improve energy efficiency in the building sector. And, as cities like Toronto move to a net zero economy, building energy codes will continue to play a critical role in reducing energy waste and emissions associated with the energy buildings consume.

Efficiency Canada supports the IEC's recommendation that City Council request the Ministry of Municipal Affairs and Housing consider strengthened requirements in the Ontario Building Code for increased energy efficiency improvements at the time of renovation. This includes provincial collaboration with the federal government to ensure the swift development of a stringent Alterations to Existing Buildings Code that includes a tiered path to net zero energy and emissions.



Clarify the feasibility of building performance targets in Q2 2022

Building performance standards are one of the select regulatory tools that set a clear path towards reducing energy use and emissions in buildings, and in a way that conventional building codes cannot. By signalling the desired end-state of the existing building stock, building performance standards provide the certainty needed to encourage deeper energy retrofits while providing policymakers with the flexibility to target specific segments, building archetypes, and/or specific municipal objectives. Building performance standards are also key to catalyzing the electrification of building heating systems, as a preferred alternative that will reduce reliance on natural gas.

Efficiency Canada's supports IEC recommendation 21, with the caveat that key stakeholders report back in the second quarter of 2022 on the feasibility of implementing emissions performance standards or incentives for existing buildings using the City's existing authorities or specific recommendations for any regulatory or legislative changes needed to enable implementation of emissions performance standards and zero carbon HVAC systems.

Provide key recommendations to encourage deep retrofits sooner, rather than later

We support the City's building retrofit strategy, a comprehensive framework that leverages opportunities to improve the efficiency and carbon performance of buildings alongside planned building upgrades. Building retrofits are one of the highest priority climate actions listed by respondents to the City's Net Zero Strategy consultations alongside fuel switching. We applaud the Strategy's recognition of the role building retrofits play in broader decarbonization efforts.

Building retrofits are also one of the key intervention points in a buildings lifecycle that enable fuel switching and, together with the City's Toronto Green Standards program, reduce reliance on natural gas in new and existing buildings.

Efficiency Canada supports the IEC's recommendation that key stakeholders report back on options for additional financial incentives, disincentives and other mechanisms to further encourage deep retrofits of existing buildings. However, we recommend that this reporting period conclude in the second quarter of 2022, rather than the first quarter of 2023

Taking early action demonstrates municipal leadership

Taking early action now is not only a bold act of municipal leadership, but it also offers the City and its constituents a means to reap the financial benefits of the avoided carbon and energy costs more quickly. We applaud the Strategy's recognition of the important role both new and existing buildings play in reducing emissions and avoiding locking in high energy, high emissions buildings for decades to come.

We would be pleased to discuss further how the Net Zero Strategy can generate employment in the clean-energy economy, stimulate innovative clean technology and help the buildings sector demonstrate the City of Toronto's leadership in Canada's transition to a low-carbon future.

Sincerely,

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