

Date: December 2, 2021
To: Infrastructure and Environment Committee
Re: IE26.16 TransformTO - Critical Steps for Net Zero by 2040

Dear Members of the Infrastructure and Environment Committee,

Toronto Environmental Alliance (TEA) and our supporters across the city understand that ambitious targets, community engagement in decision-making, and sustained funding are needed to address climate change locally.

We are writing to encourage this Committee and City Council to adopt the new Net Zero by 2040 target, and to strengthen the plans in 5 key areas that we have identified in our analysis.

Adopt the Net Zero by 2040 target

This updated climate strategy, with a proposed new target of net zero in 2040, represents a significant step up in Toronto's climate ambition. We are glad to see the focus on reducing emissions to zero faster, and on a trajectory to the current 2030 target.

Net zero by 2040 is an important destination, but like any ambitious collective journey, we need a detailed map and the resources to make it happen. We need specificity in the plan and the resources to be allocated.

Strengthen the plan in the following 5 key areas

1. ACCELERATE PLANS IN HIGH-IMPACT EMISSIONS AREAS

This report identifies high-impact areas in the Net Zero Strategy where accelerated action can achieve the most significant emissions reductions, and create a healthier and more liveable city. The top two areas include:

Buildings -- As the biggest source of emissions, accounting for 57% of Toronto's total emissions, this plan aims at eliminating natural gas heating across the city. If done right, accelerating actions in this area can cut emissions, improve housing and create good, green jobs.

Our recommendations:

- Advance the schedule for implementing **V5 and V6 of Toronto Green Standard** by one year each, so that V5 applies in 2025 and V6 applies in 2028, to ensure that buildings constructed in or after 2030 are near zero emissions

- Determine the City's powers to accelerate the implementation of - and compliance with - **new building standards** (Toronto Green Standard and the Net Zero Strategy for Existing Buildings), in order to quickly transition off natural gas for heating
- Develop a plan to ensure **green renovations and energy retrofits** don't cause renovictions or affect affordability for tenants and low-income residents

Transportation -- The Net Zero Strategy outlines a number of actions to reduce transportation emissions (many from the original TransformTO plan). This includes increasing active transportation use, expanding and electrifying transit, and electrifying the City's own fleets. Accelerating action in this area will reduce emissions quickly, and benefit residents across the city.

Our recommendations:

- **Accelerate transit expansion** plans, and implement RapidTO bus lanes
- Move up the timeline for a **zero-emission TTC fleet**
- Move the **City's fleet** to EVs starting now (vehicles and bikes)
- Build **complete streets** that protect pedestrians and cyclists sooner, especially in communities where active transportation infrastructure is the most lacking

2. STRENGTHEN ACCOUNTABILITY AND REPORTING

To ensure the City is hitting its ambitious targets, we need stronger accountability and reporting mechanisms. We want to see that the City is seeking out and meaningfully implementing responses received from Indigenous people¹, and feedback from local residents, organizations, and equity-deserving communities.

Our recommendations:

- Implement **robust annual reporting** on emissions, starting in 2022; otherwise, we won't know if we are on track to meet our 2025 target until we see the 2025 update report
- Develop **accountability structures** that measure progress and outcomes towards TransformTO Net Zero Strategy goals across the array of connected City programs and strategies, such as the Toronto Green Standard for buildings, the Net Zero Existing Buildings Strategy, cycleTO, the Official Plan, and numerous other strategies
- Accelerate the City's **consumption based emissions inventory**, to account for emissions from the goods and services we use, and adjust our targets and emissions reduction pathways; report on the City's community-wide consumption emissions in 2022, for inclusion in the City's total emissions inventory and models for the TransformTO 2023 annual report
- Design and implement a **Toronto Carbon Budget** and associated key performance metrics, which align with the City's financial budgets, to manage corporate and community GHG emissions, within an absolute limit that aligns with the City's 2025, 2030, and 2040 emissions reduction targets, by 2023

¹ [Indigenous Climate Action Summary Report: Indigenous Strategic Discussions on City of Toronto Climate Strategies" \(2018\)](#)

The Net Zero Strategy report recognizes that City efforts to engage Indigenous communities have been lacking. Accountability must include recognition of the City's obligations to Indigenous Peoples.

Our recommendation:

- The City should articulate how it will do a better job **engaging Indigenous communities** as rights holders in decision-making on the Net Zero Strategy.

3. ENGAGE MEANINGFULLY WITH RESIDENTS

The City plans to engage communities in the implementation of the Net Zero Strategy, but we want to see a concrete plan that enables meaningful involvement of residents in the design, development, and evaluation of actions that goes beyond “advice giving”.

Our recommendations:

- Establish a **Climate Advisory Group** that centres the voices of equity-deserving groups, and includes youth, civil society organizations, labour and workers rights organizations, and academia, and is resourced to produce an independent, annual review of the City's progress on the TransformTO Net Zero Strategy
- Create new **structures for meaningful resident participation** which enable community-led and place-based recommendations and feedback to shape TransformTO
- **Support resident-led climate action** and engagement by dedicating an action area to supporting community hubs, community centres, neighbourhood pods and other local support networks, as key social and physical infrastructure for strengthening community climate engagement and resilience

4. IMPLEMENT THE CITY'S EQUITY LENS

In 2019, the City committed to developing a plan to apply the City's Equity Lens to TransformTO decision-making in order to ensure that strategies include and benefit equity-seeking groups. This plan has not been developed and the Net Zero Strategy does not include a fulsome equity analysis.

Our recommendations:

- **Work with equity-deserving people**, including people with disabilities, racialized people, newcomers, and residents with low incomes, to advance benefits and prevent harms
- **Increase youth participation**, particularly youth from equity-deserving groups, in developing and implementing climate strategies
- Follow through with the City's Climate Emergency commitment to engage job-seekers, workers, unions, academic institutions, relevant sectors, and social service agencies in the creation of a **low-carbon jobs strategy** that supports a decent work agenda, career pathways for equity-seeking groups, and the expansion of green industry sectors across Toronto.²

²MM10.3 - Declaring a Climate Emergency and Accelerating Toronto's Climate Action Plan - by Mayor John Tory, seconded by Councillor Mike Layton <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.MM10.3>



5. COMMIT TO ROBUST AND SUSTAINED FUNDING FOR CLIMATE ACTION

Since the original TransformTO climate plan was passed in 2017, there have been repeated delays and underfunding of climate action in the City Budget. The new targets in the Net Zero Strategy increase Toronto's climate ambition, and this necessitates that our Mayor and Council step up their support for implementing and funding this plan.

Full funding of this plan will require support from other levels of government, but we can't rely on these sources alone. Over the last several years, civil society groups have been asking the City to commit to creating and implementing new revenue tools - that are fair and equitable - within its own powers.

Our recommendations:

- Put **fair and equitable revenue tools** in place in the 2022 City Budget, to create sustained and ongoing funding for climate action
- Commit to **fully funding the climate plan** every year
- Develop robust and transparent **Climate Lens criteria**; conduct peer review of the Climate Lens to ensure the criteria is agreed upon through the engagement of climate advocacy groups, experts and academics, and to ensure robust criteria are used in the development and application of the climate lens, and to evaluate how climate impacts are being assessed in major City decisions, including capital and operating budgets in the 2022 City Budget

We encourage this Committee and City Council to adopt the new Net Zero by 2040 target, and to strengthen the Implementation Plan in 5 key areas above, to get on the right emissions reduction trajectory to meet our 2025, 2030 and 2040 targets.

Kathryn Tait
Climate Specialist
Toronto Environmental Alliance
kathryn@torontoenvironment.org