



SUSTAINABLE BUILDINGS CANADA

33 Longboat Ave • Toronto • ON • M5A 4C9 • Tel (416) 752-3535
www.sbcanada.org

June 21, 2021

Nancy Martins
10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Ms. Martins,

Sustainable Buildings Canada (SBC) is pleased to lend its support to the implementation of the Toronto Green Standard, Version 4. SBC was formed as an independent non-government organization in 2003 with a mandate to promote and support greater energy and environmental performance in buildings. SBC has a history of supporting codes and standards that foster energy savings and lower greenhouse gas emissions. Members of our organization worked closely with City of Toronto (“the City”) staff in the development of the original TGS and have followed the development of the new standard with great interest.

Since Version 3 was adopted in 2017, SBC has collaborated with the development industry on creating design and technology solutions to meet the required levels of improved energy and storm water management performance. This includes developers who have wished to go beyond the minimum requirements. We note that achieving the required energy performance associated with Tiers 2 and 3 of Version 4 are achievable with readily available technologies and a number of developers are already embracing the higher tier performance in their designs in a desire to be “ahead of the Code”.

We also feel that it is important for the City to ensure that the designs and technologies associated with the energy and resiliency targets that are approved as part of the planning process actually make their way into the final constructed building. This includes the need for an audit of compliance after occupancy turnover – a process that requires working closely with property managers. It also requires adequately resourced compliance and oversight as typically delivered by the various City departments. Post construction audits with appropriate penalties for non-compliance will send a signal to the market that there is an expectation that buildings will get built with the design and technology that was approved as part of the planning process.

Please include our organization in the list of those who believe that adopting the proposed standards and encouraging builders to achieve greater levels of environmental performance represents an excellent direction that the City can take in leading the market to lower carbon solutions.

Sincerely,

Michael Singleton
Executive Director
msingleton@sbcanada.org