

May 9, 2023

Dear Deputy Mayor and Council

RE: PH3.19 - Toronto Green Standard Update: Advancing Net Zero Emissions in New Development

Toronto Environmental Alliance is writing to strongly support the recommendations in PH3.19 - Toronto Green Standard Update: Advancing Net Zero Emissions in New Development.

Toronto's Green Standard is a leading market transformation tool for green, sustainable buildings. These recommendations include important steps forward in the more precise tracking, management, and reduction of embodied carbon emissions from buildings and are vital for getting Toronto to its net zero 2040 goal.

In order to truly reach our Council-supported climate goals, a city like Toronto with a booming construction industry must take into account the embodied emissions of building construction, which include emissions associated with the manufacture of construction materials, the energy used to transport those materials to the site, and the energy used to construct the buildings.

A substantial portion of a building's total emissions comes from the embodied greenhouse gas emissions of the building. Currently, most of a building's Scope 3 greenhouse gas emissions are not included in the City's annual greenhouse gas inventory, as Toronto's annual greenhouse gas inventory primarily accounts for the emissions only from a building's operations.

The steps proposed by staff here provide consistent, clear goalposts for industry, and help to send a clear signal on the importance of precise, full lifecycle carbon accounting while also accounting for industry adaptation timelines. In addition, the proposed changes



encourage adaptive reuse of existing buildings, reducing emissions and preventing construction waste. Meanwhile, the Toronto Green Standard continues to provide financial incentives to industry for higher level compliance.

By strengthening how construction projects manage their embodied energy, this update to the Toronto Green Standard greatly increases the city's ability to meet Net Zero by 2040. We therefore support its adoption.

Sincerely,

A handwritten signature in black ink, appearing to read "How-Sen Chong". The signature is fluid and cursive, with a long horizontal stroke at the end.

How-Sen Chong
Climate Campaigner
Toronto Environmental Alliance