



December 12, 2023

Toronto City Council
Toronto City Hall
100 Queen St. West
Toronto, ON M5H 2N2

Re: IE9.5 Proposed Building Emissions Performance Reporting By-Law

Dear Mayor Chow and Council members,

Efficiency Canada is the national voice for an energy efficient economy. Based at Carleton University, 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.

We thank Council for the opportunity to demonstrate our support for the recommendations put forward by the Infrastructure and Environment Committee regarding the *Proposed Building Emissions Performance Reporting By-Law*. The proposed by-law is a significant step towards reaching the City of Toronto's net zero by 2040 and interim goals. We fully support the adoption of a by-law that would require owners of large and medium-sized buildings (929 square meters) to report building energy and water use data to the City annually.

We endorse the ambitious yet pragmatic phased implementation approach as outlined in the proposed by-law. This strategy not only adheres to international best practices but also extends a crucial grace period for building owners who may be unfamiliar with benchmarking and reporting requirements. This approach provides these owners with sufficient time to develop their internal processes, fostering a more seamless and effective integration into the new reporting requirements.

Additionally, by simplifying the compliance process for buildings also subject to Ontario's Energy and Water Reporting and Benchmarking (EWRB), building owners are well-positioned to meet the requirements with minimal effort.

Existing buildings are essential to meeting environmental, social, and resilience goals

Existing buildings are the largest source of greenhouse gas emissions in Toronto, accounting for 58 percent of the City's total emissions. And in the coming decades, the City of Toronto's



ability to meet its 2040 and interim 2030 climate targets and achieve net-zero emissions will largely depend on how effectively it can reduce emissions from the existing buildings stock.

Along the way, the City can capture the many benefits of low emissions buildings, including better health outcomes for occupants, reductions in energy poverty, and good jobs in the local economy.¹ Non-energy benefits provided by low emissions buildings extend beyond the building itself to encompass adaptable and resilient communities that, through robust envelope and ventilation strategies, can keep occupants safe in the event of extreme heat or cold weather events, poor air quality caused by wildfires, and other disasters.

Reporting of building emissions performance leads to more effective policy

As outlined in a recent Efficiency Canada's [Regulating energy and emissions in existing buildings](#), the reporting/benchmarking of building emissions is a critical step needed to prepare for the implementation of mandatory performance standards for existing buildings, a core component of Toronto's Net Zero Existing Buildings Strategy. As such, we strongly support recommendation 7, and encourage the City to swiftly implement disclosure of non-anonymized data on building performance.

Benchmarking measures the operational performance of a building over time and enables comparisons to similar building types and sizes. It is used to establish a building's baseline energy performance, set performance goals, track, improve, and compare ongoing energy use, and identify buildings that are ripe for efficiency investments.

Informed by the buildings level data collected by the proposed *Building Emissions Performance Reporting By-Law*, the City can ensure building owners are provided a supportive framework of practical support, and that social safeguards for disadvantaged populations are in place. Benchmarking data can also be used to develop ambitious, but achievable, building performance criteria, and identify the levels of support needed for program outreach, support, and investment of future building performance standard initiatives. Such standards build on voluntary measures and programs such as Ontario's EWRB initiative which, while helpful in raising awareness about building energy use and emissions, has been largely ineffective in triggering the scale of retrofit activity required to meet our climate commitments in a way that a mandatory initiative can.

Long-term assets or enduring liabilities

Each building that is not on a path to deeply reducing its emissions represents an enduring liability that will need to undergo costly retrofits in the coming years. From affordable housing to

¹ Haley, Brendan. Energy efficient buildings are critical infrastructure in a net-zero emission economy. October 2020.



childcare and community recreation centres, these buildings must be enduring assets that are climate neutral, inclusive, and contribute to the livability of our communities.

Benchmarking, particularly in preparation for a building performance standard, can help the City avoid the risk of exacerbating the affordability crisis by imposing additional costs on building owners. It will help all involved understand the existing building stock - the building types, floor area, energy sources used, and emissions generated. This much needed information is fundamental to MBPS design and implementation. Information gathered from this benchmarking initiative can ensure future policies reflect technical, financial, equity, and societal priorities of the City, and find opportunities to improve the quality of our existing buildings stock to better serve the health and safety of Toronto's businesses and residents.

Next steps

As indicated by our comments above, we strongly believe that the proposed Building Emissions Performance Reporting By-Law is integral to rapidly reduce emissions in the buildings sector, particularly the most wasteful and emissions-intensive buildings in our City. In doing so, the City can tackle climate change and increase resilience; and improve social inclusion and quality of life for all. We applaud the excellent work of the Environment and Climate Division in the development of the proposed bylaw and strongly recommend that Council members vote in favour of the Infrastructure and Environment's recommendations.

We welcome further opportunities to discuss how low-emissions buildings can serve a critical role in Toronto's efforts to meet its 2030 climate targets and achieve net-zero emissions by 2040.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. Lockhart'.

Kevin Lockhart
Research Manager, Efficiency Canada