



**Sept 19, 2023**

Toronto City Hall  
100 Queen Street West  
Toronto, Ontario  
M5H 2N2

**RE: IE 6.6 Consumption-based Emissions Inventory and Cool Food Pledge Commitments**

Dear Members of the Infrastructure and Environment Committee,

The Toronto Environmental Alliance (TEA) would like to commend and support the City of Toronto's efforts to carry out a Consumption-based Emissions Inventory for both community (city-wide) and corporate emissions. This is a necessary step in getting a more thorough understanding of Toronto's carbon footprint, which includes emissions from all the products and materials consumed by residents in any given year, even if they occur outside of Toronto. This is also a significant milestone in fulfilling the City's 2019 climate emergency declaration commitments, which included a commitment to develop a plan to measure, monitor, and reduce consumption-based emissions.

**How is this different from Toronto's current approach to calculating our carbon emissions?**

Unlike the City's sector-wide community emissions inventory, which only counts emissions generated inside the City's borders (as well as the emissions from generating electricity used within Toronto), this Consumption-based Emissions Inventory accounts for nearly all the upstream emissions for all things consumed by Toronto residents. This includes emissions from the overseas factories that produce our goods and services, the emissions associated with getting those goods and services to the border of our city, the emissions generated by Toronto residents flying or driving outside the city, and many other categories not captured in Toronto's current approach.

Counting emissions from all the goods and services we consume has a large multiplier effect on our carbon footprint. This initial inventory estimates that Toronto's emissions are approximately 2.5 times higher when counted through a consumption-based lens vs the usual sector-based lens. It's a good reminder that our choices and activities in Toronto drive carbon-intensive industries far outside of our borders - and that not all residents contribute the same level of consumption-based emissions. Since

carbon emissions don't respect jurisdictional borders, addressing the climate crisis will ultimately mean thinking more broadly about the impact of our activities.

### **Does this report change how we should move forward to address climate change?**

Looking at Toronto's emissions through this new lens reaffirms the need for an approach focused primarily on shifting away from burning fossil fuels like natural gas and gasoline, which contribute significantly to every category in this analysis (housing, transportation, food, goods, services). The report explains that "across Toronto's community-wide consumption-based emissions inventory, transportation (specifically gasoline consumption) and natural gas usage present the greatest opportunities for the city to reduce emissions feasibly and readily from their current levels..." This supports the approach taken in the City's TransformTO Net Zero Strategy, which aims to accelerate a shift to low carbon buildings and transportation as key steps forward.

This method of calculating emissions also highlights the impact of some previously uncounted areas, including the impacts of food production, aviation, the production of building materials, and many other activities which technically happen outside of the City's borders, which are influenced by the decisions made within the city's borders. For example, when you factor in the significant emissions impact of food production, food waste becomes a much bigger climate problem. Toronto residents waste an estimated 20% of the food we purchase; cutting food waste is a strong opportunity to reduce emissions associated with producing food (as well as emissions associated with food decomposition).

These insights bring new opportunities for the City to lead by example in reducing carbon emissions. For example, the report shows that corporate emissions are dominated by Construction and Maintenance activities - clearly an area where the City can have significant impact in reducing in-house consumption-based emissions. This is already starting to move forward, as the City of Toronto is beginning to consider the embodied emissions of building materials (ie the emissions generated in manufacturing and transporting building materials) in the Toronto Green Standard, which is a very welcome step.

### **How can future Consumption-Based Emissions Inventories build on and strengthen this work?**

One category which hasn't been included in this analysis is the emissions impact of building waste from demolition activities. Including an analysis of the impact of building waste in future progress reports could provide valuable insights to inform the City's Net Zero Existing Buildings Strategy.

This data could make a stronger case for salvaging and reusing building materials whenever possible. Including emissions from construction waste and demolition into future inventories may also

show that demolishing older buildings to make way for new “net zero” buildings is not always the best course of action. In the case of many buildings, particularly older buildings which provide a disproportionate number of affordable rental units, this data could reveal a stronger case for preserving existing housing with less intensive retrofits, and a switch to technologies like heat pumps or geothermal energy to heat and cool the building.

In conclusion, the Toronto Environmental Alliance (TEA) applauds the City’s work to examine emissions from a new and informative perspective. We look forward to this data being incorporated into the implementation of the TransformTO Net Zero Strategy, and look forward to collaborating with staff to further understand its implications.

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah Buchanan". The signature is fluid and cursive, with the first name "Sarah" and the last name "Buchanan" clearly distinguishable.

Sarah Buchanan  
Campaigns Director  
Toronto Environmental Alliance