



November 29, 2023

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

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

Dear: Members of the Infrastructure and Environment Committee,

TEA supports the implementation of the proposed Building Emissions Performance Reporting By-law as part of the City of Toronto's plan to create building emissions performance standards on all buildings across Toronto.

Bringing existing buildings to net zero emissions by 2040 is essential to Toronto's climate goals, and to our collective future. Buildings are the source of the majority of Toronto's emissions, consistently making up about 60% of our total greenhouse gas emissions in annual inventories. This is primarily from the burning of so-called 'natural' gas. City staff have wisely and consistently pointed out in the Net Zero Existing Buildings Strategy that "voluntary measures will not be sufficient to catalyze the scale of action required to achieve net zero emissions."

The first step in moving forward is getting a baseline building-by-building understanding of energy use in larger buildings. This will form a foundation for the next step: improving emissions performance over time through the timely phase-in of mandatory standards. **These two steps are the most powerful actions Toronto can take right now to significantly reduce greenhouse gas emissions, and are absolutely essential in meeting Net Zero Strategy goals.**

Additionally, implementing energy reporting and building emissions performance standards will create green jobs in building retrofitting, energy auditing, green building management, building

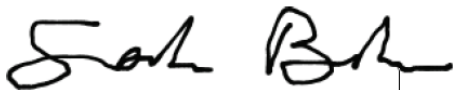
decarbonization, and other spinoff trades —workforce expertise that will be essential to a future economy built around low or zero carbon solutions.

In addition to being good for the environment, building emissions performance standards have the potential to improve building conditions and affordability by ensuring minimum energy efficiency standards, which reduces the cost of operating a building. This is particularly important as those who pay a building or a unit's energy bills are often not the same entities that build or manage buildings. In order to ensure that this plan does not increase net costs for tenants, and instead acts as a catalyst to improve building conditions, **we recommend aligning this work with other City-led programs and policies to track and improve building conditions, such as RentSafe.**

If this by-law is implemented, Toronto will join leading jurisdictions around the world in taking serious action in cutting carbon emissions from buildings. New York, Washington DC, Montreal, and Vancouver, have implemented building performance standards around energy efficiency and emissions which gradually require increased energy efficiency over time. This approach has been adopted internationally due to its effectiveness and ability to provide a predictable, stepped pathway for industry and building owners.

In conclusion, TEA strongly supports the implementation of the Proposed Building Emissions Performance Reporting By-law, and we commend the work that City Council and City staff have accomplished on the issue.

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