

**From:** [sisgordon@sympatico.ca](mailto:sisgordon@sympatico.ca)  
**To:** [Infrastructure and Environment](#)  
**Subject:** [External Sender] Infrastructure and Environment Committee communication re Items IE14.9 and IE14.10 May 28 2024 from Seniors for Climate Action Now!  
**Date:** May 27, 2024 2:05:47 PM

---

*Clerk of the Infrastructure and Environment Committee: Please distribute to all members of the Committee. Thank you.*

For all Councillors on the City of Toronto Infrastructure and Environment Committee:

Seniors for Climate Action Now! is a volunteer organization of seniors compelled to urgent action to mitigate the climate emergency, to protect the land we live on so we can pass on a beautiful, healthy place to live to future generations. We are Canadian seniors with chapters across the province and members across the country. SCAN! Toronto, the local chapter, has members in every ward in the city.  
(<https://seniorsforclimateactionnow.org/>)

Thank you to Toronto City Council for your submissions to the provincial government on Bill 165. We wish we could all have been more effective in stopping or changing that act which intends to bake in green-house gas emissions and profits for Enbridge for at least another generation and maybe two.

SCAN! also opposed Bill 165 in very public ways including this submission to the provincial government: <https://seniorsforclimateactionnow.org/wp-content/uploads/2024/04/SCAN-FINAL-Submission-to-Standing-Committee-on-Bill-165-April-6-2024.pdf>

We are submitting this letter with our comments on two reports to the Infrastructure and Environment Committee meeting May 28, 2024:

- IE14.9 Impact of Bill 165 and Gas Utility Use of Public Property in Toronto
- IE14.10 Authority to Ban Natural Gas in Toronto

As the report in front of you today notes, “Natural gas is a fossil fuel responsible for over half of Toronto’s annual greenhouse gas emissions as the primary energy source for heating buildings. The TransformTO Net Zero Strategy aims to accelerate a rapid and significant reduction in natural gas use in buildings, identifying this as one of four "critical steps" to achieving City Council's goal of net zero emissions by 2040. This critical step is consistent with a worldwide energy transition away from fossil fuels because they are the main cause of climate change.”

It is also important to note the report you received recently about the progress in meeting the goals for emissions reductions set out in Transform TO. **Toronto is not on track to meet those goals** – not the 2025 goal, the 2030 goal and certainly not the 2040 goal for net zero emissions. Shutting down the city for COVID made it appear that progress was being made in reducing emissions. It was temporary. The return to “normal” life makes it clear we are not. GHG emissions continue to increase. More urgent and impactful action is required.

The Infrastructure and Environment Committee and City Council must base their decisions on that knowledge.

As it stands, the Toronto Green Standard discourages the use of natural gas for heating/cooling and hot water in new buildings. The plan will not prevent new hook-ups in new buildings until May 2028 – 4 years from today. Toronto plans to build and enable the construction of 285,000 new homes by 2031. There is no way to reduce green-house gases if stringent controls are not put in place on all new buildings and developments starting immediately. Natural gas heating and cooling systems installed today are expected to last for 60 years. Toronto will be unrecognizable by the time they are replaced if we don't do more to mitigate climate change.

**We urge this Committee and City Council to bring forward new measures in Green Standards Version 5 later this year to implement net zero emissions for all new buildings – including residential buildings under 10 units – as soon as possible.**

**The Emissions Performance Bylaw for existing buildings should also be adopted and implemented within months, not years, to make a difference as soon as possible.**

**The application of both the Green Standards and Emissions Performance standards must be accelerated.**

The costs of implementing these standards now are far less than the costs – both to the city and individuals - of continuing the current pollution of our environment and the increase in climate change.

SCAN! is pleased to see the City working to capture methane at land-fill sites to reduce direct methane emissions and get some use from renewable natural gas. It is a worthwhile interim measure until it is clear how to reduce those emissions. However, it is not a good long-term solution or a reason to keep natural gas infrastructure in use.

The section of the report in front of you on the financial relations between the City and Enbridge is very concerning to SCAN! What is going on here? Are Enbridge and the City still relying on an agreement the City signed in 1848? We're happy to see that staff are planning to discuss with the province the possible update of the financial arrangement between the City and a private for-profit utility.

To what extent are the people of Toronto subsidizing the distribution of gas by Enbridge in the City with our taxes? Without levying certain charges and restrictions on Enbridge, is each resident of Toronto paying for the costs of distributing natural gas around the City - and then paying again for that cost in their gas bills?

The original request for this report asked for information on “costs incurred by the City from utility cuts and fuel utilities on public property” which we don't think has been

entirely answered.

We would like to see more information about those costs.

SCAN! and the City agree that it is necessary for residents and buildings in Toronto to transition away from fossil gas for heating/cooling and hot water. That will make Enbridge's distribution pipes increasingly stranded assets. What agreements are in place - or should be in place - to ensure that the cost of removing those pipes does not fall to the residents of Toronto? It is the company that has been making profits from them for – it appears – about 140 years. Under existing arrangements, to what extent will residents of Toronto pay for unused pipes? And what will it cost to remove them in order to ensure that they do not become hazardous? Gas customers have already paid for the infrastructure through their bills.

SCAN! doesn't have the legal expertise to comment on the confidential report under the next item on the agenda, the City's authority to ban natural gas in Toronto. But we can comment generally on what we think Council should do about that report. Do not be overly cautious. The cost of failing to meet our goals for emissions reductions will be catastrophic.

**We urge this Committee and Council to do everything you can to reduce the consumption of natural gas in Toronto as soon as possible. Use whatever tools at you disposal to achieve Net Zero.**

Later is too late.

In summary, we encourage the Infrastructure and Environment Committee to:

- Amend plans for the adoption and application of the Toronto Green Standard Versions 5 and 6 to cover all new buildings in Toronto and to apply at the earliest possible feasible date;
- Amend plans for the adoption and application of Green Performance Standards for existing buildings to bring them into effect as soon as is feasible;
- Ask staff to report on the amount of subsidy the City is providing to Enbridge for distribution of its product through City property and on the feasibility of ending that subsidy and when.

Finally, SCAN! thanks you all for your public service and encourages this Committee and Council to act boldly and urgently to reduce emissions to make Toronto a safe and healthy place to live for us and for future generations.

Sincerely,  
Shelly Gordon for  
Seniors for Climate Action Now! (SCAN!) Toronto