



May 27, 2024

Infrastructure & Environment Committee
Re: 14.3 and 14.4

Dear Chair and Councillors,

The TransformTO Net Zero by 2040 plan calls exactly for this transition. However, during the budget period, it became clear that the city is continuing to install or replace fossil fuel infrastructure despite having endorsed the principles of this treaty initiative.

This is not taking us in the direction we need to go - we need to rapidly decarbonize.

Bill 165 promotes the installation of gas pipelines in new developments.

We thank the director of the Environment and Climate division, James Nowlan, for his excellent deputation during the hearings on Bill 165, which outlines the impacts on municipalities. Nonetheless the provincial government passed Bill 165.

There is another step the City can take re Bill 165, and that is to send a letter to the Auditor General requesting a review of the Bill.

Two opposition parties, the NDP and the Greens, have written to the Auditor General asking for an investigation into the financial and environmental impacts of Bill 165. Likewise, more than 30 NGOs, including ClimateFast, as well as many individuals [have written to the Auditor General](#) asking for this review.

We believe the City should ask for a review of legislation that interferes with the city's ability to meet our climate targets. This step would help bring to light the bill's adverse impacts and open possibilities for public debate and re-consideration of the Bill.

We thank the City for the Toronto Green Standard which is moving toward no new gas infrastructure in buildings by 2028, and we urge that this date be accelerated. Each new building built with gas infrastructure will have to be converted to meet the EPS standards currently in development long before the lifetime, putting a burden on the owners that could completely be avoided by installing an electrical system of heating at the time of construction. We also urge the City to accelerate the Building Performance Standards for existing buildings.

We urge the city to do everything possible to ensure that every new development it is involved with is heated by geothermal, district heating, or heat pumps and meets the highest level of energy efficiency, ideally the passive house standard.

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