



EMAILED

July 2, 2024

Deputy-Mayor Jennifer McKelvie and Members
of the Infrastructure & Environment Committee,
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Matthew Green, Administrator

Dear Deputy -Mayor McKelvie and Committee Members:

Re: IE15.4 - Building Emissions Performance Standards - Design Principles and Development Plan

We are writing to request that staff be directed to consult with the Toronto Industry Network regarding the proposed reporting requirements and by-law mandating that our facilities report the water, electricity and natural gas use for our buildings. We have serious concerns regarding this initiative that include:

1. Our members are being required to report even before consultations are over for a proposed by-law which may suggest that the consultations are not meaningful. Normally, TIN is engaged at the conceptual stage of such an initiative.
2. Staff have no idea how difficult it is to separate out water, electricity and natural gas usage for buildings from that used in production.
3. The data we would be required to report is often proprietary information.
4. The City would be well-advised to ask the federal and provincial governments why most manufacturing is exempted from similar reporting requirements.
5. Comparing what Toronto plans to do re an EPS by-law to what other jurisdictions are doing does not provide a fair comparison since most exempt manufacturing.
6. Reporting by the manufacturing sector will raise the costs of many products used every day in our City.

We thank you for your attention.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Craig McLuckie', is positioned below the 'Sincerely,' text.

Craig McLuckie,
President

www.torontoindustrynetwork.com