

Planning and Housing Committee

City of Toronto
100 Queen Street W
Toronto, Ontario
M5H 2N2

June 9, 2026

Re: PH31.12 - Overview of Bill 98 Implications with Respect to Planning Matters

Dear Planning and Housing Committee Members,

The Atmospheric Fund (TAF) is a regional climate agency serving the Greater Toronto and Hamilton Area (GTHA). TAF has strongly supported the Toronto Green Standard (TGS) since its inception and has worked closely with the City on its design and evolution over the past 16 years. We recognize that the City is responding to significant legislative constraints introduced through Bill 98, the *Building Homes and Improving Transportation Infrastructure Act, 2026*. Our comments focus on the implications of shifting toward voluntary compliance with the TGS for Toronto's climate goals.

Since its introduction, the TGS has delivered more greenhouse-gas (GHG) reductions than all other City climate policies and programs combined, by a substantial margin, resulting in over [5.4 megatons of avoided emissions](#) since 2010. It has also generated major co-benefits, including reduced energy bills for residents and businesses, improved indoor air quality and public health, enhanced stormwater management and resilience, and reduced urban heat island impacts. To date, the TGS has delivered an estimated \$407.6 million in utility cost savings for building owners and residents.

The transition to voluntary compliance represents a significant gap in the City's climate plan.

Given the legislative context, there is a rationale for making interim changes to the TGS including shifting performance measures from mandatory to voluntary. But without strong uptake mechanisms, Toronto risks locking in decades of higher emissions, higher utility costs, less efficient homes and substantial retrofit costs to be dealt with in the future.

In addition to this interim update, TAF strongly urges the City to report back in 2027 with the results of a broader review of the TGS, including recommendations to strengthen implementation and compliance. Because the TGS is foundational to Toronto's climate plan, it is essential that the City complete the proposed TGS review without delay. Any slowdown in climate action must be offset by new or enhanced measures. Each year of delay risks thousands of new homes being built to lower standards, locking in long-term consequences for affordability, resilience, and emissions.

We are pleased that the City intends to maintain existing TGS-related incentives, including the Development Charge Refund Program for high-performance private developments. While incentives alone cannot replace mandatory standards, they remain a critical tool for sustaining momentum.

The TGS has been a cornerstone of Toronto's climate leadership and is key to making progress towards the City's targets laid out in the TransformTO Net Zero Strategy. The shift to voluntary compliance creates a substantial challenge for meeting these targets. TAF urges the Committee to prioritize a rapid and comprehensive strategy to sustain high-performance development to address climate change and protect residents from climate impacts. We appreciate the work of City Planning staff and look forward to continued collaboration to support Toronto's climate and resilience goals.

Sincerely,
Bryan Purcell



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The Atmospheric Fund
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About The Atmospheric Fund

The Atmospheric Fund (TAF) is a regional climate agency that invests in low-carbon solutions for the Greater Toronto and Hamilton Area (GTHA) and helps scale them up for broad implementation. Please note that the views expressed in this submission do not necessarily represent those of the City of Toronto or other GTHA stakeholders. We are experienced leaders and collaborate with stakeholders in the private, public and non-profit sectors who have ideas and opportunities for reducing carbon emissions. Supported by endowment funds, we advance the most promising concepts by investing, providing grants, influencing policies and running programs. We're particularly interested in ideas that offer benefits in addition to carbon reduction such as improving people's health, creating local jobs, boosting urban resiliency, and contributing to a fair society.