

Established in 1889, the Ontario Association of Architects (OAA) is the self-regulating body for the province's architecture profession. It governs the practice of architecture and administers the Architects Act in order to serve and protect the public interest.

TransformTO  
Environment and Energy Division  
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Toronto, Ontario M5V 3C6

[Sent via email to [transform@toronto.ca](mailto:transform@toronto.ca)]

July 28, 2021

**Re: TransformTO: Getting TO Net Zero**

To Whom It May Concern:

On behalf of the Ontario Association of Architects (OAA), I welcome the opportunity to respond to the *TransformTO: Getting TO Net Zero* consultation. The City of Toronto has already demonstrated leadership in getting to net zero through the implementation of the Toronto Green Standard (TGS). Now, further actions should be taken to help ensure the goal of net zero is achieved by 2050.

According to TransformTO's own presentation, the construction and operation of buildings are responsible for 55% of greenhouse gas emissions in Toronto. The OAA and its members—the architecture profession of Ontario—stand ready to work with the City to achieve net zero. The following recommendations should be considered in order to reach that goal:

1. **Stay on track with TGS implementation** – The OAA has been a strong supporter of the TGS since its introduction. In a recent [letter of support](#) for TGS Version 4, we noted "...the existence of the Toronto Green Standard and the projected escalation of minimum tier requirements is the most persuasive tool available to practising architects to argue for the development of sustainable buildings in Toronto."

The OAA strongly encourages the City to stay on track with the implementation of the TGS so that, by 2030, Tier 4 is required in all new buildings in Toronto.

2. **Support green retrofits** – Given the expanse of Toronto's built environment, the requirement of energy efficiency standards in *new* buildings only is not enough. Rather, the City should require any existing building undergoing renovations to also include upgrades to make them more efficient.

The training and expertise required to be part of the architecture profession means many of our members are uniquely positioned to help identify these retrofit opportunities and to make targeted recommendations that can maximize energy efficiency. Supports, such as property tax rebates, should be made available to property owners to ease the financial burden of these upgrades.

3. **Make energy reporting mandatory for all buildings** – To demonstrate compliance with the TGS, energy reporting is currently mandatory for Part 3 buildings. To increase the Standard's uptake and to better position the

City to achieve net zero by 2050 or sooner, all buildings in Toronto should be required to comply with the TGS and to demonstrate compliance by way of energy reporting.

To demonstrate our own commitment to this, the OAA has supported the development of an energy benchmarking tool that enables architects to check an energy model against the current Toronto Green Standard. As well, the Association has recently launched its [TEUI Calculator](#)—which is offered free to the public—that calculates total energy use intensity of any building by entering simple utility bill data. Objective, tiered performance metrics for buildings help all stakeholders understand energy use in buildings and can help everyone do their part to achieve the 2050 targets.

While energy, transportation, and waste are all contributors to greenhouse gas emissions, buildings are the largest single emitter in Toronto. By focusing attention on ensuring that all of Toronto's building stock is more efficient, the City is uniquely positioned to make positive strides toward achieving net zero.

The OAA has long been committed to working with government and other stakeholders to protect and improve environmental quality for all Ontarians. Please do not hesitate to reach out to me directly; I look forward to continued collaboration with the City of Toronto.

Sincerely,



Susan Speigel, Architect  
OAA, FRAIC  
President

