

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.

Infrastructure and Environment Committee
Toronto City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

November 23, 2023

RE: IE9.5 Proposed Building Emissions Performance Reporting Bylaw

Chair McKelvie and Committee Members,

On behalf of the Ontario Association of Architects (OAA), I am writing to express our support for the proposed Building Emissions Performance Reporting Bylaw.

As the regulator for the profession responsible for the design of built environments in which Ontarians live, work, and play, the OAA is encouraged to see this proposal. The Association is entrusted to serve and protect the public interest and remains committed to engaging its members through continuing education opportunities that contribute to the awareness of and compliance to mandatory energy reporting. In fact, "Climate Action" is one of the two themes in our five-year Strategic Plan, with each Ontario architect required to participate in professional development regarding the topic.

In 2016, when the Government of Ontario committed to COP 21, the OAA developed a series of policy proposals to assist government in achieving its goals for reducing emissions and protecting the environment. Among these proposals, the OAA asserted that:

"...mandatory building energy disclosure regulations [should be enacted] for all buildings regardless of size."

The OAA remains steadfast in its position on this and believes the City of Toronto is uniquely positioned to continue to demonstrate its leadership on climate action by advancing this proposal.

Energy disclosure laws, which are in place in many U.S. and European jurisdictions, can have several benefits, including:

- The creation of an easily understood, industry-wide metric of building energy efficiency available to owners, buyers, realtors, designers, builders, and the general public, increasing public understanding and awareness of building energy use;
- Increasing the profile, appeal, and value of energy-efficient buildings; and

- A larger pool of energy use data to help inform designers and policy makers—this information could be tied to GIS systems to create interactive mapping of energy use, similar to how census data can be viewed interactively.

Building energy use intensity (EUI), determined from utility bills, should be disclosed for all buildings at the point of sale in industry standard units of $\text{ekWh/m}^2\cdot\text{yr}$. To demonstrate the OAA's commitment to this, the Association has launched its own [TEUI Calculator](#)—offered free to the public—that calculates total energy use intensity (TEUI) 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 2040 net zero emission targets.

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,



Settimo Vilardi, Architect
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President