



SUBMISSION TO THE REVIEW OF A PLACE TO GROW AND PROVINCIAL POLICY STATEMENT

The Canada Green Building Council (CAGBC) is a national organization that supports the building sector's transition to green buildings. CAGBC provides the sector with access to industry-leading products and services designed to help design, construct, and manage low-carbon, highly efficient and healthy buildings. We help shape the future of green building through our market-led research and **analysis**, educational programming, and capacity-building efforts. With over a thousand corporate members, we regularly convene stakeholders to share information and advance green building priorities.

Merging the Provincial Policy Statement and the Growth Plan for the Greater Golden Horseshoe aims to streamline and harmonize policies related to housing and planning development. In the process, it is critical that current efforts pertaining to sustainability are maintained. Across commercial and residential sides, the building sector is changing. Businesses and owners are demanding buildings with high energy efficiency and low carbon emissions. Pressures are rising for the sector to meet ESG (Environmental, Social and Governance) targets and compete with other countries such as the United States or provinces such as Quebec. For the industry to be competitive and innovative, green buildings have become the industry norm. Ontario's new policy would benefit from considering these changes in the building industry from an environmental as well as economic point of view as jurisdictions with strong commitments to sustainability will benefit from more investment, increased job creation, and enhanced quality of life.

Ontario has many advantages that could make it a leader in this sector: strong construction companies, forward-thinking building owners and developers, colleges and facilities that can deliver low-carbon training to build a robust and in-demand workforce. Moreover, the province already ranks as a leader in green buildings with the largest concentration of LEED (Leadership in Energy and Environmental Design) -certified buildings in Canada.

Ontario could also be an innovator by supporting the growing move toward zero-carbon buildings. In 2022, the number of projects registered to certify using CAGBC's Canadian-made Zero Carbon Building standards more than doubled, demonstrating a desire for innovation and ambition to meet carbon reduction targets.

Many Ontario municipalities have proven they are interested in green and zero-carbon building. The industry can construct these buildings at competitive costs with long-term benefits for Ontarians. It is crucial that the new policy document strengthen its stance on green building: it should demand energy efficiency and encourage and reward reductions in carbon emissions. To take a leadership stance and to super-charge its low-carbon economy, Ontario should establish thresholds of performance for existing buildings, and ensure all new construction is zero-carbon by 2030.

Whether new or retrofitted, zero-carbon buildings are Canada's best and most cost-effective opportunity to reduce greenhouse gas (GHG) emissions. Investing in zero-carbon buildings delivers valuable socio-economic and environmental benefits. They result in resilient buildings and communities that are better able to adapt to climate change – a critical necessity given the

increase in extreme weather events, like the recent derecho in Ottawa that caused \$720 million in damage according to the Insurance Bureau of Canada.¹

Beyond adaptation, zero-carbon buildings also ensure safe, healthy, and accessible workspaces and affordable homes that recognize the total cost of ownership. They reduce maintenance and energy bills for homeowners while being more comfortable to live in. Ontarians with low or modest incomes would benefit from living in efficient buildings as they reduce cost-of-living expenses and can protect owners and tenants against energy price fluctuations.

Pursuing greener, low-carbon, and resilient buildings also makes good business sense because they spur innovation and economic growth. In [CAGBC's 2020 market impact report](#), we showed how investment in green buildings and subsequent policies could, by 2030, grow Ontario's green building sector to 626,080 direct jobs and contribute \$60.8 billion to its GDP (Gross Domestic Product), an increase from 228,000 jobs and \$22.7 billion in 2018.

Lastly, developing green infrastructure and preserving conservation areas (natural parks, marsh, and agricultural land) is a smart investment in Ontario's future. In the face of changing climate and weather patterns, green infrastructure provides a first line of defence. According to the Urban Land Institute, "green infrastructure of various types can reduce flood and extreme heat impacts, improve access to natural landscapes that reduce stress, insulate buildings and improve energy efficiency, sequester carbon, involve community groups in planning, design, and upkeep, and provide water filtration."²

Taking advantage of the benefits of green building and the economic opportunity it presents will require strong municipal policies. Green development standards must be leveraged to enable the shift towards energy efficient, cost-conscious green buildings that help owners maintain a competitive edge and meet ESG goals. Following the adoption of Bill 23, the new policy on land development and housing could promote the harmonization of green municipal standards with a provincial standard that would streamline industry adoption and result in more affordable zero-carbon buildings.

While building more houses faster is a necessity, we must not do it at the expense of building better and more efficient homes. The building sector can support green development standard whether they are local or harmonized at the provincial level, and through established and rigorous voluntary standards such as LEED and the Zero Carbon Building standards. Decarbonizing Canada's built environment is critical to achieve climate change targets and requires the building sector's ongoing support and commitment to green building practices and standards.

Thank you for organizing this consultation on this crucial policy that could bring more jobs, save money, and provide greener and healthier homes to Ontarians.

Sincerely,

Thomas Mueller
President and CEO

¹ [May 21 derecho ranked 6th costliest natural disaster in Canadian history | CTV News](#)

² Urban Land Institute, *Nature Positive And Net Zero: The Ecology Of Real Estate*, p40, [nature-positive-and-net-zero_the-ecology-of-real-estate.pdf \(uli.org\)](#), October 2022.

