

MPP Laurie Scott, Chair  
Standing Committee on Heritage, Infrastructure and Cultural Policy  
Legislative Building  
Queen's Park  
Toronto ON M7A 1A1

Dear Mrs. Scott and Committee Members,

**RE: Bill 23, the More Homes Built Faster Act, 2022, Impact on Municipal Green Standards**

Passive House Canada opposes the language in Bill 23, the *More Homes Built Faster Act, 2022*, that will end the use of municipal green building standards in Ontario.

Municipal green building standards compel industry to address energy consumption in new construction and that, ultimately, results in more affordable housing, healthier and more durable buildings and homes. Robust municipal green building standards can also drive economic investment and jobs by attracting high performance building component manufacturers to Ontario.

Passive House Canada is a member-based association working to support government and industry in the transition to high-performance buildings through education, certification, and policy development. The United Nations Economic Commission for Europe (UNECE) has recognized Passive House Canada as an "International Centre of Excellence for High-Performance Buildings." Our members include architects, designers, consultants, tradespeople, and professionals from the broader building sector.

We have heard from our members, including developers and builders, that green building standards do not pose a barrier to the design and construction of affordable housing in Ontario. We believe ending the use of municipal green building standards poses a real threat to the affordability, health, and sustainability of homes in Ontario.

**Health**

Homes built to higher energy efficiency standards are healthier homes. Municipal green building standards are important policy tools that improve building design and construction, gradually, to address energy efficiency. However, improved energy efficiency is not the only outcome. Better design and construction also result in improved health, comfort and indoor air quality for occupants. For example, Passive House homes and buildings use ventilation systems that bring in a continuous supply of filtered fresh air, reducing the spread of airborne pathogens and ensure moisture and resulting mold do not make inhabitants ill and compromise the

home. Without green standards, the construction of healthier, better-quality homes, where Ontarians live, work and play, is at risk.

### **Affordability**

Bill 23 will make housing unaffordable for Ontarians. The speed of home construction is not the only factor that influences affordability. The rapid design and construction of poor-quality buildings will burden homeowners financially and cause long term community problems.

New homes that don't meet energy efficiency guidelines will require retrofits in the near term to address increasing energy prices and the looming energy crisis, as well as to make them more resilient to extreme weather. The burden will fall on homeowners and government to finance and improve their properties. Better quality buildings should be designed and constructed at the outset to minimize costs on homeowners and increase affordability.

Furthermore, homes that are not designed to address energy efficiency, place an additional cost burden on homeowners. Energy poverty is already an issue in our communities. With the price of energy increasing, inflation at an all-time high, and recession on the horizon, Ontarians cannot afford homes that have high energy bills. Municipal green building standards help to address this by requiring increasing levels of energy efficiency in new building construction over time. Energy efficient homes ultimately make homeownership more affordable.

### **Sustainability and Emergency Preparedness**

Extreme weather events are increasing. In recent years, Ontario has seen an increase in tornados, ice storms, forest fires and flooding. Ontario must ensure that the design and construction of new homes allows them to withstand these weather events. Green building standards are important policy tools to ensure new construction becomes increasingly sustainable and resilient. For example, in Passive House homes, occupants can shelter in place for up to a week in an extreme weather event when the power goes out, whereas occupants in code-built buildings must evacuate within hours. Passive House homes meet Tier 4 of the Toronto Green Standard. Homes that are not climate resilient will be costly for homeowners, government and the insurance industry alike. Green standards take sustainability into account to ensure our homes are designed appropriately for energy efficiency and climate.

### **Economic Competitiveness**

The Toronto Green Standard is internationally recognized as a leading building sector policy. Other municipalities have taken note and are implementing their own green standards. Municipalities should be empowered to use these policy tools to support economic competition and growth in their communities.

This is good for business in Ontario. It provides the building sector with certainty about what's required of them and where the market is headed. It allows them to plan, to increase skills capacity, and to innovate, enabling them to compete locally and abroad.

## **Recommendation**

Passive House Canada recommends that Committee remove the following text from Bill 23: the More Homes Built Faster Act, 2022.

"(2) Subparagraph 2 iv of subsection 114 (5) of the Act is repealed." (Proposed change to the City of Toronto Act)

"(2) Subparagraph 2 (d) of subsection 41 (4) of the Act is repealed." (Proposed change to the Planning Act)

Sincerely,



Chris Ballard  
Chief Executive Officer  
Passive House Canada

**PASSIVEHOUSE**  
**CANADA** Build better.  
Feel better.

**MAISONPASSIVE**  
**CANADA** Bâtir mieux.  
Se sentir mieux.

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