

Joint Industry Submission on Bill 17

Subject: Ensuring Smart, Performance-Based Planning Tools to Reduce Energy and Carbon in Buildings Remain Part of Ontario's Housing Strategy

To: Ministry of Municipal Affairs and Housing

From: Cross-Industry Stakeholders in Sustainable Building, Materials, and Development, led by Mantle Climate

Date: June 26, 2025

Introduction

We, the undersigned organizations representing leaders across Ontario's green building consulting, building material manufacturer, development, engineering, design, and sustainability sectors, welcome the Ontario government's goal to accelerate housing supply and create a more efficient, streamlined planning system through Bill 17.

We fully support the need for regulatory clarity and predictability in the approvals process, as well as the government's goal to accelerate infrastructure and housing development across the province. However, we are concerned that proposed limits on the types of studies that municipalities can request, particularly those related to environmental, climate, and health performance, could inadvertently undermine domestic manufacturing, innovation, public safety, and Ontario's broader environmental objectives.

Key Concerns

1. Conflicts with Ontario's Domestic Manufacturing Agenda

Ontario's construction, materials manufacturing, and clean technology sectors are growing rapidly, producing high-performing, low-carbon materials, systems, and services that are already used across Canada and internationally. By preventing municipalities from requesting performance-based studies, Bill 17 could:

- Disincentivize the use of verified low-carbon materials manufactured domestically including low-carbon cement and steel
- Make it harder for Ontario developers to meet the requirements of voluntary green building and low-carbon construction programs like LEED and others
- Limit investment in Ontario's clean construction sector, a major jobs and export opportunity

One potential outcome of limiting the use of performance-based studies could be increased use of imported building materials, manufactured in jurisdictions with lower environmental standards and with fewer investments in modernization and efficiency.

2. Risk of Devaluing Investments Already Made

The Ontario manufacturing and construction industry has invested heavily to reduce the carbon footprint of its materials, including lower-carbon cement and concrete, among other materials. Significant investments have also been made in related studies, including:

- Life Cycle Assessments (LCAs)
- Embodied Carbon Analyses
- Environmental Product Declarations (EPDs)
- Stormwater Management Plans
- Resilience Assessments

This has been central in enabling cities, developers, and designers to meet market and regulatory expectations related to climate action, net-zero targets, and clean procurement.

Bill 17, as currently framed, could result in many of the benefits of these investments losing their value and the resulting competitive advantages. Bill 17 could also lead to municipalities being prohibited from requesting these reports, even in contexts where they are:

- Necessary for compliance with federal funding requirements
- Required for third-party certifications (e.g., LEED, Net Zero)
- Essential to ensuring long-term building performance and cost-effectiveness

Companies that manufacture low-carbon materials here, like cement, steel, concrete, gypsum, or glass, have invested heavily in cleaner products, and have hired the workforce to produce them. This means good-paying jobs and investment in Ontario's economy. Without municipal tools to recognize and require performance-based materials, these Ontario-made innovations are less likely to be used, which hurts local industry, jobs and takes away the ability to export products.

3. Loss of Qualified Expertise

The Bill also proposes restricting those authorized to prepare or review studies, potentially limiting professional engineers, architects, and environmental specialists from providing input even in their recognized fields. This could reduce the quality and accountability of technical reports submitted to support planning and reduce the demand for technical, good-paying jobs in Ontario.

Companies that manufacture low-carbon materials here, like steel, concrete, gypsum, or glass, have invested heavily in cleaner products and have hired the workforce to produce them. This means good-paying jobs and investment in Ontario's economy.

4. Increased Long-Term Costs

A critical benefit of studies such as life cycle assessments, embodied carbon analyses, and energy modelling is their ability to identify and implement cost-effective design decisions early in the planning process. These studies allow developers, designers, and municipalities to evaluate the upfront costs of construction and the long-term operational, maintenance, and energy cost savings associated with different building strategies and materials.

Buildings that are not designed with sustainability and performance in mind from the outset typically result in significantly higher operating costs over their lifespan. Poor thermal performance, reliance on fossil fuel-based systems, and material inefficiencies lead to increased utility bills, maintenance expenditures, and premature system replacement. Other examples of green building-related initiatives reducing long-term costs include making new buildings EV-ready, which minimizes costly upgrades in the future related to extensive building upgrades, and the creation of green roofs and other stormwater management systems, which minimize costly flood-related damage.

In contrast, performance-based studies allow project teams to make data-driven decisions that minimize long-term life cycle costs of ownership, optimize durability, reduce energy use, and minimize environmental and financial risk.

These assessments support housing affordability and resilience by enabling long-term cost savings, particularly in the context of rising energy prices and climate-related disruptions. Removing or restricting their use could unintentionally increase lifecycle costs for developers and building occupants.

A recent extensive [study](#) by Clean Energy Canada, Chandos Construction, and Ha/f Design demonstrates that lower carbon materials are readily available in Ontario and are often available at no cost premium. This includes made-in-Ontario low-cost cement and concrete.

Our Shared Position

We are aligned with the goals of:

- Streamlining approvals to accelerate much-needed housing
- Standardizing study requirements to improve consistency across municipalities
- Eliminating unnecessary delays in the planning process

However, standardization should not come at the expense of Ontario-based manufacturing, performance, innovation, or public interest outcomes. Any new regulation must include clear allowances for:

- Studies related to climate resilience, energy performance, both operational and embodied carbon emissions, EV-ready construction, stormwater management, and environmental impact
- Professionals who are qualified under existing regulatory or licensing frameworks to prepare these studies

Recommendations

We respectfully recommend that the final version of the regulations:

1. Explicitly allow studies related to:
 - Embodied carbon and life cycle impact of materials
 - Environmental and building performance, including operational energy and emissions
 - Resilience to flooding (including through stormwater management practices), overheating, and extreme weather
 - EV-ready construction
2. Recognize qualified professionals, including:
 - Licensed engineers (P. Eng)
 - Architects (OAA)
 - Environmental and sustainability consultants with relevant credentials (e.g., LCA experts, LEED professionals)
3. Support municipalities using standardized templates and guidance to request these studies consistently and efficiently across jurisdictions. The province could provide various tiers of climate-related ambition so that a consistent set of options is available across the province, leaving municipalities the ability to adopt the tier of their choosing - similar to the successful model used in the BC Energy Step Code.

Closing

Ontario's building and materials sectors are ready to deliver housing faster, better, and cleaner. However, success depends on maintaining access to practical, performance-based planning tools that reflect modern standards in construction, sustainability, and community safety.

We urge the Ministry to work with industry to define clear, scoped, and streamlined criteria for allowable studies, rather than broadly limiting them in ways that may have unintended consequences.

We thank you for the opportunity to contribute to this important conversation and would welcome the chance to provide additional input or examples and to co-create a way forward.

Sincerely,



Supporting Organizations:

