



Ontario Association of Architects

January 28, 2019

The Honourable Rod Phillips, MPP  
Minister of the Environment, Conservation and Parks  
Ferguson Block 11<sup>th</sup> Floor  
77 Wellesley St. W  
Toronto, ON. M7A 2T5

Dear Minister,

As you are likely aware, the Ontario Association of Architects (OAA) is the self-regulating body for the profession of architecture in Ontario, dedicated to promoting and increasing the knowledge, skills and proficiency of its members. The OAA also governs the practice of architecture and administers the *Architects Act* in Ontario in order that the public interest may be served and protected.

The OAA has long been committed to working with government and other stakeholders, and it is for that reason that I write to you today. *Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan* changes the Province's course for conservation of the natural environment and sounds a cautionary note. The diverse membership of the Ontario Association of Architects works very hard every day with communities across the province to design safe, sustainable built environments that align with previously established targets for reducing our energy and carbon use.

The three guiding principles of the new plan provide limited assurance that this prior course for creating a sustainable built environment will be achievable. The OAA recommends the following considerations to make the Province's plan more effective:

- **Enforcement balanced with easing of regulatory burdens**
  - Ensure agencies like the Ministry of the Environment, Conservation and Parks streamline review processes while retaining critical criteria, such as control of phosphorus loading, in order to continue protecting land and water;
  - Weigh further development in greenbelts and adjacent watersheds against the substantial benefits that these natural areas provide. Greenbelts and adjacent watersheds are a critical component in our system of strategies required to manage storm water and, in particular, relieve the burden on aging infrastructure;
  - Promote further intensification to help conserve natural lands and reduce the dispersion of infrastructure, thereby helping contain development costs; and

- Strengthen provisions in the Ontario Building Code (OBC) relating to building environmental performance. The OAA is not recommending an increase in regulation, but rather that the OBC be more effective and streamlined in defining the ways in which Ontario's building industry can be both more innovative and competitive. This is easily achieved by building better buildings that are more effective at utilizing natural resources, like wood, and increasing their positive effects on the natural environment.
- **Trust and transparency underpinned by real-time monitoring**
  - Create a website that shows provincial carbon dioxide emission in real time, and not just at the time of a specific event or in relation to a particular infraction;
  - Increase the purchase of hydropower (renewable energy) from Quebec instead of refurbishing nuclear reactors; and
  - Create mandatory building energy standards with related monitoring. As a regulator with a mandate from the Province to regulate and govern the practice of architecture in service and protection of the public interest, the OAA is well-positioned to help bring attention to this issue. Examples of how the OAA is providing leadership on building energy standards is provided later in this letter.
- **Building resilience with local solutions**
  - Provide better filters for outlets into water bodies to reduce the infiltration of plastics. This would also include banning certain plastic products that are particularly harmful to the environment and otherwise difficult to recycle such as straws, take-out containers and bags; and
  - Advocate for greater building flexibility. As the regulator for the practice of architecture in Ontario and as a key member of the design and construction industry, the OAA advocates for building designs that can involve assembly and disassembly to enable the reuse of more building components. This is a continuation of environmental leadership programs to which the OAA already subscribes. For example, green building standards like LEED (Leadership in Energy and Environmental Design) or Passivhaus set criteria for substantially reducing waste on construction sites. Similar programs also exist in municipalities across the province that encourage significant waste diversion from landfills. According to the United Nations Environment Programme (UNEP) Sustainable Consumption and Production (SCP) Branch, one third of all waste results from construction and demolition activities.

Underlining this guidance is a consistent message about the need for balancing our path toward an ever-improving relationship with the natural environment, and fiscal responsibility as core parts of our legacy for future generations. Moreover, the OAA also believes that these recommendations correspond to goals made by the provincial government. These recommendations will help:

- Reduce energy costs for families and businesses;
- Grow the economy by promoting valuable advanced technologies and businesses in Ontario;

- Enable building owners to make better choices with their construction spending;
- Provide the Province with the opportunity to reduce red tape; and
- Reduce carbon emissions without imposing a carbon tax or increasing government spending.

The members of the OAA, by provincial mandate, are uniquely equipped to assist in building this balanced approach in the communities where we each practice. Through our membership network of local societies, OAA members are deeply rooted and aware of community challenges in local geographies across Ontario. Our daily engagement with the spectrum of stakeholders, both public and private, that are invested in building community capacity in relation to our environment provides a substantial source of experience and data to lend to the realization of the *Made-in-Ontario Environment Plan*.

Suffice it to say that the lifeblood of architects is our relationship with our communities, the places in which we live, work and recreate. In this context of communities, we work exceedingly hard to start up and grow professional practices, which are then sustainably managed to realize a reasonable rate of return for our efforts. In addition to fiscal priorities, we often volunteer our resources to help bring those in our communities closer together in order to have more informed conversations about very large, complex phenomena, such as climate change. We work to help break down this complexity to find ways for individuals to grasp the challenges and envision local solutions at the level of each constituency.

The following are examples of how the OAA and its members are involved directly in these processes and how the guiding principles of the new Province's new plan can be shaped through action into local solutions to be shared with communities across Ontario with similar sets of circumstances.

- **OAA HQ Renew + Refresh**
  - This project involves the innovative renovation of the OAA Headquarters in Toronto and was initiated by OAA members. Currently nearing completion, its aim is to achieve a low-energy building standard to meet the 2030 Challenge. This will include reducing energy use by 70 per cent when the building reopens, and then by 100 per cent to meet the 2030 target. A key message from the project is that buildings evolve, and that they can be renewed rather than replaced to generate a more productive relationship with the environment. In fact, the membership adopted the goal of the project being a net zero carbon building when reopened.
- **COMPASS: A New Energy Use Performance Data Sharing Tool**
  - OAA members are collaborating with RWDI, a building science consultancy based in Ontario, and Toronto's Architecture 2030 District to release a new software this year. COMPASS will substantially increase the ability of building industry stakeholders to share energy performance data about projects and accelerate the opportunity for more collaborations on designing buildings that reduce the use of energy and carbon. COMPASS will enable stakeholder groups in regional geographies across Ontario to better address local climate conditions, developing more resilient projects.

- **Design Innovation Opportunities**

- An emerging innovative opportunity includes the use of cross-laminated timber (CLT) for buildings. This innovative system holds carbon as it grows and is harvested, and provides stability suitable for both low-rise and tall buildings. Ontario member firms are currently developing the concept for a 12-storey CLT building for George Brown College in Toronto. A further example of an innovative opportunity includes the integration of renewable energy and battery storage as integral parts of building projects where safety and resilience are important to families. The new Mount Dennis Childcare Centre is taking this approach and is aiming to be Toronto's first net zero building.

The OAA membership will support changes to Ontario's policies and regulations that underpin the initiatives outlined above to provide a safe and sustainable built environment. The OAA membership will also continue to vigorously advocate for design and technological innovation that hold tremendous potential for environmental benefit, economic growth in Ontario, and the well-being of future generations around the world. As a regulatory body that is frequently in contact with the public and with members who contribute over \$130billion to Ontario annually in direct and induced economic benefits (14% of Ontario's GDP according to an independent report by Altus Group), the OAA and its members are a key part of the skills and leadership needed to realize this climate action. The OAA remains a ready and willing resource for you and your ministry.

Sincerely,



John K. Stephenson, Architect  
OAA, MAA, FRAIC  
Immediate Past President

