

August 15, 2025

The Honourable Rob Flack
ON Minister of Municipal Affairs and Housing
Toronto, ON M7A 2J3
By email

Re: Bill 17 – Building Faster and Smarter for a Sustainable Ontario

Dear Minister,

On behalf of the Canada Green Building Council (CAGBC), I am writing to share our perspective on Bill 17, *Protect Ontario by Building Faster and Smarter Act*, 2025.

CAGBC is headquartered in Ottawa and represents over 820 corporate members and a network of more than 14,000 professionals across Canada, working in everything from architecture, engineering and construction to real estate investment and building ownership.

We support the Ontario government's efforts to streamline construction and modernize development regulations, principles that are essential to address the Province's housing challenges. At the same time, we believe these efforts must not compromise long-term resilience, quality, and affordability for Ontarians.

Approval processes that prioritize speed without ensuring quality construction can inadvertently lead to buildings that are more vulnerable to extreme weather and more expensive to own and operate. These buildings will likely require costly retrofits down the line, ultimately making them more expensive than starting with high-quality, energy-efficient buildings from the outset.

Ontario has a unique opportunity to lead with a development model that accelerates housing delivery while maintaining high-performance standards. Process efficiencies gained through Bill 17 can be strengthened by ensuring the resulting buildings are to last and remain affordable over time, with lower utility and maintenance costs for Ontarians.

Leveraging green building standards can help Ontario bridge the gap between speed and quality. Green building standards advance innovation, quality and performance more quickly and effectively than building codes alone. These standards also better align with commitments to sustainability in residential construction, supported by many provincial and international trading partners.

To deliver on these benefits, we recommend that Ontario establish province-wide performance standards or leverage nationally recognized standards to accelerate the development of high-quality, efficient, resilient and healthy buildings. We would gladly organize a roundtable with industry members to discuss this issue with you.

A more harmonized approach that balances speed and quality would reduce unnecessary regulatory barriers across the province, speed up project delivery, and encourage future-ready building practices. The practical experience gained through green development standards would help inform a more predictable, replicable and cost-effective approach for across the province while promoting sustainability and resilience and delivering tangible cost savings to Ontarians through lower utility costs and reduced retrofit needs.

Key Considerations

1. Green Buildings Drive Economic Growth

The [green building sector](#) supports over 27,000 jobs in Ontario and contributes almost \$28 billion to the province's GDP. Strengthening investments in high-quality buildings will enhance both provincial and regional economic competitiveness. Many manufacturers and developers look for the consistency provided by green development regulations, such as the Toronto Green Standard (TGS), to inform their business decisions. Maintaining advanced performance standards will ensure Ontarians have access to well-paying jobs in the clean economy.

2. Ontario's Competitive Advantage is at Risk

Other provinces are leveraging advanced building performance standards to attract investment. Quebec's Bill 41 advances high-performing buildings and in British Columbia, Energy or Zero Carbon Step Codes support better quality buildings. Ontario risks falling behind as these frameworks offer clear direction to the industry, reduce operating costs, and enhance competitiveness while attracting investments tied to sustainability and the clean economy.

3. Resilient, Affordable Housing for All Ontarians

High-performing, green buildings have lower utility costs, making them ideal for affordable housing initiatives. Reducing heating, cooling, and power costs helps owners and tenants retain more of their income. Green buildings are also future-proofed against changing environmental conditions (i.e., extreme weather events), future energy costs, and evolving building codes. Building right, right now means avoiding costly retrofits later on – such as B.C.'s "[Leaky Condos Crisis](#)" which cost up to **\$5 billion**, ruined the livelihood of thousands of homeowners and took decades to resolve.

4. Streamline Smart — Harmonize and Digitize

We support reducing red tape through smart regulations and improved processes. High-quality, harmonized green building performance standards would lower construction costs by making it easier to apply and replicate green building practices, while taking advantage of readily available technologies and products. Ontario could follow the example of cities using digital applications to reduce permitting processes, such as [Edmonton](#)'s AI-powered auto-review tools, and [Quebec City](#)'s single-window approach to fast-track major sustainable real estate projects.

We welcome the opportunity to collaborate with your Ministry to ensure Ontario's growth is not only fast but also future-ready, meeting homeowner and tenant expectations for lower utility bills, and creating opportunities for investors. Let us work together to build a prosperous, resilient province grounded in opportunities that will benefit the province now and for generations to come.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Mueller', followed by a horizontal line extending to the right.

Thomas Mueller
President & CEO
Canada Green Building Council (CAGBC)