



**BUILDING
OWNERS AND
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Climate Leadership Discussion Paper
Ministry of Environment
Climate Action Secretariat
PO Box 9486 Stn Prov Govt
Victoria, BC V8W 9W6

By email to: climateleadershipplan@gov.bc.ca

On behalf of the Building Owners and Managers Association of British Columbia (BOMA BC), please accept our sincere appreciation for the opportunity to provide feedback to the Climate Leadership Discussion Paper.

BOMA BC has led the charge to improve the efficiency of buildings across British Columbia. BOMA BC along with Province of BC and BC Hydro, signed a Commercial Building Energy Conservation and GHG Reduction MOU effective 2009 to 2014 with a commitment to achieving mutually identified industry targets. BOMA BC has been effective in developing and delivering monitoring and recognition programs to achieve our shared goals.

BOMA BEST (Better Environmental Standards) is a holistic building management program that looks at every aspect of a building's performance and offers ways to become more environmentally responsible. The BOMA BEST program began in the Boardroom of BOMA BC, but now has over 3600 accredited buildings across Canada and is being looked at as a model of choice for industry associations in China, Korea and the United States.

In reviewing the Climate Leadership Discussion Paper, BOMA BC believes the following points should be taken in to consideration and applied to BC's Climate Action Leadership Plan 2.0.

Goal 1: Communities are thriving and resilient in the face of climate change.

1.2 Buildings and communities produce as much or more energy than they consume; waste is a source of energy.

- *Consistent information on energy performance and efficiency targets for new and existing buildings allows people to make informed decisions regarding energy costs and the carbon content of energy sources when purchasing or renting space. Communities track where energy is used, wasted, generated and transported to efficiently link energy sources with needs.*

BOMA BC Response:

- Studies show simply by benchmarking a building's energy use it often translates to a 5-8% reduction in energy consumption. BOMA BC supports benchmarking assistance and education on its benefits but maintains disclosure should be limited only to governments primarily to use for aggregate policy analysis purposes.
 - It is important that the Province encourage utilities to support initiatives related to benchmarking not only so that utilities help provide this information, but that they directly support the gathering of that information in order to have legitimate data to use for policy making purposes.
 - We feel the Province should avoid building labeling as it is not an effective means for tangible transformation of practices and behaviour regarding building management.
- *District and distributed energy systems allow buildings to use energy as efficiently as possible, for example, by generating heat at a central plant or reclaiming waste heat from sewers, and water and waste systems.*

BOMA BC Response:

- We do not support mandatory acceptance for monopolized district energy systems until such time as the economic and environmental aspects have been proven. Instead we feel this should continue to be incentivized to the appropriate buildings at the appropriate time in order to measure its effectiveness.
- At the same time it should be noted that energy sharing may become an effective tool for transformation of energy systems if the Government allowed and encouraged buildings to sell excess energy back to the grid.

Goal 3: B.C.'s economy remains strong, and jobs continue to be created, while greenhouse gas emissions fall.

3.1 Organizations and employees embrace opportunities to contribute to B.C.'s climate goals.

- *Businesses reduce waste, increase productivity and switch to lower carbon energy sources.*

BOMA BC Response:

- BOMA BC believes incentives, rather than regulations, should be the principle method to encourage more energy efficient buildings and greater uptake of clean energy technologies.
- *B.C.'s workforce has the technology, skills and knowledge to drive the transition to the low carbon economy.*

BOMA BC Response:

- While we agree that direct educational assistance to BC's workforce is important to show them how reducing their waste will increase productivity and equip them with the tools and knowledge to drive the transition to the low carbon economy, we feel it is important to note that most people involved in the commercial real estate industry upgrade their education through industry associations.

3.2 Competitive companies drive innovation and adopt technology to cut their carbon costs.

- *Businesses ready to adopt innovation achieve the highest productivity while cutting emissions.*

BOMA BC Response:

- We believe the best way to provide education and direct assistance is through a trusted industry association, such as BOMA BC, who have a proven track record of introducing positive tangible transformation to its industry. BOMA BC energy management staff can assess, facilitate and provide a business case, and help to decide the best course of action to educate, encourage and recommend benefits of energy efficient retrofitting.
- *Companies are successful, while reducing emissions and saving money when they consider carbon and climate in business decisions*

BOMA BC Response:

- While we agree with the notion that innovation increases productivity and reduces costs when considering carbon and climate in business decisions, there needs to be more education and direct assistance provided to building owners and managers in order to implement those innovative practices.

Other BOMA BC comments:

BOMA BC proposes the Government support a one-stop shop to provide those in the built environment across British Columbia with advice on energy efficiency innovations, incentive programs, best practices and other advanced building management tools as well as hands on assistance to provide energy assessments and energy audits to allow for increased uptake of these services by building owners and managers.

In addition, if a BC stretch code is adopted, which has been suggested by some stakeholder groups, we feel that BOMA BEST should be an acceptable substitute to any retro-fit trigger regulations, such as that which has been recently implemented in the Vancouver Building Bylaw.

Again, thank you for the opportunity to provide feedback on the Climate Leadership Plan. If we can provide any more information or perspective on behalf of the commercial real estate industry, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Muneesh Sharma', written in a cursive style.

Muneesh Sharma
Director of Government Affairs and Communications
Building Owners and Managers Association of BC

cc: Rob Kavanagh – Chair, Board of Directors, BOMA BC
Paul LaBranche – President, BOMA BC