

January 15th 2024

Melissa Ollevier
Financial Instruments Branch
Ministry of Environment, Conservation and Parks
40 St. Clair Avenue West, Floor 8
Toronto, ON, M4V 1M2

Re: Comments from Ontario Universities and Colleges

Dear Ms. Ollevier,

The Ontario Association of Physical Plant Administrators (OAPPA) and the Ontario Colleges Facilities Managers Association (OFCMA) appreciate the opportunity to provide feedback on the proposed developments in the Emissions Performance Standards (EPS) program in Ontario. We are particularly interested in advocating for the inclusion of smaller universities and colleges within the regulated sector to actively participate in the EPS program, and the development of sector-based standards under NAICS codes 6113 (Universities) and 6112 (Colleges).

The EPS program plays a vital role in regulating carbon emissions, and we are keen on ensuring that educational institutions have an equitable opportunity to participate and contribute to its objectives. We believe that by opting in for all institutions within the higher education sector, we can ensure equal treatment as well as investment opportunities for all sectoral members, fostering a fair and inclusive approach.

Background

Universities boast an extensive portfolio of over 1,100 buildings across the province. These buildings, often of historical significance and intricate design, house research-intensive operations where globally renowned research takes place, contributing significantly to Ontario's global prominence within our sector. We are passionately committed to providing students with secure, state-of-the-art learning environments, and ensuring students and faculty are equipped with the necessary skills for an ever-evolving world. Our extensive infrastructure not only presents a unique opportunity to reduce carbon emissions, but also demonstrate the process, potential and environmental impact in an educational environment. Our sector's efforts can have meaningful impact on carbon footprint, the economy, and the learnings our students will gain while attending our campuses as we decarbonize.

In alignment with the government's objectives for a clean and sustainable future, universities remain committed partners to climate change mitigation. Over the decades, our sector has worked in tandem with students, communities, and the province to champion energy conservation and greenhouse gas (GHG) emissions reductions. Despite facing a substantial \$2.5 billion backlog of deferred maintenance and generating over 500,000 tons of emissions annually, universities remain poised to address projects that enhance campus infrastructure. These initiatives not only upgrade facilities but also curtail energy costs and emissions by replacing outdated equipment such as HVAC systems, boilers, deteriorating roofs, and drafty windows.

The Ontario Association of Physical Plant Administrators (OAPPA) is comprised of the facility managers responsible for Ontario's publicly assisted universities. OAPPA oversees the planning, construction, operation, utilities, and maintenance of campus facilities across the province. The Ontario Facilities Managers Association (OFCMA) is also comprised of facilities managers stewarding the provinces publicly funded colleges. Our feedback adopts a comprehensive approach to ensure that universities have the necessary resources and facilities to nurture the next generation of leaders, accompanied by a strategic, long-term plan to reduce energy costs and emissions.

Comment 1: Sector-based Approach

OAPPA and OFCMA fully supports the proposed amendments released on November 22, 2023, for a phased introduction of sector-based standards over the years, such as from 2025-2027. This approach provides facilities with the necessary time to transition to cleaner operations effectively.

Our institutions are dedicated to responsibly contributing to the reduction of greenhouse gas emissions, and we fully endorse the principles of a fair and equitable Carbon Pricing System. We understand the importance of paying our fair share within this system to encourage sustainable practices and promote a low-carbon economy. In alignment with these commitments, we propose the development of sector-based standards specifically tailored for institutions under NAICS code 6113 (Universities) and 6112 (Colleges). Universities and colleges, as distinct industry groups, present unique operational characteristics that may not be fully captured by facility-specific standards. For instance, universities differ in location, size and type of operations. By developing sector-based standards, we can account for the diversity within this sector, ensuring that compliance obligations and emission reduction targets are both realistic and effective.

Moreover, we strongly advocate for the consideration of smaller universities and colleges to be included in the EPS program. We believe that treating all universities and colleges as a sector (i.e., including smaller institutions) would allow for increased synergies leading to reduced compliance costs and greater carbon emissions reductions. We support the allocation of funds back to EPS participants to support additional decarbonization projects and seek clarification on project eligibility criteria and the specific mechanism for implementation. No matter the size, the cumulative impact of treating the sector as a whole would support Ontario's goals in terms of emissions and on the community level.

Given these amendments, we propose the following:

- consideration of allowing all institutions within the higher education sector to be able to opt-in to the EPS program,
- the development of sector-based standards under NAICS code 6113 (Universities) and 6112 (Colleges) within the EPS program.
- equal treatment of compliance costs across Ontario for all government funded colleges and universities

This initiative would not only advance the goals of carbon reduction but also provide educational institutions with a clear and tailored framework for their participation.

Comment 2: Renewable Natural Gas (RNG)

OAPPA and OFCMA supports the proposed approach of deducting from EPS, those GHG emissions from RNG purchased through a contract (i.e., not necessarily combusted at the facility). This will make this alternative more palatable as our sector transitions to low-carbon alternatives.

Thank you for your attention to this important issue, and we anticipate a positive and collaborative response.

Sincerely, OAPPA and OFCMA

Scott Johnstone *(he/him)*

Senior Associate Vice-President, Infrastructure & Operations (OAPPA President)

Brock University | Office of the Vice-President, Administration

Niagara Region | 1812 Sir Isaac Brock Way | St. Catharines, Ontario L2S 3A1

brocku.ca | T 905 688 5550 x3752 |

Nathan Splinter , P. Eng | Chair, OAPPA Energy Committee

Queen's University | 355 King St. W. | 2nd Floor

Kingston ON | K7L 3N6

cell 613.483.5395 | splinter@queensu.ca

www.queensu.ca/facilities

Paul Cochrane, B.Sc. (Env.) (EMM)

Energy & Sustainability Project Coordinator, Facilities Management (OCFMA Energy Chair)

T 519-479-0898, E Paul.Cochrane@lambtoncollege.ca

1457 London Road, Sarnia, ON, N7S 6K4

Herbert Sinnock, P.Eng, CEM, CBCP, CMVP, WELL AP

Sheridan College - Director, Sustainability, Office for Sustainability

Brampton | Mississauga | Oakville

1430 Trafalgar Road, Oakville, Ontario L6H 2L1

T 905-874-4405 , herbert.sinnock@sheridancollege.ca

sheridancollege.ca