

As Canada's largest community-based credit union, serving over 560,000 member-owners, Vancity uses the tools of finance and our community relationships to expand economic opportunity, improve the wellbeing of our members, and make our communities better. We serve the entire Metro Vancouver area, with branches and offices throughout the region.

Like Metro Vancouver, Vancity is committed to climate action and - as a building owner, a tenant, and a mortgage lender - we are very supportive of Metro Vancouver's efforts to reduce emissions from large buildings.

Having been carbon neutral in our operations since 2008, Vancity is currently working to move all our offices and branches away from carbon-based heating and to align our operational emissions with science-based targets. The planning for this includes a variety of factors, including a consideration of available actions in commercial properties we lease as opposed to those we own. However, Vancity's most significant climate-related impacts are not from our Scope 1 and 2 emissions, but from Scope 3 - the loans and investments we make (known as financed emissions) and in particular, our residential and commercial mortgage portfolios. In 2019, Vancity committed to tracking and disclosing our financed emissions, and in 2021 we announced [five climate commitments](#), including to a net-zero lending portfolio by 2040. Earlier this year we took the next step and set interim emission reduction targets for 5-year intervals, starting with 2025. To achieve these, we're supporting our members with grants, access to lower cost capital, retrofit support programs, and more. At the same time, public policy will play a key role in advancing the work at the scale and pace needed to respond to the climate crisis, with 80-90% of the emission reductions in Vancity's lending portfolio expected to result from government actions, which is why Vancity strongly supports Metro Vancouver's intention to address emissions from commercial, institutional, and residential buildings over 2,322 m²/25,000 ft² ('large buildings').

Reporting Requirements

Reporting of energy use is a very common practice around the world, and there are existing tools that facilitate disclosure of this information. As such, Vancity recommends that reporting requirements be introduced as soon as possible for all large buildings.

We also encourage Metro Vancouver to work with the Province and other jurisdictions (e.g., the City of Vancouver) to adopt a standardized reporting platform and methodology, which would reduce the reporting burden for building owners, and to make the data accessible to certain organizations - including financial institutions - which require consistent and comparable property-level data to inform climate action initiatives, decision making, and risk management.

Setting and Phasing-in GHG Emission Limits

To reach Metro Vancouver's targets, significant emission reductions will be needed within this decade; we cannot afford to delay until the 2030s and 2040s, especially with no plan in place to address the emissions from buildings not covered by this proposal.

Vancity recommends that Metro Vancouver require all large buildings to reach a greenhouse gas intensity limit (GHGi) of 0 kg/m²/yr by 2040, which also aligns with the City of Vancouver's



timeline. Setting this limit now provides a clear path and certainty for building owners, while allowing time to plan and flexibility to develop decision-making processes for building upgrades and equipment replacements.

Compliance Pathways, and Exemptions and Flexibility

Each building type and ownership model faces its own unique set of challenges in reducing emissions. For instance, rental housing, co-ops, and stratas, as well as buildings with owners/managers without building systems expertise, each have different financial and decision-making barriers and require unique supports. However, we recommend Metro Vancouver minimize exceptions and/or delays to emissions reductions, and instead focus on providing comprehensive technical and financial supports, working with partners - including financial institutions such as Vancity - to resolve challenges. As an example, Vancity Community Investment Bank has [provided a portion of the capital used in the City of Ottawa's Better Homes Ottawa Loan Program](#) to offer low-interest loans for residential homeowners to make retrofits.

We know that decarbonizing buildings is not easy, and it is critical to continue centring efficiency and affordability in this work; at the same time, inadequate action will have even greater costs and is not an option in the climate emergency. For example, there will be hurdles to decarbonizing many existing multifamily buildings, but the people living and working in these buildings are not served by delay. On the contrary, they are the ones most likely to suffer from extreme weather like the heat dome and from the rising costs of fossil fuel energy; Vancity encourages Metro Vancouver to make sure no one is left behind and to prioritize electrification (particularly the installation of heat pumps) in buildings with low-income and other vulnerable residents. We also encourage Metro Vancouver to support energy efficiency upgrades and measures to improve the climate-resiliency of buildings.

Vancity would not oppose an exemption from these regulations for buildings connected to district energy systems as long as the district energy systems are otherwise required to reach zero emissions.

We also encourage Metro Vancouver to minimize allowances for the use of renewable natural gas (RNG) in homes and commercial buildings. RNG is a limited resource with no clear pathway to develop the volume required to fully service BC's buildings^{i,ii}. It is also a critical fuel for energy intensive and hard-to-abate industrial processes and certain types of transportation; with demand for RNG set to increase over time as various sectors decarbonize, this limited resource is best preserved for these other usesⁱⁱⁱ. Gas also requires users to pay for new and existing gas connections, and the carbon tax, increasing their overall heating bill. In addition to cost concerns, RNG results in the same indoor and localized air pollution and health impacts as fossil fuel derived gas^{iv}.

Finally, on the transfer of building ownership and how to provide flexibility for new building owners to meet the requirements, it's important that this not become a loophole whereby building owners can simply sell off buildings where they haven't made appropriate upgrades (this is particularly relevant if owners are allowed to achieve compliance at the portfolio scale).

On the other hand, non-profits should be provided certain allowances when purchasing buildings that do not meet GHGi targets.

Coordination and Alignment with Others

Vancity appreciates the attention Metro Vancouver is giving to reducing process complexities and aligning across jurisdictions; that said, we encourage Metro Vancouver to move with the urgency the climate crisis requires and ensure coordination efforts don't substantially delay Metro Vancouver's important work.

As noted in the Discussion Paper, there is a gap in the BC policy landscape to manage GHG emissions from existing buildings in the region. The work proposed by Metro Vancouver to fill that gap is critical, and we encourage Metro Vancouver to prepare detailed emission reduction requirements for consultation as soon as possible.

As a financial co-operative we know we are stronger when we work together, and Vancity is a committed partner to Metro Vancouver in developing and delivering affordable decarbonization approaches for buildings. Thank you again for this opportunity to provide feedback on reducing emissions from large buildings, and please let us know if you have any questions or would like to discuss this matter further.

ⁱ [BC Energy transition outlook for 2022 - BC Sustainable Energy Association](#)

ⁱⁱ <https://www.cbc.ca/news/science/what-on-earth-bc-emissions-fortis-gas-hydro-1.6329879>

ⁱⁱⁱ [7 Questions About Renewable Natural Gas, Answered | World Resources Institute](#)

^{iv} <https://www.healthlinkbc.ca/healthlinkbc-files/indoor-air-quality-combustion-products>