



To: Public Works and Transportation Committee **Date:** April 17, 2026
From: Roeland Zwaag **File:** 10-6125-07-01/2025-
General Manager, Engineering and Public Vol 01
Works
Re: **Proposed Energy and Greenhouse Gas Emissions (GHG) Reporting
Requirement for Buildings - Engagement Results and Next Steps**

Staff Recommendation

That the proposed work plan, as described in the report titled “Proposed Energy and Greenhouse Gas (GHG) Emissions Reporting Requirement for Buildings – Engagement Results and Next Steps”, dated April 17, 2026, from the General Manager, Engineering and Public Works, be approved.

Executive Summary

The City of Richmond is advancing efforts to improve Energy and Greenhouse Gas (GHG) data for large existing buildings. The work is intended to better understand energy use, help reduce operating costs, improve building performance and comfort, and support future policies and programs. Following Council direction on April 15, 2024, staff engaged owners and managers of large industrial, retail and office buildings over 100,000 square feet to understand their readiness for annual energy and emissions reporting, including data sharing, privacy, timing, and support needs.

Participants showed broad support for energy and emissions reporting. They preferred using ENERGY STAR Portfolio Manager (ESPM) — a widely used, standardized tool for tracking building energy use, supported by Natural Resources Canada, and wanted public data disclosure to remain voluntary where possible. Identified challenges include limited access to gas data, administrative issues in multi-tenant buildings, varying technical capacity among building operators, and limitations in how the ESPM tool reflects low-carbon district energy.

At this stage, staff are not recommending an annual energy and emissions reporting regulation, and are focused on improving consistency, addressing barriers, and building readiness across the sector.

This report summarizes the engagement results and proposes a workplan to address key barriers, including an additional engagement for large building types, such as residential, hospitals, care homes, hotels, schools, and assembly uses that were not included in the previous engagement phase.

Staff Report

Origin

On April 15, 2024, Council directed staff to engage owners and managers of large industrial, warehouse, retail and office buildings in Richmond with a floor area of 100,000 square feet or larger on a proposed annual energy and GHG emissions reporting criteria. The engagement aimed to understand data-sharing considerations and identify the support building owners may need to report their data. This work will help the City better understand energy use in buildings, identify savings opportunities, and guide future policies and programs.

This report presents the results of industry engagement, identifies key implementation challenges, and outlines a recommended approach to advance voluntary benchmarking and inform future policy development.

This report supports Council's Strategic Plan 2022-2026 Focus Area #5: A Leader in Environmental Sustainability:

Leadership in environmental sustainability through innovative, sustainable and proactive solutions that mitigate climate change and other environmental impacts.

Analysis

Buildings account for about 40 per cent of Richmond's community emissions and a significant share of energy costs. Improving how buildings use energy can support better capital planning, reduce waste, and strengthen long-term reliability. Benchmarking is an industry best practice that allows building owners and operators to establish baseline emission data, monitor performance over time and compare against peers, helping identify opportunities to improve efficiency. Many major local businesses are already using this approach to inform retrofit and investment decisions. This work helps expand awareness of these practices and provides support for building owners who are not yet benchmarking.

The City has consistently advanced benchmarking initiatives for large existing buildings. In 2014, Council launched the Richmond Building Benchmarking Challenge, followed by a 2017 directive to explore options for a building energy and emissions benchmarking policy. In 2020, Council endorsed participation in Building Benchmark BC, a voluntary benchmarking and disclosure program through which many publicly- and privately-owned buildings across Richmond and western Canada are benchmarked. Collectively, these initiatives have supported industry readiness and familiarity with benchmarking practices and reduced emissions by 10-16 per cent on average in the Built Environment sector.

Other jurisdictions across British Columbia are also advancing annual energy and GHG emissions reporting requirements for large existing buildings. The City of Vancouver requires commercial buildings larger than 50,000 square feet and apartment buildings and hotels above 100,000 square feet to report their annual energy use and GHG emissions. This program has a 95 per cent compliance rate, according to the City of Vancouver, in large part due to industry readiness with existing best practices. Many of the participating buildings in Vancouver

are part of the same organizations that are active in Richmond, such as the Building Owners and Managers Association. The City of Victoria, the District of Saanich, and the Capital Regional District collaborated on a regional engagement on energy and emissions reporting. Victoria and Saanich will require all buildings over 10,000 square feet to report energy and emissions data by 2027, starting with buildings over 30,000 square feet in 2026.

The City of Richmond currently does not require building energy and emissions reporting but encourages voluntary participation through programs such as Building Benchmark BC and continues to work with local building owners to better understand opportunities for future action.

Engagement Results

Between September 2024 and January 2025, the City conducted a public engagement campaign to understand interest and readiness for a proposed reporting requirement. The campaign resulted in over 3,800 engagement interactions with businesses, associations, organizations and other interested participants in Richmond through surveys, virtual and in-person sessions, StoryMaps, video content, newsletters, mail, and one-on-one meetings. This helped build broad awareness of the initiative and gather more detailed input from building owners and industry representatives who would be directly affected.

Prior to engagement, staff were aware that many building owners are already tracking their energy use, and engagement results indicated the significant extent and details of that practice in Richmond. However, practices vary widely and data is not consistently shared. Participants noted that a common approach would help create a level playing field and make it easier to compare performance across buildings, including:

- Broad support for ESPM as the preferred benchmarking software platform (supported by Natural Resources Canada), however with varying degrees of familiarity and technical readiness;
- Strong desire for alignment with other BC municipalities to ensure consistent reporting practices and minimize confusion;
- Support for voluntary data disclosure; and
- Requests for recognition programs to acknowledge high-performing buildings and support for technical and educational resources to facilitate compliance.

In addition to the key points highlighted above, Table 1 below outlines additional challenges that were identified during engagement.

Table 1: Key Challenges

Challenge	Details
Gas Data Gaps from Utility Transfers	Gas data transfers to ESPM may have gaps, requiring building owners to verify data monthly and resolve issues directly with their utility provider, creating an administrative burden.
Gas Meter Aggregation	Automatic meter aggregation for gas data in ESPM is not currently available—a feature that helps simplify reporting and protect tenant privacy. In many cases, tenants must register in ESPM and individually grant access to their meter data, which can be impractical. Staff estimate that approximately 40 per cent of non-residential properties may face this

	challenge, with a lower impact expected in the residential sector.
Technical Capacity	Some building owners expressed limited resources and experience with ESPM.
District Energy Emissions Factors	ESPM currently lacks the functionality to reflect low-carbon district energy sources, such as Lulu Island Energy Company. NRCan customization features are expected to be available in 2026.

While engagement participants were broadly supportive of a benchmarking requirement, staff are not recommending a bylaw at this time. Engagement confirmed that benchmarking helps building owners identify energy savings, reduce operating costs, and make informed upgrades, while also giving the City better data to plan programs and track progress.

At the same time, feedback showed that practices are not consistent across buildings, and many participants highlighted the need for alignment with other municipalities and more support before a requirement is introduced. Based on this, staff are proposing to focus on a workplan to support future readiness that includes expanded engagement and practical supports to improve consistency and readiness across the sector. Detailed engagement results are included in Attachments 1 and 2.

Next Steps

To respond to the findings from engagement and address identified gaps, staff have developed the following proposed work plan (Table 2) for the upcoming months.

Table 2: Proposed Work Plan

#	Action	Details	Goal
1.	Expand Engagement to a Second Cohort of Large Buildings	Engage residential, hospitals, care homes, hotels, schools, and assembly-use buildings over 100,000 square feet from Q2 2026 to Q1 2027 using in-person and virtual sessions, webpages, surveys, and targeted outreach.	Better understand the needs and challenges of these building types to inform a potential reporting approach and appropriate support measures.
2.	Advocate with Other Municipalities and Partners for a Solution to Gas Related Data Issues	Collaborate with other jurisdictions and organizations to advocate for a solution to address gas data challenges and offer a meter aggregation feature.	Better data sharing and collection to building owners and managers.
3.	Assess Capacity and the Level of Support Required by Building Owners and Managers	Refine support for building owners and managers to facilitate their reporting processes, such as developing tools, training, and concierge support services.	Provide support to building operators to enhance compliance rates and data accuracy.
4.	Advocate for the Development of Emission Factors Customization in ESPM	Work in conjunction with district energy providers and NRCan to review the development of this tool in the near future.	Adjust emission factors for district energy systems and ensure accurate data for building managers.
5.	Develop a Consistent Standard for GHG Emissions, Energy, and Water Efficiency Reporting for Existing Buildings	Staff provided feedback on the development of a national benchmarking standard, which was released in March 2026.	Provide a consistent reporting framework for GHG emissions, energy, and water efficiency across existing buildings.

6.	Continue Promoting the Building Benchmark BC Program	Encourage participation in the existing voluntary energy reporting program through ongoing outreach, information sessions, and coordination.	Increase voluntary participation and build familiarity with benchmarking practices to support future program development.
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Subject to Council endorsement, staff will report back with the results of the proposed workplan and any recommended next steps, with implementation of identified actions anticipated between Q2 2026 and Q1 2027.

Budgetary Implications

Staff estimate the second phase of engagement will cost approximately \$15,000, covering resource development (website, FAQs, one-pagers, marketing, and outreach materials). These costs can be accommodated through existing budgets, funded by the Local Government Climate Action Program (LGCAP).

Conclusion

The engagement results show that the majority of engagement participants support a proposed energy and GHG emissions reporting requirement in Richmond, with some building owners and managers already tracking their energy use and GHG emissions. For building owners and operators, reporting enhances transparency, identifies efficiency opportunities, and supports strategic investment in building upgrades. Staff recommend expanding engagement to a second group of buildings to better assess a potential future reporting requirement, following the original engagement rollout proposed in 2024.

Respectfully submitted,

Chad Paulin, Director, Climate and Environment

Report Contributors

This report was prepared by Jovan Cheema, Manager, Climate Action and reviewed by Economic Development, Finance, Housing Office, Lulu Island Energy Company, Building Approvals, Policy Planning and Law.

Endorsed by Serena Lusk, CAO

- Att. 1: Engagement Summary
- Att. 2: Engagement Feedback Summary
- Att. 3: Let’s Talk Richmond Survey Results

Engagement Summary

Channel	People Reached	Engagements (likes, shares, comments)	Clicks-through
LinkedIn	1,055	59	27
Facebook	1,020	11	1
Economic Development E-newsletter	279	N/A	7
Economic Development Twitter/X	573	23	2
Letters via Canada Post	108	N/A	N/A
Letters delivered by Staff	54	N/A	N/A
Phone Calls	15	N/A	N/A
Emails	18	N/A	N/A
Total	3,122	93	37

Websites	Viewers	Engagement	Surveys
City of Richmond Website	211	N/A	N/A
Let's Talk Richmond	93	13	10
StoryMaps	316	N/A	N/A
Vimeo	20	N/A	N/A
Total	640	13	10

Sessions	Attendees	Delivery Mode
CoR Economic Advisory Committee Session	17	In-person
Info Session (x1)	20	Online
Engagement Sessions (x4)	33	Online
Total	70	-
1-on-1 Sessions	5 (# of sessions)	Online

Engagement Feedback Summary

Themes	Subthemes	Feedback / Questions
Data Collection	Data Privacy	Inquiry whether the information collected about buildings would be made publicly available in the future.
		Stakeholder expressed interest in understanding more about privacy protection within the City related to data, specifically inquiring whether the information collected would be shared with other City entities.
	Stratified buildings	Inquiry about the approach for data collection in the case of stratified buildings.
	Industrial facilities	"For industrial space, consider owner-operator rather than tenant owner. It is easier with light industrial; hence it is office space. However, the industrial sector is usually a single-tenancy, and the tenant lease is basically a blank shell."
		"Industrial sector is really challenging. Collecting this data from this sector is difficult." "Tenants lease out the box and it is the one who installs the systems and is responsible for the utilities. Industrial lease terms are way longer than commercial - 20-year terms - Green lease is not a feasible thing"
	Resources capacity/technical knowledge	Concerns were raised about reporting, emphasizing that the process might introduce additional challenges for individuals and organizations
	FortisBC Data	Issues with FortisBC meter threshold and aggregation: "Recently, Fortis BC has required tenant permission to disclose aggregate data, and thresholds are somewhat irrelevant. This is a significant barrier in the market currently to reporting on gas consumption where tenants hold utility accounts. How is the City of Richmond planning on addressing that?" Concerns expressed related to the following: - Meters aggregation: Thresholds and aggregation levels with FortisBC are not being applied. "Requires tenant permission for every tenant to request an aggregation data, it is not a matter of unit threshold anymore" Some data gaps are observed in the data flowing from FortisBC to ENERGY STAR Portfolio Manager
"FortisBC never implemented the aggregation tool for 11+ commercial meters. Timeline was early 2024. However, completion TBD."		

Opportunities	Operational Savings Quantification	It was suggested that emission reporting could be leveraged as a marketing opportunity. It was proposed that future 'savings' from reduced emissions could be quantified in dollar amounts and marketed to businesses, framing this approach as an economic opportunity.
	Results from Previous Program	Interest in the results of the Richmond benchmarking challenge was expressed.
	Reward Initiatives	It was mentioned that a potential recognition/award program could be explored by the City for buildings reporting to the City and with better performance.
Proposed Approach	GHG Emission Limits	Concern whether the City has plans to establish and publish its own Greenhouse Gas (GHG) emission targets.
	Consistency Across Local Jurisdictions	Concerns whether the proposed energy and GHG emissions reporting requirement would integrate lessons learned from the City of Vancouver's initiative and how the proposed approach would mirror that of Vancouver, or not.
		Inquires whether the proposed requirements are similar to Vancouver reporting requirements.
		Questions on what is required to report in other BC municipalities.
	Concerns why the City has chosen to include the industrial as an asset in the initial batch, while Vancouver has not. "it is a very challenging asset class to obtain utility consumption information from"	
Data Disclosure	" mandatory disclosure is like shaming people; for example, <i>labeling properties with a D</i> characterizes an specific area. A voluntary disclosure approach is more equitable than labeling neighborhoods." "Will the data submitted to the City of Richmond be publicly reported (e.g., through https://buildingbenchmarkbc.ca/)?"	

Proposed Approach	Associated Fees	Stakeholders wanted to broaden their understanding of the City's approach to addressing non-compliant buildings in the future, specifically asking whether penalties, such as increased business license fees, would be implemented.
		"whether permit fees like the CoV will be applied or is it only reporting"
		"The City must have enough staff and charge service fees to ensure better compliance with the benchmarking bylaw. Collecting permit fees is one idea to service the program. "
		"What mechanism/tool will be used to get building owners to report their data? CoV has imposed monetary fines, but can the City of Richmond do anything other than asking us to comply?"
	Reporting Deadline	"Would suggest a June 2025 deadline for reporting might be a bit ambitious for properties that aren't currently on ESPM. It's a pretty steep learning curve and gathering consumption information, particularly from Fortis, as mentioned, can take many months."
	District Energy System	Questions whether a building supplied by District Energy will also be required to report.
	Requirements and Exclusions	Question whether it will be mandatory for all buildings to report energy consumption in Richmond, or if any exceptions will be in place.
		Will there be any exclusions from the reporting process? For example, process loads?

Let's Talk Richmond Survey Results

Closed

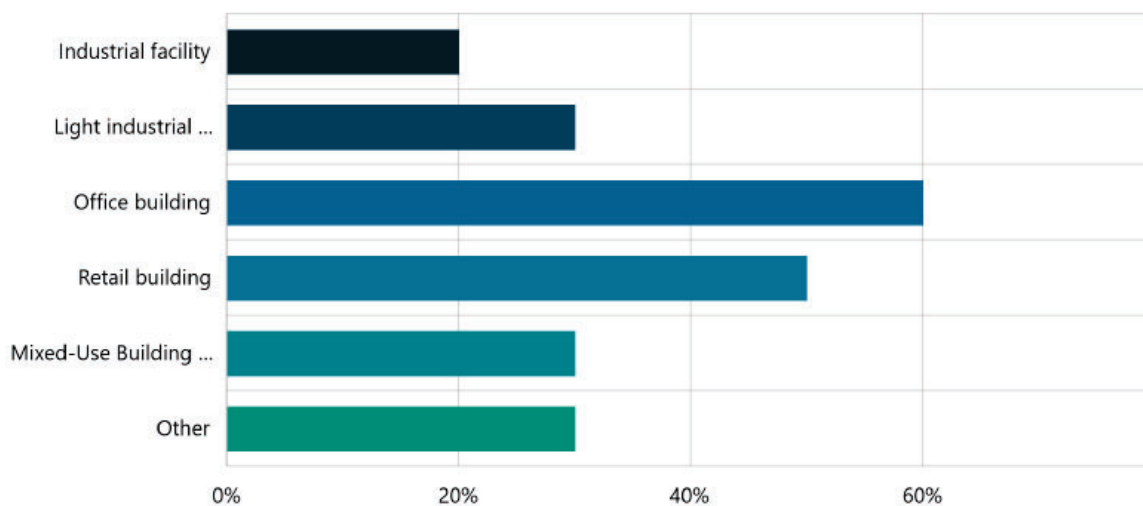
Energy and GHG Emissions Reporting Survey
[Proposed energy and greenhouse gas emissions reporting](#)

0 Contributors | 10 Contributions

Contribution Summary

1. I am a building owner, manager or representative of a/an: (select all that apply) Required

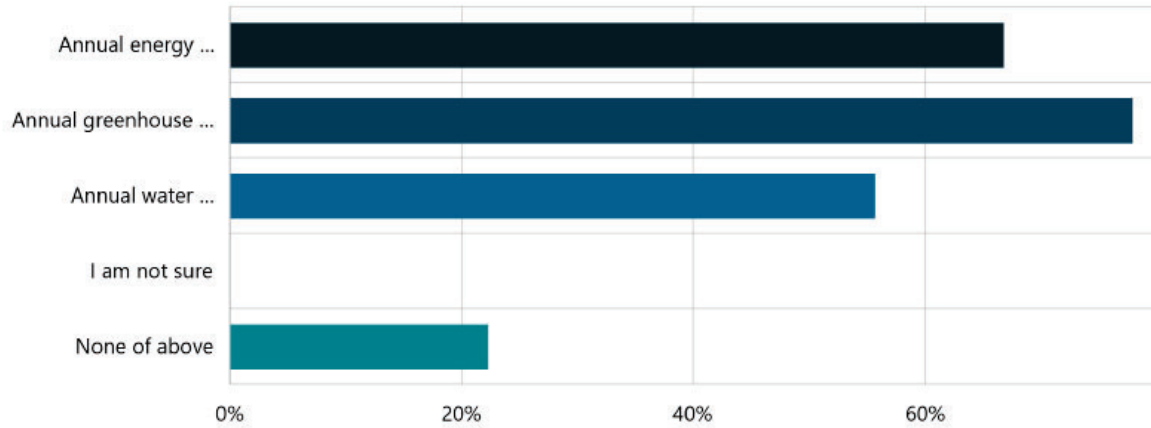
Multi Choice | Skipped: 0 | Answered: 10 (100%)



Answer choices	Percent	Count
Industrial facility	20.00%	2
Light industrial facility (e.g. warehouse)	30.00%	3
Office building	60.00%	6
Retail building	50.00%	5
Mixed-Use Building (more than one use - i.e. office retail)	30.00%	3
Other	30.00%	3

2. My organization currently tracks the following building information: (select all that apply)

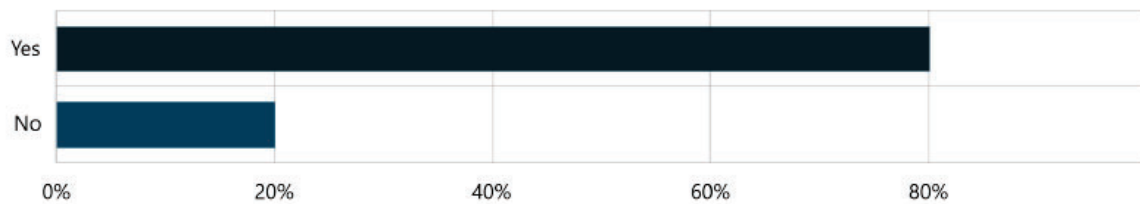
Multi Choice | Skipped: 1 | Answered: 9 (90%)



Answer choices	Percent	Count
Annual energy consumption	66.67%	6
Annual greenhouse gas (GHG) emissions	77.78%	7
Annual water consumption	55.56%	5
I am not sure	0%	0
None of above	22.22%	2

3. I have previous knowledge about tracking my building's/facility's energy consumption and greenhouse gas (GHG) emissions:

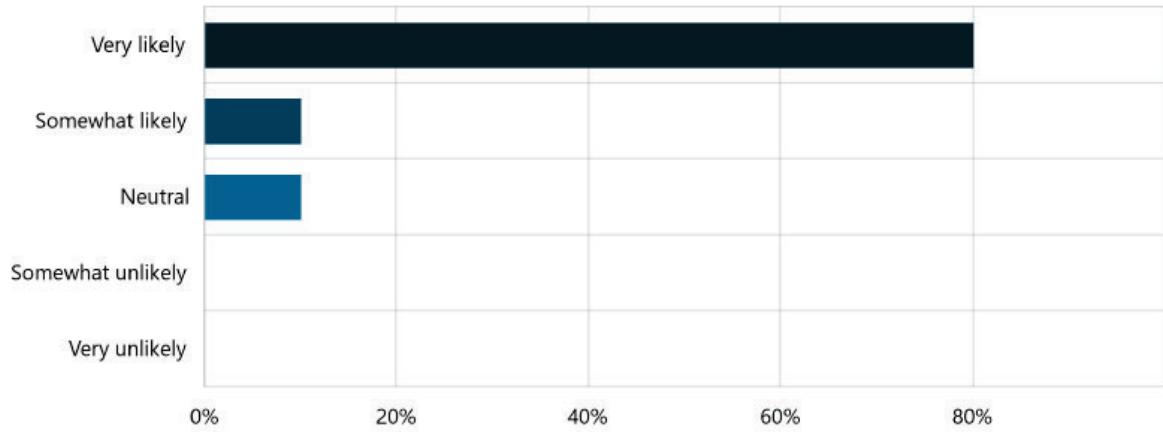
Multi Choice | Skipped: 0 | Answered: 10 (100%)



Answer choices	Percent	Count
Yes	80.00%	8
No	20.00%	2
Total	100.00%	10

4. After reading the background information and learning more about energy and greenhouse gas (GHG) benchmarking, my level of support to implement a benchmarking program for my building(s) would be:

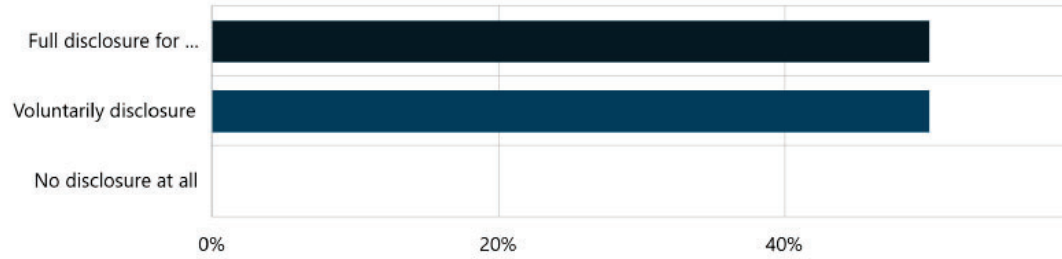
Multi Choice | Skipped: 0 | Answered: 10 (100%)



Answer choices	Percent	Count
Very likely	80.00%	8
Somewhat likely	10.00%	1
Neutral	10.00%	1
Somewhat unlikely	0%	0
Very unlikely	0%	0
Total	100.00%	10

5. The proposed requirement is to report buildings' energy use and GHG emissions to the City of Richmond. Regarding energy and greenhouse gas (GHG) public data disclosure, I support the following:

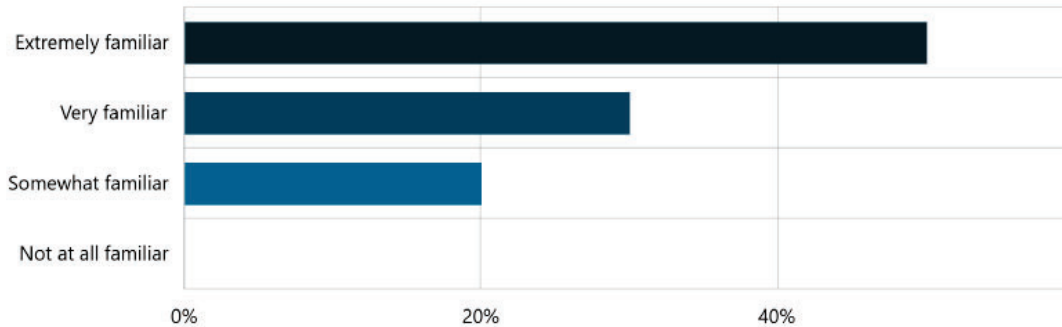
Multi Choice | Skipped: 0 | Answered: 10 (100%)



Answer choices	Percent	Count
Full disclosure for every building under this requirement	50.00%	5
Voluntarily disclosure	50.00%	5
No disclosure at all	0%	0
Total	100.00%	10

6. Before participating in this survey, I was _____ with energy and GHG emissions reporting tools: (fill in the blank)

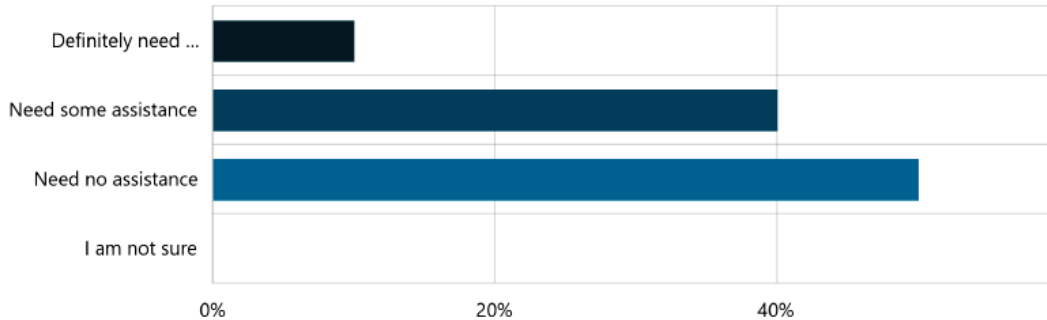
Multi Choice | Skipped: 0 | Answered: 10 (100%)



Answer choices	Percent	Count
Extremely familiar	50.00%	5
Very familiar	30.00%	3
Somewhat familiar	20.00%	2
Not at all familiar	0%	0
Total	100.00%	10

7. Energy Star Portfolio Manager (ESPM) is free reporting and benchmarking software widely used in North America to collect, store and report annual building energy and emissions data. To use ESPM to report annual energy usage and greenhouse gas (GHG) emissions, I would:

Multi Choice | Skipped: 0 | Answered: 10 (100%)



Answer choices	Percent	Count
Definitely need assistance	10.00%	1
Need some assistance	40.00%	4
Need no assistance	50.00%	5
I am not sure	0%	0
Total	100.00%	10

Additional Comments Provided on Let’s Talk Richmond Survey:

1. “City of Richmond has been a climate action leader when it comes to decarbonizing the building sector. This program related to disclosure requirement will build on the City’s climate action leadership work. It will not only reduce energy consumption in participating buildings, but can help inspire other municipalities to take similar steps in their jurisdictions. There is a CSA National Standard on Energy and GHG Emissions Reporting being developed as we speak and when published, the standard can help provide a consistent approach re: energy benchmarking across municipalities. Also, note that Engineers and Geoscientists BC is developing professional practice resources in relation to GHG emissions regulations for large existing buildings (related to City of Vancouver’s bylaw) and that would be of relevance to the work led by the City of Richmond as the scope of guidance covers energy benchmarking. We wish the City of Richmond best of luck in implementing this new initiative and commit to providing support through the development of professional practice resources.”
2. “My company is already developing a sustainability program to track key information such as energy consumption, renewables consumption (cardboard, paper, wood pallets). So this is a timely initiative for corporate responsibility.”