

OWNERS OF LARGE BUILDINGS IN MONTRÉAL: ARE YOU READY TO MAKE YOUR FIRST GHG REPORT?

Posted on June 22, 2023

Categories: [Insights](#), [Publications](#)

As part of its goal to be carbon neutral by 2050, the City of Montréal adopted the *By-law concerning greenhouse gas emission disclosures and ratings of large buildings in 2021*. (21-042)^[1] (the “**By-law**”).

The By-law requires owners of large buildings to disclose to the City the sources (electricity, natural gas, steam, hot water, etc.) and quantities of energy consumed by their buildings.

The By-law is being implemented in phases, as follows:

- Buildings of 5,000 m² to 14,999 m² or 50 dwellings or more (including condominiums): reporting of 2022 data by June 30, 2023
- Buildings of 2,000 m² or more, or with 25 to 49 dwellings (including condominiums): reporting of 2023 data by June 30, 2024.

The data must be disclosed according to the procedures defined in Schedule B of the By-law.

With this measure, the City aims to gain a better understanding of the amount of greenhouse gases (GHGs) produced by large buildings. Under the By-law, the City will assign a “GHG emission performance rating” to each building, to be displayed by the owner and published on the City’s website.

Applying the By-law would raise confidentiality and access to information issues, particularly for condos, where the syndicate of co-owners must access the owners’ data in order to comply with the By-law. The City seems to have acknowledged these issues,^[2] and information-sharing gateways between it and Hydro-Québec and Énergir are now reportedly operational.^[3]

The By-law applies only to the territory of the City of Montréal and not to the 14 other cities that make up the Montréal agglomeration.

[1] [By-law concerning greenhouse gas emission disclosures and ratings of large buildings \(21-042\)](#), online (in French)

[2] City of Montréal, [*By-Law 21-042 on the Mandatory Disclosure of Building Energy Consumption Data – Application Guide*](#), January 2022, online (in French)

[3] SolutionCondo, [*Règlement sur la divulgation et la cotation des émissions de gaz à effet de serre des grands bâtiments. Êtes-vous prêts*](#), June 9, 2023, online (in French)

by [Martin Thiboutot](#)

Cautionary note

The foregoing provides only an overview and does not constitute legal advice. Readers are cautioned against making any decisions based on this material alone. Rather, specific legal advice should be obtained.

© McMillan LLP 2023