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June 3, 2016

The Honourable Minister Catherine McKenna  
Minister of Environment and Climate Change Canada  
200 Sacre-Coeur, 2nd Floor  
Gatineau, Québec K1A 0H3

Mr. Matt Parry, Lead  
Working Group on Adaptation and Climate Resilience  
200, boul. Sacré-Coeur  
Gatineau, Québec K1A 0H3

Mr. Matt Jones, Lead  
Working Group on Specific Mitigation Opportunities  
200 Sacre-Coeur Blvd., 14th floor, Office 1477  
Gatineau, Québec K1A 0H3

Dear Minister McKenna, Mr. Matt Parry and Mr. Matt Jones:

This submission is on behalf of the signatories to the [Canadian Boreal Forest Agreement](#) (CBFA), including the Forest Products Association of Canada, 19 leading forest products companies, and 6 leading environmental non-governmental organizations. When we signed this agreement in 2010, we committed to work together on shared solutions for mitigation and adaptation to climate change as part of our vision for a stronger, more competitive forestry industry and a better protected, more sustainably managed boreal forest. As the consequences of climate change continue to emerge, finding these shared solutions is more vital than ever.

Both FPAC and a number of the ENGOs in the CBFA have, or will, also make individual submissions to ECCC. This submission is meant to highlight where there is common interest and agreement. However, there are areas where the CBFA signatories do have differing perspectives, which are expressed in more detail in our individual submissions.

Topics that signatories are discussing in more detail include: how to address emissions resulting from forest harvesting into a life cycle assessment in a robust and manageable manner, whether and when there is a role for increased biomass harvesting as a climate change solution, and what are adaptation approaches that also reflect the multiple values of our forests. The collaborative model embodied by the CBFA could play a role in advancing these discussions moving forward.

### **The importance of forests in the context of climate change**

Canada's boreal forest provides critical ecosystem services to local, regional and global populations, which are more important than ever in the face of climate change. Natural Resources Canada (NRCan) recently published a paper quantifying the climate change





mitigation potential of Canada's managed forest,<sup>1</sup> which found a cumulative mitigation of 254 Tg CO<sub>2</sub>e in 2030 and 1180 Tg CO<sub>2</sub>e in 2050.<sup>2</sup>

Management of the 73 million ha of boreal forest tenures held by CBFA signatories (which represents over 50% of Canada's managed boreal forest) looks to sustain communities and protect biodiversity, while contributing approximately \$40 billion per year to Canada's resource economy— and is of global significance in the fight against climate change.

### The CBFA contribution

In the six years since the Agreement was signed, CBFA signatories have been actively developing and implementing real change on key issues relating to forestry, species at risk, and protected areas across the boreal forest in collaboration with Provincial, Indigenous governments and others. Our actions have been guided by a 'twin pillars' approach that sees the economy and the environment as fundamentally intertwined and a commitment to base our strategies and outcomes on the best available science and information, including Indigenous Traditional Knowledge. CBFA signatories recognize the contribution a managed forest landscape can make towards adaptation and mitigation of climate change while also maintaining complex natural systems on the landscape to adapt on their own in conservation areas (e.g. protected areas and set asides). We recognize equally the importance of forest products to a sustainable economy, and that the need to balance our efforts for nature with our efforts for the forest sector economy and the 300,000 Canadians it supports.

While not all of our actions are focused on climate change, many have climate relevance, including:

- **Collaborative conservation planning** - Pilot carbon modelling shows that implementing CBFA plans has significant mitigation benefit, on the order of several million tonnes of carbon in the near term and tens of millions past 2030.
- **Natural Range of Variation (NRV) harvesting** - As of January 2016, CBFA signatories have gone further in replicating nature in the way we harvest. NRV can concentrate harvested areas and reduce fuel use in transportation, as well as offering new ways to increase the resilience of forest ecosystems and help them adapt to the changes brought on by climate change.

<sup>1</sup> This definition of "managed forest" was developed for the purpose of reporting to the UNFCCC. It is a spatial definition covering areas with forests being managed in different ways. See a map at Kurz et al. 2013, pg 266.

<sup>2</sup> Smyth et al, 2014. Quantifying the biophysical climate change mitigation potential of Canada's forest sector. *Biogeosciences*, 11, 3515-3529, 2014.





- **Developing world-leading practices for adaptation and mitigation** – Signatories are working together to identify shared solutions on such topics as adaptation and mitigation in forest management, biomass harvesting, and forest carbon accounting in Life Cycle Assessments, as well as guidance for incorporating climate change vulnerability in protected areas planning. As with other CBFA work, we are collaborating with leading scientists and stakeholders in our efforts.

We have undertaken these actions in the belief that not only do they help mitigate global warming and adapt our forests to a changing climate, but also make Canadian forest products a more valuable and sustainable choice in an increasingly carbon constrained world.

The forest sector has demonstrated early leadership on climate change, reducing emissions from pulp and paper mills by more than 66% since 1990, but we believe there is potential to do more in the boreal forest. As work proceeds on a pan-Canadian solution to the challenges of climate change, we ask you to consider the following priorities:

- **Development of processes for managing and accounting for forest carbon** - Understanding carbon dynamics in forests is complex, but there is vast mitigation potential in Canada's forests and wood products. Government should prioritize development of our ability to track carbon in poorly understood ecosystems such as wetlands and peatlands, in forest products at home and abroad, and in the effects of forest disturbances such as fires, pests, and their management. Government should also support the efforts of forest managers to account for and understand carbon impacts of management practices on their tenures. Linking embodied forest carbon to products, such as in lifecycle carbon assessments (LCA), is complicated by scale and practicality, but of increasing interest to the marketplace. Government should work with stakeholders to develop accurate and viable carbon accounting methods.
- **Landscape-level planning** - The changing climate poses challenges to biodiversity and ecosystems. In the face of different temperatures and precipitation levels, invasive species, and other climate-related stresses, species may need to move in order to live or identify new strategies for their survival. By the same token, areas with more native biodiversity and fewer stresses resulting from human and industrial activities, may be the most resilient to new pressures caused by climate change. In Canada, the 'managed forest' spans some of the most biodiverse and productive boreal forest areas of Canada. As a result, it is vital that the ecosystems it represents be considered. Efforts to create or maintain connectivity, support its resilience for the many actors that depend on the forest for their livelihoods, like the forest products sector and the Canadians it employs, is vital.
- **Provision of tools and in-kind support** - Government has a key role to play in providing the tools we need to manage forests in a changing climate. From the provision of climate data, to monitoring and reporting, to funding for adaptation, government is a necessary enabler of adaptive and mitigating actions in the boreal forest. Expertise and



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support from Federal as well as Provincial / Territorial scientists and managers has been and will continue to be critical to the success of the CBFA.

- **Regulations that work in a changing climate** - Canadian jurisdictions have some of the strictest systems of sustainable forest management in the world- based in part on assumptions of ecosystem stability. In a future that increasingly departs from past trends, we must work to ensure our regulatory frameworks encourage and allow our forests to adapt.
- **Recognizing that adaptation and mitigation go hand-in-hand** - Helping forests adapt to climate change helps store carbon, and slowing the pace of climate change gives forests more time to adapt. Efforts to adapt and mitigate climate change in Canada's boreal forest should recognize the synergies between these two goals, and their linkage to socio-economics and biodiversity values.

Signatories of the CBFA recognize that while the responsibility for the future of forestry and conservation in Canada's boreal forest rests primarily with governments, both industry and environmental organizations have a role to play in defining that future. We thank you for the opportunity to participate in this consultation, and would welcome the opportunity to work with the government to further discuss how our efforts can enhance mitigation and adaptation values, and how we can be further involved in being part of the solution.

In anticipation of further shared successes in the Boreal forest,

Sincerely,

Aran O'Carroll  
Executive Director  
On behalf of The Signatories of the Canadian Boreal Forest Agreement

cc  
Mark Hubert  
CBFA Industry Caucus Lead

Cathy Wilkinson  
CBFA Environment Caucus Lead

