

An open letter to Minister Jonathan Wilkinson on the need to improve the accessibility and biodiversity measures of the 2 Billion Tree Program from more than 100 conservation, environmental and social justice groups representing hundreds of thousands of supporters in Canada.

June 20, 2023

The Honourable Jonathan Wilkinson, P.C., M.P.
Minister of Natural Resources Canada
House of Commons
Ottawa, ON

RE: Recommendations for a More Accessible and Biodiversity-Friendly 2 Billion Tree Program

Dear Minister Wilkinson,

We welcome the federal government's 2 Billion Tree (2BT) program as a unique opportunity for cities and environmental organizations to strengthen their communities' climate resilience and biodiversity through tree-planting.

We are writing, however, to raise concerns about inherent barriers that hamper participation in the 2BT program and limit its effectiveness, and to provide recommendations and solutions that address how those barriers can be mitigated and overcome.

The recent report from the Commissioner of the Environment and Sustainable Development (CESD) highlighted that due to the relative absence of long-term agreements and other factors, NRCan's tree-planting targets for 2022 and beyond are unlikely to be met. There are currently a number of barriers that are restricting the ability of prospective applicants to access the program and contribute to meeting the target of 2 billion trees. Improving the accessibility of the 2BT program can not only help achieve those goals, but also increase uptake from smaller organizations with less capacity, which would include racialized and First Nations groups.

The minimum tree-planting requirements have a high threshold, which exceeds the capacity of many local environmental organizations and cities with smaller populations. Potential applicants may not have access to enough planting spaces or sufficient tree supply from local nurseries, and may not be able to obtain geolocations for sites in advance of planting. Currently, the program's rigid minimum tree-planting requirements that need to be met in the first year disqualifies many organizations from participating in the program.


We therefore recommend that the 2BT program's minimum tree-planting requirement operate on a multi-year basis, rather than a yearly one. For example, instead of requiring 10,000 trees to be planted every year, the program could present an option of entering into a six-year agreement, by the end of which they will need to have planted 70,000 trees. Applicants would be more inclined to enter into multi-year agreements of this type because it would give them time to secure seed and sapling stock and flexibility with regard to how many trees are planted each year.

An alternative recommendation would be to allocate more funds towards the capacity-building streams for the specific purposes of helping both Indigenous and non-Indigenous groups develop local tree and shrub supply.

We also appreciate that the 2BT program supports the involvement of aggregators, but we would suggest expanding the program's model to include and develop more local and regional organizations as aggregators. Using their familiarity with both the region and other groups operating in the area, these types of organizations would be able to establish a regional network of stakeholders and coordinate tree-planting projects amongst local organizations. Having such locally and regionally based aggregators would facilitate the participation of and be a useful resource for organizations who are unable to meet the tree-planting requirements on their own, but could contribute to meeting them with partners.

Additionally, we want to convey that organizations and cities across Canada share the same concerns outlined in the CESD report with regard to the program's lack of emphasis on biodiversity or permanent protection of planted trees. Firstly, the program restricts the acquisition of shrub species to only 15% of project costs, which will limit the biodiversity and ecological integrity of newly planted forests. Since shrubs act as nurse plants for young trees, planting them in riparian restoration and reforestation projects can help save resources by reducing mortality and follow-up planting of later successional species. Secondly, the requirement that planting sites be completely located in either urban or rural areas limits the program's potential to establish ecological corridors and increase connectivity between rural and urban environments. We therefore recommend that the program allow a greater percentage of funds to be used to plant shrubs, allow for greater flexibility between the urban and rural planting streams, and implement more specific and transparent measures to ensure that trees are permanently protected.

Finally, as noted by the CESD, the department did not clearly state its expectations for long-term monitoring of tree health and survival for the 2021 planting season. We are pleased that the department has since required that applicants provide a monitoring plan, but would suggest that expenses related to long term maintenance be included in eligible expenses and that more funding be allocated for such monitoring.



Our concerns and recommendations build on a growing body of evidence that demonstrates the value of supporting all scales of tree-planting projects in bolstering climate resilience, enhancing biodiversity, and improving our communities. There are thousands of “shovel-ready” and “shovel-worthy” projects of various scales across Canada and within Indigenous communities by organizations that are eager to ensure that trees are planted and cared for in a manner that guarantees long-term protection and strengthens the surrounding ecosystems and biodiversity.

This potential is waiting to be unlocked, and with minor changes to minimum tree planting requirements, biodiversity and monitoring requirements, and permanent protection, can be put to use in meeting our climate targets and reversing our growing biodiversity crisis.

Thank you for taking our recommendations into account.

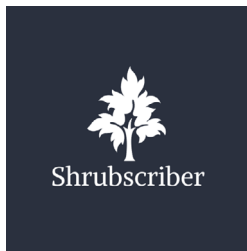
Sincerely,

SIGNATORIES



SIGNATORIES





SIGNATORIES

Nature Nova Scotia
Bruce Trail Conservancy
Nature Saskatchewan
Greater Victoria Greenbelt Society
New Brunswick Anti-Shale Gas Alliance
Ontario Headwaters Institute
Climate Action for Life long Learners
HealthyYEG
GentleWays for OurPlanet
Bee City Canada
Garden City Conservation Society
York Simcoe Nature Club
London Environmental Network
Friends of the Saskatoon Afforestation Areas Inc.
Green Communities Canada
Saugeen Nature
Sustainable Orillia
One School One Farm Shelterbelt Project
Green Ummah
Hamilton-Wentworth Green Venture
Nature NB
Lions Bay Bird Friendly City
Ecology Ottawa
ClimateFast
McKellar Island Bird Observatory
For Our Kids Toronto
Blomidon Naturalists Society
Toronto Field Naturalists
Association forestière des deux rives
Biodiversity and Climate Action Niagara
ontariogreenca@gmail.com
Kamloops Naturalist Club
Staniforth and Associates
Friends of Kingston Inner Harbour
BC Conservation Foundation
Elk River Alliance

ReForest London
The Nashwaak Watershed Association
Island Nature Trust
Calgary Wildlife Rehabilitation Society
Nature Regina
ecoCaledon
Nanaimo Science and Sustainability Society
Community Forests International
Tree Trust Stratford Perth
Nature London
Wildcoast Ecological Society
Nature Vancouver
Nature Alberta
Water & Environmental Protection for Albert County
Sudbury Naturalists
Mind Your Plastic
Seedlings Forest Education
Trout Unlimited Canada
Wilder Climate Solutions
rare Charitable Research Reserve
Shrubscriber
Sustainable Milton
Clean Air Partnership
South Simcoe Streams Network, Nottawasaga Futures
Redberry Lake Biosphere Reserve Association
SOS Trees Coalition
Sydenham Field Naturalists
Manitoba Eco-Network
Friends of the Helen Schuler Nature Centre Society
Alberta Ecotrust Foundation
BC Nature - Federation of BC Naturalists
Guelph Urban Forest Friends
Reep Green Solutions
Prince Albert Model Forest Association Inc.

SIGNATORIES

Souris and Area Branch of the PEI Wildlife Federation

Yukon Conservation Society

Prince Edward County Field Naturalists

Fredericton Nature Club

False Creek Watershed Society

WWF-Canada

Friends of Semiahmoo bay Society

Friends of Clayoquot Sound

Nature Québec

Camp Kitigay

Grassroutes Ethnoecological Association

Bird Friendly Calgary

LEAF

Nanaimo & Area Land Trust

K&C Silviculture Ltd.

Southern Alberta Group for Environment (SAGE)

Dougan and Associates Ecological Consulting and Design

Calgary Urban Species Response Team

Calgary Climate Hub

Eco-Elders For Climate Action

Friends of the Saskatoon Afforestation Areas Inc.

West Kootenay Climate Hub

CAFES

Muskeg Lake Cree Nation

Salal + Cedar

Edmonton River Valley Conservation Coalition

Okanagan Similkameen Conservation Alliance

Nova Scotia Salmon Association

West Lake Community Association (WLCA)

BurlingtonGreen