

April 2, 2024

Hon Steven Guilbeault, PC, MP  
Minister of Environment and Climate Change  
Government of Canada

Hon Jonathan Wilkinson, PC, MP  
Minister of Energy and Natural Resources  
Government of Canada

Dear Ministers Guilbeault and Wilkinson,

We are writing to express concern about the narrow scope of the [LULUCF emissions accounting review](#), which excludes Canada's approach to estimating and reporting forestry emissions.

Last year, Canada's [Commissioner on the Environment and Sustainable Development](#) identified a lack of transparent reporting of forestry and logging emissions by the ECCC and NRCan in Canada's annual greenhouse gas inventory, and recommended that the Departments "commission and publish an independent expert review" of "Canada's approach to estimating and reporting emissions related to forests and specifically to logging," and that the review include "a formal engagement process with users, such as researchers and environmental and industry groups."

[Scientists, MPs and Senators](#), and [environment, health and Indigenous groups](#) have also all raised concern about the lack of full and accurate reporting of logging emissions. And a [peer-reviewed study](#), published in January, found that the federal government has been mischaracterizing the GHG emissions from logging, reporting the forestry sector as roughly carbon neutral when, in fact, anthropogenic activities have accounted for an average of over 90 million tonnes (Mt) of emissions a year. And, in a [2022 report](#), a UNFCCC expert panel raised concern about the lack of information justifying Canada's approach to separating our non-anthropogenic emissions.

Given the current underreporting of forestry emissions and the Commissioner's recommendations, the review's failure to address Canada's approach to estimating and reporting emissions calls into question its ability to deliver on its goals of ensuring "comparable, transparent and credible GHG accounting."

We urge you to act to ensure the effectiveness and legitimacy of the review by including in it a consideration and discussion of how Canada estimates and reports logging and forestry emissions.

Sincerely,

Sabaa Khan  
David Suzuki Foundation

Gretchen Fitzgerald  
Sierra Club Canada Foundation

Michelle Connolly  
Ecotrust Canada

Tegan Hansen  
Stand.earth

Jennifer Skene  
NRDC (Natural Resources Defense  
Council)

Janet Sumner  
Wildlands League

Michael Polanyi  
Nature Canada

Katie Krelove  
Wilderness Committee

Mathieu Béland  
Nature Québec

cc: Laurel Collins, MP, NDP Critic for  
Environment and Climate Change  
Gérard Deltell, MP, Conservative Party  
Critic for Environment and Climate  
Change

Caroline Schultz  
Ontario Nature

Elizabeth May, MP, Leader of the  
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