May 2, 2024

Dr. Sandro Federici, Generalist, San Marino (Lead Reviewer)
Ms. Jacqueline Pham, Projections expert, Australia (Lead Reviewer)
Ms. Hannah Wanjiru, FTC expert, Kenya
Expert Review Panel of Canada's 8th National Report and 5th Biennial Report
United Nations Framework Convention on Climate Change (UNFCCC)

Dear Dr. Federici, Ms. Pham and Ms. Wanjiru,

We are writing to encourage you, in your review of Canada's 8th National Communication and 5th Biennial Report, to closely examine the methodologies of Canada's reported greenhouse gas emissions from forestry and logging.[1]

Given that the purpose of your review is to assess Canada's progress in achieving economy-wide emission reductions, we wanted to share our concern with how Canada classifies its natural versus anthropogenic LULUCF emissions and the barriers that methodology poses to accurately assessing the impact of Canada's economic activity on forests.

On page 48-9 of the report, the authors of the report state that LULUCF sector constituted a net removal of 6.8 Mt CO2e in 2020, and that "the combined net flux from Forest Land and Harvested Wood Products–from forest harvest [i.e., anthropogenic emissions and removals associated with forest management activities] fluctuated from a net source of 9.4 Mt in 2005 to a net sink of 22 Mt in 2009 (lowest harvest year) and constituted a new sink of 6.5 Mt in 2020."

There is evidence that these estimates vastly underrepresent the true anthropogenic emissions associated with forestry and logging.

A recent peer-reviewed study[2] found that average annual net emissions from forestry and logging in Canada between 2005 and 2021 were 90.8 Mt/year, far higher than the -4.7 Mt/year combined net flux number reported (counted) by the Canadian government. The study concluded that the discrepancy arises from Canada's designation of GHG emissions from wildfires as natural, but GHG emissions from forests at the age of commercial maturity, despite those forests being primarily of natural disturbance origin, are anthropogenic.

With this approach, Canada is creating an artificial carbon sink that is obfuscating the true emissions from industrial logging. In addition, the IPCC's 2019 Refinement states that "when

[1] Environment and Climate Change Canada (2022). Canada's Eighth National Communication on Climate Change and Fifth Biennial Report, https://unfccc.int/documents/624782.
[2] Bysouth D, Boan JJ, Malcolm JR and Taylor AR (2024). High emissions or carbon neutral? Inclusion of "anthropogenic" forest sinks leads to underreporting of forestry emissions. Front. For. Glob. Change. 6:1297301. doi: 10.3389/ffgc.2023.1297301, https://www.frontiersin.org/articles/10.3389/ffgc.2023.1297301/full.

emissions from natural disturbances are disaggregated, it is good practice that subsequent removals are also disaggregated until the balance has been reached."[3] Canada is not adhering to this practice of balance (it disaggregated 77 Mt in net annual emissions between 2005 and 2021).[4]

Over the past two years, numerous experts and observers have raised concern about Canada's approach to estimating and reporting forestry emissions. In April 2023, Canada's Commissioner of the Environment and Sustainable Development stated that "Environment and Climate Change was not transparent in its reporting on the effects that human activities on forest land have on greenhouse gas emissions."[5] In December, 29 Members of Parliament and Senators called on the government to "advance effective action to tackle climate change by committing to separately and transparently report GHG emissions attributable to logging."[6] International scientists,[7] Canada's Net Zero Advisory Body,[8] and various groups of environmental and health organizations[9,10,11] have also raised concern.

In addition, the UNFCCC, questioned Canada's approach to accounting for non-anthropogenic emissions in its 2021 review of Canada's National Inventory Report, stating, "[Canada] did not include in the NIR enough information justifying the assumption that emissions and subsequent removals due to stand-replacing fires in managed forest are not anthropogenic; or provide sufficient information on how such non-anthropogenic circumstances…tend to average out across time."[12]

Canada's underreporting of forestry GHG emissions by almost 100 Mt/year calls into question the comprehensiveness of its climate plan. It creates a massive shortfall in Canada's actions to achieve its 2030 target, and is leading to the adoption of counterproductive policy and spending measures based on a false portrayal of logging as a climate solution.

---

[3] IPCC (2019). 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories, Volume 4 Agriculture, Forestry and Other Land Use, p. 2.74, https://www.ipcc-nggip.iges.or.jp/public/2019rf/pdf/4_Volume4/19R_V4_Ch02_Generic%20Methods.pdf.
[4] Bysouth et al, p. 08.
[5] Office of the Auditor General of Canada (2023). Forests and Climate Change, Reports of the Commissioner of the Environment and Sustainable Development to the Parliament of Canada, p. 19, https://www.oag-bvg.gc.ca/internet/docs/parl_cesd_202304_01_e.pdf.
[6] Aldag J et al (2023). Letter to Minister Guilbeault and Minister Wilkinson, December 6, 2023, https://naturecanada.ca/wp-content/uploads/2023/12/Logging-Emissions-MP-Sign-On-Letter-December-2023.pdf.
[7] Anderson W et al (2022). Letter from Scientists to Prime Minister Justin Trudeau Regarding the Protection of Canada's Primary Forests, March 23, 2022, https://www.nrdc.org/sites/default/files/media-uploads/primary_forest_scientist_letter-final.pdf.
[8] Net-Zero Advisory Body (2024). What We Heard: 2022-2023 Engagement Report, p. 17, https://assets-global.website-files.com/64ef3fd141170da059cb6d80/6602d13e25410fd4a9b1e46f_NZAB-2022-2023%20What%20We%20Heard.pdf.
[9] Khan S et al (2024), Letter to Minister Guilbeault and Minister Wilkinson, April 2, 2024, https://naturecanada.ca/wp-content/uploads/2024/03/ENGO-Letter-to-NRCan-and-ECCC.pdf?.
[10] Nature Canada et al (2022), Letter to Minister Guilbeault and Minister Wilkinson, https://naturecanada.ca/wp-content/uploads/2024/03/ENGO-Letter-to-NRCan-and-ECCC.pdf?.
[11] Swift A et al (2023). Letter to President Biden and Prime Minister Trudeau, https://www.nrdc.org/sites/default/files/2023-03/carbon-accounting-letter-biden-trudeau-20230323.pdf.
[12] UNFCCC (2022). Report on the individual review of the inventory submission of Canada submitted in 2021, May 11, 2022, p. 25, https://unfccc.int/sites/default/files/resource/arr2021_can.pdf.

We encourage you to address this significant gap in Canada's climate plan in your review of Canada's National Communication and Biennial Report.

Thank you for your attention to this issue.

Sincerely,

Akaash Maharaj
Director of Policy
Nature Canada

Mathieu Beland
Forest Analyst
Nature Quebec

Anthony Swift
Senior Director, Global Northern Forests
Natural Resources Defense Council

Nicolas Mainville
Conservation and Climate Director
Société pour la nature et les parcs du Canada- SNAP Québec

Michelle Connolly
Director
Conservation North

Jay Ritchlin
Director General, B.C. and Western Region
David Suzuki Foundation

Tamara Stark
Head of Impact
Canopy

Janet Sumner
Executive Director
Wildlands League

Cc: Mr. Nalin Srivastava, UNFCCC Secretariat
Hon Steven Guilbeault, PC, MP, Minister of Environment and Climate Change
Hon Jonathan Wilkinson, PC, MP, Minister of Energy and Natural Resources
Laurel Collins, MP, NDP Critic for Environment and Climate Change
Gérard Deltell, MP, Conservative Party Critic for Environment and Climate Change
Elizabeth May, MP, Leader of the Green Party of Canada
Monique Pauzé, MP, Bloc Québecois Critic for Environment and Climate Change