

Ontario's proposal to expand multi-unit forest planning and streamline approvals is presented as an efficiency measure with no change to environmental outcomes. This assumes forests will continue to balance carbon released through harvesting over time. In reality, that balance depends on strong monitoring, transparency, and accountability.

Data from Environment and Climate Change Canada shows managed forests can shift from a carbon sink to a net source depending on harvest levels and wildfire activity. Carbon is released immediately through harvesting and fire, while regrowth takes decades to recover it. This creates a persistent gap that must be actively measured and managed.

Larger planning areas and reduced reporting risk masking local losses of older, high carbon forests and weakening the ability to track cumulative impacts. Without clear, accessible data, communities, Indigenous governments, and the public cannot assess whether forests are gaining or losing carbon over time.

Scientific guidance, including from the Intergovernmental Panel on Climate Change, underscores that accurate tracking of emissions and removals is essential. Older forests store significantly more carbon, and shifts toward younger forests reduce storage for extended periods. These changes are not visible without consistent monitoring.

The issue is not whether forests regrow, but whether Ontario can demonstrate that they are keeping pace with emissions. Without strong guardrails, it becomes unclear whether policy decisions are reducing emissions or increasing them.

Recommendations

- Require cumulative carbon assessment across multi-unit planning areas
- Maintain explicit carbon impact reporting, including recovery timelines
- Integrate wildfire emissions into forest sector reporting
- Strengthen protection of mature and high carbon forests
- Maintain transparent, accessible data and meaningful public and Indigenous participation
- Ensure efficiency measures do not reduce monitoring detail or accountability

Sources

1. **Environmental Registry of Ontario – ERO 026-0109: Revisions to Forest Manuals**
<https://ero.ontario.ca/notice/026-0109>
Confirms that Ontario's current forest management system is built on "rigorous processes and standards" to ensure sustainability, biodiversity protection, and public and Indigenous participation.

2. **Wildlife Conservation Society Canada – Input on the Review of Ontario’s Forest Management Guide for Boreal Landscapes (2024)**
<https://wcscanada.org/resources/input-on-the-review-of-ontarios-forest-management-guide-for-boreal-landscapes-april-2024/>

Provides science-based recommendations emphasizing the need for strong ecological criteria, indicators, and protection of high-integrity forests to prevent degradation.

3. **State of the Forest – Supporting Research (Canada)**
<https://stateoftheforest.ca/supporting-research/>

Synthesizes peer-reviewed evidence showing that cumulative industrial impacts in boreal forests drive biodiversity loss, underscoring the need for strict, landscape-level safeguards.