

Ontario's proposal to allow forest management plans to cover multiple management units and streamline wood tracking and approvals is presented as an efficiency measure with no change to environmental outcomes. However, this assumes that forests will continue to balance out carbon released through harvesting over time, something that this proposal weakens by reducing the clarity and strength of monitoring and accountability. National reporting from Environment and Climate Change Canada shows that Canada's managed forests can shift from absorbing carbon to becoming a net source of emissions depending on harvest levels and wildfire activity in a given year. This reflects a well documented delay where carbon is released immediately when trees are harvested while it takes decades for regrowth to restore the same level of carbon storage, meaning the balance is not stable or automatic and depends on strong monitoring and reporting.

Canada's data shows forest emissions are not stable. In some years, managed forests add carbon to the atmosphere instead of absorbing it, especially when harvesting and wildfires are both high. Recent wildfire years have released over 200 megatonnes of carbon dioxide equivalent in a single year from land use and forestry combined. These emissions are immediate and add to ongoing emissions from harvesting.

The concern is that the proposed changes make these combined effects harder to see. Larger planning areas can average out differences in forest age, carbon storage, and harvesting intensity across a wider region, which can hide local losses of older forests that store more carbon. If less climate and emissions data is collected or made public, it also becomes harder for communities, Indigenous governments, and the public to track whether forests are gaining or losing carbon over time.

Independent science bodies, including the Intergovernmental Panel on Climate Change, emphasize that tracking emissions and removals clearly is essential to understanding whether climate policies are working. Older forests generally store two to three times more carbon than younger ones depending on forest type, so shifts toward younger forests reduce overall carbon storage for long periods. This does not appear immediately unless it is tracked consistently over time.

While harvested wood can store some carbon in long lived products, a significant share is short lived or eventually decomposes, meaning much of the carbon returns to the atmosphere over time. Wildfires add further pressure, releasing large amounts of carbon quickly and increasingly under climate change conditions.

The key issue is not whether forests will regrow, but whether Ontario will be able to clearly measure whether forests are keeping up with the carbon being released. Without strong monitoring and public reporting, it becomes harder to know whether policy decisions are reducing emissions or increasing them.

Recommendations:

Require cumulative carbon impact assessment when planning across multiple management units so that emissions and carbon storage changes are evaluated at the landscape scale, not just within individual planning areas.

Retain or introduce a requirement to explicitly assess and report the carbon implications of forest management decisions, including how long it will take for harvested areas to recover the carbon they release.

Ensure wildfire emissions are consistently integrated into forest sector reporting so that harvesting decisions are understood in the context of already increasing natural emissions from climate change.

Strengthen safeguards for mature and high carbon forests by requiring clear justification where harvesting reduces long term carbon storage capacity across a landscape.

Maintain meaningful public and Indigenous participation in forest planning decisions with access to underlying carbon and ecological data, not only summarized outcomes.

Ensure that efficiency measures such as multi-unit planning do not reduce the granularity of ecological and carbon reporting needed to detect local impacts and cumulative trends.

Maintain and strengthen public reporting of forest carbon data so that changes in carbon stored in forests, harvested volumes, and wildfire impacts remain visible over time.

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.