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To: Nature 2030 Team, Environment and Climate Change Canada

By email:

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RE: Comments on Canada's 2030 Biodiversity Strategy

On behalf of Canadian Forest Owners (CFO), we would like to propose the following comments on the 2023 Canadian Biodiversity Strategy using the series of questions in the document *Toward a 2030 Biodiversity Strategy for Canada: Halting and reversing nature loss*

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## **WHO WE ARE**

Canadian Forest Owners (CFO) represents some 450,000 members including small and medium-sized businesses, large companies, pension funds, diverse communities, families, First Nations and female-led businesses from coast to coast. Our members are your neighbours who supply fresh drinking water, important fish, wildlife and plant habitats, forest products and other social and environmental services that support local businesses and communities.

Private forests in Canada represent 10 percent of the national managed forest (25 million hectares) but almost 20 percent of forest production. Most of these forests are located in Canada's most populated regions and represent a significant part of our settled natural landscape. For example, about one-third of Canada's population lives in southern Ontario where 90 percent of the forests are privately owned and managed. In 2020, forestry activities on private forest land created about \$14B in revenues and 40,000 direct jobs.

CFO members are committed to long-term resilient forests and a healthy climate. Canadian Forest Owners are committed to the sustainable management of private forest resources to ensure they will continue to contribute to the economic, social, environmental and cultural well-being of rural communities across Canada.

**CFO strives to balance the public interest and private property rights within a policy and incentive framework that fosters responsible stewardship**

## OVERARCHING QUESTIONS

- **What are the key features of a successful 2030 Biodiversity Strategy?**
  - Involvement of key forest stakeholders and forest owners in the development of strategy and its implementation.
  - Build on and enhance successful programs that promote sustainable forest management and active conservation.
  - Provide incentives (and in some cases compensation) to forest owners to be actively engaged in the implementation of the strategy.
  - Define realistic but ambitious targets and indicators to measure progress using an excellent and accurate database.
  - Have a whole-of-government approach to avoid duplication and counterproductive government programs, legislation and initiatives.
  - Make sure that any programs and initiative recognized on-the-ground field experience to ensure realistic solutions.
  
- **What are the most significant challenges and opportunities to achieving the KMGBF 2030 targets in Canada?**
  - The many levels of government (regional, provincial, territorial and federal) should recognize their respective jurisdictions, promote coordination and create synergies when possible.
  - Our collective resources are limited. It is important to focus on those initiatives that will help realize the most gains.
  - Synergies between forest carbon credits and biodiversity credits should be explored and implemented to provide incentives for forest owners to secure their active engagement.
  
- **What successful initiatives could we build upon?**
  - Canada is a leading country in terms of third party sustainable forest management certification through programs such as CSA, FSC and SFI that provide a balance between economic, social and environmental values.
  - Canada is among the countries with the most certified forest in the world.
  - Such programs for public and private land should be recognized and encouraged as they are already integrating many of the targets identified in the strategy.
  - CFO is developing a 2 billion trees proposal to work with partners such as farmers organizations, nursery producers and other stakeholders to ensure the federal government meets its 2 Billion Tree program commitment.
  
- **Are there targets where Canada is already making good progress and others where Canada should focus more attention?**
  - Third party sustainable forest management certification is an effective and recognized tool to promote SFM including conservation measures. Incentives for private woodlot owners to promote the certification of their forests will help achieve significant progress.

- **What measures should be prioritized and implemented as soon as possible to ensure we meet the 2030 targets and are on track to reach the longer-term 2050 goals?**
  - From a private woodlot owner's perspective, it would be important that a national biodiversity strategy identifies tools that would promote active management of their lands while respecting their private property rights.
  - The federal government should recognize and support the role of Canadian forest owners in rural economic development, biodiversity conservation and fighting climate change by developing and implementing a Personal Silvicultural Savings and Investment Plan (PSSIP) as part of the federal taxation system. This investment plan is crucial to enabling small- and medium-sized forest owners to invest in creating long-term resilient forests, accelerate the 2 Billion Tree Initiative, help fight climate change, sequester carbon and increase biodiversity conservation.
  - The government should find a means to inform forest owners of ways to preserve biodiversity. Communication activities through forest owner's associations and groups should be encouraged and subsidized.
  - The government should encourage and subsidize the creation of forest management plans that include a specific level of recommendation towards biodiversity conservation. Forest management plans remain a safe and practical way to ensure forest owners adopt sound management practices enabling them to cultivate their forests while safeguarding biodiversity.
  - There will need to be education for woodlot owners on best practices for biodiversity management and also on the identification of many of the species that they may be looking to protect. Small woodlot owners, in general, do not possess knowledge of the many species at various stages of growth. Additional research in to how to sustainably manage and harvest Non-Timber Forest Products (NTFP), would add to the incentive to manage for biodiversity and ensure its promotion.
  - Depending of specific circumstances and with the right incentives, forest owners have contributed to the creation of protected areas and to the development of Other Effective Conservation Measures (OECM). This should be encouraged.
  
- **No target is an island: What overarching tools and solutions hold the most potential for making progress across multiple targets?**
  - As described above, SFM Certification and Tax incentives such as CFO's proposed Personal Silvicultural Savings and Investment Plan are tools that would help achieve multiple biodiversity targets.
  
- **What additional knowledge and enabling mechanisms (e.g., networks, policies) are critical to inform implementation decision-making at all levels?**
  - Programs promoting accurate biodiversity inventories at the national, provincial and local levels must be the cornerstone of any programs or initiatives on biodiversity conservation to ensure the optimal positive impact.
  - It is very important to make sure that such programs and initiative recognize on-the-ground field experience to ensure realistic solutions.

- **In drafting the 2030 Biodiversity Strategy what individuals', communities', or organizations' perspectives, knowledge, and skills should be meaningfully amplified to make progress on reducing threats to biodiversity?**
  - As mentioned above, forest owners, with the right information and incentives, could significantly contribute to many of the National Biodiversity Strategy.
- **What are the key human needs and values to be addressed to make biodiversity loss a mainstream concern? • What does success look l**
  - If you want small land owners to protect biodiversity, there needs to be an educational program to increase woodlot owner's knowledge of biodiversity in their landscape and why it is important. Many do not know what they have and so can inadvertently do damage. Also, if biodiversity has a monetary value, that is an added incentive to protect it.



Susannah Banks, Chair, Canadian Forest owners



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