

Comments on proposed Emissions Trading System for Greenhouse Gases

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We are providing comments in response to the review period for the industrial sector cross cutting issues of the federal government's *Regulatory Framework for Air Emissions*. These comments are in relation to Manitoba Wildlands' focus on boreal forest regions and the reality that Manitoba is home to over 20 million hectares of intact boreal regions ecosystems. These regions in our province provide significant national and global ecological services – including with respect to climate change. It is our contention that any domestic market, incentive, or trading system with respect to emissions reduction in Canada needs to include forests, while making sure that all current ecological services from our forest regions are maintained or enhanced. It would be unacceptable to have environmental costs, degradation, or losses resulting from any climate change or emissions reduction policy, or regulation.

We also expect that domestic forest management emissions reductions mechanisms, will need to include *both* management improvements for emissions reductions in Canada's managed forests *and* eventually in our intact, boreal systems which today hold 60% of Canada's carbon. Regional schemes, such as Canada's domestic system can anticipate and prepare for climate change measures by being long sighted. Potentially Canada will be ready for Kyoto post 2012 requirements by taking these steps now in its domestic trading system. Even if managed forests are not included under Kyoto post 2012 Canada can initiate its own forest management standards that require carbon efficient practices and carbon sequestering.

We would suggest that these issues need discussion at the upcoming CCME meeting, and as part of the CCFM steps for a new national forestry strategy for Canada in 2008. Climate change plans, and mechanisms. conservation of biology, and sustainable forest management are part of the responsibilities for both ministers' councils, including for our forest regions.

Spin offs and benefits from including managed forests now, and preparing for the inclusion of intact forest systems include: conservation of biodiversity, maintaining carbon stocks and ecological services, economic outputs from new management methods, plus a variety of benefits to affected communities. Pilot projects now would help Canada initiate incentives for carbon efficient forest management in advance of the climate change effects our forest regions will experience. These projects could assist in learning, assessment of incentives, and decisions for methods for post 2012. Forest dependant communities, who will be gradually more affected by climate change in relation to how far north they are located, can become leaders in climate change mitigation and forest management methods learned.

Colleagues in other organizations have commented on access to environmental information, both for transparency and credibility when the information pertains to reporting about baseline emissions, and Manitoba Wildlands continues the work of WWF Canada and Nature Canada for new Manitoba Protected Areas.

reductions. Our domestic system can learn from other existing emissions reporting systems in this regard, and maintain, while improving on, Canada's high standards for access to information. Any market mechanisms will need information access for credibility. We support independent third party monitoring for the domestic market and posting of all reports for public access. Based on conservation of biodiversity concerns and making sure emissions reductions do not cause other environmental losses through secondary impacts, we recommend that environmental assessment for impacts from emissions reductions be built into requirements. These also would need to be public information.

Kyoto rules for Land Use Change and Forestry Projects (1e) require that implementation of "land use and land use change and forestry activities contribute to conservation of biodiversity." We expect that decisions about and steps for inclusion of forest management in Canada's domestic emissions reduction system and market, and future steps regarding Canada's forest carbon stocks, will uphold this rule.

We know now that forest management causes one quarter of emissions world wide. Manitoba can be a leader with Canada in reducing emissions from forest management, and we can begin now by putting forest management projects in the domestic regime for emissions reductions. It would be timely for Canada to start to take these steps, given we are home to the world's largest terrestrial carbon storehouse. Canada is an important nation globally for many reasons, including as a forest nation. Joining other countries who are already setting domestic carbon efficiency standards and goals in place for forest management is also consistent with Canada's international role in sustainable forest management.

Manitoba Wildlands' mandate is focused on the conservation of biology in our boreal regions. We urge the federal government to include forest management in its domestic emissions reduction and trading system, and to prepare for inclusion of forest management and forest carbon maintenance in post 2012 regimes.

Thank you for the opportunity to participate in this public comments process.

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