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FCOP Feedback, May 31, 2021

I am writing to offer feedback in the context of the proposed revisions to the BC Forest Carbon Offset Protocol (FCOP), because Sierra Club BC is very concerned about both BC's climate pollution trends and conservation and carbon trends of BC forests.

The latest federal data for provinces shows BC's emissions increased for the fifth year in 2019¹. After a century of industrial logging, now combined with climate change, BC's forests have shifted from carbon sink to carbon source; 97% of the forests with the biggest trees (and the highest carbon storage per hectare) have been logged and forest management emissions not included in the official total (more than 200 million tonnes in 2018) are now more than three times greater than officially reported provincial emissions.

We fear putting emphasis on forest carbon offset projects will neither help the province to meet our climate targets nor deliver the promised paradigm shift in forest management outlined by the Old-growth Panel. Fundamental policy change is crucial for achieving both of these goals. The heavy lifting to achieve the needed fundamental forest policy change, leading to a new baseline for forest management in BC, cannot be tied to offsets, because this would enable massive additional carbon pollution.

This shift will require adequate non-offset funding for conservation and climate action (like the \$2.3 billion commitment by the federal government to meet conservation goals²), not expanding forest offset projects that appear to be no longer a safe bet for the 21st century, particularly considering the ongoing failure to meet climate targets.

Climate policy experts recently warned that offset projects can lead to increasing pollution³. They cite evidence that shows that a large number of projects are not additional, i.e. they would have occurred one way or the other. This risk is particularly high for a number of the activities described in the proposed new protocol, like tree planting or the use of fertilizer.

Planting trees is generally legally required. There is a significant risk of tree planting projects benefiting from unwarranted offset payments. This risk is exacerbated by increasing climate change impacts which are particularly harmful for younger trees. Similarly, activities listed under 'Improved Forest Management', such as fertilization, are already part of industry practice and make commercial sense, but can have negative impacts on biodiversity. Improved utilization, increasing rotation age and increasing the proportion of harvested wood products require urgently needed policy changes to ensure they become part of a new baseline. Again, this shift will require funding but can't be used to enable more pollution if we are serious about climate action.

Allowing carbon pollution based on selling more forest carbon offsets today means enabling a vicious cycle, enabling more climate pollution beyond the already exhausted carbon pollution budgets, making climate change worse and fueling forest die-off.

¹ <https://www.canada.ca/en/environment-climate-change/services/climate-change/greenhouse-gas-emissions/sources-sinks-executive-summary-2021.html#toc6>

² <https://cpaws.org/cpaws-welcomes-largest-canadian-investment-ever-in-nature/>

³ <https://www.cbc.ca/news/opinion/opinion-carbon-offsets-1.5951395>

We fear that we have arrived at a point where forest carbon offset projects could speed up the crisis by enabling dangerous levels of climate pollution and global warming that forest ecosystems in BC cannot adapt to and, at the end of the day, would result in further carbon release and even more warming.

We are already in this new, “positive feedback” chapter of the climate crisis with severe climate impacts underway. Many forest regions around the world are, like BC, already degraded from industrial activity, and are being hit hard by drought, insects and fire, further reducing the amount of carbon they can absorb.

Logging and human-induced climate impacts combined have reduced net forest growth to the point that these regions can no longer replace the amount of carbon logging is cutting out of them. Without logging, many of these regions would still be carbon sinks, but they are being tipped into carbon sources by logging more than is growing back⁴.

In past decades, a limited role for forest conservation carbon offsets meeting high standards, combined with aggressive climate action to quickly reduce emissions from all sources, could have been considered part of a viable climate solution path.

But we have not set adequate targets and we failed to meet the weak ones we set. Now forests are no longer safely storing carbon. We must protect them to keep as much carbon as possible stored where it belongs. A forest carbon offset, however, is no longer a meaningful promise.

Climate scientists have also pointed out that ***the hoped-for potential of natural climate solutions is already accounted for in the remaining modeling paths to a livable climate as ‘negative emissions’: they are now badly needed to sequester some of the pollution already emitted, NOT to allow even more pollution today.***⁵

Being so close to climate and ecosystem breakdown means that a realistic last-ditch effort to get climate pollution under control must address ALL emissions at the same time, from fossil fuels AND forests. Pretending we can take one action INSTEAD of the other is irresponsible. This means any serious climate action plan MUST include strong policies to reduce all emissions at the same time, particularly in jurisdictions like BC and Canada with vast forest landscapes and massive growing forest emissions.

Policies to reduce forest emissions (and funding to implement them) must be pursued with the same urgency as policies to reduce emissions from burning fossil fuels. Despite uncertainty about the future, these policies can be developed based on estimates of the expected emission reductions; with clear policy targets and timelines (e.g. phase out plan for old-growth logging and slash burning).

Importantly, existing forest conservation carbon projects like the one in the Great Bear Rainforest need ongoing support until transition to new non-offset funding mechanisms can be ensured. Similarly important, First Nations looking for revenue from projects like the one in the GBR need adequate funding in order to allow them to protect forests and seek economic alternatives to logging without feeling forced to sell offsets that could jeopardize the remaining paths towards a stable climate.

We oppose expanding the role of forest carbon offsets at this point of the climate crisis, particularly without limiting the scope and scale of their role or without excluding buyers like fossil fuel industries still seeking expansion of production like BC’s LNG sector. We call on the BC government to strengthen instead of weaken its commitment to reduce real, domestic GHG emissions by at least 80% by 2050

⁴ <https://www.nationalobserver.com/2021/05/07/news/canada-carbon-sink-managed-forests-circling-drain>

⁵ <https://www.climatechangenews.com/2020/12/11/10-myths-net-zero-targets-carbon-offsetting-busted/>

(BC's current goal) while adding a further commitment to net-zero by 2050 (i.e., limiting the use of any offsets or carbon capture options).

All these reforms will require funding but we must avoid calling for mechanisms that would enable greater climate pollution forests can no longer fully absorb, ultimately further impacting these already weakened natural carbon sinks.

Sincerely

Jens Wieting, Senior Forest and Climate Campaigner/Science Advisor, Sierra Club BC