



VIA EMAIL: ENVI@parl.gc.ca

October 24, 2022

Standing Committee on Environment and Sustainable Development
Sixth Floor, 131 Queen Street
House of Commons
Ottawa ON K1A 0A6
Canada

Re: Study of Clean Technologies in Canada – Canada at a Clean Energy Crossroads

Dear Committee Members:

We are pleased that your Committee is undertaking a study of clean technologies to reduce greenhouse gas emissions and other harms to the environment.

We are writing out of concern over Canada's characterization of biomass, the burning of wood for heat and energy, as a clean or low-carbon solution. Claims about biomass' climate neutrality are based in part on an inaccurate accounting of emissions associated with their lifecycle and deployment.

Such a portrayal depends on the assumption that logging to supply biomass is itself carbon-neutral. As a recent [analysis](#) of government data by Nature Canada and the Natural Resources Defense Council recently highlighted, logging in Canada is a high-emitting sector, with net emissions on par with oil sands operations.¹

Unfortunately, the Government of Canada currently does not transparently report emissions associated with logging in its National GHG Inventory, nor does it have a clear action plan to reduce logging emissions in its 2030 Emissions Reduction Plan.

We therefore strongly urge you to ensure that policy decisions related to advancing so-called clean technologies are based on transparent and accurate accounting of the greenhouse gas emissions associated with them, including recognizing that logging is a high emissions sector and that biomass cannot be considered a clean technology given the high net emissions of the logging sector.

¹ Jennifer Skene and Michael Polanyi (2022). [Lost in the Woods: Canada's Hidden Logging Emissions are Equivalent to Those From Oil Sands Operations](#). See also Matthew Bramley and Graham Saul (2022). [What Are the Net Greenhouse Gas Emissions Associated with Logging in Canada?](#)



We further urge you to recommend to the government that it transparently report the net emissions from logging in Canada and take action to reduce GHGs from this high-emitting sector to allow for informed, accurate policy decisions on clean energy and other climate strategies moving forward.

Thank you for considering our submission.

A handwritten signature in black ink, appearing to read "MP Polanyi".

Michael Polanyi, PhD
Policy and Campaign Manager (Nature-based Climate Solutions)