



The Honourable Amarjeet Sohi
Minister of Natural Resources Canada
Government of Canada
580 Booth Street
Ottawa, ON K1A 0E4

October 25, 2018

Dear Minister Sohi:

We are alarmed by the Forest Products Association of Canada's (FPAC) September report claiming their caribou efforts represent leadership on woodland caribou conservation. FPAC's initiatives are insufficient to ensure the long-term survival of woodland caribou, and do not address the urgent need for comprehensive caribou habitat range protection outlined in the federal boreal caribou Recovery Strategy. We urge you not to allow FPAC's ongoing messaging tactics to distract from the substantial work still needed to effectively protect caribou habitat. We ask your government to continue to work with Indigenous leaders, provinces, territories, scientists, conservation organizations, and companies that recognize the threat of habitat disturbance, to establish protections that satisfy the habitat requirements for self-sustaining caribou populations outlined in the federal Recovery Strategy.

Over the last few years, FPAC has misrepresented scientific studies on the causes of caribou declines and introduced misleading information into policy discourse. For example, FPAC has significantly downplayed the impact that forestry has on caribou.¹ FPAC's messaging has cast doubt upon the peer-reviewed science that serves as the basis for the federal government's caribou Recovery Strategy, and which highlights the critical role that habitat loss plays in boreal caribou decline. These actions have caused public confusion and compelled expert caribou scientists to correct misinformation disseminated by FPAC.²

12 caribou scientists published a response to some of FPAC's most egregious claims in September 2017. They noted that an overwhelming body of evidence indicates a clear link between boreal caribou habitat degradation and population decline. This science, supported by decades of research, is the basis for the federal boreal caribou Recovery Strategy. As the science behind the Recovery Strategy indicates, caribou require a minimum of 65% undisturbed habitat to have even a 60% chance of long-term survival.³ Therefore, a conservation plan that falls short of meeting this habitat protection threshold is insufficient.

¹ Forest Products Association of Canada, "The Facts," <http://www.cariboufacts.ca/facts> (accessed October 5, 2018).

² "Re: Response from scientists to claims made by the Forest Products Association of Canada regarding the scientific underpinnings of the federal Boreal Caribou Recovery Strategy," *The Globe and Mail*, September 22, 2017, <https://www.theglobeandmail.com/news/national/article36794694.ece/BINARY/scientists-letter-caribou.pdf>.

³ Environment Canada, *Recovery Strategy for the Woodland Caribou (Rangifer tarandus caribou)*, Boreal Population, in Canada, Species at Risk Act Recovery Series (2012), https://www.registrelep-sararegistry.gc.ca/document/default_e.cfm?documentID=2253.

None of the initiatives FPAC promotes in this new report adopt the large-scale habitat protections that would achieve the science-based habitat thresholds required for caribou recovery. Instead, FPAC points to measures that do little to prevent the growing industrial footprint from exceeding 35% disturbance in caribou ranges or recover those that have already exceeded this level of degradation.

FPAC's report has an extensive focus on new scientific studies. While valuable, these studies do not undermine the scientific consensus confirming the immediate need for range protections. As the federal government found last year, caribou populations continue to decline, and some herds are down to their last few individuals.⁴ With a strong scientific agreement around habitat degradation's primary role in this decline, additional research into issues like nutrition should not be used as a basis for delaying critically urgent habitat protections.

We trust that the federal government does not consider the actions in FPAC's report as equivalent to legally sufficient habitat protections. As provinces have not adopted any enforceable protection measures since the previous report released in April, we expect that in the federal government's second Section 63 report due this month the evidence will show that boreal caribou habitat remains unprotected across all provinces. We also ask the federal government not to support or promote FPAC's campaigns to undermine sound caribou science, and to make any continued support for FPAC contingent on its alignment with the goals of the *Species at Risk Act (SARA)*.

We ask the federal government to swiftly implement the goals outlined in the Recovery Strategy, working with Indigenous Peoples, scientists, conservation organizations, provinces, territories, and industry leaders on caribou protection, to develop and adopt policies consistent with SARA. Such policies should lead to the immediate creation of large-scale caribou habitat protection and enforceable recovery plans. Where provinces and territories fail to implement habitat protections, the federal government should step in to safeguard this habitat until provincial solutions are enacted.

FPAC's report attempts to downplay the urgency of implementing legally sufficient range plans and immediately halting degradation in ranges that exceed 35% disturbance. The federal government should not be misled by this report and should swiftly work to achieve a more sustainable economic future, driven by sound science, including Indigenous knowledge.

Sincerely,



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Rachel Plotkin
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⁴ Environment Canada, *Report on the Progress of Recovery Strategy Implementation for the Woodland Caribou (Rangifer tarandus caribou), Boreal Population in Canada for the Period 2012-2017*, Species at Risk Act Recovery Strategy Series (2017), <http://registrelep-sararegistry.gc.ca/default.asp?lang=En&n=7037FCE4-1>.

cc: Paul Lefebvre, Parliamentary Secretary to the Minister of Natural Resources
Christyne Tremblay, Natural Resources Canada Deputy Minister
Beth MacNeil, Canadian Forest Service Assistant Deputy Minister
Erin Flanagan, Natural Resources Canada Director of Policy