Missing Indicators Brief

State of the Forest (2026)



Ontario Nature · David Suzuki Foundation · Nature Canada · NRDC · Sierra Club Canada · Wilderness Committee · Nature Québec · Sierra Club BC

Canada is a signatory to several international agreements—including the Kunming–Montreal Global Biodiversity Framework, the Paris Agreement, and the U.N. Declaration on the Rights of Indigenous Peoples (UNDRIP)—that require reporting on alignment with global biodiversity, climate and Indigenous governance goals.[1] The Government of Canada has reaffirmed these commitments in its 2026 report *A Force of Nature: Canada's Strategy to Protect Nature*. Canada is also a signatory to voluntary, non-treaty frameworks such as the Montreal Process, which provide a shared set of indicators to measure and report on the sustainable forest ecosystem management in temperate and boreal forests.[2]

Canada's annual State of the Forest report has been identified as a key part of substantiating its claims about the sustainable use of forests by providing public transparency on the condition and trends of forests across Canada.[3] However, this reporting tends to rely primarily on economic and forestry-sector-focused indicators, such as the productivity of forests, employment and harvest levels. It places its emphasis on natural disturbance, rather than anthropogenic disturbance. As described in *Accountability… or Advertising? A Critical Review of Canada's State of the Forests Report*, key indicators relating to environmental values and Indigenous rights are missing or minimized in federal reporting.[4]

This brief presents six indicators that are not currently reported upon in Canada's State of the Forest report but would provide additional rigour and accountability: the remaining area of old-growth forests, the remaining area of primary forests, the amount of protected areas, the integration of UNDRIP into provincial forestry laws, the disturbance levels for at-risk boreal woodland caribou, and net greenhouse gas (GHG) emissions from forestry. By focusing on these six indicators—each central to biodiversity, climate resilience, Indigenous rights, and a range of environmental benefits such as clean air and water—this brief provides a more comprehensive picture of the impacts of forest management on environmental and social indicators than what is currently presented in federal reporting.

The data is available–these additional indicators could be monitored by and reported upon by Natural Resources Canada to ensure a more unbiased and evidence-based lens when considering whether Canada is meeting its goals and commitments to sustainability, reconciliation, and long-term ecological integrity.

Recommended Indicators and Initial Findings:

- **Recommended Indicator 1 – Old-growth Forests:** There is widespread decline in old-growth forests across Canada. British Columbia best illustrates the urgency to halt further decline. Only 15 percent of the estimated original old-growth has protection (and a much smaller fraction of productive old growth with big trees).
- **Recommended Indicator 2 – Primary Forests:** Canada does not track the extent or loss of primary forests annually, though its sampling studies suggest that it is losing up to 1.3 million hectares (ha) of primary forest each year.
- **Recommended Indicator 3 – Protected Areas:** Canada has only protected 14 percent of terrestrial lands and 9 percent of forests, far short of its commitment to protect 30 percent by 2030.
- **Recommended Indicator 4 – UNDRIP:** There is limited alignment of provincial forestry laws with the UNDRIP.
- **Recommended Indicator 5 – Boreal Caribou:** Forest degradation in caribou habitat is ongoing and often increasing; all provinces with boreal caribou have some ranges that exceed the maximum federal range disturbance threshold of 35% needed to support stable populations.
- **Recommended Indicator 6 – Forestry Sector GHG Emissions:** Major greenhouse gas (GHG) accounting gaps underestimate forestry-sector emissions by more than 140 Mt and preclude consideration of policies that would protect and enhance forest carbon stores.



Recommended Indicator 1:

Report on changes to area covered by old-growth forests over time.

Photo credit: Mya Van Woudenberg/Sierra Club BC

Old-growth forests have declined across Canada as industrial logging has preferentially targeted mature and old-growth trees. This has led to a coinciding reduction in the extent of forests that retain the structure, age diversity, and ecological function that would be expected if these forests were not logged.[5] These losses matter because old-growth forests provide critical habitat for species that depend on them, long-term carbon storage, cultural and spiritual values, and ecosystem stability that younger, managed forests cannot replicate on meaningful timescales. Nowhere is this more evident than in British Columbia (BC), where a recent state of the forest report, with a focus on old-growth, shows that the province has retained only a small fraction of the most productive, big-tree ecosystems, making BC a focal point for understanding both the urgency and complexity of old-growth conservation in Canada.

Example: Old-Growth in BC

Old-growth forests in BC are considered ecologically irreplaceable, critical to Indigenous cultures, and globally significant for climate and biodiversity. They supported more than 400 species that depend on old-growth conditions, including at-risk species such as the marbled murrelet, woodland caribou and the now functionally extinct spotted owl.[6] Coastal and inland temperate old-growth rainforest stands in BC also store extraordinary amounts of carbon—for example, up to 1,300 tonnes of carbon per hectare on Vancouver Island—making them among the most carbon-dense ecosystems on Earth.[7]

In BC, without logging, about half of the forested area would be old-growth naturally (using provincial age-class definitions of more than 250 years old in wetter, rarely disturbed ecosystems and more than 140 years old in drier ecosystems with more frequent fire). Today, in BC's heavily logged landscapes, only about one-fifth of the forested area is old-growth.[8]

Forest age alone misses the full story, because ecosystem complexities differ: while highly productive sites grow massive trees and develop complex forest structure relatively quickly, less productive sites support smaller, sparser trees.[9] Big-treed old growth forests are biodiversity hubs, carbon banks and climate change refugia; they are globally rare and important. In BC only 1.5–3.3% of old-growth forests are big-treed old-growth while a disproportionate amount of old-growth forests in protected areas support smaller, sparser trees, leaving the remaining amount of big-tree old growth open to logging.[10]

The authors of the report *Closer to the Brink: The State of the Forest in BC* in 2025 found that the province has currently only protected 15 percent of the estimated historic amount of old-growth and the strength of the protection measure is variable (see Figure 1).[11]

The report shows that protecting at least 30 percent of the historical amount of old-growth, which would align with the international goal of 30% terrestrial protection by 2030, requires protection of an additional 15 percent, approximately 4.3 million ha, which should focus on the highest risk, highly productive old-growth forest to address ecosystem representation.[12]

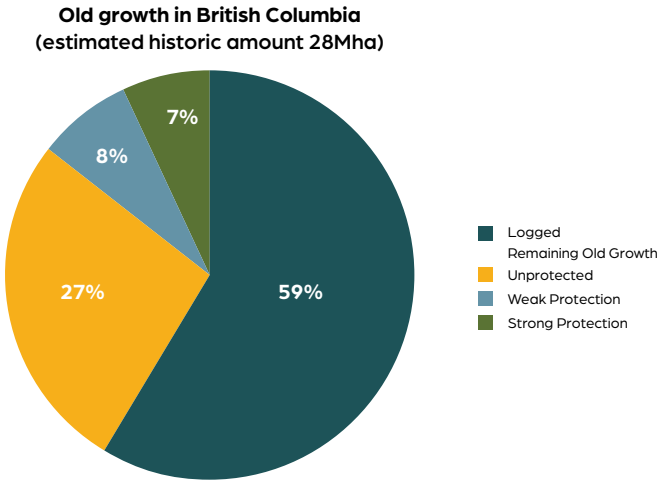


Figure 1: *The majority of the estimated historic amount of old-growth in BC has already been logged. Only a fraction has strong protection, and most of what remains standing is unprotected (% values rounded up).*



Recommended Indicator 2:

Report on changes to forested area covered by primary forests and cumulative trends in the loss of primary forests.

Photo credit: Mya Van Woudenberg/Sierra Club BC

Primary forests are complex ecosystems that show no sign of industrial-scale land uses such as logging, mining, human-caused fires, dams, and road construction.[13] They generally support more biodiversity, store more carbon, and have greater resilience against climate change and other stressors than more simplified secondary forest ecosystems.[14] Reporting on primary forests is a key tool for tracking Canada's progress toward meeting international commitments to halt and reverse forest degradation.

While primary forests not part of Canada's annual State of the Forest report, Canada's Forest Resources Assessment submissions to the U.N. Food and Agriculture Organization (FAO) rely on Canada's National Forest Inventory (NFI), which is a sample-based, statistically representative monitoring system covering approximately 1 percent of the landmass in Canada. Using this approach, Canada reported the amount of primary forest in the 1990 and 2025 reports to the FAO and declared a loss of 22,392,000 ha of primary forest during that time.[15] Additionally, a 2025 NFI report stated an annual loss of 1,317,000 ha of primary forests, on average, across all years in the reporting period (see Table 1).[16]

Of note, about 33 percent of the net decrease in primary forests fell into the category of "multiple causes or unattributed," meaning the plot assessment changed but the NFI could not confidently assign the loss to one cause, because multiple plausible drivers were present or the evidence was insufficient. Unlike deforestation, which is often a single, clear event, primary forest loss typically unfolds through multiple, sequential disturbances: a road built into an intact area, followed by industrial logging, and, later, energy exploration, mining operations, or other developments. Primary forests almost always experience layered disturbance histories rather than one discrete trigger, and under the NFI's system, they often fall into this catchall category (see Figure 2).

Table 1: Decrease in primary forest in Canada, as reported to FAO (1990 to 2025).[17]

Country	Forest area in 2025 (1000s of ha)	Primary forest in 2025 (1000s of ha)	Primary forest in 1990 (1000s of ha)
Canada	369,000[18]	200,316	222,708



***Figure 2**: Spatial distribution of estimated change in primary forest area. Stable areas are represented in gray, declining areas are shown in red. (Source: NFI, 2025; see Figure 12).* [19]



Recommended Indicator 3:

Report on annual and cumulative progress toward meeting Canada's commitment to protect 30 percent of lands and waters by 2030 under the Global Biodiversity Framework.

Photo credit: Mya Van Woudenberg/Sierra Club BC

Canada's protected-areas network has expanded over the past two decades but remains far short of what is required to meet global biodiversity commitments, with approximately 14 percent of land protected currently, including 9 percent of forests (see Figure 3).[20] Reaching the national target of protecting 30 percent of land and inland waters by 2030 means doubling the protected land base in just four years, an unprecedented scale of conservation action that cannot be achieved through small or incremental additions. The most viable pathway lies in large, Indigenous-led, landscape-level initiatives—particularly Indigenous Protected and Conserved Areas, which align conservation with Indigenous rights, title, and stewardship.[21] Significant opportunities also exist across northern boreal and tundra regions, where globally important carbon stores and intact habitats can contribute millions of hectares toward 30 by 30, as well as through major provincial and territorial land-use planning processes in BC, Québec, the Northwest Territories, and Yukon (see Figure 4).

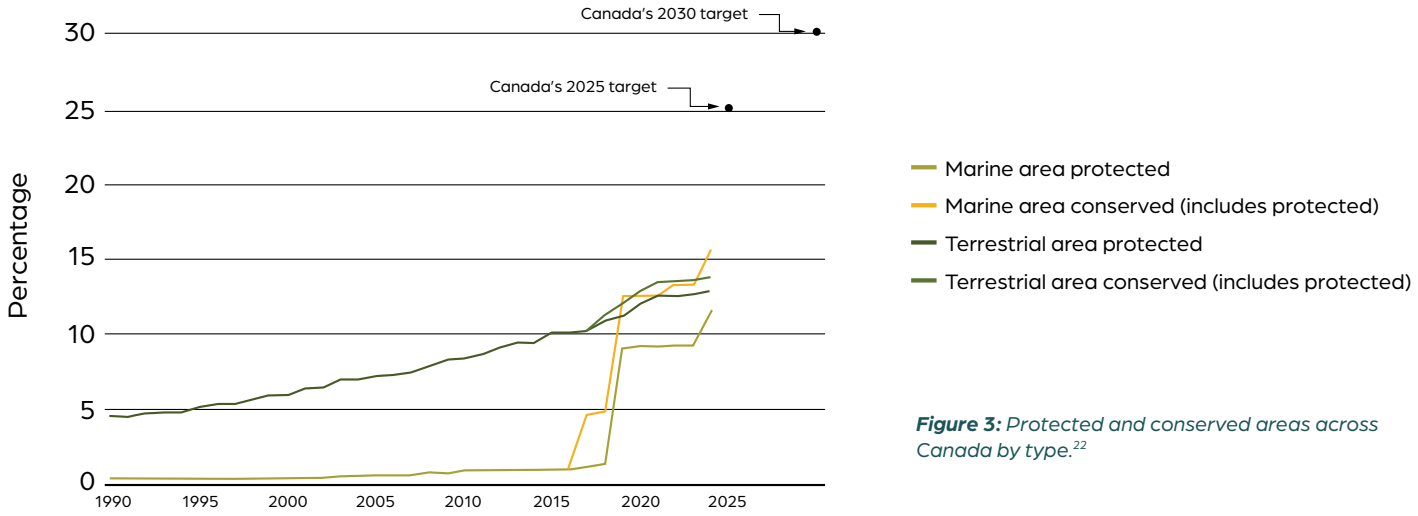


Figure 3: *Protected and conserved areas across Canada by type.*[22]

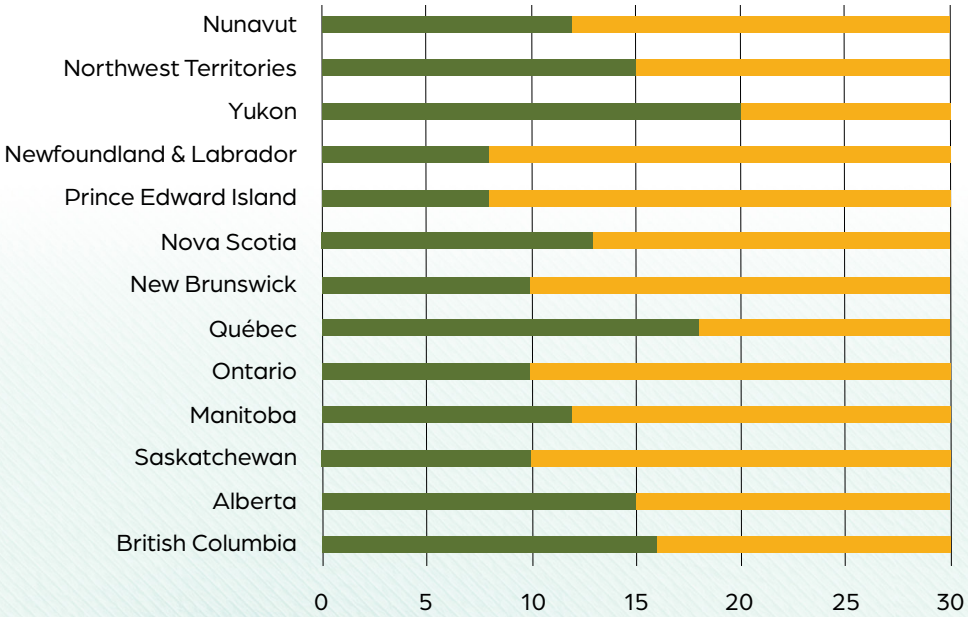


Figure 4: *Protected and conserved areas by province. Green indicates areas protected under provincial or federal legislation, and orange indicates the percentage of protected and conserved areas still needed to meet Canada's 30 by 30 commitment.* [23]



Recommended Indicator 4:

Report on updates to laws and regulations related to forest management that advance alignment with UNDRIP.

Photo credit: Mya Van Woudenberg, Sierra Club BC

Implementing UNDRIP into provincial forest laws across Canada is important because it embeds Indigenous rights, authority, and decision-making power directly into the legal frameworks that govern forest use. This will help ensure that forest management respects free, prior, and informed consent (FPIC); supports co-governance between the Crown and Indigenous Peoples; and leads to more equitable, sustainable, and culturally grounded stewardship of forest ecosystems.

Key provincial legislation related to managing forests on Crown (public) lands in provinces across Canada were assessed—specifically BC's Forest Act, Alberta's Forests Act, Ontario's Crown Forest Sustainability Act, and Québec's Sustainable Forest Development Act—to identify alignment with the standards of UNDRIP, particularly in light of the normative framework established by Canada's UNDRIP Act and similar provincial initiatives.[24] Article 26 of UNDRIP was specifically considered: (1) Indigenous peoples have the right to the lands, territories, and resources that they have traditionally owned, occupied, or otherwise used or acquired, and (2) Indigenous peoples have the right to own, use, develop, and control the lands, territories, and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those which they have otherwise acquired.[25] Article 32 was also considered: Indigenous peoples have the right to determine and develop priorities and strategies for the development or use of their lands or territories and other resources.[26] Note that the federal UNDRIP Act is a framework statute aimed at aligning federal laws and policies with UNDRIP through an action plan and law-reform process. It does not directly amend or compel changes to provincial forestry legislation. Instead, provinces face political and normative pressure but no formal legal obligation to amend their legislation.

No province has amended its forestry statute to directly implement the federal UNDRIP Act, as the federal act applies only to federal laws, not provincial ones (see Table 2). BC is the closest to structural alignment through its 2019 Declaration on the Rights of Indigenous Peoples Act (DRIPA) rather than through amendments to the Forest Act (however, there is significant ongoing critique of DRIPA from First Nations). DRIPA and the 2025 Gitxaala v. BC decision require all provincial laws to be interpreted consistently with UNDRIP. [27] Ontario and Québec show only partial alignment through participation mechanisms rather than rights-based reforms, allowing Indigenous involvement in forest planning but stopping short of FPIC, shared jurisdiction, or guaranteed benefit sharing.[28] Alberta shows the least alignment, as its Forests Act contains no Indigenous-specific provisions and the province has not adopted an UNDRIP-implementation statute (see Table 2).[29]

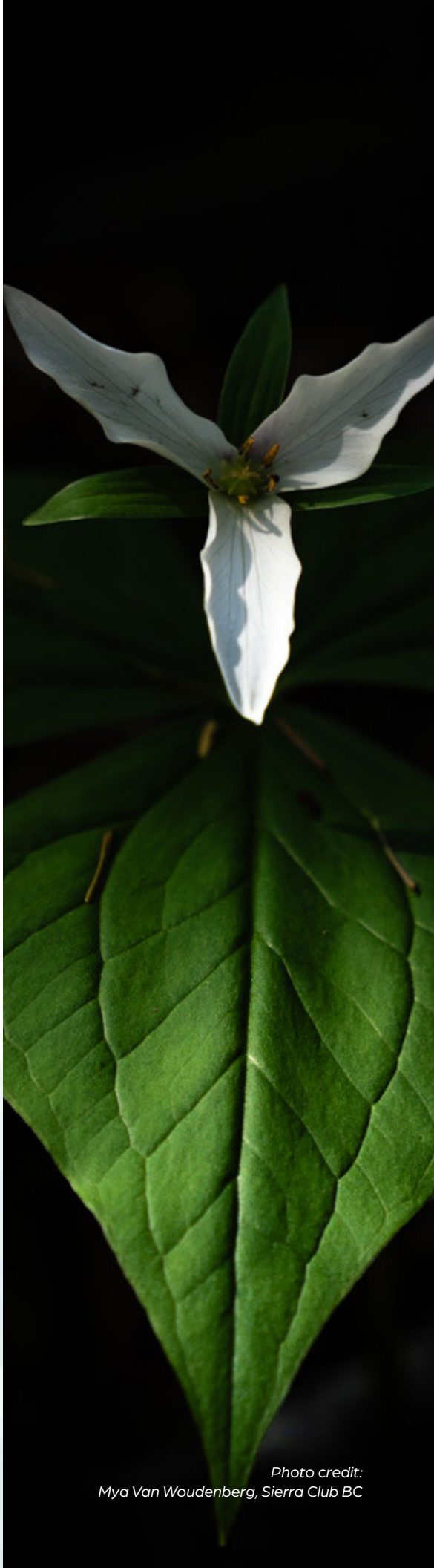


Photo credit:
Mya Van Woudenberg, Sierra Club BC

Table 2: Summary results for provincial forestry laws and UNDRIP requirements.

	Ontario **Crown Forest Sustainability Act**	**Quebec** **Sustainable Forest Development Act**	**British Columbia** **Forest Act**	**Alberta** **Forests Act**
Recognition of Indigenous rights	**Partial** – Non-derogation clause referencing s.35 rights; no explicit UNDRIP framing of rights.[30]	**Partial** – Acknowledges "Native communities" in forest governance but no explicit rights recognition.[31]	**Indirect** – No rights clause in the act; recognition occurs through DRIPA (2019) and Gitxaala (2025), not the act itself. [32]	**Partial** – Act contains no Indigenous rights provisions or non-derogation language. However, Alberta has implemented some frameworks that recognize Indigenous rights.[33]
Free, prior, and informed consent	**No** – Consultation only; FPIC not required.[34]	**No** – Consultation is policy-based; FPIC absent from statute.[35]	**No** – FPIC not in the act; may occur through DRIPA-enabled agreements outside the statute.[36]	**No** – No FPIC provisions; relies on duty-to-consult case law.[37]
Shared decision-making	**Partial (practice-based)** – Agreements with First Nations possible; Crown retains authority.[38]	**Partial (policy-based)** – Participation in planning bodies; shared decision-making not embedded in statute.[39]	**Partial (outside the act)** – Shared decision-making occurs through DRIPA agreements and land-use tables, not the Forest Act.[40]	**No** – No co-management or shared decision-making mechanisms within the Forests Act.[41]
Benefit sharing	**Partial** – Possible through discretionary agreements; not guaranteed.[42]	**Partial** – Adapted management or economic participation possible; no mandated revenue sharing.[43]	**Partial** – Tools like First Nations Woodland licenses support benefit sharing, but it is not required by statute.[44]	**No** – No benefit-sharing mechanisms in the act.[45]
UNDRIP-aligned legislative amendments	**No** – No amendments referencing UNDRIP or federal UNDRIP Act.[46]	**No** – No UNDRIP-driven amendments.[47]	**No** – Recent amendments (e.g., 2023's Bill 41) do not reference UNDRIP; alignment occurs via DRIPA, not statute.[48]	**No** – No amendments related to UNDRIP; last updates unrelated to Indigenous rights.[49]



Recommended Indicator 5:

Report on population trends of mature forest–dependent species at risk, specifically boreal woodland caribou, by province, and disturbance levels by range.

Caribou depend upon large, intact, mature forest stands to survive.[50] Alberta has some of the highest disturbance levels—often above 80 percent—driven by seismic lines, roads, forestry and energy development, and its herds have shown some of the steepest declines.[51] Ontario and Manitoba exhibit moderate to high disturbance and corresponding caribou populations that are declining or of uncertain status.[52] Northern Saskatchewan is the most heavily impacted by wildfire. Québec shows a mixed picture, with southern ranges heavily disturbed and declining, while the northern ranges with lower disturbance remain more stable. In BC, the boreal population is small and fragmented—all of the ranges require intensive recovery actions. Overall, the disturbance threshold has been largely ignored by provinces and has not been incorporated into forest planning practices (see Table 3)

The data below is primarily sourced from the 2024 Report on the Progress of the Recovery Strategy Implementation (Period 2017–2022) and the Action Plan Implementation (Period 2018–2023) for Caribou (*Rangifer tarandus*), Boreal Population, in Canada, and augmented by more recent information where available.[53] "N/A" indicates that the information was not readily available for review.

Table 3: Progress toward boreal woodland caribou federal recovery strategy requirements by province.

Province	**Are range plans completed?**	**Are priority areas for restoration spatially identified?**	**Is the disturbance threshold incorporated into planning policies?**	**Do planning mechanisms for caribou habitat incorporate wildfire projections?**	**Has the province developed a caribou recovery plan with detailed steps and a timeline?**	**Is there logging currently occurring in ranges that have already crossed the disturbance threshold?**
BC	Partially[54]	No[55]	No[56]	No[57]	Partially[58]	Yes[59]
Alberta	Partially[60]	Partially[61]	No[62]	No[63]	No[64]	Yes[65]
Saskatchewan	Partially[66]	No[67]	Partially[68]	N/A	No[69]	Yes
Manitoba	No[70]	N/A	N/A	N/A	N/A	Yes
Ontario	No	No[71]	No[72]	N/A	No[73]	Yes
Quebec	No	Partially	No	N/A	N/A[74]	Partially
Newfoundland and Labrador	No[75]	N/A	N/A	N/A	N/A	N/A



Recommended Indicator 6:

Report both GHG emissions and sequestration associated with forest management activities.

Photo credit: Mya Van Woudenberg, Sierra Club BC

Canada's current approach to forest sector GHG reporting reflects significant transparency and accounting gaps that obscure the true impact of emissions directly attributable to human activities, thereby foreclosing opportunities to consider policies and practices that would enhance the carbon storage and sequestration in forests. Specifically, emissions and removals directly caused by human activities – particularly industrial logging – remain unreported as a separate category, despite repeated recommendations from the Auditor General of Canada, limiting public understanding of industrial forestry's climate impact.[76] While Canada reports emissions from "harvested wood products" in its GHG Inventory (i.e., including emissions released when harvested wood is burned or reaches the end of its lifespan), it combines this number and the net post-logging forest emissions, with a massive 'forest land sink.' This sink includes carbon removals from never-before logged areas that are not reasonably attributable to the logging industry. In essence, Canada is offsetting emissions from logging with "credit" from forests it has not cut. In 2022, Canada categorized as anthropogenic 129 Mt of carbon dioxide removals from trees in primary forests, even though the tree growth creating this sink is attributable primarily to natural, not human, causes.

Canada's approach to reporting forest carbon emissions in its State of the Forest Report similarly obscures direct emissions from human activities. Here Canada reports on both net greenhouse gas flux – which in includes all emissions and removals from both natural and human causes, and a category it calls net emissions in areas subject to human activities.[77] This category combines emissions and removals from human activities – emissions associated with logging and carbon sequestration from forests that have been previously logged – with natural removals – carbon sequestration from natural forests that have no history of being harvested.[78]

This approach obscures the direct human drivers of forest carbon emissions and limits the policies and management practices that could protect and enhance forest carbon stores.[79] It is important for Canada to report on emissions and removals from human activities, but doing so accurately and transparently requires excluding both the natural carbon emissions and removals of natural forests with no history of harvest.

Using the methodology described in Bysouth et al. (2024), net logging emissions for 2022 were 147 Mt CO2e (see Figure 5 for same analysis from 2005 to 2022).

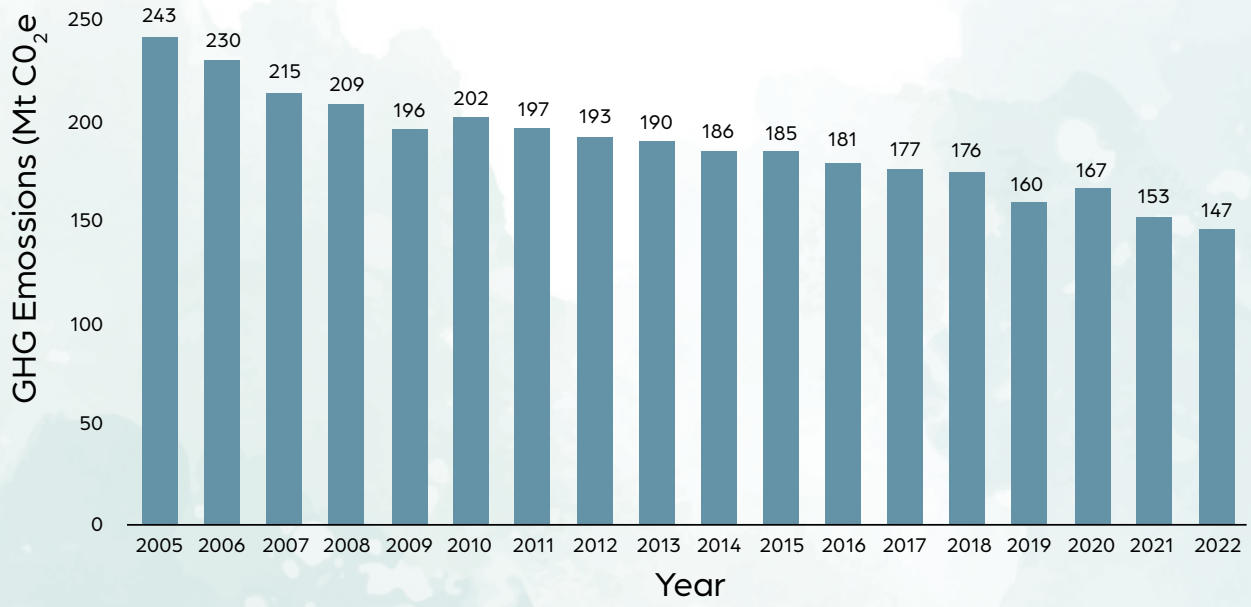


Figure 5: *Net logging emissions 2005–2022 using the method described in Bysouth et al. (2024).* [80]

Summary

Canada's forest-governance system cannot credibly claim sustainability while omitting core evidence about ecological integrity, Indigenous rights, and climate impacts. The six missing indicators highlighted in this brief—old-growth loss, primary-forest decline, insufficient permanent protection of lands and waters, weak UNDRIP alignment with forestry laws, worsening caribou habitat disturbance and population decline, and major GHG accounting gaps—demonstrate that federal reporting still presents an incomplete and distorted picture of forest conditions. Key indicators relating to environmental values and Indigenous rights are missing or minimized, and the data needed to correct this gap already exists. By integrating these indicators into its Canada's State of the Forest annual reporting, Natural Resources Canada could provide a more transparent, evidence-based, and accountable assessment of whether Canada is truly meeting its commitments to biodiversity, climate action, and reconciliation. Doing so would shift the State of the Forest report from a narrow sectoral snapshot to a credible sustainability assessment capable of guiding policy, supporting Indigenous leadership, and safeguarding the long-term health of Canada's forests.



Photo credit: Mya Van Woudenberg, Sierra Club BC

Endnotes

[1] Canada's national biodiversity strategy provides a plan to implement the Convention on Biological Diversity's Global Biodiversity Framework (GBF) domestically, including actions on forest conservation, restoration, and sustainable management. Target 3 of the GBF requires conserving 30 percent of terrestrial and marine areas by 2030. For Canada, this involves expanding protected areas in forest regions, including boreal, temperate, and coastal rainforests (Government of Canada, "Canada's 2030 Nature Strategy," last modified March 20, 2026, https://www.canada.ca/en/environment-climate-change/services/biodiversity/2030-nature-strategy.html); Canada's nationally determined contributions under the Paris Agreement, part of the U.N. Framework Convention on Climate Change (UNFCCC), includes accounting for emissions and removals from land use, land-use change, and forestry; U.N. Climate Change, "United Nations Framework Convention on Climate Change," accessed June 14, 2026, https://unfccc.int/process-and-meetings/united-nations-framework-convention-on-climate-change.

[2] The Montréal Process, "Criteria and Indicators," accessed June 4, 2026, https://montreal-process.org/The_Montreal_Process/Criteria_and_Indicators/index.shtml; United Nations Climate Change Conference (COP26). "Glasgow Leaders' Declaration on Forests and Land Use." November 2, 2021. https://www.politico.eu/wp-content/uploads/2021/11/02/20211007_Glasgow-Leaders-Declaration-on-Forests-and-Land-Use-1.pdf.

[3] Natural Resources Canada, The State of Canada's Forests: Annual Report 2025, Government of Canada, accessed June 4, 2026, https://natural-resources.canada.ca/forests-forestry/state-canada-forests.

[4] David Suzuki Foundation et al., "*Accountability… or Advertising? A Critical Review of Canada's State of the Forests Report*," accessed June 14, 2026, https://stateoftheforest.ca/.

[5] Malcolm, Jay R., Julee J. Boan, and Justina R. Ray. "Emulation or Degradation? Evaluating Forest Management Outcomes in Boreal Northeastern Ontario." Environmental Management 75, no. 8 (2025): 1901–1922. Emulation or Degradation?; Mackey, Brendan, Heather Keith, David Lindenmayer, and Bill Laurance. "Primary Forests: Definition, Status, and Importance for Conservation." Land 13, no. 1 (2024): 6. https://doi.org/10.3390/land13010006; Bergeron, Yves, Sylvie Gauthier, Martin D. Flannigan, and Stephen R.J. Bridge. "Fire Regimes and Forest Dynamics in Canadian Boreal Forests." Forestry 90, no. 2 (2017): 149–161. https://doi.org/10.1093/forestry/cpx022; Boucher, Yan, Dominique Arseneault, Luc Sirois, and Louis Blais. "Logging pattern and landscape changes over the last century at the boreal and deciduous forest transition in Eastern Canada." Landscape Ecology 24, no. 2 (2009): 171–18;. Logging pattern and landscape changes; Cyr, Dominic, Sylvie Gauthier, Yves Bergeron, and Christopher Carcaillet. "Forest management is driving the eastern North American boreal forest outside its natural range of variability." Frontiers in Ecology and the Environment 7, no. 10 (2009): 519–524. https://esajournals.onlinelibrary.wiley.com/doi/abs/10.1890/080088.

[6] Sarah Cox, "B.C. Is Opening Up Old-Growth Spotted Owl Habitat to Logging—Again," The Narwhal, October 26, 2022, https://thenarwhal.ca/spotted-owl-ecojustice-petition/.

[7] Trofymow, J.A., and Bruce A. Blackwell. "Changes in ecosystem mass and carbon distributions in coastal forest chronosequences." Northwest Science 72 (1998): 40–42. https://www.researchgate.net/publication/266741399_Changes_in_Ecosystem_Mass_and_Carbon_Distributions_in_Coastal_Forest_Chronosequences.

[8] Old Growth Technical Advisory Panel, Old Growth Technical Advisory Panel Report: Priority Deferral Areas: An Ecological Approach, Government of BC, November 2021, https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/stewardship/old-growth-forests/summary_for_g2g_package.pdf.

[9] Price, Karen, Rachel F. Holt, and Dave Daust. "Conflicting portrayals of remaining old growth: the British Columbia case." Canadian Journal of Forest Research 51, no. 5 (2021): 742–752. cdnsciencepub.com/doi/pdf/10.1139/cjfr-2020-0453.

[10] Karen Price et al., "Estimating the Amount of British Columbia's 'Big-Treed' Old Growth: Navigating Messy Indicators," Frontiers in Forests and Global Change 5 (2023): 958719, https://www.frontiersin.org/journals/forests-and-global-change/articles/10.3389/ffgc.2022.958719/full; Karen Price and Dave Daust, *Closer to the Brink*: *The State of the Forest in B.C.* in 2025, Sierra Club BC, 2025, https://sierraclub.bc.ca/stories-events/reports-and-publications/bcforests2025/.

[11] Price and Daust, *Closer to the Brink*.

[12] Ibid.

[13] Kormos, C. F., B. Mackey, D. A. DellaSala, N. Kumpe, T. Jaeger, R. A. Mittermeier, and C. Filardi. "Primary forests: definition, status and future prospects for global conservation." The Encyclopedia of the Anthropocene 2 (2018): 31–41. Primary Forests: Definition, Status and Future Prospects for Global Conservation; IUCN. Not All Forests Are Equal. ArcGIS StoryMaps. December 22, 2021. Produced by Corbett Nash, Zoe Williamson, Muneeswaran Mariappan, and Chetan Kumar. https://storymaps.arcgis.com/stories/84cd84dc720641e58b857f0897cfda29; Note: Remaining old-growth forests are usually also primary forests, but not all primary forests are old-growth.

[14] Ibid.

[15] FAO, Global Forest Resources Assessment 2025: Canada, 2025, 14, https://openknowledge.fao.org/items/1e3395bb-3955-472a-a3c6-668253125266.

[16] NFI, Preliminary Attribution of Forest Area, Volume, and Primary Forest Estimates Through the National Forest Inventory Baseline (2000–2006) and First Remeasurement (2007–2017), version 1.0, Canadian Forest Service, Natural Resources Canada, 2025, https://nfi.nfis.org/resources/others/NFI_science_note_July_2025_en.pdf.

[17] FAO, Global Forest Resources Assessment 2025: Canada, 2025, 14, https://openknowledge.fao.org/items/1e3395bb-3955-472a-a3c6-668253125266.

[18] Ibid.

[19] Ibid.

[20] Government of Canada, *A Force of Nature: Canada's Strategy to Protect Nature*, last modified April 29, 2026, https://www.canada.ca/en/services/environment/nature/nature-strategy.html; Natural Resources Canada, The State of Canada's Forest, 4.

[21] Canada Conservation. Indigenous Protected and Conserved Areas (IPCAs). Accessed June 23, 2026. https://canadaconservation.ca/home/indigenous-leadership/ipca.

[22] Government of Canada, "Canada's Conserved Areas," last modified August 28, 2025, https://www.canada.ca/en/environment-climate-change/services/environmental-indicators/conserved-areas.html.

[23] Ibid.

[24] Department of Justice Canada, "Backgrounder: United Nations Declaration on the Rights of Indigenous Peoples Act," Government of Canada, last modified December 10, 2021, https://www.justice.gc.ca/eng/declaration/about-apropos.html.

[25] U.N. General Assembly, Resolution 61/295: United Nations Declaration on the Rights of Indigenous Peoples, September 13, 2007, http://www.un-documents.net/a61r295.htm.

[26] Ibid.

[27] British Columbia, Declaration on the Rights of Indigenous Peoples Act, SBC 2019, c. 44, accessed June 23, 2026, https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/19044; OKT Law, "Gitxaala v. British Columbia: BCCA Finds That UNDRIP Is Part of BC and Canadian Law, and BC's Mineral Claim System Is Inconsistent with UNDRIP," accessed June 23, 2026, https://www.oktlaw.com/gitxaala-v-british-columbia-bcca-finds-that-undrip-is-part-of-bc-and-canadian-law-and-bcs-mineral-claim-system-is-inconsistent-with-undrip/; Province of BC, Forest Act, R.S.B.C. 1996, ch. 157,

accessed June 11, 2026, https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96157_01.
[28.] Province of Ontario, Crown Forest Sustainability Act (CFSA), S.O. 1994, ch. 25, accessed June 11, 2026, https://www.ontario.ca/laws/statute/94c25; Province of Québec, Sustainable Forest Development Act (SFDA), ch. A-18.1, accessed June 11, 2026, https://www.legisquebec.gouv.qc.ca/en/document/cs/A-18.1.
[29.] Province of Alberta, Forests Act, F-22 RSA 2000, accessed June 11, 2026, https://open.alberta.ca/publications/f22.
[30.] Recognition of Aboriginal and treaty rights: Section 6 ("Aboriginal rights") acknowledges that the act does not abrogate or derogate from existing Aboriginal, or treaty rights recognized and affirmed by section 35 of the Constitution Act, 1982.
[31.] The act states that taking account of Indigenous interests is an "integral part of sustainable forest development." This frames First Nations as a component of a provincial management strategy rather than as equal constitutional partners with inherent jurisdiction over their lands, as promoted by UNDRIP. The act "includes provisions specific to Native communities." In practice, this has supported consultation and accommodation within forest planning and tailored arrangements in some regions (e.g., adapted management, agreements, or roles in planning bodies).
[32.] BC's own DRIPA (2019) and the Gitxaala court of appeal decision (2025), which held that DRIPA incorporates UNDRIP into BC law, makes it the interpretive standard for all provincial enactments, including the Forest Act.
[33.] The Alberta government has adopted some requirements that align with Indigenous rights: protocol agreements and the legal duty to consult. Métis Nation of Alberta-Government of Alberta Framework Agreement, February 1, 2017, https://albertametis.com/app/uploads/2021/06/MNA_GoA_Framework-Agreement-Jan.31.pdf.
[34.] The act does not mention FPIC. Ontario relies on the constitutional duty to consult and accommodate, developed in case law. The CFSA does not codify FPIC as a legal requirement before approving forest management plans or licenses. Decisions can proceed without Indigenous consent if the Crown considers consultation adequate, which is below UNDRIP's FPIC standard.
[35.] The SFDA mandates that the minister consult communities and to be aware of their concerns and "accommodate those concerns, if necessary." The act treats accommodation as a discretionary procedural step.
[36.] BC's Forest Act does not require FPIC for issuing, transferring, or authorizing forest tenures because the statute is designed as a resource-allocation framework that vests decision-making authority in the minister rather than in Indigenous governments, and it contains no provisions referencing UNDRIP, FPIC, consent, or shared jurisdiction. Any consultation obligations arise instead from case law—particularly Haida Nation (2004)—which requires the Crown to consult and accommodate but explicitly does not require consent except in cases of proven title, meaning tenure decisions can legally proceed without Indigenous agreement.
[37.] Provisions on forest management plans, local citizens' committees, and forest management boards can include Indigenous participation, but again this is not framed as shared jurisdiction or FPIC, and ultimate decision-making remains Crown-centered.
[38.] No co-management or shared decision-making mechanisms.
[39.] The act still clearly vests ultimate authority with the Province of Québec. It does not recognize Indigenous governments as coequal decision-makers or rights holders with inherent jurisdiction over forests, as UNDRIP requires.
[40.] Shared decision-making is enabled through DRIPA agreements, land-use planning tables, and co-management pilots, not through the Forest Act itself.
[41.] No co-management or shared decision-making mechanisms.
[42.] Enables agreements with First Nations that can include benefit sharing, but there is no statutory requirement or default regime. The CFSA does not structurally embed benefit sharing, revenue sharing, or recognition of Indigenous ownership or title to forest resources; these remain discretionary and negotiated, not guaranteed.
[43.] The SFDA does not itself recognize Indigenous title or ownership of forest lands, nor does it embed revenue sharing or benefit sharing as a default legal requirement. These remain political or contractual, not guaranteed by the legislation.
[44.] Tools like First Nations Woodland licenses can support benefit sharing, but there is no built-in, UNDRIP-framed guarantee of revenue sharing, benefit sharing, or Indigenous ownership of forest tenures in the act itself. These remain negotiated and policy-driven.
[45.] No benefit sharing mechanisms in the act.
[46.] There is no UNDRIP-specific monitoring framework, no requirement to track CFSA implementation against UNDRIP standards, and no dedicated dispute-resolution mechanisms co-designed with Indigenous governments.
[47.] No UNDRIP-driven amendments.
[48.] DRIPA and Gitxaala mean that UNDRIP now functions as an interpretive lens for the Forest Act: When courts, ministries, or tribunals apply the act, they must read it, as far as possible, consistently with UNDRIP standards.
[49.] The act's most recent update (December 15, 2022) contains no UNDRIP-related provisions, and Alberta has not adopted a provincial UNDRIP statute comparable to BC's DRIPA.
[50.] Environment and Climate Change Canada. 2020. Amended Recovery Strategy for the Woodland Caribou (Rangifer tarandus caribou), Boreal population, in Canada. Species at Risk Act Recovery Strategy Series. Environment and Climate Change Canada, Ottawa. xiii + 143pp.
[51.] Ibid.
[52.] Ibid.
[53.] Environment and Climate Change Canada, Report on the Progress of the Recovery Strategy Implementation (Period 2017–2022) and the Action Plan Implementation (Period 2018–2023) for Caribou (Rangifer tarandus), Boreal Population, in Canada, Government of Canada, 2024, p. 82, https://publications.gc.ca/collections/collection_2024/eccc/En3-4-140-1-2024-eng.pdf.
[54.] According to the 2024 federal Report on the Progress of the Recovery Strategy Implementation, https://publications.gc.ca/collections/collection_2024/eccc/En3-4-140-1-2024-eng.pdf. (Period 2017 to 2022) and the Action Plan Implementation (Period 2018 to 2023) for Caribou (Rangifer tarandus), Boreal Population, in Canada, The Boreal Caribou Protection and Recovery Plan (BCPRP), released in 2023, does not cover the BC portion of the Chinchaga herd.
[55.] According to the 2024 federal boreal caribou recovery strategy report, BC "does not spatially and temporally identify areas that are going to be restored, nor confirm whether future undisturbed habitats will possess biophysical attributes." Environment and Climate Change Canada, Report on the Progress of the Recovery Strategy Implementation (Period 2017–2022) and the Action Plan Implementation (Period 2018–2023) for Caribou (Rangifer tarandus), Boreal Population, in Canada, Government of Canada, 2024, 82.
[56.] The draft boreal caribou protection and recovery plan "includes a target to increase undisturbed habitat from 9% to >63% in the entire area within a 40-year timeframe, with targets of between >52% and >65% undisturbed habitat for each range." Environment and Climate Change Canada, Report on the Progress, 81–82.
[57.] BC "does not project anticipated wildfire impacts, nor account for how the likelihood of significant wildfire will affect short-term progress (but caribou habitat and protection information will inform regional wildfire response plans)." Environment and Climate Change Canada, Report on the Progress, 82.
[58.] The recovery plan includes descriptions of but not expected habitat for each range over 40 years, with focus on core areas (vs. entire range); does not include incremental, short-term progress of habitat restoration/projected decrease in undisturbed habitat." Environment and Climate Change Canada, Report on the Progress, 81–82.
[59.] Wolfgang Depner, "B.C. Approved Logging in Threatened Caribou Habitat Despite Provincial Recommendation Against It," CBC News, May 16, 2026, https://www.cbc.ca/news/canada/british-columbia/b-c-logging-caribou-habitat-9.7202598.
[60.] To date, two sub-regional plans for boreal caribou have been completed and three more are in progress; planning has not yet been initiated for the

seven remaining boreal ranges. Environment and Climate Change Canada, Report on the Progress, 15.
[61.] According to the 2024 federal Report on the Progress of the Recovery Strategy Implementation (Period 2017 to 2022) and the Action Plan Implementation (Period 2018 to 2023) for Caribou (Rangifer tarandus), Boreal Population, in Canada, the "Bistcho and Cold Lake: Spatially identify areas to be restored to an undisturbed state and projections of habitat containing biophysical attributes in the CHRAs; identify timelines for habitat restoration activities, but do not include any spatially explicit information on priority restoration", 79 [Note that the Cold Lake plan has since been discarded, and the range has been incorporated into a larger, weaker plan—see https://cpawsnab.org/all-news/albertas-caribou-get-another-lump-of-coal-in-their-stockings.
[62.] Alberta references the disturbance threshold but falls short of meeting it in a reasonable timeframe. For example, with respect to the Bistcho Lake plan: "The CHRA does not project an increase in total undisturbed habitat before year 80." Environment and Climate Change Canada, Report on the Progress, 79.
[63.] The Bistcho Lake and Cold Lake subregional plans in Alberta "do not project anticipated wildfire impacts but indicate that an adaptive management approach will be used to integrate wildfire impacts as they occur." Environment and Climate Change Canada, Report on the Progress, 80.
[64.] The province has outlined "regulations that will direct and guide decision-makers and project proponents, but content is reflected as concepts that require further drafting. Additional steps are required for measures to become legally binding instruments that will prevent destruction of critical habitat." Environment and Climate Change Canada, Report on the Progress, 79.
[65.] For example, the South Athabasca plan allows for harvesting to continue South Athabasca Sub-regional Plan engagement. Province of Alberta. https://www.alberta.ca/south-athabasca-sub-regional-plan-engagement.
[66.] Province of Saskatchewan, Range Plan for Woodland Caribou in Saskatchewan, July 2019, https://www.saskatchewan.ca/business/environmental-protection-and-sustainability/wildlife-and-conservation/wildlife-species-at-risk/woodland-caribou-program/range-planning#sk2-central-range-plan.
[67.] "Tier 2 Caribou Habitat Management Areas are prioritized for habitat restoration but specific areas within the CHMAs to be restored to an undisturbed state are not currently identified, nor is it confirmed whether future undisturbed habitats will possess biophysical attributes." Environment and Climate Change Canada, Report on the Progress, 24.
[68.] Province of Saskatchewan, Range Plan.
[69.] The province has outlined "regulations that will direct and guide decision-makers and project proponents, but content is reflected as concepts that require further drafting. Additional steps are required for measures to become legally binding instruments that will prevent destruction of critical habitat." Environment and Climate Change Canada, Report on the Progress, 79.
[70.] In Manitoba, "acceleration of range plan development—which is delayed relative to agreement timelines—and implementation to maintain or achieve habitat targets will be key to supporting self-sustaining local populations across the province." Environment and Climate Change Canada, Report on the Progress, 31.
[71.] Ontario "does not include habitat restoration strategies." Environment and Climate Change Canada, Report on the Progress, 83.
[72.] Ontario "does not set a goal to maintain or achieve an explicit, range-scale minimum threshold of undisturbed habitat." Environment and Climate Change Canada, Report on the Progress, 83.
[73.] Ontario states that it is working on developing a methodology to identify priority restoration areas: "Under Conservation Measure 2.1 Habitat Restoration Initiative a methodology has been developed, and work is underway to identify priority areas for habitat restoration." Ministry of the Environment, Conservation, and Parks, 2024–2025 Annual Report on the Implementation of the Canada-Ontario Agreement for the Conservation of Caribou, Boreal Population in Ontario, Government of Ontario, May 5, 2026, https://www.ontario.ca/page/2024-2025-annual-report-implementation-canada-ontario-agreement-conservation-caribou-boreal#section-1.
[74.] "A comprehensive Caribou Strategy is urgently needed to outline landscape-level approaches to managing habitat in a way that supports self-sustaining local populations, especially in ranges with very high levels of habitat disturbance." Environment and Climate Change Canada, Report on the Progress, 45.
[75.] "The Government of Newfoundland and Labrador developed a work plan and drafted a framework to initiate range planning in June 2022. A range plan (covering all ranges) is currently being drafted in collaboration with Indigenous groups in Labrador." Environment and Climate Change Canada, Report on the Progress, 51.
[76.] Office of the Auditor General of Canada.
[77.] Natural Resources Canada, The State of Canada's Forests: Annual Report 2025, Government of Canada, 75–77, accessed October 19, 2026, https://naturalresources.canada.ca/forests-forestry/state-canada-forests.
[78.] Ibid.
[79.] Nature Canada, Natural Resources Defense Council, and Nature Québec. 2024 Logging Emissions Update: Reported Greenhouse Gas (GHG) Emissions from Logging in Canada Double After Revision to Government Data. September 2024. https://naturecanada.ca/wp-content/uploads/2024/09/2024-Logging-Emissions-Update-Report.pdf.
[80.] Bysouth, David, Julee Boan, Jay Malcolm, and Anthony Taylor. "High emissions or carbon neutral? Inclusion of "anthropogenic" forest sinks leads to underreporting of forestry emissions." Frontiers in Forests and Global Change 6 (2024): 1297301.