

FEEDBACK FORM

(Please return by 16 July 2019)

**PUBLIC CONSULTATION ON MALAYSIAN CRITERIA AND INDICATORS FOR
FOREST MANAGEMENT CERTIFICATION – ENQUIRY DRAFT**

20 MAY 2019 – 19 JULY 2019

Malaysian Timber Certification Council

C-8-5, Block C, Megan Avenue 2, No. 12, Jalan Yap Kwan Seng, 50450 Kuala Lumpur

Tel. : 03-2161 2298

Faks : 03-2161 2293

Emel : siti@mtcc.com.my / melvin@mtcc.com.my

1. General Comments

The Sustainable Forest Management Licence Agreement (SFMLA) when promulgated in 1997 has already satisfied the criterion 6.11 for Sabah Forestry context. The cut-off date i.e. 31 December 2010 is concerned with conversion or execution of planting. In the local context (tropical forest but not temperate), resources and knowledge, skill and abilities, as well as research on the species and the variety thereof are lacking. The cut-off date prejudices the tropical forest company, which are in developing countries, as compared to those temperate tree plantation entities in developed countries, which have a longer period of establishment, less species diversity, more research going into few species. The cut-off date affects them less than it affects us.

.....

.....

.....

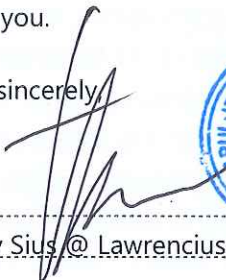
2. Specific Comments

Principle / Criterion / Indicator / Verifier	Proposal for amendment / deletion / addition	Reasons for proposed amendment / deletion / addition
Criterion 6.10 and 6.11	Propose to delete " <i>Plantation established in areas converted from natural forests after 31 December 2010 is not eligible for certification unless it fulfils the requirements stipulated under Criterion 6.11.</i>	Not suitable for Sabah context as Sabah Forestry has identify/zone its Forest Reserve into Natural Forest Management (NFM) and Industrial Tree Plantation (ITP) beside Conservation Area, thus compliance of 6.11 is already fulfilled when the SFMLA was promulgated.

		<p>the non-eligibility after 31.Dec.2010 prejudices those companies that are slow in converting their ITP due to funding, technical skills, abilities and knowledge, conditions which generally local companies face. This is particularly acute where for ITP development in tropical forest, where development is still patchy and fairly new due to those handicaps mentioned.</p> <p>Due to the reason as above, the Criterion will not helping to support and encourage for FMU in Sabah to support forest plantation certification.</p>
--	--	---

Thank you.

Yours sincerely,



(Teddy Sius @ Lawrencius)

Date: 16 July 2019