FEEDBACK FORM
(Please return by 19 July 2019)

PUBLIC CONSULTATION ON MALAYSIAN CRITERIA AND INDICATORS FOR
FOREST MANAGEMENT CERTIFICATION – ENQUIRY DRAFT
20 MAY 2019 – 19 JULY 2019

To: Malaysian Timber Certification Council
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Sarawak Timber Association (STA) wishes to submit its feedback on the Enquiry Draft
Version of the Malaysian Criteria and Indicators for Forest Management Certification or
MC&I Forest Management Certification. Our feedback are as following:

1. General Comments

   Certification (MPGSFMC)

   The MPGSFMC or so-called “The Green Book” consists of twelve (12) different
   manual, procedures and guidelines. It has been quoted as a verifier without
   reference to any particular manual, procedures or guidelines in indicators 3.3.1,
   5.1.2, 5.3.1, 5.5.1, 5.5.2, 6.2.1, 6.2.2, 6.3.2, 6.5.1, 6.5.2, 6.5.3, 6.5.4, 8.1.1 and
   9.1.1. Therefore, to avoid confusion / misinterpretation, the specific manual or
   procedures or guidelines (as contained in the MPGSFMC) that should be quoted
   on a verifier for the indicator must be clearly stated.

b. Internal Audit

   Internal audit, management review and action plan should be internal processes
   carried out by the FMU owner based on her capabilities and resources available
   and at the discretion of the FMU management. Therefore, requirement of its
   implementation as indicated in Appendix A should be simplified and reduced in
   scope and that the negative results arising from the internal audit and
   management review should not be used as a yardstick for the issue of non
   conformity report during certification audits.
2. Specific Comments

<table>
<thead>
<tr>
<th>Principle / Criterion / Indicator / Verifier</th>
<th>Proposal for amendment / deletion / addition</th>
<th>Reasons for proposed amendment / deletion / addition</th>
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<tr>
<td>Indicator 5.3.2 - Regular training shall be conducted for the staff on techniques of reduced-impact-logging.</td>
<td>To remove the word “regular”.</td>
<td>Training frequency shall be based on the necessity and operations need.</td>
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| Verifier for Indicator 8.3.1 (NF). | The “Record of Removal Pass (Royalty/Transit)” to be the only verifier for this indicator. | - To be consistent with other Regions.  
- Other listed documents (pre-felling inventory record, record of Daily Production Return, record of log specification for shutout log/forest produce, operational inventory summary sheet) are irrelevant and should be removed. |

Thank you.

Yours sincerely,

[Signature]

BRIAN YEO
Finance & Administration Manager
for Senior Manager

Date: 18 July 2019