## COMPILATION OF COMMENTS RECEIVED FROM REGIONAL STAKEHOLDER CONSULTATIONS ON ENQUIRY DRAFT 2 OF MC&I(FOREST PLANTATIONS)

Principle/ Indicator/ Criteria/ Verifier	Comment Received from Region	Amend/ Delete/ Add/ General	Proponent	Proposal	Reasons for Proposed Amendment / Deletion / Addition / General
	SWK	General	Zedtee Sdn Bhd	To review the Standard formulation procedure and composition of the Standards Review Committee (SRC).	Stakeholders should be given opportunity to comment on standard setting process and procedures, especially with regard to representation of stakeholders in the SRC.
	SWK	General	Zedtee Sdn Bhd	Reorganisation of the Standard. See Proposed Structural framework for MC&I(Forest Management) (Annex I)	There are repetitions in the standard. The format of the standard should be re-organised.
	PM	General	Peninsular Malaysia Stakeholders	Any inconsistencies in wording, spelling and phrases be looked into by the Secretariat and the SRC.	
1.1.1 V	PM	Add	CETDEM	Include "National Climate Change Policy".	To make the listing more comprehensive.
1.1.1 V	PM	Add	Forestry Department Peninsular Malaysia	Relevant sections of a law/regulation be listed in the Verifiers – standardising the level of details to be included in the laws/regulations.	To facilitate the assessment process.
1.1.1 V	PM	Delete	Pahang FD	Inclusion of "Anti-Trafficking in Persons Act 2007" should be reviewed; it is not reflected in any other part of the standard.	The inclusion of the Act may raise concern on possible ambiguity in the interpretation of this requirement, especially in relation to the classification of workers in a forest plantation.
1.1.1 V	SBH	Amend	Avantha Foundation Malaysia	"Anti-Trafficking in Persons Act 2007" to be replaced with  "Immigration Act 1959/63".	<ul> <li>Concerns on the practicality and enforceability of Anti-Trafficking in Persons Act.</li> <li>The Immigration Act would be more appropriate to address the concern of employing illegal immigrants.</li> </ul>
1.1.1 V	PM	Delete	Kelantan FD	Deletion of "Workers Minimum Standards of Housing and Amenities Act 1990".	<ul> <li>The inclusion of Workers Minimum Standards of Housing and Amenities Act 1990 as the Act is more relevant to the agriculture sector where the employers must provide amenities to the workers.</li> <li>For forest plantations in Peninsular Malaysia, most of the areas are located in forest reserves where no land conversion for grazing and livestock rearing is allowed, and that the size and location of the forest plantations may not allow the forest plantation manager to comply with the requirements of the Act.</li> </ul>

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1.1.1 V	SWK	Delete	Sarawak Timber Association	Delete "Worker's Minimum Standards and Housing and Amenities Act 1990".	<ul> <li>Act was intended for other industries</li> <li>Forest plantations involve a vast land area with a small number of workers, and that some of the structures are transient or temporary in nature.</li> </ul>
1.1.1 V	PM	Delete	NIOSH	Deletion of sub-Verifiers under the Occupational Safety and Health Act 1994.	Only the main Act be listed as a Verifier to indicate that all regulations under the Act are applicable.
1.1.1 V	SBH	Amend	WWF-Malaysia	"Asian Elephant Action Plan" to be amended to "Elephant Action Plan 2012-2016".	Correct title of the document.
1.1.1 V	SWK	Add	Sarawak Biodiversity Centre	Include "Sarawak Biodiversity Regulations 2004" as a sub-Verifier under "Biodiversity Act 2007".	<ul> <li>to govern the conduct of research and development in forest areas</li> <li>the regulation stipulates the conditions to conduct research in plantation areas, covering plant species, soil, microbes, water, etc.</li> </ul>
1.1.1 V	SWK	Add	Sarawak Forestry Corporation	To add "A Master Plan for Wildlife in Sarawak" as a Verifier for Sarawak.	Endorsed by the State government as a policy in 1996 to provide guidance for wildlife conservation in Sarawak.
1.1.1 V	SWK	Add	Lands & Survey Sarawak	To include "Interpretation Ordinance (Cap. 61)".	This is the statute that defines "Native of Sarawak".
1.1.2 V	SBH	Amend	Yayasan Sabah	To amend "record and outcome" to "records and outcomes", which should also be applied throughout the standard.	For consistency with 1.1.3.
1.3.1 V	PM	Delete	CETDEM	Delete "Kyoto Protocol to the United Nations Framework Convention on Climate Change 1997".	The only aspect relevant to forest plantation is the Clean Development Mechanism which has not been successful in the context of forestry; and it is outdated.
1.5.1 V	SWK	Add	Lands & Survey Sarawak	To include "Interpretation Ordinance (Cap. 61)".	This is the statute that defines "Native of Sarawak".
1.6.1 V	PM	Amend	Iskandar Regional Development Authority	Delete the phrase "in the form of poster or banner".	Not necessary to specify how such commitment should be communicated.
1.6.2 V	PM	Amend	CETDEM Pahang FD	"Summary of" be deleted and the wording of the Verifier be amended as "Policy statement made available to the public/stakeholders".	The wording was ambiguous and that a "policy statement" would suffice to constitute a summary of commitments.
2.1.1	PM	General	Iskandar Regional Development Authority	Consistency on the term "forest plantation area" or "forest plantation areas".	Need for consistency for this term throughout the standard.

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2.1.1 V	PM	Add	Wildlife Conservation Society	To add "Decision of the Civil Courts pertaining to legal or customary tenure or use rights" as a new Verifier for Peninsular Malaysia.	Similar to Sarawak; e.g. A court case in Johor where the Orang Asli were given compensation on the use of their lands.
2.1.1 V	PM	Amend	Iskandar Regional Development Authority	To add "if any" to the sub-Verifiers under the "State Forest Enactments".	The various permits for entry, road and usage in the context of forest plantations are required <u>if</u> the forest operation route passes through permanent reserved forests.
2.1.1 V	PM	Delete	Pahang FD	Delete the sub-Verifiers under "State Forest Enactments".	"State Forest Enactments" as a Verifier is adequate.
2.1.1 V	SBH	Add	Avantha Foundation Malaysia	To include "All adat recognised and enforceable by the Native Courts, including relevant decisions of the Civil Courts" similar to that of 1.5.1 V.	Some areas might have cultural significance – megalith, oath stone, grave site, sacred grounds, etc. e.g. The adat 'Sumuku' effectively calls for 'Prior Informed Consent' to ascertain the rights of the community to the land.
2.1.1 V	SWK	Add	Lands & Survey Sarawak	To include "Interpretation Ordinance (Cap. 61)".	This is the statute that defines "Native of Sarawak".
2.1.1 V	SWK	Add	Shin Yang	To reinstate "Land title" as a Verifier for Sarawak.	Forest plantation could also be established on private land. Land title would provide evidence of long-term forest use rights to the land.
2.1.2	PM	Amend	UPM	To add "if any" and delete "legally"; Indicator to read "Forest plantation managers shall support legally recognized mechanisms for resolving land claims, if any."	To allow for a broader mechanism in resolving land claims.
2.1.2 V	PM	Amend	UPM	Deletion of "if any" from "Records of participation in the resolution of land claims within Forest Plantation Management Unit".	Following the proposed inclusion of "if any" in the Indicator; "if any" in the Verifier is deemed not necessary.
2.2.1	PM	General	Iskandar Regional Development Authority	Consistency on the term "forest plantation <u>area</u> " or "forest plantation <u>areas</u> ".	Need for consistency for this item throughout the standard.
2.2.1 V	PM	Amend	Forestry Department Peninsular Malaysia	To delete "customary tenure" from "Contractual agreement with local communities with legal or customary tenure or use rights for use of land".	From legal point of view, the Orang Asli has no customary rights within the PRF.
2.1.1 V	SBH	Add	Avantha Foundation Malaysia	To include "All adat recognised and enforceable by the Native Courts, including relevant decisions of the Civil Courts" similar to that of 1.5.1 V.	Some areas might have cultural significance – megalith, oath stone, grave site, sacred grounds, etc. e.g. The adat 'Sumuku' effectively calls for 'Prior Informed Consent' to ascertain the rights of the community to the land.

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2.2.2 V	SWK	Add	Lands & Survey Sarawak	To include "Interpretation Ordinance (Cap. 61)".	This is the statute that defines "Native of Sarawak".
3.1.1 V	PM	Amend	Pahang FD	For Peninsular Malaysia, to delete "customary" from "Decisions of the Civil Courts pertaining to legal or customary tenure or use rights".	For consistency with earlier proposals.
3.1.1 V	PM	Delete	CETDEM	For Peninsular Malaysia, to delete "Records of customary rights of indigenous peoples' lands under the Aboriginal Peoples Act 1954".	Aborigines in Peninsular Malaysia do not have customary rights within PRF.
3.1.1 V	SBH	Add	Sabah Regional Consultation	To include a footnote indicating that FPMP would refer to PDP for Sabah.	To reduce repetitions throughout the standard whenever FPMP is listed as a Verifier.
3.1.1 V	SWK	Add	Lands & Survey Sarawak	To include "Interpretation Ordinance (Cap. 61)".	This is the statute that defines "Native of Sarawak".
3.1.1 V	SBH	Add	Avantha Foundation Malaysia	To include "All adat recognised and enforceable by the Native Courts, including relevant decisions of the Civil Courts" similar to that of 1.5.1 V.	Some areas might have cultural significance – megalith, oath stone, grave site, sacred grounds, etc. e.g. The adat 'Sumuku' effectively calls for 'Prior Informed Consent' to ascertain the rights of the community to the land.
3.1.2 V	PM	Amend	CETDEM	Amend "Records of delegation of power by indigenous peoples" to "Records of delegation of power through consensus by indigenous peoples".	To allow general consensus to be reached prior to decision making.
3.2	SWK	Amend	Zedtee Sdn Bhd	To amend the Criterion to "Forest plantation management establishment shall".	To reflect the stage of development process – not relevant if plantation established.
3.2.1 V	SWK	Delete	Sarawak Timber Association Sarawak Timber Association/Ta Ann	To delete the Verifier "List of species/resources used by indigenous peoples within the FPMU".	<ul> <li>Might create ambiguity during auditing as it may also include species of local vegetables, rattan, bush meat, etc.</li> <li>Too comprehensive for the FPMU manager to document, and would vary across communities/regions.</li> <li>Such a list should only be confined to areas identified as HCVF.</li> </ul>
4.2.5 V	PM	Add	CETDEM	To add specific regulations under the Pesticide Act 1954.	Too general to be listed as a Verifier.
4.4 4.4.2 V	SWK	Amend	Zedtee Sdn Bhd	To delete the word "planning" from both Criterion and Indicator.  Criterion 4.4 – Management planning and operations  Indicator 4.4.2 – Forest plantation planning and management practices	The planning stage should have been done earlier prior to the establishment of the plantation, and would be more appropriately considered under Principle 6.

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4.4.1 V	SWK	Delete	Sarawak Timber Association/Ta Ann	To delete "Minutes of Meeting of the District Action/Development Committee".	<ul> <li>Not applicable as Sarawak does not have such a committee and hence FPMU holders would not be able to have access to such minutes.</li> <li>Occurrence of any conflict could adequately be resolved and assessed through the "Records of meetings and/or consultations between forest plantation manager and affected local communities".</li> <li>The Verifier was meant to be included for Peninsular Malaysia only.</li> </ul>
4.4.1V	SBH	Amend	Avantha Foundation Malaysia	To amend "Report on social impact evaluation" to "Report on social impact assessment".	Common term used by sociologist.
4.5.1 V	SWK	Amend	Sarawak Timber Association	To add the word "plantation" in the Verifier.  "Records of meetings and/or consultations between forest plantation manager and affected local communities."	For consistency.
4.5.2 V	PM	Amend	UPM	To amend the Verifier "Records of outcomes of consultation and negotiation, and outcomes".	Taking into consideration of any on-going processes in resolving grievances.
5.1.1	SBH	Amend	Sabah Regional Consultation	To amend the Indicator as "Investments and reinvestments shall be made in forest plantation management, including for forest plantation administration, research, human resource development, environmental protection, economic, conservation environmental and social aspects, consistent with the tenure of the forest plantation areas".	To simplify.
5.2 5.4	PM	General	Iskandar Regional Development Authority	The fundamental premise of Principle 5 and Criteria 5.2 and 5.4, especially on the context of the size of forest plantations and the requirements for non-timber forest products, should be reviewed.	Certification of forest plantation must take into account the social, economic and environmental concerns; and that management of forest plantations differs from that of natural forests.
5.4.1	PM	General	Iskandar Regional Development Authority	"Non-timber forest resources" should be further deliberated and clarified by the SRC.	
5.5.2 V	SBH	Delete	Yayasan Sabah	Remove "Harvesting Plan" in Verifier.	Annual Work Plan includes Harvesting Plan.

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5.5.2 V	SWK	Delete	Sarawak Timber Association Sarawak Forestry Corporation	To delete "Annual Harvesting Plan" from the Verifier for Sarawak.	It is redundant as the Annual Harvesting Plan is an integral part of the FPMP.
5.6.1 V	SWK	Amend	Sarawak Timber Association	Amend the second Verifier as "Area harvested according to Tree Harvesting Plan".	
5.6.1 V	SWK	Delete	Sarawak Timber Association	Delete "Annual Harvesting Plan" and "Permit to Harvest Coupe (PHC)".	The "Annual Harvesting Plan" and "Permit to Harvest Coupe (PHC)" are included in the "Tree Planting Plan".
6.1	SWK	Amend	Zedtee Sdn Bhd	To add the word "establishment" in the Criterion - " Environmental impacts shall be assessed prior to commencement of forest plantation <u>establishment</u> operations".	To give emphasis when the requirements will come into effect during the plantation development process.
6.1.1 V	SBH	Add	Maxland Sdn Bhd WWF-Malaysia	To include "Environmental Compliance Report (ECR)".  The same Verifier should also be included in other parts of the standard where applicable.	For monitoring purposes.
6.1.1 V	SBH	Amend	WWF-Malaysia	To amend the year of the Environment Protection (Prescribed Activities) (Environmental Impact Assessment) Order 2005 to 2012.	Updated document, to be consistent with 1.1.1 V.
6.1.1 V	SBH	Amend	WWF-Malaysia	To replace "Environmental Impact Assessment (EIA) Guidelines for Logging and Forest Clearance Activities, 2002" to "Environmental Impact Assessment (EIA) Guidelines for Forest Harvesting (Logging) and Forest Plantation Establishment, 2012".	New Guidelines by the Environment Protection Department (EPD Sabah).
6.1.2	PM	Add	Wildlife Conservation Society	To add "Management Plan for Flora" and "Management Plan for Fauna" as new Verifiers for biodiversity conservation.	The EIA may not be adequate in addressing the conservation concerns.
6.1.3 V	SBH	Amend	Sabah Forestry Department	To amend the Verifier to "Plantation Development Plan with mitigation measures for all impacts identified in the Environmental Impact Assessment (EIA) report".	To streamline the verifier as the FPMP is known as PDP in Sabah.
6.2.2 V	SBH	Amend	WWF-Malaysia	"Asian Elephant Action Plan" to be amended as "Elephant Action Plan 2012-2016".	Correct title of document.

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6.2.3	SBH	Amend	Kadazan Dusun Cultural Association	To amend the Indicator by including also the "native society".  The indicator now reads: "Existence of cooperation between forest plantation managers, civil and <u>native</u> societies, research institutions, institutions of higher learning and regulatory authorities in implementing conservation and management activities".	Cooperation with indigenous people should also be considered especially in making specific contributions in terms of sharing knowledge for mapping of biodiversity values, for example.
6.2.4 V	SBH	Amend	Yayasan Sabah Kadazan Dusun Cultural Association	To amend "Prevent" to "Control" in the Verifier.	Control is regarded more appropriate in the context of Sabah.
6.3	SWK	Amend	Samling	To delete "enhanced" and "restored" from Criterion 6.3: "Ecological functions and values shall be maintained, enhanced or restored"	
6.3	SWK	Delete	Zedtee Sdn Bhd	To delete the Criterion.	The Criterion is not applicable to forest plantations, and would be only relevant in the context of regeneration of natural forest areas.
6.3.1	SWK	Amend	Samling	To amend the Indicator to "Availability and implementation …and measures to enhance natural regeneration, where necessary, in forest plantation areas".  Any reference to "measures to enhance natural regeneration" should be deleted.	Not fair for the FPMU to be burdened with the responsibility in "enhancing natural regeneration", which is outside the management scope of the FPMU and not financially or economically viable.
6.4.3 V	SBH	Amend	Yayasan Sabah	To amend the Verifier to "Demarcation on map of the environmentally sensitive area and buffer zone".	The Indicator mentioned buffer zones but this is not reflected in the Verifier.
6.4.3 V	SWK	Delete	Sarawak Timber Association	To delete the Verifier "Demarcation on map of environmentally sensitive area".	The definition of ESA is uncertain in Sarawak.
6.4.3 V	SWK	Amend	Wildlife Conservation Society	To reword the Verifier to "environmentally sensitive areas / terrain 4".	To address the ambiguity of definition of ESA for Sarawak.
6.5.1 V 6.5.2 V 6.5.3 V	PM	Amend	CETDEM	Amend the Verifier "Guidelines for Prevention and Control of Soil Erosion and Siltation in Malaysia, 1996" as "Appropriate guidelines to control soil erosion and siltation".	General requirement for implementation of guidelines to control soil erosion and siltation.
6.5.1 V 6.5.2 V 6.5.3 V	PM	Delete Add	Perak FD	To delete the Verifier "Guidelines for Prevention and Control of Soil Erosion and Siltation in Malaysia, 1996" and to replace it with "EIA report".	EIA report also contains conditions or management prescriptions for erosion prevention and control.

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6.6.1	PM	Add	CETDEM	Include the specific regulations under the Pesticide Act 1954 (see comment made under 4.2.5).	Too general.
6.7.1	PM	Amend	Forestry Department Peninsular Malaysia	To delete "re-cycling" in the Verifier "Standard Operating Procedure on waste disposal and re-cycling-of solid non-organic wastes".	The activity is not conducted by the operators.
6.10.1	SBH	Add	Avantha Foundation Malaysia	To include "Social Impact Assessment (SIA)" as a new Verifier.	There might be communities living adjacent to the Conversion Area.
6.10.1 V	SWK	Delete	Sarawak Timber Association	To delete Verifier "Cost benefit analysis including social aspects".	It is irrelevant and should be deleted.
6.10.2 V	SWK	Delete	Sarawak Timber Association	To delete Verifier "Cost benefit analysis including social aspects".	It is irrelevant and should be deleted.
7.1.1 V	SBH	Amend	Yayasan Sabah	To amend the Indicator by deleting the phrase "prepared in accordance with existing guidelines and the provisions listed in Principle 1" in "Implementation of forest plantation management plan prepared in accordance with existing guidelines and the provisions listed in Principle 1".	Redundant phrase. The content of the Management Plan makes minimal reference to guidelines and provisions listed in Principle 1.
8	SWK	Add	Zedtee Sdn Bhd	The requirements for internal audit and management review should be included in the standard.	An internal audit system is expected to be in place and assessed by the certification bodies during audit. However, this requirement is not reflected in the standard.
8.1.2 V	SBH	Add	Maxland Sdn Bhd WWF-Malaysia	To include "Environmental Compliance Report (ECR)".	For monitoring purposes.
8.2 8.2.1 V	SWK	Delete	Samling Sarawak Timber Association/Ta Ann	To delete item (e) from the Criterion.  The corresponding Verifier "Audited Financial Statement covering item (e)" to be deleted as well.	<ul> <li>The requirement for financial statement to assess cost, productivity and efficiency is indeterminate, notwithstanding that elements for assessing productivity are already included under Criterion 8.1.</li> <li>The audited financial statement only shows the financial health of the company and that the auditors would not be able to assess productivity and efficiency from the statement. Moreover, such information is required to be reflected in a public summary under Criterion 8.5.</li> </ul>

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9	SBH	Amend	Malaysian Nature Society - Sabah	To amend "High Conservation Value Forests" to "High Conservation Value Areas".	To reflect current trend to refer to sites with high conservation value as HCVA as the sites are not limited to 'forests' but include geological features, such as caves, rock formations, etc.
9	SWK	Amend	Sarawak Forestry Corporation	To update the definition of HCV.	The definition of HCVF in the standard should be updated in accordance with the recent update in FSC v5.0 under the "Common Guidance for the Identification of HCV".
9.1.1 V	SWK	Amend	Sarawak Timber Association	To delete the phrase " in the Forest Plantation Management Plan" in the Verifier "Report on the assessment, identification and demarcation on maps of HCVFs in the Forest Plantation Management Plan using guidelines, such as the High Conservation Value Forest (HCVF) Toolkit for Malaysia".	
9.3.1 V	SBH	Comment	Sabah Regional Consultation	Agreed on the inclusion of "where appropriate" in the Verifier	
9.3.1 V	SWK	Amend	Sarawak Timber Association	To add the word "progressively" into the Verifier:  "HCVF areas are mapped and incorporated progressively into the Forest Plantation Management Plan and demarcated on the ground, where appropriate".	
10	PM	Amend	Iskandar Regional Development Authority	Merge Principle 10 into Principles 1-9.	There are some redundancies between Principle 10 and other Principles in the standard. The standard could be simplified to 9 principles.
10	SWK	General	Sarawak Timber Association/Ta Ann	The detailed statements in the Criteria under this Principle should be removed, reworded or transferred into other indicators and verifiers. e.g. Criterion 10.8 is already covered under Principle 8.	Criteria should be simple and concise.
10.1.1 V	SWK	Delete	Sarawak Timber Association	To delete "Annual Harvesting Plan".	The Annual Harvesting Plan is part of the Forest Plantation Management Plan.
10.2.1	PM	Add	CETDEM	To include a new Indicator to promote afforestation.	The standard should also encourage the establishment of forest plantation on degraded non-forest areas.
10.5	SWK	Delete	Zedtee Sdn Bhd	To delete Criterion 10.5.	The license given to the FPMU manager is to establish and manage forest plantation, not to restore the land into natural forest.
10.6.1 V	SWK	Amend	Sarawak Timber Association	To change "Harvesting Plan" to "Forest Plantation Management Plan".	

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10.8	SWK	Amend or Delete	Zedtee Sdn Bhd	To delete Criterion 10.8 and incorporate elements in this Criterion into other relevant parts of the standard.	Criterion 10.8 is too ambitious and overloaded, covering the requirements of 5 principles and a number of the requirements are repetitive.
10.8.1 V	SBH	Add	Maxland Sdn Bhd WWF-Malaysia	To include "Environmental Compliance Report (ECR)"	For monitoring purposes.
10.8.1 V	SWK	Amend	Sarawak Timber Association	To amend the following Verifiers for Sarawak:  - "Annual Harvesting Plan" to "Forest Plantation Management Plan"  - "Monitoring Reports" to "Other monitoring reports, if any".	
Glossary	SWK	Add	Sarawak Forestry Corporation	<ul> <li>Include definition of "scale" in the glossary.</li> <li>To use rare, threatened &amp; endangered (RTE) species rather than endangered, rare and threatened (ERT) species in accordance with the incremental status of protection of the species.</li> </ul>	

## Proposal by Zedtee Sdn Bhd

## **Proposed Structural framework for MC&I (Forest Management)**

