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Dear Mr. Cheah,

Review of the Malaysian Criteria and Indicators for Forest Management Certification (Natural Forest): (i) First Public Comment (16 November 2015 – 15 January 2016)

With reference to your letter dated 13 November 2015.

Herewith we attached GEC's feedback for MC&I (Natural Forest) for your further action.

Thank you.

Yours sincerely,

Faizal Parish
Director

General Comments

In the preparation of this document, one of the current environmental issues / disasters resulting from forest management was not included under the Principle 6 as measures to address it and incorporated with the existing forest management plan. Here are some additional general suggestions for this document:

1. **Include consideration of climate change**

i) Given Malaysia's commitment to enhance measures for mitigation of and adaptation to climate change. Malaysia submitted in November 2015 its "Intended Nationally Determined Contribution (INDC)" to UNFCCC with a target to Reduce greenhouse gas emissions intensity by 45% by 2030. There should be greater emphasis on this in the revised MC&I such as

- Enhanced effort to protect and rebuild carbon-rich mangroves and peat swamps by specific reference to maintaining such critical and fragile ecosystems.
- The carbon stocks in these ecosystems are among the highest of any forest and their destruction results in large emissions of greenhouse gasses. Added emphasis should be placed on rehabilitation of degraded forest land.
- Degradation of mangroves and peat swamps in Malaysia is also leaving communities more vulnerable to storms, forest fires, haze and leading to the loss of wildlife, fish, and biodiversity. These ecosystems should either not be logged or logging intensity reduced significantly or wide internal buffer zones should be established (eg 400m from the coast in the case of mangroves – in line with JPS guidelines on coastal development)

2. **Buffer zone management should be emphasized**
   - Many of the threats to forests are from uncontrolled development of adjacent areas (beyond the FR boundary)
   - External buffer zones are seen as an important tool in conserving areas of ecological importance, while at the same time addressing the development issues of the people in the areas surrounding the forest reserve.
   - Buffer zones can reduce degradation or fire risk in forest boundaries and also enhance sustainability of activities of local stakeholders.

3. **Give clear guidance in verifier Section**

   Consideration should be given to adding specific guidance in the verifier section rather than just listing a large number of related manuals. In cases it may be more useful to extract the specific guidance from such manuals and include it in the Verifier section. Such an approach is used by RSPO in its P&C and enhances the understanding of both the land manager and the auditor on the specific guidance that needs to be followed.

Principle/ Criterion/ Indicator/ verifier	Proposal for amendment/ deletion/ addition	Reason for proposed amendment/ deletion/addition
Verifier 1.3.1	*Add New Verifiers* • **ASEAN Agreement on Transboundary Haze Pollution, 2002** • **Paris Agreement on Climate Change, 2015** • **Malaysia's Intended Nationally Determined Contribution (INDC) 2015**	These are is an important international agreement relevant to forest management in Malaysia Malaysia's Intended Nationally Determined Contribution (INDC) 2015 indicates that malaysia needs to reduce greenhouse gas emissions intensity by 45% by2030 including through enhanced forest management
Verifier 2.2.2	*Add New Verifier* **Records of action taken to support living/ livelihood of the local communities/ indigenous**	Additional verifier to require records be kept of positive actions to support community welfare.
Verifier 3.3.1	*Add text in bold* List and maps depicting locations of important cultural, ecological, economic or religious sites in the FMU/area to be certified **including buffer zones where felling trees is prohibited**	It is important to designate buffer zones (of at least 50mwidth) adjacent to any such sites to minimise impacts
Indicator 4.1.1	*Add text in bold* Forest managers provide appropriate support for training, retaining local infrastructure, facilities and **economic**/social programmes that **are** commensurate with the scale and intensity of forest management operations	Support should also be provided for economic and livelihood issues as well as social programmes
Indicator 5.5.1	*Add text in bold* Implementation of Guidelines and/or procedures to identify and demarcate sensitive areas for the protection of soil and water, water courses, wetlands **and coastal areas and related buffer zones where felling trees is prohibited**	Add coastal areas to the list as buffer zone are also needed between forests and the sea eg in mangrove forests and coastal or beach forests. Add reference to buffer zones around sensitive areas where felling trees is prohibited – in line with existing verifier 6.2.2
Verifier 5.5.1	*Add new verifier*	Without maps it will be difficult to verify

<table>
<tr><td></td><td>Description/Maps to describe sensitive areas for protection of soil and water, water courses and wetlands and related buffer zones</td><td>whether areas are identified or demarcated</td></tr>
<tr><td>Indicator 6.1.2</td><td>Addition of text in bold
Environment impacts assessments are carried out, including the potential impacts on endangered, rare and threaten species and fauna, and rare and vulnerable ecosystems (eg. Freshwater swamp forest, peat swamp forest, beach and coastal forest, lakes and rivers) and the need for biological corridors in the FMU, appropriate to the scale and intensity of forest management; as well as consideration of the impacts on forest carbon stocks, risks of fire and pollution or siltation of water courses and wetlands</td><td>Environment impacts need to be considered at the ecosystem level as well as species level
Freshwater swamp forest is a very rare ecosystem and Peat Swamp forest is vulnerable , both are fragile ecosystems which need maximum protection
At end of indicator some additional issues added to highlight emerging issues related to environmental impact including fire, loss of forest carbon stocks and downstream pollution and siltation</td></tr>
<tr><td>6</td><td>Proposed new criterion:
Environment Sensitive Areas are safeguarded with no timber harvesting allowed in ESA Class 1 areas and limited harvesting in ESA class 2 areas. –</td><td>To ensure compliance with the National Physical Plan 2, 2010 (for Peninsular Malaysia).
Requirement for ESA Class 1 is that no development, agriculture or logging shall be permitted except for low-impact nature tourism, research and education
Requirement for ESA Class 2 is that Sustainable timber harvesting may be permitted subject to local constraints</td></tr>
<tr><td>Verifier 6.2.2
Buffer strips for permanent streams and rivers in Inland Forest and Peat Swamp Forest of at least 5m in width on either site of the stream or</td><td>Insert table(see below) on variable width of minimum riparian buffer as specified in guidelines by DID/Ministry of Natural Resources and the Environment
<table>
<tr><th>River width (m)</th><th>Width of buffer zone on either side of river (m)</th></tr>
<tr><td>>40</td><td>50</td></tr>
<tr><td>20-40</td><td>40</td></tr>
<tr><td>10-20</td><td>20</td></tr>
<tr><td>5-10</td><td>10</td></tr>
<tr><td><5</td><td>5</td></tr>
</table></td><td>The buffer strips of 5m width on either side of banks, is only acceptable for rivers less than 5m width. For rivers wider than 5m the buffer should be up to 40 m wide. Narrow buffers on large rivers are not effective in reducing impact of logging.</td></tr>
</table>

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river, are marked and felling trees is prohibited.	The buffer strip should be measured from the top of the bank or the level of the wet season water level. This verifier should also be included for Sabah and Sarawak Refer to Guideline for managing Biodiversity in the Riparian Zone (NRE, 2010)	
Indicator 6.3.1	*Addition of text in bold* Availability and implementation of management guidelines to assess post harvest natural regeneration, and measures to supplement natural regeneration **and rehabilitate degraded areas**, where necessary in the FMU.	Some FMUs include areas that are seriously degraded as a result of clearance, fire, drainage or erosion. These areas may or may not have been logged and mays required efforts beyond normal silvicultural treatment.
Criterion 6.5	*Addition of text in bold* Guidelines shall be prepared and implemented to:- control erosion; minimise forest damage during harvesting, road construction, and all other mechanical disturbances; protect water resources **and prevent fire**	Fire is becoming an increasing problem in Malaysian forests especially due to climate change and development of adjacent lands. Logging makes forests more susceptible to fire and enhances access to others increasing fire risk. Fires in peat swamp forests could lead to serious environmental and social problems due to persistent the fires as well as haze
Criterion 6.5	*Proposed new indicator* **The natural hydrology of wetland forests (peat swamp forest, freshwater swamp forest, mangrove) is not disrupted through harvesting or forest management activities such as through the construction of drains, canals, bunds, roads etc**	Drainage of peat swamp forest as part of logging operation for example as experienced in North Selangor peat swamp forest (with 500km of canals) leads to serious and long term negative environment impacts including fire, subsidence and poor forest recovery etc
Criterion 6.5	*Proposed new indicator* **Fire prevention and control plan to be prepared and implemented for all fire prone forest types such as peat swamp forest, kerangas, Bris and other fire prone sites**	Fire especially on peat could lead to serious environmental and social problem. Preventing fires is much more cost effective than controlling and rehabilitating afterwards. Preparing and implementing fire prevention and control plans in fire prone sites is a key step
Verifier 6.5.4	Add Guideline for managing Biodiversity in the Riparian Zone (NRE, 2010)	See verifier 6.2.2 above

Criterion 6.6	Forest manager shall adopt, ~~where possible~~, environmentally friendly non-chemical methods of pest management, and ~~strive to~~ **must** avoid the use of chemical pesticides.	It is not appropriate to use any chemical pesticides in natural forests
Indicator 6.9.1	~~Document, control and monitor on the use of exotic species to avoid adverse ecological impacts.~~ ~~Preference shall be given to~~ **Only** native species are allowed in enrichment planting/ **rehabilitation in natural forest**	Exotic species should only be permitted in plantation forest. Enrichment planting will exotic species may completely change the nature of natural forests.
Indicator 6.10.1	*Add to definition of limited area* No more than 5% of FMU to be converted to forest plantation	Existing definition required modification in current review. Current MC&I limits conversion to plantation to 5%. This should be maintained or reduced to prioritise natural forest areas for natural forest. Forest plantations should be outside of natural forest areas and only in degraded land.
Criterion 7.1	*Addition of text in bold to contents list of management plan* j) Plan for rehabilitation of any degraded portion of forest or post logging rehabilitation k) Maps describing fragile and vulnerable or rare forest types such as peat swamp forest and freshwater swamp forest l) Resources required for implementing plan including staffing, equipment, finance .etc m) Impacts on forest from adjacent land use or development and plans to overcome or reduce them n) Stakeholder engagement with adjacent communities, landowner etc o) Fire prevention and control plan	Current listing is not complete and additional items proposed to make it more comprehensive and in line with other criteria and indicators
Indicator 7.1	*Addition of text in bold* Availability and **adequacy of** implementation of Forest Management Plan	It is important to show that plan is being implemented in an adequate and timely manner
Indicator 9.3.1	*Addition of text in bold* Measures to demarcate, maintain and/or enhance the HCVF attributes are documented in the forest management plan, **have adequate resource allocation** and effectively implemented.	Without adequate resource allocation, the HCV area may not be maintained or enhanced