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

a. Manual, Procedures and Guidelines for Sustainable Forest Management 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.
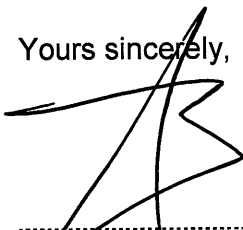
b. Internal Audit

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

Principle / Criterion / Indicator / Verifier	Proposal for amendment / deletion / addition	Reasons for proposed amendment / deletion / addition
Indicator 5.3.2 - Regular training shall be conducted for the staff on techniques of reduced-impact-logging.	To remove the word "regular".	Training frequency shall be based on the necessity and operations need.
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,

BRIAN YEO
Finance & Administration Manager
for Senior Manager

Date: 18 July 2019