

COMMENT FORM

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 Organisation: Ta Ann

Principle / Criterion / Indicator / Verifier	Proposal for amendment / deletion / addition	Reasons for proposed amendment / deletion / addition
<p>Appendix A in reference to 8.1.3</p>	<p>Word on "Interpretation" should be Δ to "Guideline"</p> <p>Deletion on "Criterion 7.2, 7.2.1 & 7.2.2" from the column "Requirements"</p>	<p>→ to provide clarity & flexibility</p> <p>→ App. A is specifically on "Internal Audits, Mgmt Review & Action Plan" - <u>not for review of FMP.</u></p> <p>→ remove mis-interpretation by CBs/auditors on the requirement for FMPs holders to do periodic revision of FMP as per App. A</p>

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<p>Verifier for 8.3.1</p>	<p>Deletion of</p> <ul style="list-style-type: none"> - Pre-felling inventory record - Operational inventory summary sheet 	<ul style="list-style-type: none"> - These are pre-harvest inventory / enumeration / assessment only and does not reflect the actual CoC of the harvested / forest products in a 100% manner - The remaining verifiers would suffice in proving CoC & fulfilling Appendix B. - For instance, Penin. & Sabah only will use "Removal Passes" instead

of so many verifying documents.

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<p>P.1 I.1.1.1</p>	<p>Deletion of "Manual, Procedure & Guidelines - - - - -"</p>	<p>It's not a LAW or even a Policy <u>but</u> a technical guideline for implementation. Moreover it is referred to as verifiers in many other indicators.</p> <p>Moreover it is not official and still under-review due to errors inside the Greenbook.</p>

P.1 title,
C.I.1

REGIONAL CONSULTATION ON ENQUIRY DRAFT OF THE MALAYSIAN CRITERIA AND INDICATORS FOR FOREST MANAGEMENT CERTIFICATION

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<p>General</p>	<p>Under most of the verifiers for common indicators for NP & FP, and also specifically, for FP, the official document "Tree Planting Plan" for forest plantations / LPF holders is not cited. Likewise for the doc "License for Planted Forest"</p>	<p>Need to consider to include "Tree Planting Plan" is same of the as verifiers in some of the most relevant indicators.</p> <p>TPP → verifier in 6.9.1, 7.1.1 LPF → verifier in 2.2.1</p>

FEEDBACK FORM

(Please return by 16 July 2019)

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

17 MAY 2019 – 16 JULY 2019

Malaysian Timber Certification Council

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

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2. General Comments

- i. Deletion of Manual, Procedures and Guidelines for sustainable forest Management Certification as verifier for Sarawak. This will make it difficult for the state agencies to make necessary ammendment for each guideline when required. Small ammendment on a guidelines will result in revision of the whole book which is not pratical while nobody know how many guidelines will be added into the compilation which may be relavant or not relavant to the Criteria and Indicators.

2. Specific Comments

Principle / Criterion / Indicator / Verifier	Proposal for amendment / deletion / addition	Reasons for proposed amendment / deletion / addition
Verifier 1.1.1 (Sarawak) Natural Resources and Environment (Fire Danger Rating System) Order, 2004 Manual, Procedures and Guidelines for sustainable forest Management Certification	This order should be for Forest Plantation (FP) only. Delete	Under the NRE(FDRS)O, 2004: Section 2. This Order shall apply to burining of timber and vegetative residues on land for development or establishment of commercial plantation. The manual has not been endorsed by the state govt for use and has lots of errors.

<p>Verifier 3.3.1 (Sarawak) Manual, Procedures and Guidelines for sustainable forest Management Certification</p>	<p>Delete and replace with Forest Zoning: Procedures to Identify Production, Protection and Community-Use Areas</p>	<p>This Procedures directly address the indicator on the process for identification and protection of such sites. However, procedures not state any provision for the rights to access to these sites by indigenous people.</p>
<p>Indicator 4.1.2 Communities living within,....</p>	<p>Add "Qualified" communities living within or adjacent</p>	<p>During employment intake/interview, an applicant should qualify himself in accordance with existing legislation of federal & state, and also meet the standard/universally accepted criteria (in public & private sectors, NGOs alike) of able-bodied, ability, medical-fit, matching of job requirements, skill, attitude etc. in which any employer will be looking at.</p>
<p>Verifier 4.1.2 Record of efforts to recruit workers from local communities without gender discrimination</p>	<p>Delete word "without gender discrimination".</p>	<p>No need to emphasis on the gender discrimination.</p>
<p>Indicator 4.2.1 Up-to-date information..... shall be disseminated to them in Bahasa Malaysia and English.</p>	<p>Delete word "in Bahasa Malaysia and English"</p>	<p>Not necessary to be very specific up to determining language to be used.</p>
<p>Verifier 5.1.2 (Sarawak)NF only Manual, Procedures and Guidelines for sustainable forest Management Certification</p>	<p>Delete and replace with Guidelines for Silviculture Practice (enrichment Planting)</p>	<p>To be more specific to certain guideline. However, the guidelines only address one silviculture (enrichment Planting) practise only.</p>

<p>Verifier 5.3.1 (Sarawak)NF Only Manual, Procedures and Guidelines for sustainable forest Management Certification</p>	<p>Delete and replace with "<i>RIL for Ground Based Harvesting system</i>"</p>	<p>To be more specific to certain guideline</p>
<p>Verifier 5.5.1 (Sarawak) Manual, Procedures and Guidelines for sustainable forest Management Certification</p>	<p>Delete and replace with <i>Forest Zoning: Procedures to Identify Production, Protection and Community-Use Areas and RIL for Ground Based Harvesting system</i>"</p>	<p>To be more specific to certain guideline</p>
<p>Verifier 5.5.2 (Sarawak) Manual, Procedures and Guidelines for sustainable forest Management Certification</p>	<p>Delete and replace with <i>Forest Zoning: Procedures to Identify Production, Protection and Community-Use Areas and RIL for Ground Based Harvesting system</i>"</p>	<p>To be more specific to certain guideline</p>
<p>Verifier 6.2.1 (Sarawak) Manual, Procedures and Guidelines for sustainable forest Management Certification</p> <p>A Master Plan for Wildlife in Sarawak, 1996</p>	<p>Delete and replace with <i>Guidelines to identify endangered, rare, threatened or protected forest tree species in Sarawak and Guidelines for Fauna Conservation and Ecosystem Management</i></p> <p>Delete</p>	<p>To be more specific to certain guideline</p> <p>Most of its content is obsolete and already addressed inside <i>Guidelines to identify endangered, rare, threatened or protected forest tree species in Sarawak and Guidelines for Fauna Conservation and Ecosystem Management</i></p>
<p>Verifier 6.2.2 (Sarawak)NF only Manual, Procedures and</p>	<p>Delete and replace with</p>	<p>To be more specific to certain</p>

Guidelines for sustainable forest Management Certification	<i>Guidelines to identify endangered, rare, threatened or protected forest tree species in Sarawak and Guidelines for Fauna Conservation and Ecosystem Management</i>	guideline
Verifier 6.3.2 (Sarawak) Manual, Procedures and Guidelines for sustainable forest Management Certification	Delete and replace with <i>Guidelines for Fauna Conservation and Ecosystem Management</i>	To be more specific to certain guideline
Verifier 6.5.1 (Sarawak) NF only Manual, Procedures and Guidelines for sustainable forest Management Certification	Delete and replace with " <i>RIL for Ground Based Harvesting system</i> "	To be more specific to certain guideline
Verifier 6.5.2 (Sarawak) Manual, Procedures and Guidelines for sustainable forest Management Certification	Delete and replace with " <i>RIL for Ground Based Harvesting system</i> "	To be more specific to certain guideline
Verifier 6.5.3 (Sarawak) Manual, Procedures and Guidelines for sustainable forest Management Certification	Delete and replace with " <i>RIL for Ground Based Harvesting system</i> " Add Detailed Harvesting Plan (DP)	To be more specific to certain guideline
Verifier 6.5.4 (Sarawak) NF Only Manual, Procedures and Guidelines for sustainable forest Management Certification	Delete and replace with " <i>RIL for Ground Based Harvesting system</i> " Add detailed harvesting Plan (DP)	To be more specific to certain guideline
Indicator 6.5.5 Fire prevention and control plan	Reclassified to FP only as NF has	Only applicable for Forest

to be prepare and implemented for all fire prone forest types	low risk of Forest Fire	Plantation
Indicator 6.9.1 (FP only) Verifier list	add	Propose to add in "LPF document/ Tree Planting Plan (TPP)" as this official document also provides evidence of the approved choice of species for forest plantation establishment, by the state government.
Indicator 8.1.1 Manual, Procedures and Guidelines for sustainable forest Management Certification	Delete	Guidelines inside the "green book" not addressing the requirement of the indicators. Should use the verifier inside MC&I 2012 standard. Procedures fro the Inspection of Harvesting Area, 1999...
Indicator 8.1.2 Manual, Procedures and Guidelines for sustainable forest Management Certification	Delete Add Environmental Compliance Audit Report (internal/external)	as this verifier doesn't address most requirement indicated by the indicator. The Procedure to minitor social, ecological, environmnetal and economic impacts has covered it all. The state is shifting from EMR to Environmental Compliance Audit (ECA)
Indicator 9.1.1 Manual, Procedures and Guidelines for sustainable forest Management Certification	Delete and refer to the National Interpretation for the identification of HCV	The guideline in the "green book" only adress monitoring of HCV but not covering identification and management of HCV

Thank you.

Yours sincerely,



Date: 4TH JULY 2019

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