

CLARIFICATION STATEMENT FROM MTCC: RIGHT TO REPLY

The Malaysian Timber Certification Council (MTCC) refers to the email received on 26th February 2026 and appreciates the chance to reply to the reports commissioned by Friends of the Earth England, Wales and Northern Ireland (FoE).

While we value civil society's role in promoting sustainable forest management, we question the credibility of the *Trouble with Timber* report as it disclaims its own accuracy, yet FoE uses it as a primary basis for discrediting MTCS and to make recommendations to several parties, including to the Government of UK.

MTCC maintains that such discourse must remain grounded in accurate, verifiable data. An assessment of certification requires the use of current standards. While third-party data can provide general insights, it cannot supersede official certification records. We note the following discrepancies in the reports:

- **Obsolete Standards and Guidance:** The reports rely on superseded documents, such as the 2014 Guidance and outdated PEFC benchmark standards. Assessments must be conducted against the current **MTCS ST 1002:2021 (MC&I SFM)**. This standard is in line with the PEFC benchmark standard.
- **Incorrect Conversion Cut-off Date:** The report incorrectly references a 2012 cut-off date; the MTCS strictly maintains **31 December 2010** as the applicable cut-off for forest conversion based on the MTCS ST 1002:2021 Malaysian Criteria and Indicators for Sustainable Forest Management. This is in line with the PEFC benchmark standards.
- **Data Verification:** Conclusions drawn from satellite imagery or open-source maps often fail to distinguish between production forest, land use conversion and natural disturbances. Authoritative boundaries are managed by State Forestry Departments and must be verified against official management plans. The links provided in the report are images and cannot connect to the source website (broken links).
- **Misleading information:** In the Executive Summary, 1b, this statement, "...such as claiming that Indigenous people in the Pahang FMU no longer have traditional ecological knowledge" is entirely false, and we encourage you to refer to the audit summary posted publicly here, https://www.sirim-qas.com.my/wp-content/uploads/2025/03/Public-Summary-FMC-of-Pahang-Forest-Management-Unit-4th-Surveillance-4th-Cycle_202269.pdf, where the auditor statement is different. The reference to Rudge A is to an article on the weaving of mats and baskets, far removed from 'tainted timber.'

The *Tainted Timber* report attempts to link specific UK imports to certification failures using shipment records. Whilst shipment and trade flow data can provide useful insights into commercial movements, such data alone may not establish the origin of timber, its compliance with certification requirements, or a direct link to the concerns raised. A quick overview of the report found the following errors:

- **Trade Data Correlation vs. Origin:** Trade flow data alone does not establish the specific forest origin or the certification status of a timber product.
- **Inconsistent Reporting Periods:** The datasets used cover different timeframes (e.g., Dec 2024–Nov 2025 vs. Jan–Dec 2025), which may lead to misinterpreted findings.
- **Need for Evidence:** Claims linking specific companies to certification failures must be supported by **case-specific evidence** verified against official certification records.

- Non-certified Companies: From the list, 2 companies listed are not MTCS/ PEFC certified companies.

The above examples are not exhaustive, and MTCC requests that a more responsible factual editing and fact-based approach be applied to the report.

The MTCS is a national voluntary scheme endorsed by the **Programme for the Endorsement of Forest Certification (PEFC)** since 2009. It operates under a strict "third-party" model to ensure impartiality where assessments are conducted by independent Certification Bodies (CBs). CBs must be accredited by the **Department of Standards Malaysia** under **ISO/IEC 17021-1**. As a standardising body, MTCC does not perform its own certifications or accreditations, ensuring a transparent check-and-balance system.

MTCC maintains a rigorous, evidence-based procedures for investigating concerns via the **MTCS GD 3003 Complaint Handling and Dispute Resolution Procedure**.

- Submission Requirements: Stakeholders must provide specific, verifiable, and actionable evidence to support any claims of non-conformity.
- Procedural Alignment: We urge civil society organizations to utilize these established institutional channels to ensure a transparent and legitimate investigation process.
- Platform: info@mtcc.com.my or via the online system on MTCC website: www.mtcc.com.my

MTCC observes that the authors of the *Trouble with Timber* report have included an explicit disclaimer absolving themselves of responsibility for the accuracy of their content. It also includes a disclaimer stating that "*readers are responsible for assessing the relevance and accuracy of the content*". To protect the rights of readers and users to factual accuracy, MTCC formally suggests that such disclaimers be prominently highlighted to ensure that users of the report are fully aware of the authors' own stated lack of accountability for the factual integrity of the document.

MTCC, 13 March 2026