

Table 1: Summary of Public Comments by Stakeholders on Draft MC&I(Forest Plantations)

No.	Organisation	Comments
1.	Edmund Gan – Sabah Forest Industries Sdn. Bhd.	<p>Principle #6</p> <p>6.1.2 As forest Plantation Management Plan already incorporate environmental aspects, there is no need for a separate Environmental Management Plan as a verifier. Therefore, it is suggested that Environmental Management Plan be deleted.</p> <p>6.2.1 The same applies 6.2.2 The same applies</p> <p>6.5.1 It is more appropriate to include the Guidelines for site preparation and planting techniques as a verifier instead of the Forest Plantation Management Plan.</p> <p>6.9.1 EIA report would have covered the potential ecological impact of exotic species. As such, evaluation report is not needed as a verifier.</p>
2.	Ivy Wong – WWF Malaysia	<p>1) The term Planted Forests vs Forest Plantation. The Planted forest sounds better. It can be distinguish from oil palm plantation clearly and avoid confusion.</p> <p>2) The representation of the certificate/licence versus NF as reported in the map for areas under MTCC cert. Leading to this, if the issue of size of FMU for Peninsular Malaysia can be resolved to FMU level and not state level, this can be easily resolved and areas can be clearly spelt out figure and visual wise.</p> <p>3) The requirement for planted forest to be certified, size of the area I mean, this has to be practical to be applied. If its a big area owner, it should be fine but if its a small holder say of 25ha, would that be practical (rubber plantation wood etc)? Just throwing out questions to be considered.</p>
3.	Jammy Gabriel – Sabah Environment Protection Department	<p>Principle #1: Compliance with Laws and Principles –</p> <ul style="list-style-type: none"> • The Environment Protection Department is now enforcing '<i>Environment Protection Enactment 2002</i>' and <u>not</u> <i>Environmental Conservation Enactment 1996</i>. Please update.

4.	Francis Chai – Sarawak Forest Department (SFD)	<p>Indicator 4.5.1 (i) Additional verifier to be included i.e. interview with locals.</p> <p>Indicator 6.5.1 (i) Verifier on Forest Plantation Management/Development Plan has to be more specific</p> <p>Indicator 6.5.2 (i) Verifiers for Sarawak have to be more specific</p> <p>Indicator 6.5.4 (i) Additional verifier to be included i.e. Riparian buffers</p> <p>Indicator 6.6.1 (i) Additional verifier to be included i.e. forest health/silviculture plan</p> <p>Indicator 6.6.2 (i) Additional verifier to be included i.e. forest health plan</p> <p>Indicator 7.1.1 (i) Verifier on Forest Plantation Management/Development Plan (Is this adequate?)</p> <p>Indicator 8.2.1 (i) Forest Plantation Management/Development Plan (more specifics suggested)</p> <p>Indicator 8.3.1 (i) Additional verifier to be included i.e. Removal Passes/Permits</p> <p>Indicator 8.5.1 (i) The verifier to be amended as “<i>Summary of the Forest Plantation Management Plan <u>made</u> publicly available</i>”</p> <p>Indicator 9.2.2 (i) Additional verifier to be included i.e. HCVF Protected areas</p>
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5.	Dr. Lee Hua Seng – Sarawak Timber Association (STA)	<p>Principle 3: Indigenous Peoples Rights</p> <ul style="list-style-type: none"> • In most circumstances, no official documents are available to indicate indigenous people’s land. Furthermore, most land disputes / land claim issues occur between the different communities in the area. These disputes are usually beyond the control of the FMU holders. In light of this, FMU holders should neither bear the sole responsibility to resolve these issues nor be penalized for their inability to address these issues • As such we suggest that the formulation of the <i>MC&I</i>(Forest Plantations) Assessment Procedures should and must take this into account
6.	Jack Meredu anak Ko <i>Jabatan Tenaga Kerja Sarawak</i>	<p>Principle 1: Compliance with Laws and Principles</p> <ul style="list-style-type: none"> • There must be effective mechanism to ensure compliance with laws • There must be effective mechanism to ensure compliance to government policies and procedure on timber royalties,taxes and other charges • The legislation listed in the Verifiers is comprehensive • The employers must actively send their officers for training to understand government policies and laws concerned • Safety of workers must be put as the highest priority <p>Principle 3: Indigenous Peoples Rights</p> <ul style="list-style-type: none"> • This is a good protection for the indigenous people • Arbitrator to deal with any disputes or claims on land tenure be set up <p>Principle 4: Community Relations and Worker’s Rights</p> <ul style="list-style-type: none"> • Monitoring from the management is required so that every worker will enjoy the same benefit • There must be committee set up to facilitate the management in arranging all the employment opportunities so that only the qualified and hardworking people is offered an employment and no discrimination in selection process <p>Principle 6: Environmental Impact</p> <ul style="list-style-type: none"> • This is one of the issues which must be given higher priorities and attention to protect the ecosystem and existing forest