

**Table 2: Summary of Consideration of Public Comments on Draft MC&I(Forest Plantations) by the Technical Working Group (TWG)**

No.	Organisation	Comment	Consideration and Recommendation of TWG
1.	Edmund Gan – Sabah Forest Industries Sdn. Bhd. (SFI)	<p><b>Principle #6</b></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>	<p>On the recommendation to delete the Verifier on “Environmental Management Plan” from Indicators 6.1.2, 6.2.1 and 6.2.2 for Sabah, the TWG recommended that the suitability of this Verifier be reviewed during the field testing of the draft standard.</p> <p>The TWG concurred with the recommendation, but agreed that the Verifier should be amended slightly as “Guidelines for forest plantation establishment.” The Meeting agreed that this recommendation should also be made applicable for Sarawak and Peninsular Malaysia.</p> <p>The TWG concurred with this recommendation as the EIA reports would have considered these potential impacts. The TWG agreed that this recommendation should also be made applicable for Sarawak.</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>	<p>The TWG agreed to maintain the term “forest plantation” in line with international norm.</p> <p>The TWG noted these comments regarding the certificate/licence and size of the FMU are general comments that would not affect the standard development process. However, the TWG agreed that these comments should be taken note of by the MTCC during the certification process once the standard is finalized for implementation.</p>
3.	Jammy Gabriel – Sabah Environment Protection Department	<p><b>Principle #1: Compliance with Laws and Principles –</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul>	<p>The TWG concurred with the recommendation to amend the verifier on “Environmental Conservation Enactment 1996” under Indicator 1.1.1 for Sabah to “Environment Protection Enactment 2002” as this is the legislation currently being enforced in Sabah.</p>

4.	Francis Chai – Sarawak Forest Department (SFD)	Indicator 4.5.1 (i) Additional verifier to be included i.e. interview with locals.	The TWG was of the view that the gist of this proposed Verifier has already been included in the Verifier “Records of meetings and/or consultations between forest managers with communities.”
		Indicator 6.5.1 (i) Verifier on Forest Plantation Management/Development Plan has to be more specific	The TWG concurred with this proposal and agreed to adopt the recommendation by Mr. Edmund Gan of SFI.
		Indicator 6.5.2 (i) Verifiers for Sarawak have to be more specific	The TWG was of the view that the Verifier “Harvesting plan” is specific enough to address the requirements of this Indicator.
		Indicator 6.5.4 (i) Additional verifier to be included i.e. Riparian buffers	The TWG concurred with this recommendation and proposed that the Verifier for Peninsular Malaysia, i.e. “Buffer strips for permanent streams and rivers in forest plantation areas, on both sides of the stream or river, are demarcated and felling of trees is prohibited” be adopted for both Sabah and Sarawak.
		Indicator 6.6.1 (i) Additional verifier to be included i.e. forest health/silviculture plan  Indicator 6.6.2 (i) Additional verifier to be included i.e. forest health plan	The TWG was of the view that the recommendation to include additional Verifiers on “forest health/silviculture plan” and “forest health Plan” are not relevant as these Indicators deal with guidelines on the use of chemicals.
		Indicator 7.1.1 (i) Verifier on Forest Plantation Management/Development Plan (Is this adequate?)	The TWG was of the view that the Verifier is adequate to address the requirements of this Indicator.

		Indicator 8.2.1 (i) Forest Plantation Management/Development Plan (more specifics to be suggested)	The TWG was of the view that the Verifier is adequate to address the requirements of this Indicator.
		Indicator 8.3.1 (i) Additional verifier to be included i.e. Removal Passes/Permits	The TWG agreed with the recommendation to include "Removal Passes/Permits" for Sarawak. In addition, the TWG also recommended that the Verifier on "Record of source of planting materials" for Sabah be adopted for Sarawak and Peninsular Malaysia.
		Indicator 8.5.1 (i) The verifier to be amended as " <i>Summary of the Forest Plantation Management Plan <u>made publicly available</u></i> "	The TWG concurred with this recommendation.
		Indicator 9.2.2 (i) Additional verifier to be included i.e. HCVF Protected areas	The TWG was of the view that there is no need to include "HCVF protected areas" as an additional Verifier.
5.	Dr. Lee Hua Seng – Sarawak Timber Association (STA)	<p><b>Principle 3: Indigenous Peoples Rights</b></p> <ul style="list-style-type: none"> <li>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</li> <li>As such we suggest that the formulation of the MC&amp;I(Forest Plantations) Assessment Procedures should and must take this into account</li> </ul>	The TWG noted that Dr Lee's comments are general in nature with no specific recommendations for amendment to the draft standard. The TWG however, concurred with his proposal that these issues raised should be addressed during the formulation of assessment procedures on the use of the MC&I(Forest Plantations) for Sarawak.

6.	Jack Meredu anak Ko <i>Jabatan Tenaga Kerja Sarawak</i>	<p><b>Principle 1: Compliance with Laws and Principles</b></p> <ul style="list-style-type: none"> <li>• There must be effective mechanism to ensure compliance with laws</li> <li>• There must be effective mechanism to ensure compliance to government policies and procedure on timber royalties,taxes and other charges</li> <li>• The legislation listed in the Verifiers is comprehensive</li> <li>• The employers must actively send their officers for training to understand government policies and laws concerned</li> <li>• Safety of workers must be put as the highest priority</li> </ul> <p><b>Principle 3: Indigenous Peoples Rights</b></p> <ul style="list-style-type: none"> <li>• This is a good protection for the indigenous people</li> <li>• Arbitrator to deal with any disputes or claims on land tenure be set up</li> </ul> <p><b>Principle 4: Community Relations and Worker's Rights</b></p> <ul style="list-style-type: none"> <li>• Monitoring from the management is required so that every worker will enjoy the same benefit</li> <li>• 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</li> </ul> <p><b>Principle 6: Environmental Impact</b></p> <ul style="list-style-type: none"> <li>• This is one of the issues which must be given higher priorities and attention to protect the ecosystem and existing forest</li> </ul>	The TWG took note of the comments from Mr. Meredu which are general in nature dealing with processes to ensure compliance with laws, with no specific recommendations for amendment to the draft standard.
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