

REVIEW OF THE *MALAYSIAN CRITERIA AND INDICATORS FOR FOREST MANAGEMENT CERTIFICATION (FOREST PLANTATIONS)* [MC&I(FOREST PLANTATIONS)] – FIRST PUBLIC COMMENT

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Views expressed below are that of Malaysian Nature Society, Penang Branch, shall there be a difference of view with Malaysian Nature Society, HQ, the view of the later shall prevail.

General Comments:

1) Whilst we are not completely against Forest Plantations as a reliable and continuous source of timber for the Malaysian Timber industry and its downstream industry for the economic well being of Malaysia and its citizens.

We cannot support the Plan, if:

- 1) Clearing of existing forest reserve to convert into Forest Plantation
- 2) Tropical Forest Plantation cannot be equated with temperate countries forest plantation where the biodiversity of the later is much less when compared to our tropical forest. Hence the difference in Biodiversity in Temperate countries Forest Plantation with natural forest is much less.
- 3) The present unbridled clearing of natural forest, whether degraded, protected or otherwise, for forest plantation is not acceptable and may be an economic and/or environmental disaster, until a more complete and prolong studies on a much reduce scale of forest plantation is completed. Example, extensive hill slope planting of Timber Latex Clone, at times on steep hill slope. The suitability and manpower to tap the rubber trees on steep hill slopes.
- 4) Sustainable logging of tropical forest should be maintain to provide a continuous and reliable source of tropical hard-wood which cannot be equate with for example, TLC.
- 5) Malaysia record of forest plantation had so far not been successful for a myriad of reasons including the non suitable climate for exotic or non-native timber. Maintenance of forest plantation can be better.

6) The present rate of conversion to TLC is also not advisable as if there is any significant drop of rubber price, rubber production have to be reduced.

7) At Branch level (MNS Penang) members during trips to Kedah, Perak, and a lesser extent Kelantan have seen extensive forest clearing (mainly for TLC), at the following locations, Gunung Inas FR, (Bkt Palong, Lata Celak, Kemangi) Pedu-Muda areas, Sik Area (near Lata Mengkuang) Bukit Peranginan FR, all in Kedah. We had seen extensive forest clearing at the Kupang – Gerik highway, involving, Bintang Hijau FR, Bkt Kenderong FR, and Hulu Semang FR, and also at Pondok Tanjung FR. Scant regard were paid to the maintenance of riparian zone and also the pollution of river source to now stream villages. Further a field, in Kelantan land clearing along the Banding – Hutang Melintang section of the East West highway. Habitats of Elephants, Tapirs, Hornbill, endangered and threatened species were probably not taken into consideration in EIA reports that we have examined.

8) Until and unless a complete and systematic review of existing clearing of forest for Forest Plantation is carried out, further clearing should be halted immediately.

9) Forest Plantation should be on already cleared or degraded forests that were classified as such before say 1995. It is of no use if present forests were cleared and international or regional organization or buyers do not accept these areas as sustainable Forest Plantation.

Nevertheless, the Branch are providing proposal below

Principle/Criterion/ Indicator/Verifier	Proposal for amendment/deletion/ addition	Reasons for proposed amendment/deletion/ addition	Proposed wording for amendment/ addition
1.3 The provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.			Peninsular Malaysia / Sabah / Sarawak Where relevant, provisions related to forest plantation management of the following binding international agreements are INCLUDED in forest plantation management plan* and in forest plantation management:
1.5 Forest management areas shall be protected from illegal harvesting, settlement and other unauthorized activities.	<u>But shall allow reasonable public access for NGO for monitoring and access to forest reserve nearby. Including access for eco-tourism and possible recreational forest reserve.</u>		
4.1 The communities within, or adjacent to, the forest management area shall be given opportunities for	<u>Also opportunity to develop eco-tourism.</u>		

employment, training, and other services.			
4.4 Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.			Peninsular Malaysia / Sabah / Sarawak <input type="checkbox"/> Environmental Impact Assessment (EIA) report must be carried out before commencement of work and review periodically by an independent panel
5.5 Forest management operations MUST recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.	5.5.1 Availability and FULL implementation of guidelines and/or procedures to identify and demarcate sensitive areas for the protection of soil and water, watercourses and wetlands in forest plantation areas, and all Riparian Zone as per JPS Guidelines at all times.		
6.1 Assessment of environmental impacts shall be completed ó appropriate to the scale, intensity of forest management and the uniqueness of the affected resources ó and adequately integrated into management systems. Assessments shall include landscape level consideration as well as the impacts of on-site processing facilities. Environmental impacts MUST be assessed prior to commencement of site-disturbing operations.			
6.2 Safeguards MUST exist which protect rare, threatened and endangered species and their habitats (e.g. nesting and feeding areas). Conservation zones and protection areas MUST be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping and collecting shall be controlled.			
6.3 Ecological functions and values shall be maintained intact,	*20% of a forest plantation shall be designated as such areas, or if forest		

<p>enhanced, or restored, including:- a) Forest regeneration and succession. b) Genetic, species and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem. (This Criterion shall apply only to areas/sites within the forest plantation management unit which are allocated for conservation or natural forest management*)</p>	<p>plantation converted from degraded habitat shall be restored to its original forest habitat)</p>		
<p>6.4 Representative samples of existing ecosystems within the landscape MUST be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</p>	<p>Current trend is to “protect” hill slope, which is not representative of existing ecosystem, more lowland forest should be made representative. All river system should be protected and not included in any forest plantation.</p>		
<p>6.10 Forest conversion to plantations or non-forest land uses MUST not occur, except in <u>ALREADY DEGRADED HABITAT, and classified as such before 1995.</u></p>	<p>It is preferable to use abandon agricultural land and the like for conversion to forest plantations.</p>		