

**COMPILATION OF COMMENTS RECEIVED FROM  
THIRD 60-DAY PUBLIC COMMENT PERIOD ON ENQUIRY DRAFT 3 OF REVIEW OF MC&I(FOREST PLANTATIONS)**

Comments received from 8 organisations:

1. Malaysian Wood Industries Association (MWIA)
2. WWF-Malaysia
3. Sabah Forestry Department
4. WCS-Malaysia Programme
5. Forestry Department Peninsular Malaysia
6. Sarawak Forestry Corporation
7. Department of Irrigation and Drainage, Sabah
8. United Sabah Dusun Association

| <b>Principle/<br/>Indicator/<br/>Criteria/<br/>Verifier</b> | <b>Amend/<br/>Delete/<br/>Add/<br/>General</b> | <b>Proponent</b>                                 | <b>Proposal</b>                                 | <b>Reasons for Proposed<br/>Amendment / Deletion / Addition / General</b>   | <b>Proposed Wording for Amendment /<br/>Deletion / Addition / General</b>   |
|---|--|--|---|---|---|
| 3.3   | Delete   | Forestry<br>Department<br>Peninsular<br>Malaysia | Delete the word “and protected” in the sentence | <p>Forest managers will not threaten these sites as required in C3.2 as follows:</p> <p>“Forest plantation management shall not threaten or diminish either directly or indirectly, the resources or tenure rights of indigenous peoples.”</p> <p>However forest managers shall not be held responsible for sites being acquired by local authorities. Going against local authorities to protect these sites for the sake of indigenous peoples are beyond the scope of plantation business.</p> | <p>Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognised <del>and</del> <u>protected</u> by forest managers.</p> |

| Principle/<br>Indicator/<br>Criteria/<br>Verifier | Amend/<br>Delete/<br>Add/<br>General | Proponent  | Proposal  | Reasons for Proposed<br>Amendment / Deletion / Addition / General  | Proposed Wording for Amendment /<br>Deletion / Addition / General   |
|---|--------------------------------------|--|---|--|---|
| 3.3.1 V   | Delete                               | Forestry<br>Department<br>Peninsular<br>Malaysia | Delete the word “and protecting” in the sentence.                 | Forest managers will not threaten these sites as required in C3.2 as follows:<br><br>“Forest plantation management shall not threaten or diminish either directly or indirectly, the resources or tenure rights of indigenous peoples.”<br><br>However forest managers shall not be held responsible for sites being acquired by local authorities. Going against local authorities to protect these sites for the sake of indigenous peoples are beyond the scope of plantation business. | <b>Peninsular Malaysia</b><br><ul style="list-style-type: none"> <li>Procedures for identifying <del>and protecting</del> sites of special cultural, ecological, economic or religious significance to indigenous peoples and provisions for rights or access to these sites</li> </ul> |
| 4.1.3 V   | Add                                  | Sabah Forestry<br>Department                     | Add “Certificate of Identity” as an additional verifier for Sabah | Relevant to Indicator 4.1.3  | <b>Sabah</b><br><ul style="list-style-type: none"> <li>Immigration Act 1959/63</li> <li>Employment records</li> <li><u>Certificate of Identity</u></li> </ul>   |
| 5.5.1   | General                              | WCS (Malaysia<br>Programme)                      | Comment   | Minimum widths of river and wetland buffers are currently inadequate. For example in Pahang streams 1 to 5 meters in width the buffers are equivalent to the width of the stream, therefore a 1 meter wide stream will have a 1 meter buffer on each side. The current guidelines are not realistic to prevent sedimentation, run-off, and to protect the trees and plants which provide fruit and flowers that fish may feed on and prevent increase in water temperature.                |   |

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|---|--------------------------------------|---------------------------|---|--|--|
| 6.1.2   | General                              | WCS (Malaysia Programme)  | Comment   | The forest plantation should not be seen as a permanent feature. It should be managed in such a way that, at the end of the lease, the area can revert to natural forest. Therefore the environmental impacts must not be so severe that this is not possible. For example, there must be enough natural forest conserved within the plantation so that seed trees of sufficient biological diversity are available for forest regeneration. |  |
| 6.1.2   | Add                                  | Sabah Forestry Department | Add the term "salt licks" in the Indicator            | To emphasize on the importance of salt licks as stated in the Criterion 6.2  | Availability and implementation of guidelines to identify and protect endangered, rare and threatened species of flora and fauna, including features of special biological interest, such as seed trees, <i>salt licks</i> , nesting and feeding area, in forest plantation areas. |
| 6.2.1 V   | Amend                                | WWF-Malaysia              | Add IUCN Red List / Malaysian Red List as a guideline | The IUCN Red List, or the Malaysian Red List is a good guideline for rare, threatened and endangered species   |  |
| 6.4.3   | Delete                               | MWIA                      | Delete Indicator 6.4.3.                               | Difficult to comply and implementation especially for smallholders in Peninsular Malaysia whose area of plantation in the range of 5 hectares or less. Discourage them to go for certification and majority supply of raw materials for Peninsular Malaysia are from those smallholders.   |  |

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|---|--------------------------------------|--------------------------|---|---|---|
| 6.5.2   | General                              | WCS (Malaysia Programme) | Comment   | Many streams and rivers in logging concessions appear to be adversely affected by sedimentation arising from logging activities. For example the Sg. Mas and Sg. Kemidak in Johor. The present drainage practices appear to be ineffective to prevent sedimentation of rivers and wetlands.   |   |
| 6.9.1   | General                              | WCS (Malaysia Programme) | Comment   | Control of exotic species should also include funds set aside and actual steps and programs taken to prevent the spread of the exotic species. <i>Acacia mangium</i> is an example of an exotic species which has spread extensively and competes with native pioneer species in regeneration of degraded areas. For example along some stretches of the road reserve into Kg. Peta, Johor, the <i>A. mangium</i> has established stands which are crowding out native pioneer species. |   |
| 9.1.1 V   | Amend                                | WWF-Malaysia             | Add HCVF toolkit for Malaysia as verifier for Peninsular Malaysia | WWF-MY strongly suggest that this toolkit serves as a guideline in implementing Principle 9 for Peninsular Malaysia, as currently there are no other available guidelines apart from the suggested toolkit on identifying, management and monitoring HCVs in Malaysia   |   |

#### Other Comments

1. Department of Irrigation and Drainage, Sabah – No more comments on the Enquiry Draft 3
2. Sarawak Forestry Corporation – Suggestions from Regional Stakeholder Consultation held in Kuching, Sarawak were considered/incorporated in the Enquiry Draft 3 and no further comments
3. United Sabah Dusun Association – No objection on Enquiry Draft 3