

Review of MC&I (Natural Forest): First Public Comment

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Feedback

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1) General Comments

- 1.1 Need to lay the groundwork for the unification of MC&Is (NF) and (FP).
The fatiguing cycles for the review of the two standards need to be broken at some stage. NOW is the time!?
- 1.2 Proposal for a unified standard: MC&I (Forest Management).
- 1.3 Need for a structural framework for the organisation of Principles to reduce symptomatic repetitions and cross references.
Balanced roles and contributions from different stakeholder groups.
Facilitate training, monitoring and assessment.
- 1.4 Proposal for a hierarchy of Principles based on natural processes or practical progression
Enable appraisal in phases.
Reduce costs and demand on critical resources (including qualified certification bodies/auditors/assessors)
- 1.5 Need to review the current and corresponding "Audit Procedure"
- 1.6 Need pragmatic response to land use reality.
Holistic forest management plan including plantation. (An illustration of the integration of P10 into the unified standard is attached as appendix).

The following specific comments reflect changes arising from the proposed structural organisation for the Principles.

2) Specific Comments

Principle/Criterion /Indicator/Verifier	Proposal	Reasons
Principle 1: Compliance with Laws and Principles	"Forests Ordinance,2015" where relevant.	Update
Indicator 1.5.2: Control encroachments.....	To delete	Legal provisions and verifiers already addressed by Indicator 1.5.1. Administrative indicator to move to the Principle for Management Plan and/or Environment Impact.
Principle 2: Tenure and Use Rights and Responsibilities	Reconcile natives, local community (P2) and indigenous people (P3). Expand P2 to include "P3: Indigenous	Indicator 2.2.1 identical with 3.1.1. Indicator 3.3.2 identical with 2.3.1 Criteria 3.2, 3.3 and 3.4 may become Criteria 2.4, 2.5 and 2.6.

	Peoples' Rights" and "P4: Community Relations and Worker's Rights". P2: Tenure and Use Rights and Responsibilities	Criteria 4.1(employment opportunity), Criteria 4.2(laws on OSH) and 4.3 (rights to organise) can be reasonably manifested under P2 as Criteria 2.7, 2.8 and 2.9.
Principle3: Indigenous Peoples' Rights	To delete. To re-designate P3 as " Environment Impact"	Original P3 to be nested under the revised P2. EIA is the essential legal and procedural process following P1 & P2.
Principle 6: Environmental Impact	To become P3: Environmental Impact and maintenance of High Conservation Value Areas	Maintenance of HCVAs is one of the objectives of EIA. Indicator 9.1.1 is redundant/superfluous. Criterion 9.2 to be nested under EI. Criterion 9.3 and 9.4 to be incorporated under FMP and M&A respectively. Criterion 6.10 to adopt MC&I (FP)
Principle 4:Community Relations and Worker's Rights	To delete. (Community relations and legal provisions for worker's rights may be more appropriate under use rights and responsibilities.)	4.4 (social impact) and 4.5(compensation for loss or damage of customary rights and properties) have been addressed in P2 Criteria 4.1(employment), 4.2(OSH) and 4.3(right to organise) moved to P2
Principle 5: Benefits from Forest	To combine with Management Plan as P4.	Benefits from Forest logically should frame the preamble for the management plan and affect its outcome.
Principle 7: Management Plan	To become P4: Management Plan and Benefits from the Forest	Management Plan logically should be based on EIA to optimise <i>benefits from the forest</i> . "Forest plantation development and management" to be manifested as new/separate criterion. (Appendix)
Principle 8: Monitoring and Assessment	To become P5: Monitoring and Assessment.	
Principle 9: Maintenance of HCVAs	To delete.	To manifest under revised P3 (Environmental Impact & Maintenance of HCVAs), revised P4(Management Plan & Benefits from Forest) and revised P5 (Monitoring and Assessment)

Summary of P&C for proposed MC&I (Forest Management)

P1: Compliance with Laws and Principles (Official)

Maintained with essential update on "Forests Ordinance, 2015"

P2: Tenure and Use Rights and Responsibilities (Social)

Combine P2, P3 and P4 on the human/social dimension.

Removed similar or equivalent criteria & indicators dictated by interpretations for natives, local communities and indigenous people. (Focus on customary tenure and use rights)

C2.1: long term forest use rights

C2.2: Local communities with legal or customary tenure or use rights

C2.3: Dispute resolution

C2.4: Forest management shall not threaten or diminish tenure or rights of indigenous people

C2.5: Sites of special cultural, ecological, economic or religious significance

C2.6: Traditional knowledge...

C2.7: Employment opportunity...

C2.8: Laws and training on OSH....

C2.9: Rights to organise...

P3: Environmental Impact and Maintenance of HCVAs (Environmental)

Combine P6 and P9 on the environment protection and conservation dimension.

Holistic environmental management incorporating HCVAs.

C3.1: Assessment of Environmental impacts

C3.2: Safeguards for RTE species

C3.3: Ecological functions

C3.4: Ecosystems and HCVAs

C3.5: Guidelines to control erosion and damage

C3.6: Pesticides

C3.7: Chemicals and non-organic wastes

C3.8: Biological control agents

C3.9: Exotic species

C3.10: Forest conversion to plantations

P4: Management Plan and Benefits from the Forest (Economic)

Combine P5 and P7 on plan for social environmental and economic sustainability

C4.1: Economic viability and ecological productivity of forest...

C4.2: Optimal use and local processing

C4.3: Minimise wastes

C4.4: Diversify local economy

C4.5: Maintain and enhance forest services and resources

C4.6: Rate of harvest

C4.7: Management plan with supporting documents

C4.8: Forest Plantation Development and Management

C4.9: FMP to be revised periodically

C4.10: Forest workers to be trained for FMP implementation

C4.11: FMP public summary

P5: Monitoring and Assessment (Institutional)

C5.1: Frequency and intensity of monitoring

C5.2: Research data needed to monitor indicators

C5.3: Documentation for CoC

C5.4: Results of monitoring incorporated into FMP

C5.5: Public summary of monitoring

Unified MC&I will consist of 5 Principles and 40 (more or less) Criteria.

Appendix:

***P10 {MC&I (Forest Plantation)}: Forest Plantation Development and Management**

Proposed change for unification under MC&I (Forest Management):

1. To be manifested as a Criterion of proposed Principle on "Management Plan and Benefits from the Forest"
2. Criterion 4.8: Forest Plantation

Principle/Criterion /Indicator/Verifier	Change	Reason
P10	Criterion 4.8: Forest plantation shall be planned, established and managed in accordance with all Principles and associated Criteria	Plantation as part of FMP
Indicator 10.1.1: Management objectives.....	Indicator 4.8.1 No change for description	No issue with expressed intent
Indicator 10.2.1: Design and layout...	To delete	No meaningful value vis-a-vis 10.2.2
Indicator 10.2.2: Forest plantation establishment....	Indicator 4.8.2:natural landscape, wildlife corridors, buffer strips....	
Indicators 10.3.1 and 10.3.2: Diversity in the composition....	Indicator 4.8.3 Combine 10.3.1 and 10.3.2-List of species planted, extent of area, age class and map	Less is more.
Indicators 10.4.1 and Indicator 10.4.2: Choice and justification of species	Indicator 4.8.4 Combine 10.4.1 and 10.4.2- Availability of documentations of choice of species in forest plantation establishment or restoration	Less is more

Indicator 10.4.3: Assessment of exotic species...	Indicator 4.8.5: Assessment of exotic species....	
Criterion 10.5 Indicator 10.5.1: Portion of planted forest as natural forest	To delete	Contradictory in the first instance. No issue or need if forest plantation considered within the original landscape and holistic FMP
Indicator 10.6.1: Appropriate site preparation to avoid soil degradation, water quality etc...	Indicator 4.8.6: Appropriate site preparation.... Consider if this is a repetition if it had not included species specific effect on soil.	May be maintained but should be redundant in view of Principle on Environment Impact as manifested under C3.1(Environment Impact), C3.3 (Ecological functions) and C3.5(Guidelines to control erosions and damage) and Indicator 4.8.4(choice of species)
Indicator 10.7.1: Guidelines to control outbreak of pests...	Indicator 4.8.7: Guidelines to control outbreak of pests...	
Indicator 10.7.2: Fertilisation schedule	Indicator 4.8.8: Fertilisation schedule	
Criterion 10.8: Special attention to social issues on land acquisitions....	To delete	Restated and served to undermine Principles on Laws, Tenure and Use Rights etc.
Indicator 10.8.1: Monitor potential ecological and social impact	To delete	Restated and served to undermine Principle on Environment Impact
Indicator 10.8.2: Documentation of nursery and field trial...	Indicator 4.8.9: Nursery and field trial	

**Holistic consideration for proposed unification of MTCS standards*

The revised Criterion on "Forest Plantation Development and Management" will contain nine Indicators compared with 14 under Principle 10 in MC&I (Forest Plantation).

