

## Melvin Ku

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**From:** Francis Cheong <fcheong@wcs.org>  
**Sent:** Friday, 15 January, 2016 10:40 PM  
**To:** Cheah Chi Ern  
**Subject:** Review of the Malaysian Criteria and Indicators for Forest Management Certification (Natural Forest): (1)First Public Comment (16 November 2015 - 15 January 2016)  
**Attachments:** Comments - Appendix II.pdf

Dear Sir,

I attach the feedback form in respect of the above for your attention.

Thank you.

Yours sincerely,



**Francis Cheong**  
**Assistant Director, Malaysia**  
Wildlife Conservation Society  
Tel: 603 78802029 | Fax: 603 78802058  
web: [www.wcsmalaysia.org](http://www.wcsmalaysia.org) | [www.wcs.org](http://www.wcs.org)

First Public Comment  
Feedback Form

Malaysia Timber Certification Council  
C-8-5, Block C, Megan Avenue2, No.12 Jln Yap Kwan Seng, 50450 Kuala Lumpur  
Tel : 03-2161 2298  
Fax : 03-21612293  
Email : [cheah@mtcc.com.my](mailto:cheah@mtcc.com.my)

Dear Mr Cheah,

Review of the Malaysian Criteria and Indicators for Forest Management Certification (Natural Forest):

(1) First Public Comment (16 November 2015 - 15 January 2016)

With reference to your letter dated 13 November 2015, I would like to provide the following comments on the MC&I (Natural Forest):

- 1) General Comments:
- 2) Specific Comments:

Principle / Criterion / Indicator / Verifier	Proposal for amendment / deletion / addition	Reasons for proposed amendment / deletion / addition
Indicator 1.1.1/Verifier Sarawak State laws	– to replace Forest Ordinance (Cap 126) with Forest Ordinance 2015 (Chapter 71)	New legislation has been gazetted
Indicator 1.5.2 Control of encroachment, illegal harvesting, hunting, and settlement, and other unauthorised activities in the FMU.	Verifier: Need to implement effective monitoring and control methods Eg surveillance cameras, smart patrols, hard core patrol units. Robust supervision of the monitoring & control is also needed.	A high level of encroachment and illegal activities is occurring in PRFs.
Indicator 5.4.1 Forest management strategy that encourages production of a mix of commercial forest products .....	Verifier: Action plans needed for conservation of NTFP species. Customary extraction by local communities to be taken into account in action plans.	Illegal extraction of gaharu from PRFs by Indo-chinese is widespread, intensive, conducted in a destructive manner & may lead to depletion / extinction of tree species.

Indicator 5.5.1 Implementation of guidelines and/or procedures to identify and demarcate sensitive areas.....	Verifier : Need for enhancement/ revision of guidelines for reduced impact logging to protect water courses and minimize erosion.	Water courses experience heavy siltation from logging operations.
Indicator 6.1.1 Environmental impact assessments are carried out.....	Verifier : to add in “and revisions thereof” for Environmental Quality (Prescribed Activities)(Environmental Impact Assessment ) Order 1987 ..	The EQ Order is in the process of being revised.
Indicator 6.2.1 Availability and implementation of guidelines to identify and protect endangered, rare, threatened species.....	Verifier : to add in “National Elephant Conservation Action Plan” which was launched in 2013	The 2013 plan is being implemented. It has replaced the 2006 Pelan Pengurusan Gajah
Indicator 6.2.2 Availability and implementation of management guidelines .....	Verifier: Enhance/revise the minimum width of buffer strips for permanent streams and rivers to correspond /relate to the stream order (refer “Strahler stream order” - Order 1 to Order 4)	To better protect the integrity of water courses. The broader the stream, the wider the buffer. e.g. order 1 streams – minimum 5m ; Order 2 streams – minimum 10m.
Indicator 6.5.3 Availability and implementation of guidelines for forest road layout and construction.....	Verifier: to include provision for rehabilitation of log landings	After logging operations, log landings become large forest gaps with compacted soil. They should be rehabilitated to discourage invasive species, for soil protection and species recuperation.
Indicator 6.5.4 Availability and implementation of guidelines for conservation of buffer strips along streams and rivers	Verifier: see Indicator 6.2.2	To ensure that buffer strips are adequate and in good condition
Indicator 6.8.1 Documentation monitoring and control of biological control agents.....	Indicator & Verifier: to include GMOs	To conserve the native genetic diversity of organisms in the PRFs which represent the nation’s gene bank
Indicator 6.10.1 The forest manager shall ensure the conversion from natural forest to forest plantations....	Indicator : To include in item (a) “environmentally sensitive areas and biological corridors”. To add item (b) “conversion shall firstly utilise badly degraded forest which is not possible to be rehabilitated.	To maximize the sustainability of natural forests and to maximize the conservation of biodiversity

	Verifier : 1. for badly degraded forest - the low volume/value of harvestable timber in the proposed conversion area. 2. Public/stakeholder consultation needed.	
Indicator 9.1.1 Forest managers shall determine the presence of HCVF attributes.....	Verifier for PM: to include “decisions of the Civil courts pertaining to legal or customary tenure or use rights”	Recent court decisions in PM eg Lingiu dam, Kg. Peta
Indicator 9.2.1 Forest managers shall consult.....	Verifier: to include “implement co-management with stakeholders, in the event of court decisions granting legal or customary tenure or use rights to local community”	To gain community support in the event of relevant court decisions.

Thank you.

Yours sincerely,

(Francis Cheong / WCS-Malaysia Program)

15<sup>th</sup> January 2016