



for a living planet®

WWF-Malaysia

1 Jalan PJS 5/28A
Petaling Jaya Commercial Centre (PJCC)
46150 Petaling Jaya
Selangor, Malaysia
Phone: +603 7450 3773
Fax: +603 7450 3777
Email: contactus@wwf.org.my
Website: wwf.org.my
FB: www.facebook.com/wwfmy

Cheah Chi Ern,
Malaysian Timber Certification Council (MTCC)
C-08-05, Block C, Megah Avenue II,
No. 12, Jalan Yap Kwan Seng,
50450 Kuala Lumpur, Malaysia
Tel: +(6) 03 – 2161 2298
Fax: +(6) 03- 2161 2293
Website: www.mtcc.com.my

15 January 2016

Tuan,

Review of the Malaysian Criteria and Indications for Forest Management Certification (Natural Forest): WWF-Malaysia's Feedback

We refer to the letter dated 13 November 2015 (Ref: (70) MTCC 7/1/6/3) from MTCC on the above matter:

2. WWF-Malaysia would like to express our deepest appreciation on the opportunity given to provide suggestions and comments on the Malaysian Criteria and Indications for Forest Management Certification (Natural Forest) [MC&I(Natural Forest)]. Our 10 pages comments are attached with this letter.
3. WWF-Malaysia looks forward to working with you to strengthen our national forest certification scheme for sustainable forest management. Please do not hesitate to contact us for further information and clarification.

Thank you.

Sincerely yours,

Dr. Sundari Ramakrishna
Conservation Director
WWF-Malaysia
Email: sramakrishna@wwf.panda.org
Phone: +603 7450 3773

Patron: DYMM Paduka Seri Sultan Perak Darul Ridzuan, Sultan Nazrin Muizzuddin Shah
President: Emer. Prof. Dato' Dr Abdul Latiff Mohamad
Chairman: YAM Tunku Ali Redhauddin ibni Tuanku Muhriz
Treasurer: Ms Caroline Russell
Legal Advisor: Ms Suhana Dewi Selamat
Trustees: Datuk Dr Beatrice Beth Baikan, Mr Robert Basiuk, Mr Chew Hoy Ping, Mr Stephen Hagger, Mr Jayl Langub, Prof. Dato' Dr Mazlin Mokhtar, Mr Ken Pushpanathan, Mr Christopher HW Wong
Executive Director/CEO: Dato' Dr Dionysius S.K. Sharma

Donations to WWF-Malaysia are tax-deductible.
Registered as: WWF-Malaysia (World Wide Fund For Nature Malaysia)

First Public Comment
(Please submit by 15 January 2016)

Feedback Form

Malaysia Timber Certification Council

C-8-5, Block C, Megan Avenue 2, No. 12 Jln Yap Kwan Seng, 50450 Kuala Lumpur

Tel : 03-2161 2298

Fax : 03-2161 2293

Email : cheah@mtcc.com.my

Dear Mr Cheah,

Review of the Malaysian Criteria and Indicators for Forest Management Certification (Natural Forest): First Public Comment (16 November 2015 – 15 January 2016)

With reference to your letter dated 16 November 2015, I would like to provide the following comments on the MC&I(Natural Forest):

1) General Comments:

- I. To ensure the consistency on changes needed for new Laws Orders and the actual name of such Orders and Laws.
- II. To adopt and make the language consistent Principle 9 of MC&I[Forest Plantation v.2]

2) Specific Comments:

Principle / Criterion / Indicator / Verifier	Proposal for amendment / deletion / addition	Reasons for proposed amendment / deletion / addition
1.1	To include an additional indicator (1.1.4) "A system is in place to update relevant laws, regulations, policies/plans".	There may be changes to the relevant laws, regulations etc. and these need to be updated on a periodic basis. As such there needs to be a system in place to address this.
1.1.1 Verifier Peninsular Malaysia	<u>Federal Law</u> To replace "Environmental Quality (Prescribed Activities) (Environmental Impact Assessment) Order, 1987" with " <i>Environmental Quality (Prescribed Activities) (Environmental Impact Assessment) Order, 2015</i> " *Note : This change needs to be reflected throughout the document, where the 1987 EIA Order is mentioned e.g in Principle 6	A new EIA Order has been passed by the Parliament to replace the 1987 EIA Order.
1.1.1 Verifier Peninsular Malaysia	<u>Policies</u> To include "National Policy on Climate Change; Central Forest Spine I : Masterplan for Ecological Linkages" and "Central Forest Spine II : Masterplan for Ecological Linkages"	The CFS masterplans are important plans that call for sustainable management of forests within the CFS area and maintaining and creating ecological linkages where identified. As such this is an important verifier.
1.1.1 Verifier Sabah	<u>Federal Law</u> To include "National Policy on Climate Change; and International Trade in Endangered Species Act, 2008."	
1.1.1 Verifier	<u>State Law</u> To amend "Biodiversity Enactment, 2000" to " <i>Sabah</i>	The actual name of the enactment

Principle / Criterion / Indicator / Verifier	Proposal for amendment / deletion / addition	Reasons for proposed amendment / deletion / addition
Sabah	<i>Biodiversity Enactment, 2000</i>	
1.1.1 Verifier Sabah	<u>State Law</u> To replace "Environment Protection (Prescribed Activities) (Environmental Impact Assessment) Order, 2005" with " <i>Environment Protection (Prescribed Activities) (Environmental Impact Assessment) Order, 2012</i> ".	The Order has been upgraded
1.1.1 Verifier Sabah	<u>State Law</u> To replace "Sabah Parks Ordinance, 1962" with " <i>Park Enactment, 1984</i> ".	There is no longer Sabah Parks Ordinance, 1962
1.1.1 Verifier Sabah	<u>State Law</u> To include "Drainage & Irrigation Ordinance, 1956"	
1.1.1 Verifier Sarawak	<u>Federal Law</u> To include the following: - Biosafety Act 2007 - Immigration Act 1959/63 - International Trade in Endangered Species Act 2008 - Minimum Retirement Age Act 2012 - National Wages Consultative Council Act 2011 (including the 'Minimum Wages Order 2012) - Plant Quarantine Act 1976	Relevant laws to be considered as reference.
1.1.1 Verifier Sarawak	<u>State Law</u> To amend "Forests Ordinance (Cap. 126)" to " <i>Forest Ordinance, 2015</i> ".	
1.1.1 Verifier Sarawak	<u>State Law</u> To amend "Labour Ordinance (Sarawak Cap. 76)" to " <i>Labour Ordinance, 1952 (Sarawak Cap. 76)</i> "	
1.1.1 Verifier Sarawak	<u>State Law</u> To amend "Land Code (Cap. 81)" to " <i>Land Code, 1958 (Cap. 81)</i> "	
1.1.1 Verifier Sarawak	<u>State Law</u> To amend "Natural Resources and Environment Ordinance (Cap. 84)" to " <i>Natural Resources and Environment Ordinance, 1993 (Cap. 84)</i> "	Relevant documents to be considered as reference.
1.1.1 Verifier Sarawak	<u>State Law</u> To include "Natural Resources and Environment (Fire Danger Rating System) Order, 2004"	Relevant documents to be considered as reference.
1.1.1 Verifier Sarawak	<u>State Law</u> To change the word of 'adat' with customary laws/ adat laws	To be consistent with the verifier captured under MC&I(Forest Plantation)
1.1.1 Verifier Sarawak	<u>Policies</u> To include "Orangutan Strategic Action Plan: Trans-boundary Biodiversity Conservation Area"	Relevant documents to be considered as reference.
1.2.1 Verifier Sabah	To include "Forest Enactment 1968 [Sections 24C & 42(d),(e)]; "Forest Rules 1969, Rule 12(1)"; "Removal Pass", "Revenue Hammer Mark", "Timber Disposal Permit"; "Monthly Revenue Collection Report".	To be specific, as listed in for Sarawak State
1.2.1 Verifier Sabah	To replace "FD Circulars" with " <i>CF Circular 1/81 Measurement of Timber For Royalty Assessment-CF No 1/81 2006 Version, 1st Revision</i> "	To be specific, as listed in for Sarawak State
1.3.1 Verifier	To include "ASEAN Agreement on Transboundary Haze Pollution, 2002"; and "United Nations Resolution	Relevant documents to be considered as reference.

Principle / Criterion / Indicator / Verifier	Proposal for amendment / deletion / addition	Reasons for proposed amendment / deletion / addition
	A/RES/69/314 on Tackling the Illicit Trafficking in Wildlife, 2015”	
1.5.1 Verifier Sarawak	To include “Interpretation Ordinance (Cap. 61)” and “Wild Life Protection Rules, 1998”	Relevant laws to be considered as reference.
1.5.1	To include the following as guidance under the indicator: <ul style="list-style-type: none"> i. Publicly available maps of an appropriate scale showing the extent of different functions of forests within forest management unit (forest classes) ii. (if any) Publicly available document and maps and clearly demarcated of native/indigenous people area with documented agreement with affected group 	This could provide a clear pictures to auditor and public on the activities allowed within FMU to ease the efforts in detecting any illegal/ unauthorized activities; clearly demarcated native/indigenous people area would also ease the ground auditing for principle 2 and 3.
1.5.1 Verifier	To amend “Compliance with the following through records of monitoring” to “ <i>maps and documents as per the guidance of the indicator, and complying with the following</i> ”	As maps and action plan could provide a solid pictures on how these provisions could and would be addressed.
1.5.2	To include the following as guidance under the indicator: <ul style="list-style-type: none"> i. A document detailing the monitoring and implementation plan for controlling illegal and unauthorized activities, which shall be communicated to all levels of workforce and operations. ii. Total number of observed ground control measures, i.e. signage, gates 	Having these guidance would and could ease the auditing process and making the standards and certification more credible with specific guidance proving the efforts towards curbing illegal and/or authorized activities.
1.5.2 Verifier	To amend “Compliance with the following through record of monitoring” to “ <i>Forest Management Plan, Post-Harvesting plan, and/or through record of monitoring/monitoring system, capturing information on the following</i> ”; and To include more details in the verifier as evidence to curb illegal encroachment/harvesting/hunting. These include (but not limited to) : <ul style="list-style-type: none"> - Forest have gates and/or have controlled access; - Temporary roads are physically closed off after harvesting; - Forest roads are patrolled to detect and prevent illegal access to the forest; - Number of personnel and resources assigned on the ground to detect and control illegal activities promptly. - Records of patrol conducted 	Having these efforts properly planned out as per planned activities and capturing its within existing Forest Management Plan and Post-harvesting plan will make information and evidence gathering easier and more comprehensive. These proposed examples will provide a more detailed guidance on the evidence required to curb illegal harvesting/hunting. Access to forest reserves through old logging roads can increase poaching incidences and closing off these old logging roads and controlling access to forest reserves can deter access. The number of personnel and resources assigned (for example per 100ha of forest reserve/FMU) as well as records of the number of patrols conducted will indicate if the resources and patrolling efforts are sufficient to effectively curb illegal encroachment and harvesting in forest reserves.
1.6	To amend “Forest managers shall demonstrate long-term commitment to adhere to these Principles and Criteria” to “ <i>Forest managers shall demonstrate commitment(s) to long-term economic, environmental</i>	As the main gist of adhering to these Principles and Criteria is about achieving sustainability; the criteria is therefore be made to reflect this in a more holistic and

Principle / Criterion / Indicator / Verifier	Proposal for amendment / deletion / addition	Reasons for proposed amendment / deletion / addition
	<i>and social viability and sustainability”.</i>	credible manner.
1.6.1	To amend “Availability of policies or statements of commitment to forest management practices consistent with these Principles and Criteria” to “ <i>Availability of policies, statements and/or plan of commitment(s) towards achieving long-term economic, environmental and social viability and sustainability.</i> ” Guidance: i. <i>Policies or statements should contain:</i> a. <i>Complying to applicable federal, state and local laws and administrative requirements (compliance to Criteria 1.1 of this Standard).</i> b. <i>Contributing to achieving relevant binding international agreements applicable to forest management (contributing to relevant listed verifier of Criteria 1.3)</i> c. <i>Disclosure of associated companies</i> d. <i>Made publicly available (i.e. posted on website, and/or captured in Annual Report)</i>	Changing the indicator to reflect the contribution and alignment to criteria; while capturing the specific guidance achieving this to ease the auditing and compliance.
1.6.1 Verifier	To include “Forest Management Plan”, and “website and annual report”	These could serves as good verifier of such policies, statements and/or plans towards achieving sustainability and viability of management regime.
1.6.2 Verifier	To amend “Records of staff briefings” to “ <i>Records of staff briefings and trainings</i> ”	To better capture trainings provided as a means of efforts contributing to ensuring staffs are well-informed on all related policies, plans and missions towards achieving sustainability
1.6.2 Verifier	To amend “Evidence of distribution of policy statement to stakeholders” to “ <i>Evidence of distribution of policies, statements and plans to relevant subsidiaries, parent company and other interested groups of stakeholders.</i> ”	This could serves as one of the means ensuring all associated companies, staffs and stakeholders are informed of relevant policies, statements and plans.
2.1.1 Verifier Sarawak	To include “Interpretation Ordinance (Cap. 61)”;	Relevant laws to be considered as reference.
2.1.1	To include the following as guidance under the indicator: i. Legal boundaries shall be clearly demarcated and visibly maintained. ii. Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available	This could address previous stakeholders comments and concerns on the lack of transparency on the actual legal boundaries; edging encroachment, and social conflict due to unclear land demarcation.
2.1.1 Verifier	To include “Forest Management Plan”; “(as and when relevant) agreement or legal document on land acquisition”; and “any other relevant documents proving the fair compensation and legal procedure on	This is to serve as good verifier for the guidance provided above

Principle / Criterion / Indicator / Verifier	Proposal for amendment / deletion / addition	Reasons for proposed amendment / deletion / addition
	land/title acquisition". (to be included into Peninsular Malaysia, Sabah and Sarawak)	
2.2.1 Verifier	To include "United Nations Declaration on Rights of Indigenous Peoples, 2007" as verifier for Sarawak; and to include "Forest Management Plan" as verifier for Peninsular Malaysia, Sabah and Sarawak.	Relevant documents to be considered as reference.
2.2.2	To include the following as guidance under the indicator: <ul style="list-style-type: none"> i. Where there is a conflict on the condition of land use as per land title, forest managers show evidence that necessary action has been taken to resolve the conflict with relevant parties. ii. Maps of an appropriate scale showing the extent of recognised legal, customary or user rights. 	To better capture the needs for proof of such efforts in addressing all previous concerns and comments from stakeholders on the credibility of the standards in addressing right and/or social conflict.
3.1.1 & 3.2.1 Verifier Sabah	To amend "Tagal and Sogit systems" to " <i>Documented Tagal and Sogit systems through participatory consultation with respective groups of indigenous people.</i> "	As the Tagal and Sogit systems are local-based; there is a need to document the locally designed systems as to respect IP's knowledge and rights.
3.1.1 Verifier Sarawak	To include "United Nations Declaration on Rights of Indigenous Peoples, 2007"	Relevant documents to be considered as reference.
3.2.1 Verifier Sarawak	To include "List of species/ resources used by indigenous peoples within the forest management unit as identified through the EIA and HCV assessment process"; and "Recognition of tenure and resource-based rights under the established laws".	Provide additional information or evidences that the rights of indigenous people are being considered by the FMU holder.
3.3.1 Verifier Sarawak	To amend "Procedures for identifying and protecting sites of special cultural, ecological, economic or religious significance to natives." to " <i>Procedures for identifying, protecting and demarcating sites of special cultural, ecological, economic or religious significance to natives.</i> "	Besides identifying and protecting, there is a need to have information that show these sites are properly marked on the ground.
4.1.2 Verifier Sarawak	To include "Documentation of management commitment" and "Records of efforts to recruit workers from local communities"	Relevant documents to be considered as reference.
4.2.1 Verifier Sarawak	To include the following: <ul style="list-style-type: none"> - Factories and Machineries Act 1967 - Labour Ordinance, 1952 (Sarawak Cap. 76) - Occupational Safety and Health Act, 1994. - Workmen's Compensation Act, 1952. 	Relevant documents to be considered as reference.
4.4.1 Verifier Sarawak	To replace "Report on social impact evaluation" with " <i>Report on social impact assessment (SIA)</i> "	Relevant documents to be considered as reference.
4.5.1 Verifier Sarawak	To include "records of meetings and/or consultations between forest manager and affected local communities"	Relevant documents to be considered as reference.
4.5.2 Verifier Sarawak	To amend "Records of consultation and negotiation" to "Records of consultation, negotiation and outcomes."	Relevant documents to be considered as reference.
5.1.1 Verifier Sarawak	To include "Annual Work Plan/ Annual Harvesting Plan" and "Forest Management Plan"	Relevant documents to be considered as reference.

Principle / Criterion / Indicator / Verifier	Proposal for amendment / deletion / addition	Reasons for proposed amendment / deletion / addition
5.1.2 Verifier Sarawak	To include 'Annual Work Plan'	Relevant documents to be considered as reference.
5.4.1 Verifier	To include "Number and type of PES schemes" as a verifier.	PES schemes are being explored more as an alternative source of income for forest units. It can be used as a verifier for 5.4.1
5.5.1 Verifier for Sabah	To include "High Conservation Value Forest (HCVF) Toolkit"	HCVF Toolkit has been widely use in Sabah for the identification of sensitive and high conservation value area and thus its management requirements
5.5.1 Verifier for Sarawak	To include the following: <ul style="list-style-type: none"> - Procedures for Identifying and Demarcating Sensitive Areas for the Protection of Soil and Water, 1999. - Sensitive areas in the forest management unit identified, classified, mapped and protected. - NREB's Guidelines for Preliminary EIA for Forest Harvesting - HCVF Toolkit 	Relevant guidelines to be considered as reference.
5.6.1	To include "Guidelines of Malaysia Silvicultural System"	The Guidelines sets the minimum cutting limits for dipterocarp and non-dipterocarp species.
6.1.1	To seek clarification on "...landscape level considerations..." and to include an explanatory note or specific guidance to ease the auditing and verification process	
6.1.1 Verifier Sarawak	To amend "Natural Resources and Environment Ordinance (Cap. 84) – Section 11A" to " <i>Natural Resources and Environment Ordinance 1993 (Cap. 84)</i> "	
6.1.1 Verifier Sarawak	To include "Environmental Impact Assessment (EIA) report"	To include existing relevant document
6.1.1 Verifier Sarawak	To include the following: <ul style="list-style-type: none"> - Guidelines of Managing Biodiversity in the Riparian Zone, 2010. - Sarawak Plant Red List. - Guidelines for the identification and protection of rare, threatened and endangered species. 	To include existing relevant guidelines and document.
6.1.2 Verifier Sabah	To include the following: <ul style="list-style-type: none"> - IUCN Red List - Sabah Forestry Enactment - Sabah Wildlife Enactment - Records of consultations with experts in the field - HCV assessment reports 	Relevant laws, reports and documents to be considered as reference.
6.2.1 Verifier Sabah	To include the following: <ul style="list-style-type: none"> - RIL Operation Guide Book: Code of Practice for Forest Harvesting in Sabah, Malaysia, 2009 - Rhinoceros Action Plan, 2012-2016 - Orang Utan Action Plan, 2012-2016 - Elephant Action Plan, 2012-2016 - HCV assessment report - Wildlife Conservation Enactment, 1997 – 	Relevant documents and plans to be considered as reference.

Principle / Criterion / Indicator / Verifier	Proposal for amendment / deletion / addition	Reasons for proposed amendment / deletion / addition
	Sections 4-29 and 54-63 o List of totally protected species (Schedule 1) o List of protected species (Schedule 2) o List of protected species (Schedule 3)	
6.2.1 Verifier Sarawak	To include the following: - Guidelines for the identification and protection of rare, threatened and endangered species. - Environmental Impact Assessment (EIA) report. - Records of measures taken to address human-wildlife conflict.	Relevant guidelines or documents to be considered as reference.
6.2.2	To include the following as guidance under the indicator: i. Documentation of management guidelines adopted or use (i.e. HCVF toolkit) ii. Map showing protection and/or conservation areas established iii. Documentation of consultation process with interested and affected stakeholders	It is crucial to note on the management guidelines, in which forest manager is referred to in establishing conservation zone and/or areas; as well as the development of appropriate safeguards measures.
6.2.2	Include "Map of conservation zones" as a verifier for Peninsular Malaysia, Sabah and Sarawak	Conservation zones will be identified and established as per the indicator and this needs to be indicated in a map for verification.
6.2.2 Verifier Sarawak	To include the following: - Demarcation of the conservation area. - Environmental Impact Assessment (EIA) report. - Guidelines for the establishment of representative conservation and protection areas. - Orangutan Strategic Action Plan: Trans-boundary Biodiversity Conservation Area.	Relevant guidelines or documents to be considered as reference.
6.2.3	To include the following as guidance under the indicator: i. Document detailing implementation, collaborative and time-bound plan, shall include: a. The scope of conservation activities b. Objectives, outcomes and outputs of the said activities; c. Geographical scope d. Collaborative partners e. Made publicly available	It is important to take note on all efforts taken by forest managers in conservation with the most possible details on its contributions to conserving and sustaining natural resources within its FMU. * This verifier and indicator could serve to contribute to complying Criteria 1.6.
6.2.3 Verifier	To amend "Records of meetings or collaboration" to "Records and relevant documents of relevant project implementation plans, meetings, workshops etc"	This is to expands the scope of verifiers that often could be access and made available through all project implementation phases.
6.2.4	To amend "Hunting, fishing and collecting activities shall be controlled and inappropriate activities prevented in the FMU" to "Available of monitoring and controlling measures and approaches for hunting, fishing and collecting activities" Guidance: i. System or database for recording of all	The guidance and/or measures and approaching for this indicator is crucial in measuring the efforts of forest managers towards protecting rare, threatened and endangered species and habitats, as well as the important and sensitive environmental and ecological values of

Principle / Criterion / Indicator / Verifier	Proposal for amendment / deletion / addition	Reasons for proposed amendment / deletion / addition
	relevant licenses for hunting, fishing and collecting, which should have details on locations, extent and specific products ii. Monitoring mechanism, such as patrolling or checking plans for preventing any breach of licenses and/or illegal activities	forests.
6.2.4 Verifier	To include "Records, reports, system, database for recording of licenses issued and any breach of license, as well as illegal activities" as verifier to Peninsular Malaysia, Sabah and Sarawak.	Proposed of verifier aligning to the above proposed guidance and amendment of indicator 6.2.4.
6.2.4 Verifier Sarawak	To amend "Measures such as periodical patrolling of ... and extreme recreational activities" to " <i>Measures to prevent unauthorized activities in the FMU, such as setting up guard points, periodical patrolling of ... and extreme recreational activities</i> "	To provide a more accurate information.
6.2.5 Verifier Sarawak	To include the following: - List of attendance for the awareness activities conducted forest workers. - List of attendance for the awareness activities conducted for local communities.	Relevant guidelines or documents to be considered as reference.
6.3.1 Verifier Sarawak	To include the following: - Forest Management Plan - Guidelines for the demarcation and protection of natural forests. - Records of areas of natural forest demarcated, mapped and protected.	Relevant guidelines or documents to be considered as reference.
6.3.2 Verifier Sabah	To include the following: - Forest Enactment, 1968 - Rhino, elephant and orang utan Action Plan, 2012-2016	Relevant guidelines to be considered as reference and verifier.
6.3.2 Verifier Sarawak	To include "Guidelines for the conservation of genetic, species and ecosystem diversity".	Relevant guidelines or documents to be considered as reference.
6.3.3	To amend " Harvesting... the conservation of biological corridors and buffer zones... for wildlife." to " <i>Harvesting... the conservation of biological corridors, habitats, and buffer zones... for wildlife.</i> "	Wildlife habitats should be included as to maintain the ecological functions of the ecosystem for wildlife.
6.3.3 Verifier Sabah	To include the following: - HCV assessment report - Map of the corridors, habitat and buffer zones identified	Relevant existing reports and data to be included.
6.3.3 Verifier Sarawak	To include "Guidelines for Managing Biodiversity in the Riparian Zone, 2010".	Relevant guidelines or documents to be considered as reference.
6.4.1 Verifier	To amend "Records and maps of such areas." to "Records, maps, demarcation and protection of such areas."	To provide evidences of protection works done on the ground or at the site.
6.4.1 Verifier	To include "HCV assessment report"	
6.5.1 & 6.5.2 Verifier Sabah	To include "Environmental Impact Assessment (EIA); Proposal for Mitigation Measures (PMM), Agreement of Environmental Condition (AEC) and associated compliance reports."	Relevant and readily available reports
6.7.1 Verifier	To include "Environmental Quality (Scheduled Wastes) Regulations 2005".	Relevant guidelines or documents to be considered as reference.

Principle / Criterion / Indicator / Verifier	Proposal for amendment / deletion / addition	Reasons for proposed amendment / deletion / addition
6.8.1 & 6.9.1 Verifier	To include "Biosafety Act 2007".	Relevant act to be considered as reference.
6.10	To include the following as guidance under the indicator: *It should also state that the 5% include those that have been converted and in the process/ plans to be converted.	* as captured within Guidelines for the Interpretation of Requirements in MC&I (Natural Forest) [GD-NF 2/2014]
7.1.1 Verifier Sabah	To include the following: - Annual Work Plan (AWP) - Annual report - Records showing progress in AWP	
Principle 8 Monitoring and Assessment	To amend "Monitoring shall be conducted – appropriate to the scale and intensity of forest management – to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts" to " <i>Monitoring shall be conducted – appropriate to the scale and intensity of forest management – to assess the condition of the forest within the management unit, yields of forest products, chain of custody; as well as progress towards achieving management objectives, and the impacts of management activities</i> "	It is important to better capture the needs to assess the progress towards achieving sustainability and viability as stipulated within respective management objectives; and its impacts (both negative and positive) of management activities.
8.1.2 Verifier Sarawak	To include the following: - Evidence of monitoring unit is established. - Auditing and monitoring reports. - Environmental Monitoring Report (EMR).	To provide more information of monitoring works that been carrying out by the FMU holder.
8.2.1 Verifier Sabah	To include "Reports on monitoring on flora and fauna"	
8.3.1 Verifier Sabah	To include "Annual Work Plan"	
8.3.1 Verifier Sarawak	To include "Records of felling extraction and transportation".	Relevant records to be considered as reference.
9.1.1	To include the following as guidance under the indicator: i. Documentation of HCV identification guidelines adopted for the identification of HCV within FMU; ii. Responses and actions taken in addressing stakeholders' comments and feedbacks on the outcomes of (i) iii. HCV identification should be conducted by third-party accredited HCV assessor. iv. Made publicly available relevant documents	As different region adopted different HCV guidelines or toolkits; it is crucial to make transparent and participatory the process of identification, managing, monitoring and demarcating of HCV identified complying to the transparency towards sustainability.
9.1.1 & 9.2.1 Verifier	To include the following (Peninsular Malaysia, Sabah and Sarawak): - HCV guidelines/ HCVF Toolkit - HCV reports, detailing the location, values, management regime, and monitoring measures.	Relevant verifier supporting the guidance above (9.1.1)

Principle / Criterion / Indicator / Verifier	Proposal for amendment / deletion / addition	Reasons for proposed amendment / deletion / addition
	- Responses to stakeholder feedback	
9.1.1 Verifier	To amend "Report on assessment, identification and demarcation on maps of HCVFs" to " <i>Report on identification, management, monitoring and demarcation on maps of proposed HCVs.</i> " as verifier for Peninsular Malaysia, Sabah and Sarawak.	Management and monitoring of HCV identified is crucial on ensuring the forest management and/or economic activities in compliances with relevant principles of this Standards ensuring sustainability.
9.1.1 Verifier Sarawak	To include ""High Conservation Value Forest (HCVF) Toolkit for Malaysia"	Relevant guidelines to be considered as reference.
9.2.1	To include guidance: <ul style="list-style-type: none"> i. Conduct participatory consultation with relevant stakeholders on the identification, management and monitoring recommendations; as well as the demarcation of HCV identified. ii. Responses and actions taken in addressing stakeholders' comments and feedbacks on the outcomes of (i) iii. Made publicly available relevant documents 	It is crucial to ensure consultation to get feedbacks and comments on the management regime and monitoring measures is conducted through a participatory and transparent manner.
9.3.1	To amend "Measures to demarcate, maintain and/or enhance the HCVF attributes are documented in the forest management plan and effectively implemented." to " <i>Measures to demarcate, maintain and/or enhance the HCVs attributes are documented in the forest management plan and effectively implemented, based on scientific assessments/studies where available and using the precautionary approach in the absence of scientific information.</i> "	Management strategies/guidelines can be formulated for the management of HCV areas through scientific studies (e.g size of HCV areas and buffers to ensure the areas don't degrade). In the absence of such studies, the precautionary approach needs to be applied in the Criteria.
9.3.1 Verifier	To amend "Management prescriptions to maintain and/or enhance HCVF attributes" to " <i>Management measures/guidelines to maintain and/or enhance HCVs attributes</i> " verifier of Peninsular Malaysia; and to be included in as verifier for Sabah and Sarawak	Proper documented measures, in some cases in the form of HCV management guidelines (e.g management of saltlicks) need to be in place in the form of guidelines to ensure the HCV areas are protected and managed to avoid degradation as well as survival of wildlife in the forests.
9.4.1 Verifier	To amend "Monitoring procedures to assess the effectiveness of the measures in the management of the HCVFs" to " <i>Monitoring procedures that has sufficient/appropriate scope and detail to detect changes in HCVF, relative to the initial assessment and status identified for each HCVs</i> ".	The scope and detail of the monitoring procedures need to be appropriate to ensure that any changes are detected to HCV. This would be useful in determining if changes to management measures are needed.
9.4.2 Verifier	To include "Revision to HCVs management measures/guidelines" as a verifier.	If the monitoring results indicate that despite prescribed management measures/guidelines in place, HCV areas are still becoming degraded, there will be a need to review and revise the management measures/guidelines.