

## Addressing Non-conformities Raised in MTCS

No.	PEFC Requirement	MTCS Standard & Document	Assessor's Comment	Response Submitted	Amendments to address NC (Incorporating feedback from PEFC)
<b>Standard Setting Procedures</b>					
1	<b>5.3.2</b> The standardising body shall establish at least one contact point for enquiries, complaints and appeals relating to its standard-setting activities. The contact point shall be easy to access and readily available.	<b>SSP 4/2020 5.3.2</b> MTCC shall establish at least one contact point for enquiries, complaints and appeals relating to its standard-setting activities. The contact point shall be easy to access and readily available.	No contact point for the listed issues is found in the procedures. It shall be noted that such a contact point must be readily appointed in the procedures.	<p>The contact point/person is established during the standard review process in accordance with the requirement as stipulated in the procedure. This is reflected in every communication throughout the standard review process. Taking into account possible changes in personnel, MTCC is of the view that it is not pragmatic to indicate the contact person in the SSP document itself.</p> <p>Any other feedback or enquiries relating to the scheme's procedures and technical documents (outside of the review process) can be submitted in writing to the CEO of MTCC or through the feedback form on the website. The MTCC web administrator will direct all enquiries to the CEO and relevant units in accordance with the nature or topic of the feedback received</p>	<p>To address the NC, the SSP 4/2020 was amended as:</p> <p><b>5.3.2</b>  <a href="#">MTCC shall establish at least one The contact point for enquiries, complaints and appeals relating to <del>its</del> the standard-setting activities shall be the head of unit responsible for standard-setting activities and the details of the contact point shall be published at the beginning of the process.</a></p> <p>Note: Indicating the contact point/person in the standard-setting procedure is impractical. Moreover, MTCC is currently at the beginning of organizational restructuring exercise which means that the SSP may be required to be amended again prior to the start of the next revision.</p>

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				for further action.	
2	<p><b>6.4.6</b></p> <p>Where a vote is used in decision-making, the standard-setting procedures shall determine and include decision-making thresholds that quantifies consensus. The threshold must be consistent with the consensus definition (refer to 3.1).</p> <p>However, a majority vote cannot override sustained opposition in order to achieve consensus.</p>	<p><b>SSP 4/2020 6.4.6</b></p> <p>Where a vote is used in decision-making, the standard-setting procedures shall determine and include decision-making thresholds that quantifies consensus. The threshold must be consistent with the consensus definition.</p> <p>However, a majority vote cannot override sustained opposition in order to achieve consensus.</p>	<p>No clause is found in SSP 4/2020 which determines the decision-making threshold that quantifies consensus. It is noted that such a threshold was available in SSP3/2014, but no longer exists in the updated version.</p>	<p>Should the need arise for a vote during the review process, a simple majority rule would have been applied and consensus amongst the SRC members would be sought on the threshold.</p> <p>Nonetheless, MTCC will update clause 6.4.6 under the SSP 4/2020 and include a threshold for the majority vote. MTCC will propose to the MTCC BOT for a threshold of 2/3 majority vote.</p>	<p><b>To amend the SSP 4/2020 document as follows:</b></p> <p><b>6.4.6</b></p> <p>Where a vote is used in decision-making, the <del>standard-setting procedures shall determine and include</del> decision-making thresholds that quantifies consensus <del>shall be at least two-third (2/3) of the vote. The threshold must be consistent with the consensus definition.</del></p> <p>However, a majority vote cannot override sustained opposition in order to achieve consensus.</p>
<b>Sustainable Forest Management Standard</b>					
3	<p><b>8.1.4</b></p> <p>The standard requires that forest conversion shall not occur unless in justified</p>	<p><b>MC&amp;I SFM 1/2020</b></p> <p>"Definition of Key Terms Degraded Forest: Land with long-term significant reduction</p>	<p>Indicator 6.10.1 does not ensure that conversion shall entail no more than</p>	<p>With the imposition of the cut-off date of 31 December 2010, no further conversion of natural forest shall occur within a forest</p>	<p>To address the missing requirement on conversion of forest plantation to other land use, the following Indicator which was adapted from 6.10.2 of MC&amp;I Forest</p>

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	<p>circumstances where the conversion:</p> <p>b) entails a small proportion (no greater than 5 %) of forest type within the certified area; and</p>	<p>of the overall potential to supply benefits from the forest, which includes carbon storage, wood, biodiversity and other goods and services.</p> <p>Natural forest: Forest areas where many of the principal characteristics and key elements of native ecosystems such as complexity, structure and diversity are present.</p> <p>Criterion 6.10 (NF only) Forest conversion to other land uses shall not occur, except in circumstances where conversion:</p> <p>a) entails a very limited portion of the FMU;</p> <p>Plantation established in areas converted from natural forests after 31 December 2010 is not eligible for certification unless it fulfils the requirements stipulated under Criterion 6.11.</p> <p>Indicator 6.10.1 (NF only) The forest manager shall</p>	<p>5% of the respective forest type(s).</p> <p>Next, Criterion 6.10 (FP only) stipulates the circumstances when conversion would be allowed, but also indicates that conversion after 2010 is not eligible for certification (in the case of forest plantation that are the result of conversion of natural forest), unless the requirements under 6.11 are met. This is contradictory and confusing, as it would imply that the requirements under 6.10 (FP only) are useless, but risk to be misinterpreted.</p>	<p>plantation area as indicated in Criterion 6.10 (FP).</p>	<p>Plantation.v2 is proposed:</p> <p><b>MC&amp;I SFM Indicator 6.10.2 (FP only):</b></p> <p>Conversion of forest plantation areas to non-forest land uses, shall entail a very limited portion (not more than 5%) of the forest plantation management unit, provide higher conservation, economic and social values as compared to its original use, in the overall context of the need for socio-economic development of the country.</p> <p><b>Verifier:</b></p> <p><b><i>Peninsula / Sabah / Sarawak</i></b></p> <ul style="list-style-type: none"> <li>• Cost benefit analysis including social aspects</li> <li>• Environmental Impact Assessment (EIA) report</li> <li>• Records of conversion of forest plantation areas to non-forest land uses</li> </ul>

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		<p>ensure that conversion from natural forest to forest plantations or non-forest use:</p> <p>b) Covers a very limited portion* of the FMU and shall enable clear, substantial, additional, secure, long term conservation, economic and social benefits across the FMU</p> <p>*"A limited portion" is defined as not more than 5% of the total area of the certified FMU"</p> <p>Criterion 6.11</p> <p>Conversion of severely degraded forests to forest plantations shall only occur if it adds economic, ecological, social and/or cultural value.</p> <p>Precondition of adding such value are circumstances where the conversion: (...) "</p>			

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4	<p><b>8.1.4</b></p> <p>The standard requires that forest conversion shall not occur unless in justified circumstances where the conversion:</p> <p>c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and</p>	<p><b>MC&amp;I SFM 1/2020</b></p> <p>"Criterion 6.10 (NF only) Forest conversion to other land uses shall not occur, except in circumstances where conversion:</p> <p>b) does not occur on high conservation value areas; and</p> <p>c) does not occur in ecological corridors and environmentally sensitive areas identified by the relevant authorities;</p> <p>d) will enable clear, substantial, additional, secure, long-term conservation, economic and social benefits across the FMU.</p> <p>Criterion 6.10 (FP only) Conversion of natural forest to plantation forest shall not occur, except in circumstances where conversion:</p>	<p>The references ensure that no conversion will take place within important forest areas. It is however not ensured that it will not negatively impact on such areas, for instance when it happens directly next to protected areas or in corridor areas between protected areas. The "Social, environmental and economic cost benefit analysis" (Verifier 6.10.1) insufficiently ensures that negative impacts on important forest areas will be avoided.</p>	<p>Conversion of high conservation value areas as well as ecological corridors and environmentally sensitive areas (i.e. ecologically important forest area) is not allowed as it is understood that it will negatively impact such areas. For other areas that are not considered "ecologically important forest area," Criterion 6.10 (d) requires that conversion must have a long-term conservation, economic and social benefit across the FMU.</p> <p>Measures to protect ecologically important forest areas are elaborated under Principle 9, particularly under Indicator 9.2.2 and Criterion 9.3 which should be consistent with precautionary approach. Measures may include establishment of buffer zones adjacent to the ecologically important/high conservation value areas, in accordance with the result of consultation with relevant stakeholders.</p> <p>The requirement to conduct</p>	<p>MTCC is of the view that the current wordings in Criterion 6.10 (a)-(d) for both NF and FP have sufficiently captured the essence of the requirement. Nonetheless, to close the NC, the following amendments are proposed:</p> <p>Criterion 6.10 for Natural Forest is amended as:</p> <p>c) does not occur <a href="#">or negatively impact in</a> ecological corridors and environmentally sensitive areas, identified by the relevant authorities; and</p> <p>Criterion 6.10 for Forest Plantation is amended as:</p> <p>b) does not occur <a href="#">or negatively impact in</a> ecological corridors and environmentally sensitive areas, identified by the relevant authorities; and</p> <p>Note: The SRC have deliberated and opined that the safeguard is already covered under Criterion 6.4, and agreed not to change the wording of the Criterion as it will make it more</p>

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		<p>a) does not occur on high conservation value areas;</p> <p>b) does not occur in ecological corridors and environmentally sensitive areas identified by the relevant authorities;</p> <p>c) will enable clear, substantial, additional, secure, long-term benefits across the FPMU.</p> <p>6.10.1 (NF only) Verifier: Peninsula / Sabah / Sarawak</p> <ul style="list-style-type: none"> <li>Social, environmental and economic cost benefit analysis</li> </ul> <p>6.10.1 (PF only) Verifier Peninsula / Sabah / Sarawak</p> <ul style="list-style-type: none"> <li>Cost benefit analysis including social aspects</li> <li>EIA report</li> </ul> <p>Criterion 9.3 The management plan shall include and implement specific measures that ensure the</p>		<p>Environmental Impact Assessment (EIA) under Indicator 6.10.1 (both NF &amp; FP) will address the concern on impact of conversion on all forest areas.</p>	<p>subjective. However, if the addition of "negatively impact" is required to comply with the PEFC requirements, the meeting would agree to its inclusion so long as it does not contradict the spirit of Criterion 6.10.</p>

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		<p>maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach.</p> <p>These measures shall be specifically included in the publicly available management plan summary.</p> <p>Indicator 9.3.1 Measures to demarcate, maintain and/or enhance the HCV attributes are documented in the forest management plan and effectively implemented."</p>			
5	<p><b>8.1.4</b></p> <p>The standard requires that forest conversion shall not occur unless in justified circumstances where the conversion:</p> <p>d) does not destroy areas of significantly high carbon stock; and</p>	<p><b>Criterion 6.10 for Natural Forest:</b></p> <p>Forest conversion to other land uses shall not occur, except in circumstances where conversion:</p> <p>a) entails a very limited portion of the FMU; and</p> <p>b) does not occur on high</p>	<p>Although the MTCC comment shows the interpretation of the SRC, no reference was found in the standard ensuring that conversion does not destroy areas of significantly high</p>	<p>The matter on the definition of high carbon stock was deliberated at length by the SRC. Considering that there is currently no nationally agreed threshold for "high carbon stock," the SRC was of the view that term "high carbon stock" was relative as well as subjective and not well understood to guide the implementation of sustainable</p>	<p>Propose to include item (d) under Criterion 6.10 for Natural Forest:</p> <p>Forest conversion to other land uses shall not occur, except in circumstances where conversion:</p> <p>a) entails a very limited portion of the FMU; and</p> <p>b) does not occur on high conservation value areas; and</p>

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		<p>conservation value areas; and</p> <p>c) does not occur in ecological corridors and environmentally sensitive areas identified by the relevant authorities; and</p> <p>d) will enable clear, substantial, additional, secure, long-term conservation, economic and social benefits across the FMU.</p>	carbon stock.	<p>forest management. Noting that the intent of the requirement is for the protection of natural forests, particularly areas with high conservation value, the SRC was of the view that the existing requirement was sufficient.</p> <p>Fifth SRC Minute Meeting:</p> <p>The Meeting deliberated on the HCS Approach Toolkit and noted that the Toolkit is meant for protection of natural forests from being degraded via conversion to other non-forest land use which is an existing requirement in the standard."</p>	<p>c) does not occur in ecological corridors and environmentally sensitive areas identified by the relevant authorities; and</p> <p>d) <a href="#">does not negatively impact areas of significantly high carbon stock; and</a></p> <p>e) will enable clear, substantial, additional, secure, long-term conservation, economic and social benefits across the FMU.</p> <p>Note: PEFC recommended to include definition with threshold of 'High Carbon Stock' under Terms and Definition. However upon checking a few other national forest management standards under PEFC as well as FSC for reference, no other standards have included the definition and threshold for "high carbon stock". In view of current lack of nationally agreed threshold, MTCC is of the view that it shall be defined in accordance with the context of the conversion on a case-by-case basis, while noting that sufficient safeguards against indiscriminate conversion already exist in the existing requirement.</p>



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6	<p><b>8.1.4</b></p> <p>The standard requires that forest conversion shall not occur unless in justified circumstances where the conversion:</p> <p>e) makes a contribution to long-term conservation, economic, and social benefits.</p>	<p><b>MC&amp;I SFM 1/2020</b></p> <p>"Criterion 6.10 (NF only) Forest conversion to other land uses shall not occur, except in circumstances where conversion:</p> <p>d) will enable clear, substantial, additional, secure, long-term conservation, economic and social benefits across the FMU.</p> <p>Indicator 6.10.1 (NF only) The forest manager shall ensure that conversion from natural forest to forest plantations or non-forest use:</p> <p>b) (...) shall enable clear, substantial, additional, secure, long term conservation, economic and social benefits across the FMU</p> <p>Verifier: Peninsula / Sabah / Sarawak</p> <ul style="list-style-type: none"> <li>Social, environmental and</li> </ul>	<p>No reference was found that the benefits in the FPMU also cover conservation benefits. References to federal and state policies are provided as verifier, but it is unclear whether these policies ensure a contribution to long-term conservation benefits.</p>	<p>Benefits of FPMU covering conservation, economic and social benefits are captured under Indicator 6.10.1 (FP) as indicated under the verifiers:</p> <ul style="list-style-type: none"> <li>Central Forest Spine Master Plan (Peninsula) - conservation</li> <li>Cost benefit analysis including social aspects – economic and social benefits</li> <li>EIA report – conservation, economic and social benefits</li> <li>Federal and state policies on forest plantation establishment – legal, economic and social benefits</li> <li>Forest Plantation Management Plan – long-term planning and continuous improvement on conservation, economic and social benefits.</li> </ul>	<p>Item (c) of Criterion 6.10 and Indicator 6.10.1 for Forest Plantation is proposed to be amended to include "conservation, economic, and social benefits".</p> <p>Criterion 6.10 for Forest Plantation:</p> <p>c) will enable clear, substantial, additional, secure, long-term <a href="#">conservation, economic and social</a> benefits across the FPMU.</p> <p>Indicator 6.10.1 for Forest Plantation:</p> <p>Conversion of ... and shall provide substantial, additional, secure and long term <a href="#">conservation, economic and social</a> benefits across the FPMU.</p>

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		<p>economic cost benefit analysis</p> <p>Criterion 6.10 (FP only) Conversion of natural forest to plantation forest shall not occur, except in circumstances where conversion:</p> <p>c) will enable clear, substantial, additional, secure, long-term benefits across the FPMU.</p> <p>Indicator 6.10.1 (FP only) Conversion of forest area to forest plantation, (...) shall provide substantial, additional, secure and long term benefits across the forest plantation management unit.</p> <p>Verifier: Peninsula / Sabah / Sarawak</p> <ul style="list-style-type: none"> <li>• Cost benefit analysis including social aspects</li> <li>• EIA report</li> <li>• Forest Plantation Management Plan"</li> </ul>			

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7	<p><b>8.2.5</b></p> <p>The standard requires that the indiscriminate disposal of waste on forest land shall be strictly avoided. Non-organic waste and litter shall be collected, stored in designated areas and removed in an environmentally-responsible manner. The spillage of oil or fuel during forest management operations shall be prevented. Emergency procedures for the minimisation of risk of environmental harm arising from the accidental spillage shall be in place.</p>	<p><b>MC&amp;I SFM 1/2020</b></p> <p>"Criterion 6.7 Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.</p> <p>Indicator 6.7.1 Oil, fuel, tyres, containers, liquid and solid non-organic wastes, shall be disposed of in an environmentally appropriate and legal manner.</p> <p>Verifier:</p> <ul style="list-style-type: none"> <li>• Environmental Quality (Scheduled Wastes) Regulations 2005</li> <li>• Standard operating procedures on waste disposal of liquid and solid non-organic wastes"</li> </ul> <p><b>ENVIRONMENTAL QUALITY (SCHEDULED WASTES)</b></p>	<p>No reference was found ensuring the prevention of oil spillage during forest management operations. Also, no reference was found that requires emergency procedures are in place for the minimisation of risk of environmental harm arising from the accidental spillage.</p>	<p>Procedures to minimise the risk of environmental harm arising from the accidental spillage, including the emergency procedures are covered under the verifier for Indicator 6.7.1 i.e. Environmental Quality (Scheduled Wastes) Regulations 2005.</p> <p>The waste generator also has to adhere to the guideline under the Regulation, prescribed by the Director General of Environment. The guideline includes spill kit and emergency procedure with regard to spillage of waste.</p>	<p>Criterion 6.7 is proposed to be amended as follow:</p> <p>Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations. <a href="#">The spillage of oil or fuel during forest management operations shall be prevented.</a></p> <p>Indicator 6.7.1 is proposed to be amended:</p> <p>Oil, fuel, tyres, containers, liquid and solid non-organic wastes, shall be disposed of in an environmentally appropriate and legal manner. <a href="#">Emergency or remedial procedures for the minimisation of risk of environmental harm arising from the accidental spillage shall be in place.</a></p> <p>It should be noted that the above proposed additions are existing requirements under the Environmental Quality (Scheduled Wastes) Regulations 2005.</p>

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		<p><b>REGULATIONS 2005</b></p> <p>"8. Responsibility of waste generator</p> <p>(1) Every waste generator shall ensure that scheduled wastes generated by him are properly stored, treated on-site, recovered on-site for material or product from such scheduled wastes or delivered to and received at prescribed premises for treatment, disposal or recovery of material or product from scheduled wastes.</p> <p>(2) Every waste generator shall ensure that scheduled wastes that are subjected to movement or transfer be packaged, labelled and transported in accordance with the guidelines prescribed by the Director General.</p> <p>9. Storage of scheduled</p>			

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		<p>wastes</p> <p>(1) Scheduled wastes shall be stored in containers which are compatible with the scheduled wastes to be stored, durable and which are able to prevent spillage or leakage of the scheduled wastes into the environment."</p>			
8	<p><b>8.2.11</b></p> <p>The standard requires that where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment. Fertilizer use shall not be an alternative to appropriate soil nutrient management.</p>	<p><b>MC&amp;I SFM 1/2020</b></p> <p>"Criterion 6.5 Guidelines shall be prepared and implemented to: control erosion, maintain or improve soil structure, fertility, and biological activity.</p> <p>Indicator 6.5.6 (FP only) Availability and implementation of fertilisation schedule.</p> <p>Verifier:</p> <ul style="list-style-type: none"> <li>Records of application of fertilisers in forest plantation establishment and</li> </ul>	<p>No reference was found that ensures fertilisers are applied with due consideration for the environment. Also, no reference was found that ensures that fertilizers will not be used as an alternative to soil nutrient management.</p>	<p>It is to be noted in Malaysia, the use of fertiliser in natural forest management is minimal, confining to its use in the nursery. Fertilisers are however more frequently used in forest plantations both in nurseries and the early stages of planting.</p> <p>The need to ensure the fertility of the soil (soil nutrient management) is embedded under Criterion 6.5 of the MC&amp;I SFM standard where guideline to control erosion, maintain or improve soil structure, fertility and biological activity are to be formulated and implemented.</p>	<p>Indicator 6.5.6 is proposed to be amended as follows and shall be applicable to both NF and FP:</p> <p><a href="#"><u>The use of fertilisers should be minimized. Where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment. Fertiliser use shall not be an alternative to appropriate soil nutrient management.</u></a> Availability and implementation of fertilisation schedule.</p> <p>As the Indicator is applicable for both NF and FP, for consistency the verifier shall be amended as:</p> <ul style="list-style-type: none"> <li>Records of application of fertilisers <a href="#"><u>in</u></a></li> </ul>

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		<p>development, including their use in nurseries</p> <ul style="list-style-type: none"> <li>Standard operating procedures for the use of fertilisers in forest plantation operations"</li> </ul>		For forest plantation, the required procedures and documents listed as Verifiers under Indicator 6.5.6 apply.	<p><a href="#">forest plantation establishment and development</a>, including their use in nurseries</p> <ul style="list-style-type: none"> <li>Standard operating procedures for the use of fertilisers <a href="#">in forest plantation operations</a></li> </ul>
9	<p><b>8.4.5</b></p> <p>The standard requires that for reforestation and afforestation origins of native species that are well-adapted to site conditions shall be preferred. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been scientifically evaluated, and if negative impacts can be avoided or minimised.</p> <p>Note: CBD (Convention on</p>	<p><b>MC&amp;I SFM 1/2020</b></p> <p>"Criterion 6.3 Ecological functions and values shall be maintained intact, enhanced, or restored, including:</p> <p>a) Forest regeneration and succession.</p> <p>b) Genetic, species and ecosystem diversity.</p> <p>Indicator 6.9.1 (NF only) Document, control and monitor on the use of exotic species to avoid adverse ecological impacts. Only native species shall be used in enrichment planting.</p> <p>Criterion 6.9 (FP only) The selection of species for</p>	<p>Three issues are found in the case of natural forest:</p> <ul style="list-style-type: none"> <li>No reference was found ensuring that for reforestation / afforestation activities, species are preferred that are well-adapted to site conditions.</li> <li>Although enrichment planting is the main reforestation activity in natural forest in Malaysia, the requirements under Criterion 6.9</li> </ul>	<p>The use of native species for restoration/enrichment planting in natural forest is a common practice in Malaysia. Besides restoring the forest to its original composition, the planting of naturally occurring and well adapted to the site's native species will not cause any negative impact to the forest ecosystem.</p> <p>The selection and use of native species for enrichment planting is specified in the Forestry Manual Volume III.</p> <p>Under FP Criterion 6.9, native species is also preferred. If exotic species are used, there are a number of requirements to be met which include among others site suitability (Indicator 6.9.1), justification (Indicator 6.9.2), and</p>	<ul style="list-style-type: none"> <li>Indicator 6.3.1 for both Natural Forest and Forest Plantation to be amended to include: "<a href="#">Native species that are well-adapted to site conditions shall be preferred</a>".</li> <li>Criterion 6.9 for Forest Plantation will be amended to include "that are well-adapted to side conditions" as follow: ... In order to enhance the conservation of biological diversity, native species <a href="#">that are well-adapted to site conditions</a> are preferred over exotic species, ...</li> <li>It is proposed to amend Indicator 6.9.3 for Forest Plantation as follow: Availability of documentation of nursery and field trials, such as provenance trials, of selected species for forest plantation establishment.</li> </ul>

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	<p>Biological Diversity) Guiding Principles for the Prevention, Introduction, and Mitigation of Impacts of Alien Species that Threaten Ecosystems, Habitats or Species are recognised as guidance for avoidance of invasive species.</p>	<p>planting shall be based on their overall suitability for the site and their appropriateness to the management objectives.</p> <p>In order to enhance the conservation of biological diversity, native species are preferred over exotic species, other than the already established and proven exotic species, in the establishment of plantation and the restoration of degraded ecosystems.</p> <p>Exotic species, which shall be used only when their performance is greater than that of native species, shall be carefully monitored to detect unusual mortality, disease, or insect outbreaks and adverse ecological impacts.</p> <p>Indicator 6.9.1 (FP only)</p> <p>Availability of documentation of choice of species that match the site conditions and the management objectives of the</p>	<p>also regulate other reforestation / afforestation opportunities for which the evaluation of species is not included.</p> <ul style="list-style-type: none"> <li>No reference was found that ensures that species are chosen whose negative impacts can be avoided or minimised; it is noted that Environmental Impact Assessments are no part of the verifiers for this indicator.</li> </ul> <p>One issue is found in the case of plantation forest:</p> <ul style="list-style-type: none"> <li>No reference was found ensuring</li> </ul>	<p>have undergone trials (Indicator 6.9.3).</p> <p>In addition, consideration of choice of species to be planted could be obtained from the list of species recommended by the government. (<a href="https://www.mtib.gov.my/index.php?option=com_content&amp;view=article&amp;id=46&amp;Itemid=63&amp;lang=en">https://www.mtib.gov.my/index.php?option=com_content&amp;view=article&amp;id=46&amp;Itemid=63&amp;lang=en</a>)</p>	<p><a href="#">The impacts of the selected species on the ecosystem and on the genetic integrity of native species and local provenances shall be scientifically evaluated so that the negative impacts can be avoided or minimised.</a></p>

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		<p>established forest plantation areas.</p> <p>Indicator 6.9.2 (FP only)</p> <p>Availability of justification and/or analysis of the comparative advantages / benefits of choosing exotic species over native species in forest plantation establishment and/or restoration.</p> <p>Indicator 6.9.3 (FP only)</p> <p>Availability of documentation of nursery and field trials, such as provenance trials, of selected species for forest plantation establishment."</p>	<p>that species will be used whose impacts have been scientifically evaluated, which would also apply for already established and proven exotic species. Reference to proven species does not necessarily exclude established exotic species that do have negative impacts. Field trials as mentioned in the indicator 6.9.3 insufficiently ensure that the impacts are scientifically evaluated. The references insufficiently ensure a precautionary</p>		



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			approach when it comes to the choice of exotic species.		
<b>Group Certification Standard</b>					
<b>10</b>	<b>4.3.3</b> The standard shall define which requirements of the sustainable forest management standard may be fulfilled on group level.	<b>GFMC 3/2020 "4.3.2</b> (...) and define which requirements of the MC&I SFM that may be fulfilled on the group level."	No definition is found in the standard of which specific requirements of the MC&I SFM need to be fulfilled on the group level.	As forest resources available are mostly owned by the state, currently all forest managers are large organisations (state forestry departments) and large license concessionaires, group certification standard has not been utilised, neither has there been any indication of interest or application to undertake group management certification.  Nonetheless, MTCC will develop an appendix on the specific requirements that may be fulfilled on the group level.	<b>To amend the GFMC 3/2020 document as:</b>  <b>4.3.2</b> The boundaries and applicability of the group management system shall be determined to establish the scope of the group management system. <del>and define which</del> <u>All</u> requirements of the MC&I SFM <u>shall be fulfilled at the participant level with the exception of Indicator 4.4.1 and Indicator 8.1.3; and depending on the scale and intensity of the group participants, Principle 7 on management plan and Criterion 6.1 on environmental impact assessment that</u> may be fulfilled on the group level.

No.	PEFC Requirement	MTCS Standard & Document	Assessor's Comment	Response Submitted	Amendments to address NC (Incorporating feedback from PEFC)
11	<b>7.2</b> The standard shall define the necessary competence of persons doing work in the group management system.	<b>GFMC 3/2020 7.2</b> The persons doing work in the group management system shall have the necessary competence relevant to their roles.  <b>MC&amp;I SFM 1/2020 1.1.2</b> Forest managers are aware / knowledgeable of the applicable federal, state and local laws, regulations and policies as well as administrative requirements for forest management  <b>Additional explanation provided by MTCC:</b> The person doing work in the group management system is expected to have the necessary competence as a forest manager as required under the MC&I SFM standard (Indicator 1.1.2, MC&I SFM).	Although MTCC explains (and refers to) the necessary competence of persons doing work in the group management system, such reference is not found in the group forest management standard(s) and is therefore insufficiently ensured. It shall be noted that Forest Managers are not necessarily equivalent to persons doing work in the group management system.	The person doing work in the group management system is expected to have the necessary competence as a forest manager as required under the MC&I SFM standard (Indicator 1.1.2, MC&I SFM).	<b>To amend the GFMC 3/2020 document as:</b>  <b>7.2</b> The persons doing work in the group management system shall have the necessary competence <a href="#">as a Forest Manager as required under the MC&amp;I SFM standard and/or other relevant qualifications</a> relevant to their roles.

No.	PEFC Requirement	MTCS Standard & Document	Assessor's Comment	Response Submitted	Amendments to address NC (Incorporating feedback from PEFC)
12	<b>9.3.1.3</b> The standard shall define additional sampling requirements in case of participation of pre-existing organisations or group or the members participation, such as a forest owners'/managers' association, SFM programme and submission to tax programming which have their own members.	<b>GFMC 3/2020 9.3.1.3</b> Additional sampling requirements shall be defined in case of participation of pre-existing organisations or group or the members participation, such as a forest owners'/managers' association, industry association and SFM programme.	The standard does not define the actual additional sampling requirements in case of participation of pre-existing organisations or group or the members participation.	As indicated in the response above for Requirement 4.3.3, there is currently no organisation certified under a group structure. Additional sampling requirement will be defined in line with the progress in the utilisation of the group management certification standard.	<b>To amend the GFMC 3/2020 document as:</b> <u>Additional sampling requirements shall be defined in</u> <u>In</u> case of participation of pre-existing organisations or group <del>or the members participation</del> , such as forest owners'/managers' association, <del>industry association and</del> SFM programme, <u>and submission to tax programming which have their own members, the sampling requirements for the pre-existing organisation shall be determined in accordance with 9.3.2.</u>