

**Decisions and approvals of Comments and Suggestions of Stakeholders from
Public Stakeholder Consultation of Myanmar Criteria and Indicators for
Forest Management Certification (Natural Forest and Plantations)
by Sub Working Group, Technical Working Group and Myanmar Forest
Certification Committee Meetings**

Name of Person: Mr.Paul Wilson
Name of Organization: Certi Source
Position: Director
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SFM Standards

No.	Comments	Decisions and approvals
1.	<p>Gender</p> <p>I think this time is a great opportunity for MFCC to build issues of gender into the SFM Standards. I note that PEFC have built a so called ‘benchmark’ new Standard that contains a token reference to gender:</p> <p>“The standard requires that the organization is committed to equal opportunities, nondiscrimination and freedom from workplace harassment. Gender equality shall be promoted”. 6.3.4.4 (https://bit.ly/320MEZM).</p> <p>Obviously this is not a feedback submission on PEFC but this new benchmark Standard from PEFC is weak</p>	<p>According to decisions and approvals, MFCC add about gender in Criterion (4.5), Principle (4) of Myanmar Criteria and Indicators for Forest Management Certification (2020) –</p> <p>“Forest Owners shall be committed to equal opportunities, workspace and working facilities, non-discrimination and freedom from workplace harassment and actively promote gender equality, work space and working facilities.”</p> <p>MFCC also add about gender in Indicator (4.5.1), Criterion (4.5), Principle (4)–</p>

	<p>on gender. It should be acknowledged that it is encouraging that PEFC have done something but it is far too little (and far too late).</p> <p>Therefore I hope that MFCC will not only incorporate gender (and other aspects of the benchmark Standard from PEFC re equal opportunities and freedom from harassment) but do so in more detail than the somewhat throwaway manner that I believe PEFC has approached this. Gender is a critical issue and MFCC has the opportunity to become pioneers not only in Asia but also globally.</p>	<p>“Forest Management have policies and/or procedures covering equal opportunities.”</p>
2.	<p>Formatting</p> <p>A small point but you may consider having the opening pages in portrait (as opposed to landscape). This can then flow into landscape once the Cis matrix tables begin.</p>	<p>According to decisions and approvals, the standard format is conducted by MFCC format.</p>
3.	<p>Verifiers</p> <p>MFCC may at some point be offering auditors with more information on the means of verification. For instance if an auditor is checking a document (license) then it might be worth noting that the means of verification might be to check date, signature and stamp.</p> <p>So for instance in 2.2.2 “Maps showing the location of settlements of local communities, in and adjacent to the forest”.</p> <p>Some may specify that the maps must be</p>	<p>According to decisions and approvals, specific details points is included in the verifiers sections.</p>

	<p>valid and authorised and possibly even dated.</p>	
4.	<p>General System Requirements</p> <p>I understand that most standards follow this kind of SFM template. Similar principals are found consistently in almost every Standard. I have however always found it difficult to understand why other broad issues are not requirements in a Standard. Particularly I would suggest an FMU Standard should (like a CoC requirement) have aspects that include Quality Systems. I believe a FMU management system should have quality requirements.</p> <p>Moreover, internal audits need considering. An SFM Standards (as with CoC) must demand an internal audit programme at planned intervals to assess if the system is working, and if the requirements of the national sustainable forest management standard is effectively implemented and maintained.</p> <p>Likewise general management requirements should include a management review. Normally these are done annually and would include:</p> <ul style="list-style-type: none"> a) the status of actions from previous management reviews; b) changes in external and internal issues that are relevant to MFCC's management 	<p>According to decisions and approvals, for internal audit programme, MFCC add quality management system, internal audit programme and management review in new Principle, Principle 10: Internal Audit, Management Review and Continual Improvement of the System of Myanmar Criteria and Indicators for Forest Management Certification (2020).</p> <p>For the details points of these quality management system, internal audit programme and management review, MFCC add Criteria (10.1) to (10.5) and Indicators in Principle (10).</p> <p>For Material Segregation, there is no place in Myanmar Criteria and Indicators for Forest Management Certification (2020).</p>

	<p>system;</p> <p>c) information on MFCC's performance, including trends in:</p> <ul style="list-style-type: none"> • nonconformities and corrective actions; • monitoring and measurement results; • audit results; <p>d) opportunities for continual improvement</p> <p>Likewise is there a place in an SFM Standard for material segregation?</p>	
5.	<p><u>Standard Combination</u></p> <p>I feel it might make sense to combine these Standards so that MFCC has ONE Standard only. My understanding is that the overall goal is for Myanmar to have a SFM system endorsed by PEFC. That is clear from the website.</p> <p>If MFCC has two Standards will that mean that two endorsements (and two systems) need to be achieved from PEFC?</p> <p>Why not combine the Standards into one document if possible? Having said that I note that MTCC seem to have separate Standards within one system, whereas other countries combine.</p> <p>I would only urge that the viability of having two Standards for endorsement be checked.</p>	<p>According to decisions and approvals, Natural forest and Plantation Forest Standards are combined as one standard, "Myanmar Criteria and Indicators for Forest Management Certification (2020)".</p>
6.	<p><u>Smallholders</u></p> <p>It is disappointing that there is no</p>	<p>According to decisions and approvals, smallholders are</p>

	<p>smallholder's Standard. Smallholders are the catalyst for PEFC and remains an essential element to their raison d'être.</p>	<p>conducted by Group Forest Certification Standard and MFCC will adapt PEFC Group Forest Certification Standard.</p>
7.	<p><u>Human Rights</u></p> <p>MFCC Standards should require that forest practices and operations respect human rights as defined by the Universal Declaration on Human Rights.</p>	<p>According to decisions and approvals, Universal Declaration on Human Rights is added in Criterion (1.3), Principle (1) of Myanmar Criteria and Indicators for Forest Management Certification (2020).</p>
8.	<p><u>Afforestation</u></p> <p>My understanding from any FSC and PEFC SFM Standards is that there should be a requirement concerning afforestation of ecologically important non-forest ecosystems.</p> <p>MFCC need to specify that this will not occur unless in justified circumstances (I imagine that the requirements more specifically will be specified in official PEFC documents).</p>	<p>According to decisions and approvals, Reforestation and Afforestation of ecologically important non-forest ecosystems and details about Justified Circumstances are included in Criterion (11.9), Indicators (11.9.1), (11.9.2) and (11.9.3), Principle (11) of Myanmar Criteria and Indicators for Forest Management Certification (2020) to comply with PEFC Sustainable Forest Management Requirements (2018).</p>
9.	<p><u>Fires</u></p> <p>It is noted that there seems to be no mention of fire and its related management (normally for issues such as regeneration, wildfire protection and habitat management or a recognized practice of indigenous people).</p>	<p>According to decisions and approvals, MFCC add as new Criterion in Principle (6) as Criterion (6.8) of Myanmar Criteria and Indicators for Forest Management Certification (2020) –</p> <p>“Forest Management shall implement prevention and remedial measures against forest fire that comply with Forest Law.”</p>

		<p>For the detailed points, MFCC add indicator (6.8.1) and (6.8.2) in Criterion (6.8), Principle (6) of Myanmar Criteria and Indicators for Forest Management Certification (2020).</p>
10.	<p><u>Conversion</u></p> <p>I see no mention of forest conversion. This needs to be included to specify that it will not happen (unless in exceptional circumstances).</p> <p>This will also include issues of reforestation and afforestation of ecologically important non-forest ecosystems (not occurring).</p> <p>Another aspect should include a requirement that conversion of severely degraded forests to forest plantations could be considered, if there are economic benefits, ecological, social and/or cultural value.</p>	<p>According to decisions and approvals –</p> <p>For forest conversions, MFCC add justified circumstances in Criterion (6.11), Principle (6) of Myanmar Criteria and Indicators for Forest Management Certification (2020) to comply with PEFC Sustainable Forest Management Requirements (2018).</p> <p>For Reforestation and Afforestation of ecologically important non-forest ecosystems, MFCC add new Indicators and Criterion in Principle (11) as Indicator (11.9.1), (11.9.2) and (11.9.3) and Criterion (11.9) to comply with PEFC Sustainable Forest Management Requirements (2018).</p> <p>For conversion of severely degraded forests to forest plantations, MFCC add new Indicators and Criterion in Principle (11) as Indicator (11.10.1) and Criterion (11.10) to comply with PEFC Sustainable Forest Management Requirements (2018).</p>