



**PUBLIC SUMMARY
FIRST SURVEILLANCE AUDIT REPORT (3RD CYCLE) ON
SEGALIUD-LOKAN FOREST MANAGEMENT UNIT
FOR FOREST MANAGEMENT CERTIFICATION**

**Certificate Number: FMC 0001
Date of First Certification: 3 December 2009
Audit Date: 9-13 January 2017
Date of Public Summary : 5 Oct 2017**

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1.0 EXECUTIVE SUMMARY

The surveillance audit for forest management certification on the Segaliud Lokan Forest Management Unit (Segaliud Lokan FMU) was conducted from 9-13 January 2017. This is the first surveillance audit following the recertification audit conducted in 19-24 October 2015 on the overall forest management system and practices of the FMU against the requirements of the Malaysian Criteria and Indicators for Forest Management Certification *MC&I (Natural Forest)*.

This surveillance audit was conducted to assess whether the FMU had effectively maintained the forest management system in accordance with the requirements of the *MC&I (Natural Forest)* and other certification requirements using the verifiers stipulated for Sabah, to confirm the continued relevance and the applicability of the forest management system for the scope of certification and also to check on progress of planned activities aimed at enhancing the operation system to achieve improvement in overall performance as well as to verify whether KTS Plantations Sdn Bhd (KTSP) had taken appropriate corrective actions to address the Non-Compliance Reports (NCRs) raised and Opportunities for Improvements (OFIs) made during the surveillance audit.

This first surveillance audit was conducted by a 6-member team comprising Dr Yap Son Kheong (Lead Auditor), Mohd Razman Salim (Auditor), Ismail Adnan Abdul Malek (Auditor), Tn. Hj. Roslee Jamaludin (Trainee Auditor), and with Khairul Najwan Ahmad Jahari as Evaluator and Angelica Sinimis Suimin as Observer.

The FMU practiced the principles of sustainable forest management and the requirements of the Licence Agreement with the State. The revised *The Second Forest Management Plan 1st Revision Segaliud Lokan Forest Reserve, FMU 19 (b), 2009-2018* was presented during the assessment. Although originally 37,420 ha had been scheduled for Industrial Tree Plantation and 12,603 ha under natural forest management system, the FMP had maintained the whole area under natural forest management except for the 2,163 ha already established with rubber together with an experimental planting of 115 ha of *Acacia mangium* (improved variety) and 27 ha with trial species. Its main goal was to ensure that the timber resources would be maintained on a sustainable yield basis, with a commitment to protecting the natural resources and biological diversity of the natural forest through the implementation of best practices of forest management. All subsequent harvesting plan had to be approved by the State Forestry Department with the submission of the Comprehensive Harvesting Plan (CHP) for each block.

Based on the findings of this first surveillance audit, it was found that Segaliud Lokan FMU had continued to comply with the requirements of the *MC&I (Natural Forest)*. This first surveillance audit had resulted in the issuance of one (1) major and six (7) minor Non Conformity Reports (NCRs). In addition, three (3) Observation for Improvement (OFI) were raised.

This public summary contains the general information on the Segaliud Lokan FMU, the findings of the first surveillance audit, NCRs raised as well as the decision on the continued certification of the FMU.

2.0 INTRODUCTION

2.1 Name of FMU

Segaliud Lokan Forest Management Unit (Segaliud Lokan FMU)

2.2 Contact Person and Address

Name: Peter Tiong Siew Kwong
Address: KTS Plantation Sdn. Bhd.
Mile 46, Sandakan – Telupid Highway
90009 Sandakan Sabah Malaysia.

Phone # : 089 271601
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2.3 General Background on the Segaliud Lokan FMU

The surveillance audit for forest management certification of the Segaliud Lokan Forest Management Unit (Segaliud Lokan FMU) was conducted from 9-13 January 2017. This is the first surveillance audit following the recertification audit conducted in 19-24 October 2015 on the overall forest management system and practices of the FMU against the requirements of the Malaysian Criteria and Indicators for Forest Management Certification *MC&I (Natural Forest)*. A map of the Segaliud Lokan FMU is shown in **Attachment 1**.

This surveillance audit was conducted to assess the FMU's had effectively maintained the forest management system in accordance with the requirements of the *MC&I (Natural Forest)* and other certification requirements using the verifiers stipulated for Sabah, to confirm the continued relevance and the applicability of the of the forest management system for the scope of certification and check on progress of planned activities aimed at enhancing the operation system to achieve improvement in overall performance as well as to verify whether KTS Plantations Sdn Bhd (KTSP) had taken appropriate corrective actions to address the Non-Compliance Reports (NCRs) raised and Opportunities for Improvements (OFIs) made during the surveillance audit.

The FMU practiced the principles of sustainable forest management and the requirements of the Licence Agreement with the State. The revised *The Second Forest Management Plan 1st Revision Segaliud Lokan Forest Reserve, FMU 19 (b), 2009-2018* was presented during the assessment. Although originally 37,420 ha had been scheduled for Industrial Tree Plantation and 12,603 ha under natural forest management system, the FMP had maintained the whole area under natural forest management except for the 2,163 ha already established with rubber together with an experimental planting of 115 ha of *Acacia mangium* (improved variety) and 27 ha with trial species. Its main goal was to ensure that the timber resources would be maintained on a sustainable yield basis, with a commitment to protecting the natural resources and biological diversity of the natural forest through the implementation of best practices of forest management attainable. All subsequent harvesting had to be approved by the State Forestry Department with the submission of the Comprehensive Harvesting Plan (CHP) for each block.

2.4 Date First Certified

3 December 2009

2.5 Location of the FMU

The FMU is located between longitudes 117° 23'E to 117° 39'E and between latitudes 5° 20' to 5° 38'N.

2.6 Forest Management System

The FMU practiced the principles of sustainable forest management (SFM) and the requirements of the Licence Agreement with the Sarawak State. The revised *The Second Forest Management Plan 1st Revision Segaliud Lokan Forest Reserve, FMU 19 (b), 2009-2018* was presented during the audit.

2.7 Annual Allowable Cut/Annual Harvest under the Forest Management Plan

The AAC was established at 34 m³/ha/yr in *The Second Forest Management Plan 1st Revision Segaliud Lokan Forest Reserve, FMU 19 (b), 2009-2018*. The Segaliud-Lokan FMU as part of the KTS Plantations is located in the Segaliud-Lokan Forest Reserve. This forest constitutes the Forest Management Unit (FMU) 19 (b) of the Sandakan Forest District, which was gazetted in 1984. It covers an area of 57,247 ha.

2.8 Environmental and Socioeconomic Context

An EIA report entitled '*KTS Plantation Logging Activities at Segaliud Lokan Forest Reserve, Sabah*' was first produced in August 2001. The potential impacts and measures to mitigate these impacts as identified in this EIA report had been incorporated in the revised *FMP 2009-2018*.

A revised EIA for the FMU entitled *Environmental Impact Assessment (EIA) Report for the Proposed Logging Activities at FMU 19(B) (28,787ha) in Segaliud Lokan Forest Reserve September 2012* was prepared and submitted for approval in 2012. This document had included the neighbouring land use including oil palm estates, forest reserves and wildlife sanctuary. The potential impacts of these activities on the FMU ecosystem were raised in the same report. The establishment of wildlife corridors with neighbouring forest reserves was suggested. This EIA report was approved on 1 March 2013 and the contract to monitor the area with the Environment Protection Department was also signed on the same date.

A section on Environmental Management System had been included in the revised FMP relating to evaluation of impacts, controlling procedures and implementation, monitoring, auditing and management review. A study on the potential impacts of harvesting activities on endangered, rare and threatened species of flora and fauna had been monitored within the FMU as specified in the Indicator. There were 4 totally protected animals which had been identified within the FMU with the cooperation with the Sabah Wildlife Department.

The revised FMP had also incorporated mitigation measures for the protection of endangered, rare and threatened (ERT) species and occupational safety. Some mitigation measures for environmental impacts had also been identified and incorporated into the Comprehensive Harvesting Plan for each compartment as an Appendix: *Technical Specification for Reduced Impact Logging*.

Specifications for roads and skid trails as well as the establishment of riparian reserves had also been included in the revised FMP. All logging operations were done in accordance with the above guidelines and being monitored closely by the Sabah Forestry Department. Based on consultations held with the officers of the Sabah Forestry Department (including the Assistant District Forest Officers) had revealed that regular inspections had been conducted to ensure the FMU remained in compliance with all regulations and guidelines on pre-harvest, harvesting and post harvesting operations.

The FMP (2009-2018) had shown that there was no settlement or native customary rights lands found within the Segaliud-Lokan FMU. There was also no claim made by the local communities on the Segaliud-Lokan FMU. The FMU's management had listed the nearest local/indigenous community of Kampung Balat, a settlement located about 4-5 km at its nearest distance outside the

FMU's boundary, as one of its stakeholders. Hence, there were no legal/customary tenure or use rights claims on the land by the indigenous community within the FMU.

The audit is basically limited to the Segaliud Lokan FMU, a gazetted entity under the management and jurisdiction of the KTS Plantation Sdn Bhd, and demarcated on the ground by clear boundaries. The physical environment, and related forest-based operations referred to in the audit, and their associated documentation, are confined within the borders of the said FMU. Similarly, the socioeconomic context referred to in the audit is also confined within the FMU borders. However, since the FMU is under the 96 year-management (License Agreement JP (SLK) 125/93 (CO), 1 May 1993) there was no record of conflicts and grievances between parties involved concerning legal and customary rights within the FMU.

3.0 AUDIT PROCESS

3.1 Audit Dates

9-13 January 2017 (12 auditor-days)

3.2 Audit Team

Dr Yap Son Kheong (Audit team Leader)
Mohd Razman Salim (Auditor)
Ismail Adnan Abdul Malek (Auditor)
Tn. Hj. Roslee Jamaludin (Trainee Auditor)
Khairul Najwan Ahmad Jahari (Evaluator)
Angelica Sinimis Suimin (Observer)

The details on the experiences and qualifications of the audit team members are as in **Attachment 2**.

3.3 Standard Used

Malaysian Criteria and Indicators for Forest Management Certification (Natural Forest) [MC&I (Natural Forest)] using the verifiers stipulated for Sabah.

3.4 Stakeholder Consultations

Stakeholder consultation was conducted by the lead auditor in Sandakan. This involved the main regulatory agencies consisting of Forestry Department, Wildlife Department and Labour and Human Resources Department. (**Attachment 3**)

3.5 Audit Process

The audit was conducted primarily to evaluate the level of continued compliance of the FMU current documentation and field practices in forest management with MC&I (Natural Forest), using the verifiers stipulated for Sabah.

The surveillance audit was conducted from 9–13 January 2017. The first day was for the stakeholders' consultation by the lead auditor in Sandakan. Details of the audit itinerary as in **Attachment 4**.

For each Indicator, the auditors had conducted either a documentation review, consultation with the relevant personnel of the FMU or stakeholders or field audit or a combination of these methods. Depending on the compliance with the verifiers for a particular indicator, the auditors then decided on the degree of the overall compliance in the indicator and decided whether or not to issue a major or minor NCR or an OFI.

An NCR raised during an audit is categorized as follows:

- (i) A major NCR is a non-compliance deemed by the Auditor to be critical and is likely to result in an immediate hazard to the quality or standard of forest management system and practices in the FMU.
- (ii) A minor NCR is a single observed lapse in compliance by the FMU to the MC&I (Natural Forest).
- (iii) An OFI is a situation where the auditor has noted an area of concern on the capability of the forest management system to achieve conformance to the requirements of the MC&I but without sufficient objective evidence to support raising a non-conformity.

4.0 SUMMARY OF AUDIT FINDINGS

Based on the findings of this stage first surveillance audit, it was found that the KTS Plantation Sdn Bhd had continued to manage the Segaliud Lokan FMU in compliance with most of the requirements of the MC&I (Natural Forest). This surveillance audit had resulted in the issuance of one (1) major, seven (7) minor NCRs and three (3) OFIs. The details on the NCRs/OFIs raised are shown in **Attachment 5**.

The audit team had reviewed, accepted and verified the corrective actions taken by the KTS Plantation Sdn Bhd to address the one (1) major NCR raised during this first surveillance audit. The audit team was satisfied that the corrective action had been effectively implemented and had therefore closed out this major NCR. The audit team had also reviewed and accepted the KTS Plantation's proposed corrective actions to address the seven (7) minor NCRs. These corrective actions shall be verified by the audit team during the next audit.

The audit team had also verified the corrective actions taken by KTS Plantation to address the six (6) Minor NCRs which were raised during the previous audit. The responses made by the audit team leader on these corrective actions and on the final status of the NCRs are as in **Attachment 6**.

On indigenous peoples' rights, the FMU's management is a member of Deramakot FR's Social Forestry Committee which provides mechanism to resolve any conflicts and grievances. However, since the FMU is under the 96 year-management (License Agreement JP (SLK) 125/93 (CO), 1 May 1993) there was no record of conflicts and grievances between parties involved concerning legal and customary rights within the FMU.

With regard to Criterion 6.10, to date, the FMU has converted 2,138 ha (<5% allowance) into plantation out of 22,238 ha that had been approved for industrial tree plantation. However, the remaining designated area will be maintained under Natural Forest Management system (as documented in the revised Second Forest Management Plan 1st Revision Segaliud Lokan Forest Reserve, FMU 19 (b), 2009-2018) where only restoration planting will be conducted in degraded and understocked areas.

As a Major NCR was raised during this surveillance it would not be recommended that the Certificate for Forest Management awarded to KTS Plantation Sdn Berhad be continued until the verification of corrective actions within a month and implementation of the proposed corrective action to be submitted for verification within 3 months from the last day of the re-certification audit had been done and accepted by SIRIM QAS International.

There were seven minor NCRs and recommendation for the maintenance of certification would be made upon the acceptance of the corrective actions from KTS Plantation Sdn Berhad by SIRIM QAS International to address the finding within a month from the last day of the surveillance audit. The corrective actions as notified by the FMU shall be verified by the Audit Team Leader or a member of the audit team during the next audit.

The summary on the findings of the first surveillance audit on the Segaliud Lokan FMU against the requirements of the MC&I (Natural Forest) are as follows:

Principle	Strengths	Weaknesses
Principle 1 Compliance With Laws and Principles	<p>All relevant national and local laws and regulations and policies related to forest management were up-dated and available. Forest managers were aware of the regulations and forest violations, including follow-up actions which were recorded. Consultation with the Sandakan District Forestry Officer indicated no compounds were issued during 2016.</p> <p>Current list of all legally prescribed fees, royalties, taxes, and other charges was sighted. Records of payment, including on royalty, logging license, permits, deposit and monthly financial reports were kept and receipts verified. The forest managers were aware of all international agreements and their relevance to forest management. Copies of the document were available at the Lokan Base Camp office.</p> <p>There was no conflict between the Principles and Criteria with laws and regulations. The forest managers demonstrated willingness to participate in resolution of such conflicts if they were to arise.</p> <p>The FMU is legally protected by the license agreement between the KTSP and the Sabah FD (<i>License Agreement for Timber, Tree Plantation and Wood Processing Plant for KTS Plantation Sdn Bhd (1993-2089)</i>).</p> <p>FMU security was enforced through regular joint patrols between KTPS and regulatory agencies. Incidence of encroachment has reduced. Hotspot areas were given greater focus including the adoption of aerial monitoring.</p> <p>Policy statements (Forest & Environmental Management Policy) were displayed in strategic places in compliance with MC&I requirement. The statements were also included in the <i>Second Forest Management Plan, 1st revision Segaliud Lokan Forest Reserve, FMU 19 (b), 2009-2018</i>.</p>	
Principle 2 Tenure and Use Rights and Responsibilities	<p>Copies of the gazettment records of FMU areas were available as referred to the Licence Agreement JP(SLK) 125/93 (CO) dated 1 May 1993 whereby KTSP was given the approval to manage the Segaliud-Lokan Forest Reserve in Sandakan for 96 years until year 2089. There were no recorded claims by local communities on FMU land (<i>Second Forest Management Plan 1st Revision Segaliud Lokan Forest Reserve, FMU 19 (b), 2009-2018</i>).</p> <p>Relevant documentations of legal or customary tenure or use rights of local communities. The revised Forest Management Plan had documented indigenous people's rights and customary use rights, including a native dispute settlement mechanism. The Plan together with other relevant documents (such as <i>Forest Enactment, 1968 –</i></p>	

Principle	Strengths	Weaknesses
	<p><i>Part V Section 41, Land Ordinance, 1930 (Sabah Cap. 68), Native Court Enactment, 1992's Native Courts and Native Courts Ordinance (Sabah Cap 86))</i> were available at the Segaliud Lokan camp.</p> <p>There were no disputes and user rights claims. There was also no settlement within the FMU. The state however does provide legal and regulatory frameworks to resolve any disputes if they were to arise.</p>	
Principle 3 Indigenous People's Rights	<p>The Second Forest Management Plan 1st Revision Segaliud Lokan Forest Reserve, FMU 19 (b), 2009-2018 had documented indigenous people's rights and customary use rights, including a native dispute settlement, and is available at the Segaliud Lokan camp. The whole FMU had been placed under the management for 96 year lease through a Licence Agreement JP (SLK) 125/93 (CO) dated 1 May 1993. No local communities had made any claims to the land.. As mentioned earlier, the Revised Second Management Plan included mechanism for land dispute settlement should any dispute arise.</p> <p>In the social survey conducted in evaluating HCVF in Segaliud Lokan (2015 update), FMU operation did not intrude into any indigenous people's lands as recognized within the national legal frameworks. The FMU has conducted assessment to identify special sites of importance to the local community (Evaluation of HCVF (2015 update), but no such HCVF site had been identified. The FMU is also a member of the Deramakot FR's Social Forestry Committee which provided mechanism to resolve any conflict related to such special sites.</p> <p>As related in previous audits the FMU did not use any traditional forest-related knowledge and practices of the indigenous people in their management systems.</p>	
Principle 4 Community Relations and Workers' Rights	<p>In 2016, trainings were scheduled for staff and workers covering a wide syllabus, and local communities had always been given preference to fill job opportunities as emphasized in the Forest Management Plan, 2009-2018, and License Agreement.</p> <p>Field workers were updated in applicable laws on occupational safety and health through briefings, display of KTSP safety policy and its documentation in the Management Plan. Safety procedures were followed in the field, clear signage provided and workers' awareness verified. Records were kept on equipment maintenance, meetings, and chemical usage. Safety equipment was well maintained and washing facility provided. Records showed no reported injuries in 2016 and updated copies sent in to DOSH.</p> <p>The Managing Director had briefed field staff and workers on October 2016 that they were allowed to form workers' union. They were allowed to undertake collective</p>	<p>During site inspection at the contract workers' camp, maintenance records on all safety and operational equipment (e.g. chainsaws, vehicle and bulldozers) were found not up-to-date. An OFI for Indicator 4.2.3 was therefore raised.</p> <p>Workers were unaware of their entitlement for annual and sick leaves. The FMU management should clearly explain the terms of employment through briefings and documentation. A Minor NCR ISO1/2017 was</p>

Principle	Strengths	Weaknesses
	<p>bargaining in accordance with ILO Convention No. 98 and as included in the Forest Management Plan 2009-2018. Various terms of employment were verified by the audit. Workers' and staff grievance mechanism was provided (KTSP/SOP/44/21) although those interviewed did not fully understand what the process for resolution involved.</p> <p>Social impact assessment had been carried out, including community consultation, as part of the revised EIA and the HCVF evaluation. Relevant information from the study had been incorporated in management planning and the FMP revision.</p> <p>Documents on legal provisions and measures within the relevant laws regarding prevention of loss or damage affecting legal or customary rights, property, resources, or community livelihoods were available in the Segaliud Lokan Base Camp. Appropriate mechanisms were also in place for grievances resolution via the Deramakot FR's Social Forestry Committee of which the FMU is a member.</p>	<p>therefore raised for Indicator 4.3.3.</p> <p>Workers and staff interviewed did not fully understand the process for resolution of workers grievances. The SOP needs to be improved. This was raised as an OFI in the last recertification audit (19-24th October 2015) but was left unaddressed. Hence, it was upgraded to a Minor NCR IS02/2017 for Indicator 4.3.4 in this audit.</p>
<p>Principle 5 Benefits From the Forest</p>	<p>Budgets on related FMU activities, including costs of training, restoration planting, silvicultural treatment and environmental protection, submitted to the Forestry Department, were included in the Annual Work Plan 2016 and the Compliance Report 2015. The Second Forest Management Plan, 2009-2018, elaborated on forest management, conservation, socio-economic status and environmental protection.</p> <p>No minor forest produce (NTFP) was extracted, however the local community was allowed access for their domestic consumption. Local processing of timber was encouraged through preferential royalty rates (circular letter (<i>Pekeliling Pengarah</i>) FD 37/2013 starting on January 2014) in accordance with the gazetted Royalty Structure and Rates for logs in Sabah.</p> <p>Reduced impact logging techniques were implemented in accordance with the RIL Operation Guide Book: <i>Code of Practices for Forest Harvesting in Sabah 1999</i> and the Comprehensive Harvesting Plans (CHP).</p> <p>The harvesting minimized wastage of forest resources through the adoption of cutting limits, tree tagging, directional felling and salvage of useable timber. A training program for 2016 was conducted on RIL related skills at the Institut Perhutanan Sabah (IPS) Telupid, with practical training in the Segaliud Lokan FMU.</p> <p>The FMU was operating only for the production of logs. The log production that contains a mix of different species provided some diversification of forest resources.</p> <p>Sensitive areas demarcated, mapped and marked for soil and water protection in the field included riparian buffer belts and slopes above 25 degrees. There was no forest site classified as watershed within the concession. Timber</p>	

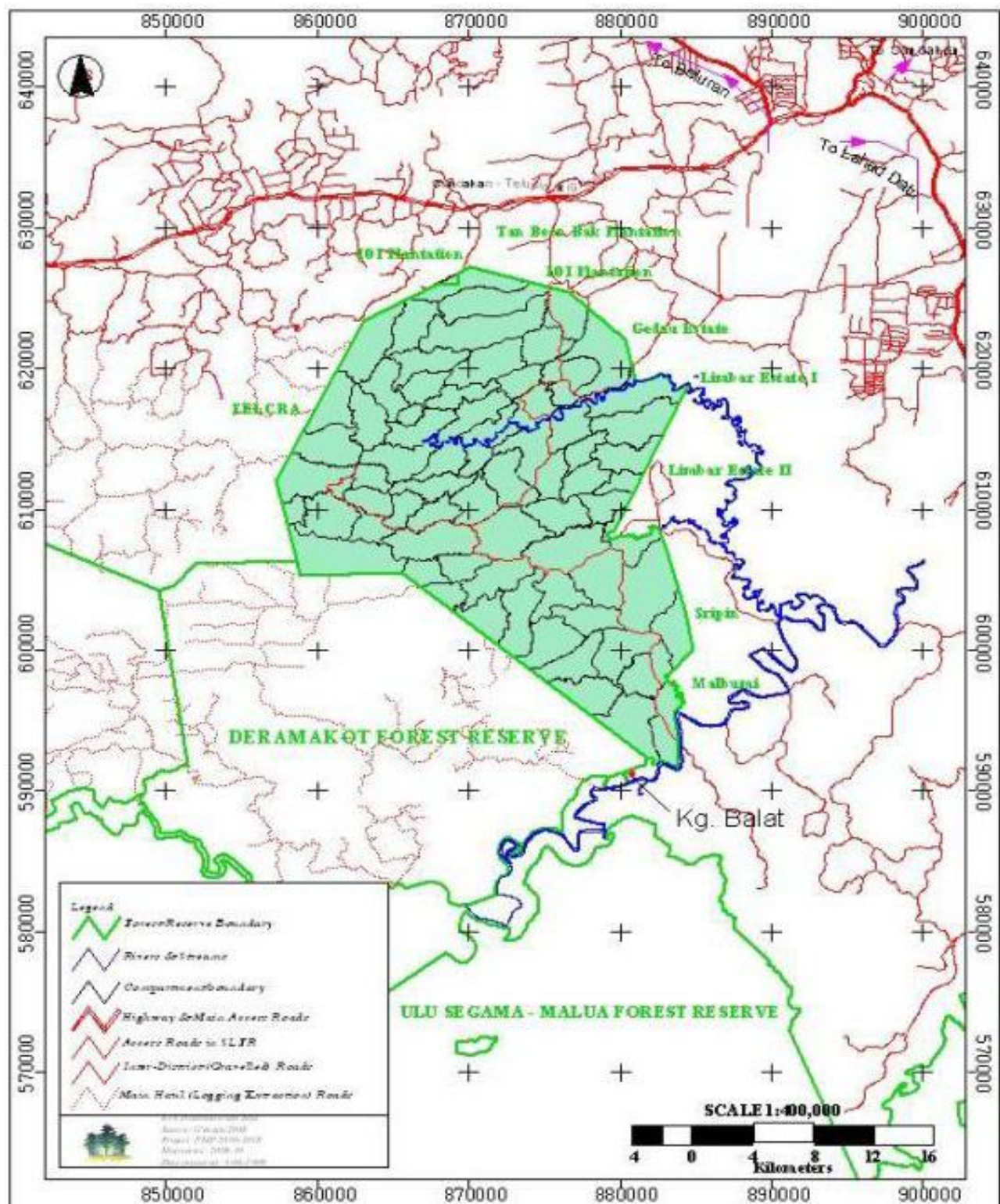
Principle	Strengths	Weaknesses
	<p>resources and stand environment were sustained through the implementation of the Comprehensive Harvesting Plan (CHP) which included tree tagging, roading and RIL practice. Use of old but usable roads and skid trails was maximized.</p> <p>The AAC was established at 34, m³/ha/yr as stated in <i>The Second Forest Management Plan, 2009-2018</i>. The first FMP reported about 80% harvest of the estimated AAC, suggesting a rate well within the cutting limit. The Finance and Administration Division kept and maintained records on the quantity of timber harvested from the FMU as summarized in the <i>Annual Work Plan (AWP) 2016</i>. No NTFP was harvested.</p>	
Principle 6 Environmental Impact	<p>The first EIA report (Environmental Impact Assessment (EIA) Report for the Proposed Logging Activities at FMU 19(B) (28,787ha) in Segaliud Lokan Forest Reserve September 2012, now revised) was approved in 2012. The potential impacts and strategies to mitigate the impacts written in this document had been incorporated into the revised <i>The Second Forest Management Plan 1st Revision Segaliud Lokan Forest Reserve, FMU 19 (b), 2009-2018</i>.</p> <p>A study on the potential impacts of harvesting activities on endangered, rare and threatened species of flora and fauna was conducted within the FMU as specified in the Indicator. Guidelines used included Wildlife Monitoring Programme –Orang Utan and Elephant, in cooperation with the Wildlife Department. Among the endangered, rare and threatened species identified were a <i>Nepenthes</i> species and four protected animal species. Salt licks were also identified and hunting ban imposed. Representative conservation and protected areas established included about 11.3% of the FMU (6,447 ha) no-logging protection zone, riparian zones and steep areas above 250 within production areas. Inter-agency cooperation was made with the District Forestry Office at Sandakan for forest surveillance, and the Global Forestry Services (GFS) Sdn Bhd for RIL audit.</p> <p>The impacts of harvesting, pre-harvesting and post harvesting on residual stand regeneration were sampled to gauge potential crop for next rotation. Areas identified as understocked were restoratively planted with timber species comprising <i>Hopea odorata</i>, Mahogany and <i>Shorea leprosula</i>. Annual Work Plan and CHP had considered the need for biological corridors and buffer zones established to protect salt licks and wallows.</p> <p>Representative areas of existing forest ecosystem had been demarcated and mapped for protection along criteria stated in the <i>Second Forest Management Plan 2009-2018</i>. A total of 10,346 ha were to be set aside as Protected Forests in addition to steep areas (exceeding 250) and riparian buffers. The protection areas, documented in the CHP and in the Compliance Report, were identified during pre-felling exercise to enforce the no-harvesting provision.</p>	<p>Despite well-defined buffer zone, with marked boundary trees, excess soil from the construction of culvert (C2) in Compartment 14 was found spilled into the zone. A Minor NCR MRS01 2017 was raised for Indicator 6.5.4.</p> <p>Wastes kept in storage in the base camp were not labelled or dated (used acid batteries [SW102], used paint cans [SW409], waste inks and paints [SW417], contaminated debris [SW 408]) and medical wastes were not disposed by specified contractors. For this infringement in Indicator 6.7.1., a Minor NCR SK 01/2017 was raised.</p>

Principle	Strengths	Weaknesses
	<p>Harvesting procedures to protect the soil from compaction by harvesting machinery and erosion during harvesting operations were implemented in accordance to the requirements of RIL guidelines. Skid trails inspected followed RIL specifications (Compartments 28 and 30, Segaliud Lokan) and constructed along pre-marked trails. The CHP for Compartment 28 (JHTN/SPK700-2/1/1/52 (klt 4)/20 dated 25/5/2016) was sighted. The plan demarcated riparian buffer belts for total protection with clear markings. Although chemicals were not used in forest harvesting operations, except for paints and fuel, the use of approved chemicals by forest workers was continuously controlled and their usage followed accepted procedures. Nursery workers were briefed on chemical handling and on safety data sheet.</p> <p>The audit identified non-compliance in waste handling and disposal. Biological control agents were not used in the FMU.</p> <p>Except for Mahagony, indigenous species were largely used in enrichment planting programme which spanned 227 ha. The latter species included Binuang, Laran, Gaharu, Bangkai, Kapur, Pulai, Kapur merah, Merbau, Keruing, Urat mata, Seraya majau, Kapur paji, Seraya punai, Sengkuang, Telisai, Seraya, Obah Sukuk and Tengkawang. Under the original ITP condition exotic fast growing species were allowed to rapidly secure protective forest cover. Being more resilient in exposed degraded sites their use was justified. However, for enrichment planting of understocked residual stands indigenous species were preferred.</p> <p>It is noted that the term 'A limited portion' which refers to the area allowed for conversion in Indicator 6.10.1 will be reviewed. In the audit, a total of 22,238 ha had been approved for the ITP programme. However, to date only 2,138 ha of plantation were established through restorative planting of very poor degraded areas to be managed under the Natural Forest Management system.</p>	
Principle 7 Management Plan	<p>The revised Second Forest Management Plan 1st Revision Segaliud Lokan Forest Reserve, FMU 19 (b), 2009-2018 presented during this surveillance included all the particulars specified under the Criterion.</p> <p>The Second Forest Management Plan 1st Revision Segaliud Lokan Forest Reserve, FMU 19 (b), 2009-2018 was a review of the first FMP. The revision included updated harvesting plans, strengthened growth analysis, harvest rates as well HCV and forest conservation strategies. To promote awareness of new scientific and technical information, KTS Plantation signed an MOU with the University Malaysia Sabah and Sabah Forestry Department. Staff was exposed to research development through educational visit and participation in joint workshop.</p> <p>A training program for 2016 was conducted covering a</p>	<p>The inventory team members involved in the establishment of Permanent Sample Plots (PSPs) were not familiar with the identification of trees. More training on this component of PSP procedure shall be conducted. Minor NCR MRS 02/2017 was raised.</p>

Principle	Strengths	Weaknesses
	<p>wide scope relevant to forest management. Some weakness in tree identification was however detected among inventory staff involved in PSP establishment. The public summary of the management plan could be viewed from the FMU's web page at www.segaliudlokan.com.</p>	
Principle 8 Monitoring and Assessment	<p>The FMU has produced an Annual Compliance and Closing Reports for 2015 as required under the Sustainable Forest Management Guidelines-Part IV (October 2003). It has also submitted the Annual Work Plan 2016 KTSP/SFD/AWP/vol. 1/2016 to the Forestry Department. The Environmental Compliance Reports submitted to EPD Y1/2016 (October 2015 to January 2016), Y2/2016 (February to May 2016) and Y3/2016 (June-September 2016) indicated no non-compliances to EIA requirements. The Monitoring Manual KTSP/SOP/446-15 October 2016 is used as a guide. Appropriate monitoring procedures were used including line transects and camera traps.</p> <p>PSPs to monitor growth and yield of harvested forests were established and data collated on various indicators given in the Criterion 8.2.</p> <p>All relevant documents were checked at the log pond including Block Scaling Log Register Book, Daily Hauling Report Block, Disposal Permits for Round Logs, Removal Passes Form IV Forest Rules 1969, Disposal Permit for Forest Produce, Daily Felling and Extraction Form and Comprehensive Tree Harvesting Report. The monitoring(?) reports for SKT A24 were verified against on-site verification records.</p> <p>The revised Second Forest Management Plan 1st Revision Segaliud Lokan Forest Reserve, FMU 19 (b), 2009-2018 presented during this surveillance had incorporated results of monitoring.</p> <p>The public summary made available in www.segaliudlokan.com was examined and the required monitoring indicators were present.</p>	<p>The monitoring conducted however did not include social impacts due to harvesting and other management operations as required in Indicator 8.2.1. A Minor NCR SK02/2017 was therefore issued.</p>
Principle 9 Maintenance of High Conservation Values	<p>The document, Updated Evaluation of High Conservation Value Forest (HCVF) Segaliud Lokan Forest Reserve (FMU 19B) June 2015, showed proposed HCVF sites in the FMU.</p> <p>A long list of stakeholders had been consulted by the FMU. However not all were relevant or competent to contribute towards determination of HCV attributes.</p> <p>The HCVF report mentioned above has identified several HCVF sites in the FMU and four environmental services. These sites were however not demarcated on the ground. And measures to enhance conservative attributes of the HCVF sites were also not made available in a public summary.</p>	<p>There was a need to enhance the stakeholder list with emphasis on including technical experts relevant to HCVF as stated in Indicator 9.2.1. An OFI was issued for the oversight.</p> <p>HCVF sites identified in the report were however not demarcated on the ground. A Minor NCR SK03/2017 was raised for Indicator 9.3.1.</p>

Principle	Strengths	Weaknesses
	<p>The specific measures to maintain and enhance the conservation attributes of the HCVF sites identified in the updated Evaluation of High Conservation Value Forest (HCVF) Segaliud Lokan Forest Reserve (FMU 19B) November 2016 were not presented in the publicly available summary.</p> <p>HCV Monitoring forms were included in a section on Recommendations to Site Maintenance to assess effectiveness of management of the sites.</p>	<p>A Minor NCR SK5/2015 was issued in the previous audit for failure to make available a public summary of the HCVF report as required in Indicator 9.3.2. Since the non-compliance was not addressed it was thus raised to a Major NCR SK04/2017 in this audit.</p> <p>The section on Recommendations to Maintenance Site can be further improved by adding management procedures and possible enhancement measures in compliance to Indicator 9.4.1. An OFI was raised on this recommendation.</p>

Map of Segaliud Lokan FMU



Experiences and Qualifications of Audit Team Members

Assessment Team	Role/Area of MC&I Requirement	Qualification and Experience
Dr. S.K. Yap	Assessment Team Leader/ Environment/ Social issues	Currently an independent consultant on forestry, arboriculture and environment. He has a B.Sc. Hons. Second Class Upper (Botany and Ph. D. in forest biology. He is an independent auditor appointed by FSC's accredited certifier - Scientific Certification System (SCS) Global Services of USA and SIRIM QAS Malaysia to conduct Forest Management Certification under the FSC Principles and Criteria and Malaysian Criteria and Indicators since 2001. He is also an accredited EMS ISO 14001 auditor with SIRIM and a Lead Auditor for RSPO certification scheme. He is a forest/flora ecology consultant for EIA and HCVF. Qualified as lead auditor under the QMS ISO 9001 in September 2013
Mr. Mohd Razman Salim	Auditor	<p>Academic Qualification: B.Sc of Forestry (Forest Production), University Putra Malaysia.</p> <p>Work Experience: Five years experienced as Research Officer at the Forest Research Institute Malaysia (FRIM) since 2007 in a various area such as ecological research for lowland and hill dipterocarp forest, Geographic Information Systems, forest inventories, forest harvesting and forest management system (SMS). Participate in organizing committee member, division level activities and projects. Coordinate and collaborate a long term ecological plot and inventory data about 25 years at the Pasoh, Negeri Sembilan with Negeri Sembilan Forestry Department, universities (local & international) and NGOs. Published and presented research findings at the seminars and conferences. Currently as Auditor at the Food, Agriculture and Forestry Section (FAF), SIRIM QAS International Sdn Bhd, since 2013. Involved in conducting assessments on forest management certification [MC&I (Natural Forest)] & [MC&I (Plantations)], MYNI of RSPO P&C and other management systems on ISO 9001, 14001 and OHSAS 18001</p> <p>Training / Research Areas:</p> <p>Successfully completed the following training programmes:</p> <p>Auditor Training Course on Malaysian Criteria and Indicators for Forest Management Certification [MC&I (Natural Forest)] & [MC&I (Plantations)] organized by MTCC, 1-4 December 2013.</p> <p>EMS 14001: 2004 Lead Auditor Course organized by SIRIM Training Services Sdn Bhd, 18-22 March 2013.</p> <p>OHSAS 18001: 2007 Lead Auditor Course organized by SIRIM Training Services Sdn Bhd, 11-15 March 2013.</p> <p>QMS 9001: 2008 Lead Auditor Course organized by SIRIM Training Services Sdn Bhd, 4-8 March 2013.</p>

Ismail Adnan	Auditor/ Forester	<p>Academic Qualification: Master of Forestry, University of British Columbia, Canada</p> <p>Work Experience: One year (1974-1975) experience as Sub Assistant Conservator of Forest at the Pahang Forest Department, involved with Forest Administration/Management and Enforcement. Next, seven years (1979-1986) experience as Forest Officer/Logging Superintendent at Syarikat Jengka Sdn. Bhd (SJSB), an integrated timber complex in Pahang. Responsible for Forest Licensing/ Administration, Forest Mapping, Road Construction and Logging Operations. Senior Lecturer at the Forestry Faculty, Universiti Putra Malaysia (UPM) from 1986 to 2014. Responsible for teaching and research in Forest Mensuration, Forest Survey, Forest Road, GIS/Remote Sensing and Forest Mapping. Responsible for academic supervision of more than 100 Bachelor/Master/Phd students in their research and thesis writing. Own research at UPM include various areas such as forest mapping using geo spatial tools, forest inventories, forest harvesting and forest management system (SMS). Also involved with consultancy works which include RPH development and Forest Mapping. Participate in organizing local/international seminars on Forestry areas. Published and presented research findings at seminars/conferences and journals. Currently as Auditor at the Food, Agriculture and Forestry /ion (FAF), SIRIM QAS International Sdn Bhd, since 2016. Involved in conducting assessments on forest management certification MC&I (Natural Forest) & MC&I (Forest Plantations).</p> <p>Training / Research Areas:</p> <ul style="list-style-type: none"> • Auditor Training Course on MC& I (Natural Forest) and MC&I (Forest Plantation V2), 9th-10th July 2015, SIRIM QAS International Sdn Bhd • ISO 14001:2004 Lead Assessor Training, 23rd-27th Nov 2015, SIRIM Training Services Sdn. Bhd • Training on Auditing Techniques, 26th January 2016, SIRIM QAS International Sdn Bhd
Hj.Roslee Bin Jamaludin	Trainee Auditor	<p>Academic Qualification: B.Sc of Forestry (Forest Management), University Putra Malaysia. Diploma of Forestry, Mara Institute of Technology, Malaysia.</p> <p>Work Experience: A retiree of Forest Conservator from Forestry Department of Peninsular Malaysia, with 36 years of experience in forest management, operation and administration. Has been working in various position since appointment in 1977, which includes Assistant Forest Management officer in Kuantan, Forestry Department of Pahang, Assistant District Forest Officer in Kuala Lipis Pahang and Segamat, Johore. Forest Plantation Officer in Johore and Terengganu, Forestry Officer for the State of Malacca. Assistant Director for Forest Harvesting and Industries in Selangor, District Forest Officer in Dungun Terengganu, Assistant Director for Forest Management in Negeri Sembilan and the State Director of Forestry Penang before retirement in April 2015. Has involved in several Working Committee form by the Forestry Department of Peninsular to further improved the existing procedures, such as, Forestry Manual, Forest Road Guidelines, Forestry Rules, other guidelines</p>

		<p>regarding the MC&I for forest certification. A member of MAJURUS was appointed as an Internal Auditor for the MC&I. Has attended several forestry Conference overseas and local. A member of IRIM (Institut Rimbawan Malaysia). Appointed as a facilitator and trainer for Forest Road Guidelines by Forestry Department Peninsular Malaysia.</p> <p>Attended training programmes:</p> <p>Auditor Training Course on Malaysian Criteria and Indicators for Forest Management Certification [MC&I (Natural Forest)] & [MC&I (Plantations)] organised by MTCC, 9 – 10 July 2015</p> <p>EMS 14001: 2004 Lead Assessor Training Course organised by SIRIM Training Services Sdn Bhd, 23 Nov. – 27 Nov. 2015.</p> <p>Briefing on RSPO Principle & Criteria (HCV) organised by SIRIM QAS (Food, Agri& Forestry Section) 21 August 2015.</p> <p>Workshop on Auditing Technique for FMC (2) organised by SIRIM QAS (Food, Agr & Forestry Section) 26 Jan 2016.</p>
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Record on Issues Received From Stakeholder

No	Name, Organization, date received, Address and Contact Numbers	Detail of Issue Raised	Comments by Audit Team Leader
1	District Forestry Officer Sandakan	Emphasis on the research activities especially on PSP analysis Noted that enrichment planting was conducted mainly along roadsides.	Minor NCR raised on PSP The FMU would re-examine the enrichment planting sites
2	Wildlife Department	Owing to the shortage of manpower keen to conduct joint patrols with the Forestry Department	Message noted Patrols now conducted jointly by the FMU with Forestry Department
3	Labour and Human Resources Department	The department would conduct field inspection especially on the housing. The implementation of annual leaves and day off. Willing to participate in consultative meeting	The benefits for workers had to be conveyed to them. Minor NCR was raised.

Surveillance 1 Audit Plan

DAY	TIME	PROGRAM		
		AUDIT TEAM LEADER	AUDITOR	AUDITOR
Day 1 9/1/2017	10.30 am-1.20 pm	Travel from Kuala Lumpur to Sandakan MH2710 –Lead Auditor		
	3.00 pm -4.00 pm	Consultation with District Forestry Officer Sandakan Night in Sandakan Pavillion Hotel		
Day 2 10/1/2017	8.30 am- 9.30 am	Consultation with the Wildlife Department Sandakan		
	9.45am-10.30 am	Meeting with the Labour Department Sandakan		
	10.30 am-1.20 pm	Travel from Kuala Lumpur to Sandakan MH2710 and Kota Kinabalu to Sandakan.MH3093- Auditors		
	2.30 pm – 4.00 pm	Travel to Segaliud Lokan Base Camp		
	4.00 pm – 5.00 pm	Opening Meeting with representatives of FMU <ul style="list-style-type: none"> Briefing session by Forest Manager of the FMU on progress of activities Q&A Session Documentation Review Evaluation of changes to the management of the FMU Check on progress of planned activities aimed at enhancing the operation system to achieve improvement in overall performance Check on complaints and follow-up actions Check on verification for closing NCRs raised during the previous audit Evaluate on procedures for internal audit Evaluate on management review system Confirmed the audit schedule 		
	8.00 pm-10.00 pm	Documentation review and discussion among auditors		
Day 3 11/1/2017	7.15 am – 5.00 pm	(Auditors 1) <ul style="list-style-type: none"> Inspection of FMU boundary Inspection of HCV sites Conservation areas 	Auditor 2 <ul style="list-style-type: none"> Inspection of pre-harvesting Inspection of active harvesting Stumping site Restoration planting sites 	Auditor 3 <ul style="list-style-type: none"> Consultations with contractors and workers operating in the active logging areas as well as the workers' camp.
	8.00 pm-10.00 pm	<ul style="list-style-type: none"> Briefing to representatives of FMU on the progress of audit Review of Day 2 Findings by Audit Team Leader Documentation review 		
Day 4		Site Visits (Auditors 1 & 2)		Site Visits (Auditor 3)

12/1/2017	7.30 am – 5.00 pm	<ul style="list-style-type: none"> • Inspection of past- harvesting compartments and PSPs • Boundary inspection • Wildlife monitoring plots • COC process • Scheduled wastes storage 	<ul style="list-style-type: none"> • Consultation with workers at nursery • Meeting with Medical Attendant on accident records and health of staff and families • Inspection of medical records
	8.00 pm – 10.00pm	<ul style="list-style-type: none"> • Briefing to representatives of FMU on the progress of audit • Review of Day 4 Findings by Audit Team Leader • Documentation review 	
Day 5 13/1/2017	7.30 am -9.30 am 10.00 pm-11.30 pm 12.30 pm-3.30 pm	<ul style="list-style-type: none"> • Preparation of closing report • Closing meeting <p>Travel to Sandakan airport and flight MH2711 to Kuala Lumpur. MH3094 Sandakan to Kota Kinabalu.</p>	

Details on NCRs and OFIs Raised During Surveillance 1 Audit (2017) and Corrective Actions Taken

P & C Indicator	Specification Major/Minor/ OFI	Detail Non-conformances	Corrective Action Taken	Verification by Assessor
Indicator 6.7.1 NCR #: SK1/2017	Minor Area/Location: Base camp	Oil, fuel, tyres, containers, liquid and solid non-organic wastes, shall be disposed of in an environmentally appropriate and legal manner. Scheduled wastes were observed to be stored over the prescribed period and some containers had not been labelled with the dates of waste generation as specified under the Environmental Quality Act.	To engage contractors to dispose scheduled wastes To improve existing environmental monitoring program on scheduled wastes compliance.	Action Plan presented would be verified during the next audit
Indicator 8.2.1 NCR #: SK2/2017	Minor Area/Location:	Forest managers shall gather the relevant information, appropriate to the scale and intensity of the forest management operations, needed to monitor the items (a) to (e) listed in Criterion 8.2. The social communication record had not included the monitoring of social impacts of harvesting and other operations within the FMU.	To conduct annual social impact To compile and highlight the social impacts of in minutes of meeting.	Accepted the action plan proposed.
Indicator 9.3.1 NCR #: SK3/2017	Minor Area/Location: HCVF sites	Measures to demarcate, maintain and/or enhance the HCVF attributes are documented in the forest management plan and effectively implemented HCVF sites with environmental services were not demarcated on the ground.	To mark Toluh waterfall boundary To erect signage at the entrance to the waterfall.	Accepted the action plan proposed.

Indicator 9.3.2 NCR #: SK4/2017	Major Area/Location:	These measures shall be included in the forest management plan summary made available to the public The specific measures to maintain and enhance HCV attributes of the sites identified in the updated Evaluation HCVF in Segaliud Lokan not presented in the publicly available summary.	To upload the management prescription on HCV into Segaliud Lokan Forest Reserve web page.	Accepted the action plan.
Indicator 4.3.4 NCR #: IS02/2017	Minor Area/Location:	Availability of appropriate procedures to address grievances raised by workers. The grievance procedures that were established by the FMU were not clearly explained and understood by the employees and workers.	To brief workers on the grievance process flow.	Accepted the corrective action plan.
Indicator 4.3.3 NCR #: IS01/2017	Minor Area/Location:	The right of workers to benefits and protection is assured under applicable laws and/or regulations. Employment terms and conditions not clearly explained to employees.	To produce a circular on annual and sick leave entitlement for the workers. To ensure the workers are aware of the circular.	Accepted the corrective action plan.
Indicator 6.5.1 NCR #: MRS 1/2017	Minor Area/Location:	Availability and implementation of harvesting procedures to protect the soil from compaction by harvesting machinery and erosion during harvesting operations. Implementation of harvesting procedures to protect soil erosions during harvesting was not followed.	To brief related persons on the following: List of penalties for breach of RIL Guidelines Procedure for Forest Infrastructure manual KTS/SOP/446-3 particularly on 5.13 Culverts and water crossing.	Accepted the corrective action plan.
Indicator 7.3.2	Minor Area/Location:	Forest workers shall be trained as to their respective roles in the implementation of the	To engage FRC to provide comprehensive trainings on PSP	Accepted the corrective action plan.

MRS 2/2017		forest management plan. Forest workers were not adequately trained in their roles on implementation and establishment of PSPs.	establishment.	
Indicator OFI #:	OFI Area/Location:		No action required	

Recertification Audit (2015) Findings and Corrective Action Taken

Indicator	Specification Major/Minor/OFI	Detail Non-conformances	Corrective Action Taken	Verification by Assessor
Indicator 1.6.2	Minor NCR SK 1/2015	Indicator 1.6.2 Policies or statements are communicated throughout the organization and contractors and are made available to the public. The public summary was not available in the web page of the FMU thus the commitment was not presented.	To publish the public summary. 6 Nov 2015	Forest and Environmental Management Policy had been presented in the web page www.segaluidlokan.com revised in November 2016. The Minor NCR is closed.
Indicator 4.3.1	Minor NCR SK 2/2015	Indicator 4.3.1 - Provisions for forest workers to freely organize into unions of their own choice in accordance with ILO Convention No. 87. The workers were not barred from organizing and voluntarily negotiate with the management as stated in <i>The Second Forest Management Plan 1st Revision Segaliud Lokan Forest Reserve, FMU 19(b) Year 2009-2018</i> . They were also allowed to be members of legally recognized unions, but this was not clearly communicated to all workers.	To discuss in MWC meeting and communicate with workers through briefing. 13 Nov 2015	The Management Workers Committee had proposed to the management to draft a labour policy. The Managing Director had on October 2016 stated the FMU would not prevent workers from worker's union. This was transmitted to the field staff and workers on 10 October 2016. The list of workers briefed was presented to the audit team. The Minor NCR is closed.
Indicator 8.5.1	Major NCR SK3/2015	Indicator 8.5.1 A summary of the results of monitoring indicators, including those listed in Criterion 8.2, shall be made available to the public. The public summary had been revised but had yet to be made available in the FMU web site.	To publish the public summary. 6 Nov 2015	The FMU had taken immediate action and placed the public summary that included all the monitoring indicators in the web page on 4 November 2015 following the re-certification audit that included all the monitoring indicators in the web page. The updated public summary was examined and the Major NCR was closed.

Indicator 9.1.1	Minor NCR SK4/2015	<p>Indicator 9.1.1 - Forest managers shall conduct an assessment to identify High Conservation Value Forests (HCVFs) in accordance with relevant guidelines, appropriate to scale and intensity of management for forest areas, and in consultation with relevant stakeholders and experts.</p> <p>The <i>Updated Evaluation of High Conservation Value Forest (HCVF) Segaliud Lokan Forest Reserve (FMU 19B)</i> June 2015 did not included maps of proposed HCVF sites.</p>	<p>To revise the Evaluation of High Conservation Value Forest by including the maps of proposed HCVF sites.</p> <p>4 Nov 2015</p>	<p>An updated Evaluation of High Conservation Value Forest (HCVF) Segaliud Lokan Forest Reserve (FMU 19B) November 2016 had included maps of proposed HCV sites.</p> <p>The Minor NCR is closed.</p>
Indicator 9.3.2	Minor NCR SK 5/2015	<p>Indicator 9.3.2 - These measures shall be included in the forest management plan summary made publicly available.</p> <p>Specific measures to ensure the maintenance and enhancement of the applicable conservation attributes were not available in a publicly available summary.</p>	<p>To include management prescription in the public summary.</p> <p>6 Nov 2015</p>	<p>The updated <i>Evaluation of High Conservation Value Forest (HCVF) Segaliud Lokan Forest Reserve (FMU 19B)</i> November 2016 presented had identified the HCV sites. <i>HCVF Monitoring Form SF 17</i> maintained had a section on <i>Recommendations to Maintenance Site</i> but these management prescription and enhancement measures were not presented in the public summary. The Minor NCR could not be closed and upgraded into Major NCR SK4/2017.</p>
Indicator 4.2.5	Minor NCR MRS1/2015	<p>Indicator 4.2.5 Demarcation of hazardous areas and provision of guidelines for storage and handling of hazardous materials. i.KTS/SOP/446-08: Hazardous Chemical Management Manual ii.OSH (USECHH) Regulations, 2000.</p> <p>It was observed that demarcation of hazardous</p>	<p>1. To demarcate hazardous area. 2. To conduct workshop on USECHH regulation.</p> <p>23 Nov 2015</p>	<p>Hazardous areas in the store and nursery were demarcated. On 15 October 2015 training on Chemical Substance and Scheduled Wastes Management was conducted. A SOP on Chemical Handling March 2016 was written. The Mino</p>

		areas, storage and handling of hazardous materials were not in accordance with OSH (USECHH) Regulations, 2000 as well as company manual.		NCR was closed.
Indicator 8.2.1	Minor NCR KN 1/2015	<p>Indicator 8.2.1: Forest managers shall gather the relevant information, appropriate to the scale and intensity of the forest management operations, needed to monitor the items (b) Growth rates, regeneration and condition of the forest.</p> <p>The establishment of new permanent sample plots (PSP) shall be improved.</p>	<p>1. To coordinate training with FRC</p> <p>2. To revise PSP SOP.</p>	<p>Training by Forest Research Centre for the inventory team on PSP was done in March 2016.</p> <p>Boundary of PSPs inspected was demarcated.</p> <p>Measurements of tree diameters were accurate. The PSPs examined were established in accordance to the SOP.</p> <p>The Minor NCR was closed.</p>