

**KPKKT's RESPONSE TO NEW MINOR CARS 2010 - FSC
SURVEILLANCE AUDIT**

Response to New Corrective Action Requests (CARs) - February 2011

Nonconformity : Up-to-date information on pertinent health & safety laws and regulations had not been maintained by forest managers and disseminated to forest workers through signs, handbooks, meetings, and/or other methods.	
Minor CAR 2010.1	The forest management shall maintain records of all pertinent health and safety requirement and disseminate them to all staff members including that of the contractors.
Deadline	By the next annual audit
Reference	Indicator 4.2.5
Action by KPKKT	<p>1. A Briefing (<i>Taklimat</i>) session will be organized by KPKKT on 10 February 2011 on (a) Work Procedures, and (b) Work Safety and Health. The briefing is targeted to a total audience of <u>65 participants</u> from</p> <ul style="list-style-type: none"> (i) KPKKT's logging contractors (Management & Staff) (ii) KPKKT's transportation contractors (Management & Staff) (iii) KPKKT's forest development contractors (Mgt & staff) (iv) KPKKT's own management and Forest Supervisors <p>Among issues to be covered in the <i>Taklimat</i> are:</p> <ul style="list-style-type: none"> (i) Work Procedures on Logging Operations (Road specs. - PL line, Secondary Roads, Access Road (<i>Jalan Tuju</i>), Skid Trails); Tree Felling; Buffer Zones; Bridges; Preparation of Timber Harvesting Report (ii) Work Procedures on Timber Transportation & Timber Grading - Tree Marking & Tree Tagging, Cross-cutting/ Bucking of logs, Timber truck operators, Contract Agreement Documents. (iii) Work Procedure on Forest Development Operations - Forest/ compartment boundaries, Pre- & Post-Felling Inventories, Forest Mgt Plan for DTC. (iv) Work Procedures on Management of Timber Wastes at KPKKT (v) Work Safety and Health in Forestry by DOSH Official. <p><i>Attachment 1 : Appendix 1.1, Appendix 1.2, Appendix 1.3</i></p> <p>2. Earlier, on 19 December 2010, a briefing on FMP of DTC was delivered by KPKKT's Resident Consultant Dr Borhan to Senior Management</p>

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	<p>& Forest Supervisors of KPKKT, which also covered matters pertaining to Work Safety and Health</p> <p><i>Attachment 2 : Appendix 2.1, Appendix 2.2</i></p> <p>3. On 20 December 2010, a meeting of KPKKT's Committee on Work Safety and Health was held, attended by KPKKT Management, KPKKT's Forest Supervisors and representatives from logging contractors and forest development contractors.</p> <p><i>Attachment 3 : Appendix 3.1, Appendix 3.2</i></p> <p>4. On 20 September 2011, FSC Mentoring Programme was held, attended by Management, KPKKT's Forest Supervisors and representatives from logging contractors and forest development contractors.</p> <p><i>Attachment 4 : Appendix 4.1, Appendix 4.2, Appendix 4.3, Appendix 4.4, Appendix 4.5</i></p> <p><i>Attachment 5 : Appendix 5.1</i></p> <p><i>Attachment 6 : Appendix 6.1</i></p>
<p>Nonconformity : Watercourses were not protected on site using buffer zones that meet or exceed regulatory requirement as side drains were constructed in the riparian buffer belts and there was not enough silt traps constructed.</p>	
<p>Minor CAR 2010.2</p>	<p>The side drains shall be constructed before the riparian buffer belts in 93 Jerangau and 13 Besul Forest Reserve and sediment traps be constructed so that excess sediments will not be washed into the rivers.</p>
<p>Deadline</p>	<p>By the next annual audit</p>
<p>Reference</p>	<p>Indicator 6.5.8</p>
<p>Action</p>	<p>KPKKT takes note of the CAR 2010.2 and appropriate actions have been taken.</p> <p>(1) Side-drains have been constructed before riparian buffer belts</p>

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by KPKKT	<p>(2) Sediment traps have been made to allow sediments to settle before excess water is allowed to flow into rivers.</p> <p>(3) Briefing sessions were conducted for the operator concerned and on-site inspection made to ensure compliance.</p> <p>(4) Contractors were reminded to abide by the contract agreement signed by KPKKT which requires them to comply with all FD's rules and regulations.</p> <p><i>Attachment 7 : Appendix 7.1, Appendix 7.2</i></p>
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Observations (OBS)

Background/justification : While actively reducing and avoiding resource waste, the forest managers had not recognized the ecological value of biomass by leaving tops and branches of felled trees in the harvested sites. Written guidelines for retention of downed woody debris and standing snags within harvest areas could also be produced. The FMU had declared debris in some sites to encourage natural regeneration.	
OBS 2010.1	Woody debris resulting from the harvesting operation could be used to cover exposed sites to reduce invasion of weeds and reduce erosion of soil.
Reference	FSC indicator 5.3.6
Action by KPKKT	<p>KPKKT does recognize the ecological value of biomass whereby downed woody debris, tops and branches of felled trees could serve their own function in forest recovery, slope stability and erosion control. To this end an SOP on the management of woody debris in the logged sites is being prepared, with the following objectives:</p> <ol style="list-style-type: none"> 1. To ensure that woody debris would not stand in the way of good recovery of the secondary stand and sound BMP in SFM. 2. Woody debris will be managed and distributed appropriately to areas where it is needed, bearing in mind the need to maintain forest hygiene while at the same time taking advantage of the potential nutrient supplies from such debris. 3. Woody debris should not be allowed to clog impede rivers and flowing streams.

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	<p>4. Woody debris should not be allowed to block access to sediment traps.</p> <p>4. Woody debris in the fringe of buffer zone may help enhance the function of the buffer zone in filtering sediments and water.</p> <p>Matters pertaining to felling biomass and woody debris will be covered during a briefing on 10 February 2011. The relevant SOP will be revised from time to time through continuous discussion and brainstorming before being finalized.</p> <p><i>Attachment 8 : Appendix 8.1, Appendix 8.2, Appendix 8.3</i></p>

<p>Background/justification : Regeneration after final harvests with desired species had not been encouraged by harvesting timely the naturally established seedlings now abundant in the forest.</p>	
OBS 2010.2	<p>With the abundance of fruits resulting from the gregarious flowering season, efforts could be made in collecting fruits for planting in open sites and also monitor the performance of the naturally regenerated seedlings.</p>
Reference	FSC indicator 6.3.4
Action by KPKKT	<p>Felling of trees within a compartment has always been conducted on the advice and guidance from FD. Felling scheduling has been mostly controlled by the administrative procedure of FD through its licensing process. Although KPKKT may have a plan of its own, it is not at a liberty to decide where and when a selective logging operation is to be conducted.</p> <p>As for regeneration, the <i>Tanaman Kawasan Lapang</i> (Open area planting) operation has been the standard practice which is carried out on a compulsory basis at KPKKT and enforced by FD.</p> <p>At the same time, flowering and fruiting patterns of timber trees are regularly observed and monitored by relevant KPKKT staff and nursery contractor concerned. Fallen fruits are regularly collected and germinated and seedlings are raised in KPKKT's nursery. So such monitoring is indeed being carried out at KPKKT.</p> <p><i>Attachment 9 : Appendix 9.1, Appendix 9.2, Appendix 9.3</i></p>

Background/justification : Information had been gathered through monitoring activities and could be utilized to adjust/revise management practices and the management plan.

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OBS 2010.3	With the pre harvesting and post harvesting analysis completed for some sites that are undergoing second rotation under Selective Management System (SMS) system, it is possible to utilize these data to adjust or revise the management practices.
Reference	FSC indicator 8.2.2
Action by KPKKT	Efforts in this direction are on going. PSPs are being re-measured, in which the re-measurement of the first 18 plots are expected to be completed in February and preliminary results expected in March 2011. Data and findings from other pre and post-harvest surveys are being compiled for use in revising the FMP and, later introduced in field decision-making process. <i>Attachment 10 : appendix 10.1, Appendix 10.2, Appendix 10.3</i>

Background/justification : The management operation could improve its protection of high conservation values by considering new development published by stakeholders.	
OBS 2010.4	WWF Malaysia had not completed a draft report High Conservation Value Forest (HCVF) preliminary findings in Dungun Timber Complex in December 2009. A working plan has to be developed to implement relevant recommendations from the report.
Reference	FSC indicator 9.2.3
Action by KPKKT	The Report by WWF on their findings on HCVF in Dungun Timber Complex had been completed in September 2010. Discussion on the Report was held at JPNT on 19 September 2010. A few proposals/ideas were raised for the attention and action by KPKKT (i.e with the cooperation with Terengganu FD, PERHILITAN, FRIM, DOE and other relevant agencies). Among the issues raised were: <ol style="list-style-type: none"> 1. The need to prepare wildlife management plan within DTC 2. The need to prepare conservation plan for (a) <i>Didymorcarpus</i> sp., (b) <i>Barringtonia</i> spp. found within the vicinity of DTC <p>KPKKT will continue its cooperation with the relevant agency in an effort to comply with this Observation and to achieve SFM.</p> <p><i>Attachment 11 : Appendix 11.1, Appendix 11.2, Appendix 11.3, Appendix 11.4, Appendix 11.5, Appendix 11.6</i></p>