

Forestry Verification Systems in Indonesia ¹

Summary of Bahasa Indonesia Technical Report

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Abstract

Indonesia is the largest exporter of tropical timber in the world. The forest sector in Indonesia has become the focus for a wide range of donor, NGO and Private sector initiatives aimed at promoting legal and sustainable trade. However, while many of these efforts focus on civil society monitoring and voluntary standard-setting, the priority remains to strengthen the mandatory “backbone” of existing monitoring and verification systems. This includes: (1) Legal compliance in respect of timber administration (PUHH) and harvest practices, (2) Certification against mandatory C&I for Sustainable Forest Management, introduced under an initiative to revitalise and secure the long-term viability of natural production forest management, and (3) Mandatory export registration (ETPIK).

This study addresses three sets of issues: verification system components, harmonization of Norms and Procedures with Timber Administration (PUHH), and Enabling Conditions. There exist 17 monitoring and verification systems related to legal compliance in Indonesia spanning: (1) First Party self-reporting, carried out by the company or association to monitor and evaluate internally; (2) Second Party verification, carried out by the Government as a mandatory incentive-disincentive instrument, and (3). Third party verification, carried out by independent third party to monitor and evaluate based on recognized market standards. However effective verification against clear Norms requires a more conducive regulatory and policy framework.

Key words: Mandatory scheme, legal compliance, Sustainable Forest Management, verification system components, harmonisation study, and Enabling Conditions

A. Scope and Objective of Forestry Verification systems in Indonesia

Verification is defined as activities to assess facts and evidence related to achievement against defined standards. In order to prove that a fact is true or false, it needs a benchmark that we call norms. In some reference books, norm means acceptable standards, rules, model, habit, and average. In the verification context, verification can be categorised into 3 principles: 1) General Norm – transparent, objective, fair, and accountable; 2) System Norm – Characterized by the inter-dependency of verification system components, vertically and horizontally; and 3), Technical Norms – including

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principles, criteria, and indicators. This study of verification systems addresses three sets of problems:

A.1. Study of Verification System Components

Components which can ensure the system can be well implemented:

- a. **Standard** – principle, criteria, and indicator
- b. **Verification Procedure and Decision making process on:**
 - legal compliance
 - legal origin and
 - origin sustainable
- c. **Institution**
 - Forest Management Unit – First party – mandatory/voluntary – self declaration
 - Government – Second Party – mandatory – observation and guidance
 - Independent Body – Third party - voluntary – market driven certification

A.2. Harmonization of Norms and Procedures for Timber Administration (PUHH) in line with Forestry Ministerial Decree No. 126/Kpts-II/2003

A variety of verification systems in Indonesia need to be harmonised to provide a benchmark of minimum requirements for National Forest Verification aimed at Sustainable Forest Management and economic growth. The Forestry Minister Decree No 126/Kpts-II/2003 constitutes the foundation of implementing timber administration and it can be used as a template for learning how norms and procedures should be harmonised.

A.3. Enabling Conditions

Prevailing verification standards require compliance with rules and regulations. Enabling conditions are necessary to undertake National Norms effectively, through the support of conducive policy and legislation.

B. Verification System Components:

The process of forest verification in Indonesia is presented schematically in Figure 1. In this scheme, verification takes into account the gap between Norms and Facts in accordance with formula of $D = N - F$. The objective is to verify: LEGAL COMPLIANCE, LEGAL ORIGIN & ORIGIN SUSTAINABLE depending on the degree of deviation between Norms and Facts.

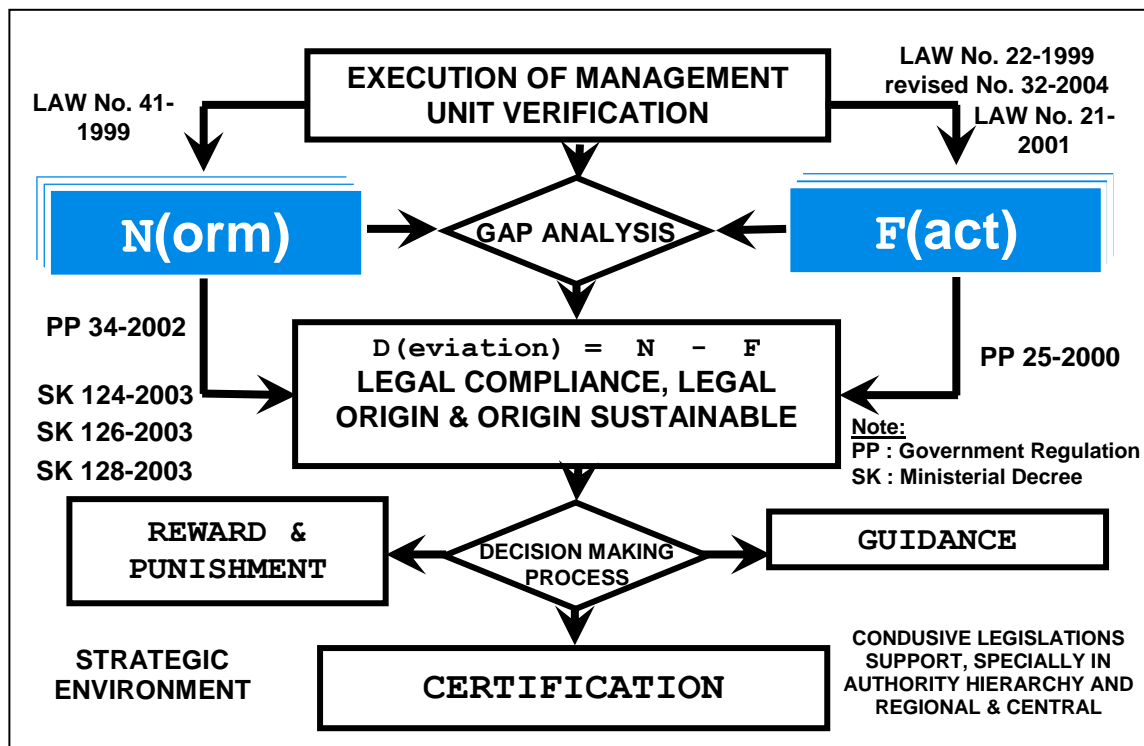


Figure 1. Forestry Verification System

Norms (N) : consist of general, system and technical norms. General Norm is transparent, objective, measureable and fair system. System Norm is a system requirement that is characterized with an order dependency relation among its supporting components. Technical Norm is system completion related to logical framework, such as the principle, criteria and indicators. System Norm comprises of verification schemes; Legal Compliance, Legal Origin and Origin Sustainable.

Procedures: cover the implementation of verification, analysis and decision making process. A complete verification activities comprises of pre-assessment, full assessment and decision making process. To ensure a good verification implementation, procedure should be developed until Standard Operation Procedure (SOP) level.

Institutions, including credible organizations and personnel

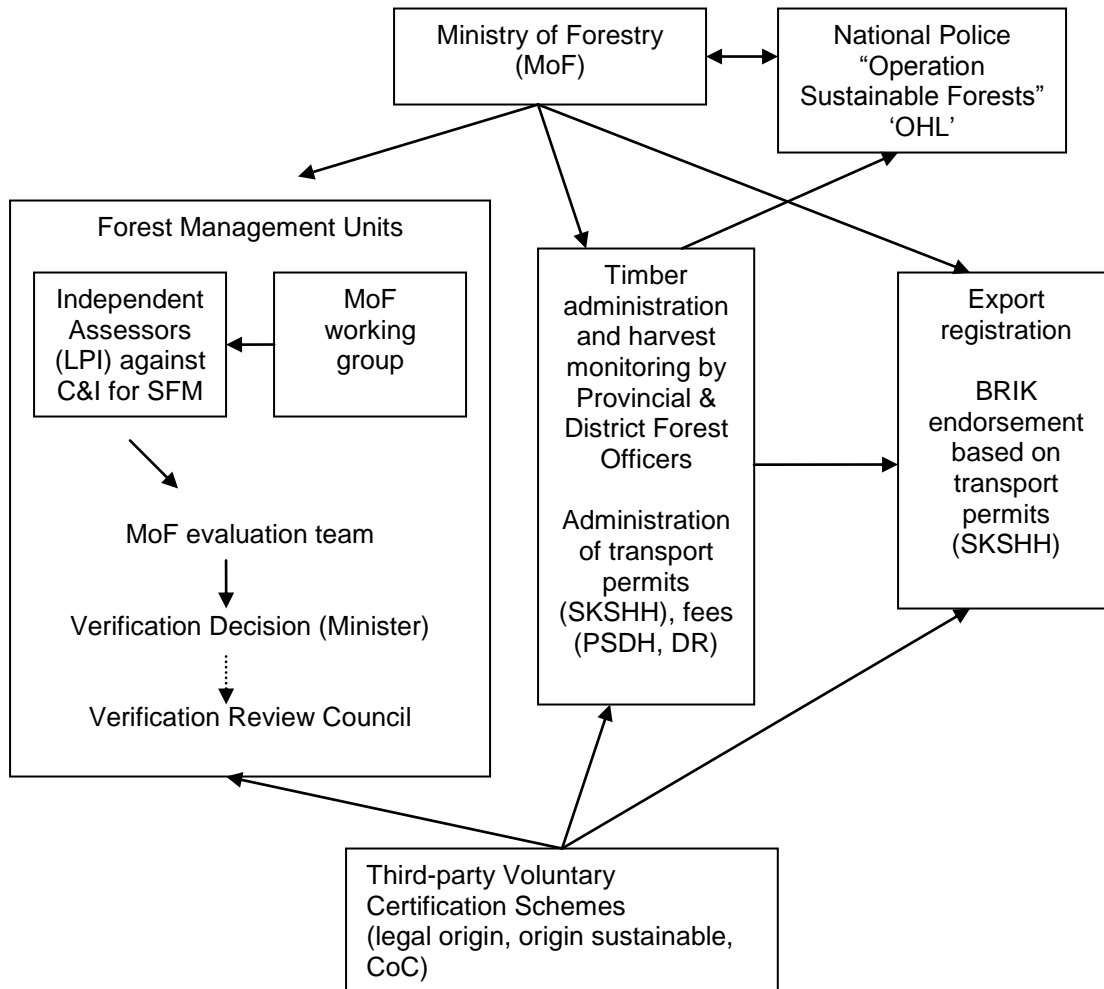
a) **First Party verification** aimed at continuous improvement within the company, and includes self-reporting systems against standards established by the Indonesian Forest Concession-Holders Association (APHI).

b) **Second-party or Government verification** aimed at reward or punish based on the performance of Forest Management Units (FMUs). Environmental Impact Assessment is undertaken by Provincial Environment Offices, as provides a baseline for future monitoring. Monitoring by the Ministry of Forests draws on Annual Compliance Reports by individual FMUs, as well as Timber Administration (PUHH) documentation. The Ministry's own Working Group on Restructuring of Natural Production Forest Management will assess all monitoring reports of FMU. If problems are identified, audits will be conducted by one of 16 Independent Assessor Bodies (LPI), appointed by the Ministry of Forests. Verification of the legality of forestry product exports is undertaken by the Forestry Industry Revitalisation Agency (BRIK).

c) **Third Party verification** is conducted by external auditors against markets standards (certification).

In addition, the Ministry of Forests together with National Police have instituted Operation Sustainable Forests (OHL) as a rapid-response enforcement measure in the field.

Fig 2 summarises this institutional arrangement:



C. Institutions and Forestry Verification System

C.1. First party self-declaration: Forest Management Unit (FMU)

Standard :

- Association of Indonesian Forest Concession Holder (APHI) in 1990 used ITTO standard
- Decree of Forestry Minister No. 610/Kpts-IV/1993 of Criteria and Indicator of Sustainable Forest Management at Management Unit Level

Institutions :

- Forest Management Unit as member of APhi
- Association of Indonesian Forest Concession Holder

Procedures and Verification Mechanism:

- APhi developed checklist in accordance with Decree of Minister of Forestry No. 610/Kpts-II/1993 and the standard of ITTO
- Forest Management Unit (HPH) filled up the checklist
- APhi involved experts from various Forestry Faculties in Indonesia (UGM, IPB, Unlam, Untan, Unmul, Unhas, and Uncen) to carry out scoring assessment
- It was mandatory for all member of APhi

Decision Making System and Objective:

- Together between APhi and experts, conducting decision making process based obtained score: Passing Grades of Readiness : Very Ready, Adequate Ready, Less Ready and Not Ready
- Transparent among member of APhi

C.2. Second Party : Government

1. Environmental Impact Assessment (EIA)

Standard:

Quality of Chemical, Physical, Biology, Socio-Cultural Economic and Health Socialize (Government Regulation No. 20/1990, Decree of Forestry Minister No. 364 and No. 457 of 1989, Decree of Ministry of Environment No. 13/MENLH/3/195, Governor Decision of West Java No. 38 of 1991)

Institution:

- Executor : Consultant of EIA (Listed on BAPEDAL)
- Assessor – Decision Making Process : EIA Committee of Centre/Region
- Approval : Ministry/Governor/Regent/Mayor

Verification Procedures:

- Evaluation Process of TOR of EIA Documents and Main Report of EIA, Environment Management Plan & Environment Monitoring Plan by Technical Team and EIA Committee of Central/Regional Level

- Public Documents – Mandatory – Environmental Feasibility

Decision Making System and Objectives:

- EIA Accepted → Activity Plan is Continued
- EIA Refused → Needs a Pre Condition – Special Treatment or Activity Plan is not Continued

2. Annual Report of Management Unit to Forestry Department

Standard :

Standard Operating Procedure (SOP) of Indonesian Selective Cutting System (TPTI) for Natural Production Forest; is still predominated by Sustainable Production Function Aspect in form of Planning (RKPH, long term plan – RKL, five yearly plan – RKT, annual plan). They are approved by Local Government/Forestry Department (Decree of Forestry Minister No. 16/Kpts-II/2003, Decree of Forestry Minister No. 151/Kpts-II/2003)

Institution:

- Executor : Forest Management Unit
- Assessment and Approval : Forestry Duty/Forestry Department

Verification Procedure:

- Assessment Process by Forestry Regency Officer by comparing between Plan (N) and Realisation Activity (F)
- Mandatory Scheme – Annual Report

Decision Making System and Objectives:

- Realisation as Targeted ($D = N - F \rightarrow 0$) → Reward/Appreciation
- Realisation Below and Above of Target ($D \neq 0$) → Need Guidance, Warning up to Revocation

3. Independent Assessment Bodies (LPI)

Standard :

- Natural Forest : Decree of Forestry Minister No. 4795/Kpts-II/2002
- Plantation Forest : Decree of Forestry Minister No. 177/Kpts-II/2003
- Industry of Wood Forest Product : Decree of Forestry Minister No. 6884/Kpts-II/2003

Kelembagaan:

- Executor : Independent Assessment Bodies (LPI) – Listed on Ministry of Forestry, last Decree of Minister of Forestry No. 313/Menhut-VI/2004
- Assessment and Approval : Evaluation Team – Verification Review Council, last Decree of Forestry Minister No. 303/Menhut-II/2005

Verification Procedure:

- Forest Management Unit to be verified is determined by Ministry of Forestry, last Decree of Director General No. S.572/VI-BPK/2005
- Field Team and Technical Team of LPI based on standard, analyse the performance of FMU to get final scoring as accordance with Decree of Forestry Minister No. 476/Kpts-II/2002 for Natural Forest, Decree of Forestry Minister No. 178/Kpts-II/ 2003 for Plantation Forest, and Decree of Forestry Minister No. 6884/Kpts-II/2002 for Forest Product Industry.
- Assessment Result of LPI's Technical Team is submitted to Expert Team (TE) to get the final scoring, and is submitted to FMU to get approval or objection.
- Mandatory Scheme and suited to requirement

Decision Making system and Function:

- If Scoring Documents from LPI do not get objection from FMU, TE is then processed to be final scoring assessment and is submitted to Forestry Minister through Director General of Forestry Production Management
- Assessment Documents from LPI and gets objection from FMU, TE with Verification Review Council (DPV) then process the final scoring assessment and is submitted to Forestry Minister through Director General of Forestry Production Management
- Forestry Minister will use the Final Scoring Assessment from TE in order to guide the FMU

4. Restructuring Working Group of Natural Production Forest Management

Standard :

- Criteria and Indicator of FMU (IUPHHK) Continuation Assessment (9 criteria and 17 indicators) : Decree of Forestry Minister No. 149/Kpts-II/2003

Institution:

- Formed in accordance with Decree of Forestry Minister No. 58/Kpts-VI/2003
- Its role is to provide recommendation to the Minister of Forestry through Director General of Forestry Production Management

Verification Procedure:

- FMU holder carries out presentation in front of working group attended with Directors and Commissioners or Cooperative Managers.
- For the sake of Presentation, FMU is obliged to make activity report with predetermined format
- If there are 3 times postponements and there is no sign of FMU readiness to do presentation, the assessment is done with available data and information held by the Ministry of Forestry and is written down on Assessment Minutes of Meeting
- Product of presentation is provided in form of Presentation Summary
- It is Mandatory

Decision Making System and Objectives:

- In accordance Assessment Minutes of Meeting or Presentation Summary, working group is analysing the FMU's continuation on managing Natural Forest
- Based on the analysis, working group submits recommendation to the Minister of Forestry through Director of Forestry Production Management as consideration material to decide the FMU's continuation on managing Natural Forest.

5. Timber Administration (PUHH)

Standard :

Movement Legality of Forest Product – Decree of Forestry Minister No. 126/Kpts-II/2003

- Area 1 : Forest Pre Logging; legalities RKT (Annual Cutting Plan)– LHC (Cruising Report)
- Area 2 : Forest Post Logging; legalities LHP (Production Report) – SKSHH (Transportation Permit) – DPP (Invoice)

- Area 3 : Processing Industry; legalities LMHHO (Processed Forest Product Report) – SKSHH– DPP
- Area 4 : Export Port; legalities SKSHH – DPP Processed Wood

Institutions:

- Executor : Forest Management Unit–Forestry Industry–Exporters of Forestry Industrial Product
- Assessor and Legality Approval : Local Government – Forestry Department

Verification Procedure:

- RKT - LHC are approved by Local Government, SKSHH is a prove of legal logs, process wood, and forestry industrial product. SKSHH has to be valuable letter which must have high governmental legality, there is only one format and cannot be falsified
- It is Mandatory Scheme

Decision Making system and Objectives:

- According to legal authentication, especially SKSHH in every node, there is a decision in every node. Violation can be in the form of : unavailable SKSHH, inconsistent type and volume of SKSHH or false SKSHH.
- Every violation can be processed under available legal regulations
- Objectives: guiding to all parties who are related to forestry activity, so that forestry timber administration runs orderly, and in order to have sustainable forest management, national income, and optimal forest utilisation achieved.

6. Forestry Industry Revitalisation Agency (BRIK)

Standard:

- Enlisted Exporter of Forestry Industrial Product (ETPIK)
- Forestry Industrial Product and SKSHH

Institution:

- BRIK – is formed Institute with Joint Decree (SKB) between Minister of Trade & Industry and Minister of Forestry No. 803/MPP/Kep/12/2002 and No. 10267/Kpts-II/2002 that has been amended with Decree. No. 495.1/MPP/Kep/9/2004 and No. SK.335.1/Menhut-I/2004
- National Conference has to be implemented every 5 years since the formation → toward Non Government Organisation whose members are ETPIK and Forestry Industries

Verification Procedure:

- ETPIK is verified for legal documents, company location, export activities and products as according to its permit
- ETPIK is verified for legal documents, company location, export activities and products as according to its permit
- BRIK awards endorsement to any forestry industrial products for export, which are: HS. 4408, HS. 4410, HS. 4409, HS. 4410, HS. 4411, HS. 4412, HS. 4413, HS. 44.15, HS. 4418, HS. 4419.00.100, HS. 4421.90.100, HS. 4421.90.300 dan HS. 9406.00.000 – Decree of Trade and Industry Minister No. 647/MPP/Kep/10/2003
- It is Mandatory scheme

Decision Making Process:

- Legalising as ETPIK is done by Foreign Trade Director General under BRIK recommendation
- New ETPIK can export forestry industrial products after it gets endorsement from BRIK

7. Sustainable Forest Operation (OHL) Program

Standard:

- PUHH Decree of Forestry Minister No. 126/Kpts-II/2003 - SKSHH
- Legal Laws Framework and Regulations related with logging problems
- Crime Aspect related with Laws No. 41 of 1999

Institution:

- Presidential Instruction No. 4 of 2005 of Illegal logging eradication in the forest area and its circulation throughout region of Republic of Indonesia
- Main Institutions : Ministry of Forestry and Police of Republic of Indonesia

Verification Procedure:

- Verification to wood legality between field fact against norm, especially with Timber Administration (PUHH) – SKSHH ; legal compliance
- Punishment to anyone conducts illegal compliance

Decision Making System and Objective:

- Everyone conducts illegal compliances will be punished as according to Crime Punishment Acts as stated in Chapter XIV Law No. 41 of 1999 about Forestry

C.3 THIRD PARTY: INDEPENDENT INSTITUTIONS

1. Indonesian Ecolabelling Institute (LEI)

Standard:

- Certification of Sustainable Natural Production Forest Management (PHAPL) : Standard LEI 5000-1
- Certification of Sustainable Plantation Production Forest Management (PHTL) : Standard LEI 5000-2
- Certification of Sustainable community Based Forest Management (PHBML) : Standard LEI 5000-3
- Chain of Custody (CoC) : Standard LEI 5001

Institution:

- Executor : LEI accredited Certification Bodies : Guidance of LEI 99-01
- Assessor and Decision Maker : Team of Assessor and Expert Panel : Guidance of LEI 99-02 and LEI 99- 03 – Certification Review Council : Guidance of LEI 55

Verification Procedure:

- FMU to be verified submits proposal to Certification Body
- Expert Panel I decides whether Certification Process can be continued or not : Guidance of LEI 99-23

- Field Assessment Result is evaluated by Expert Panel II, yields decision of certification and recommendation. Decision of certification is announced by Certification Body
- Objection against Certification Decision is processed by Certification Review Council : Guidance of LEI 55
- It is Voluntary Scheme

Decision Making System and Objective:

- Decision making of certification executed by Expert Panel II : Guidance of LEI 99-24
- Result of assessment categorised in : Gold, Silver, Bronze, Copper and Zinc, certification is only given to FMU which obtains assessment of Gold, Silver and Bronze
- Certificate of PHAPL is valid for 5 years and extendable : Guidance of LEI 99-26
- Certification is implemented in order to fulfill market demand (market driven), voluntary

2. Forest Stewardship Council (FSC)

Standard:

Ten Principles of FSC (FSC STATUTES) – 47 Criteria and Indicators

- Compliance with Laws and FSC Principles (6 criteria and indicators)
- Tenure and Use Rights and Responsibilities (3 criteria and indicators)
- Indigenous People's Rights (4 criteria and indicators)
- Community Relations and Worker's Rights (5 criteria and indicators)
- Benefit from the Forest (6 criteria and indicators)
- Environmental Impact (10 criteria and indicators)
- Management Plan (4 criteria and indicators)
- Monitoring and Assessment (5 criteria and indicators)
- Maintenance of High Conservation Value Forest, HCVF (4 criteria and indicators)
- Plantations

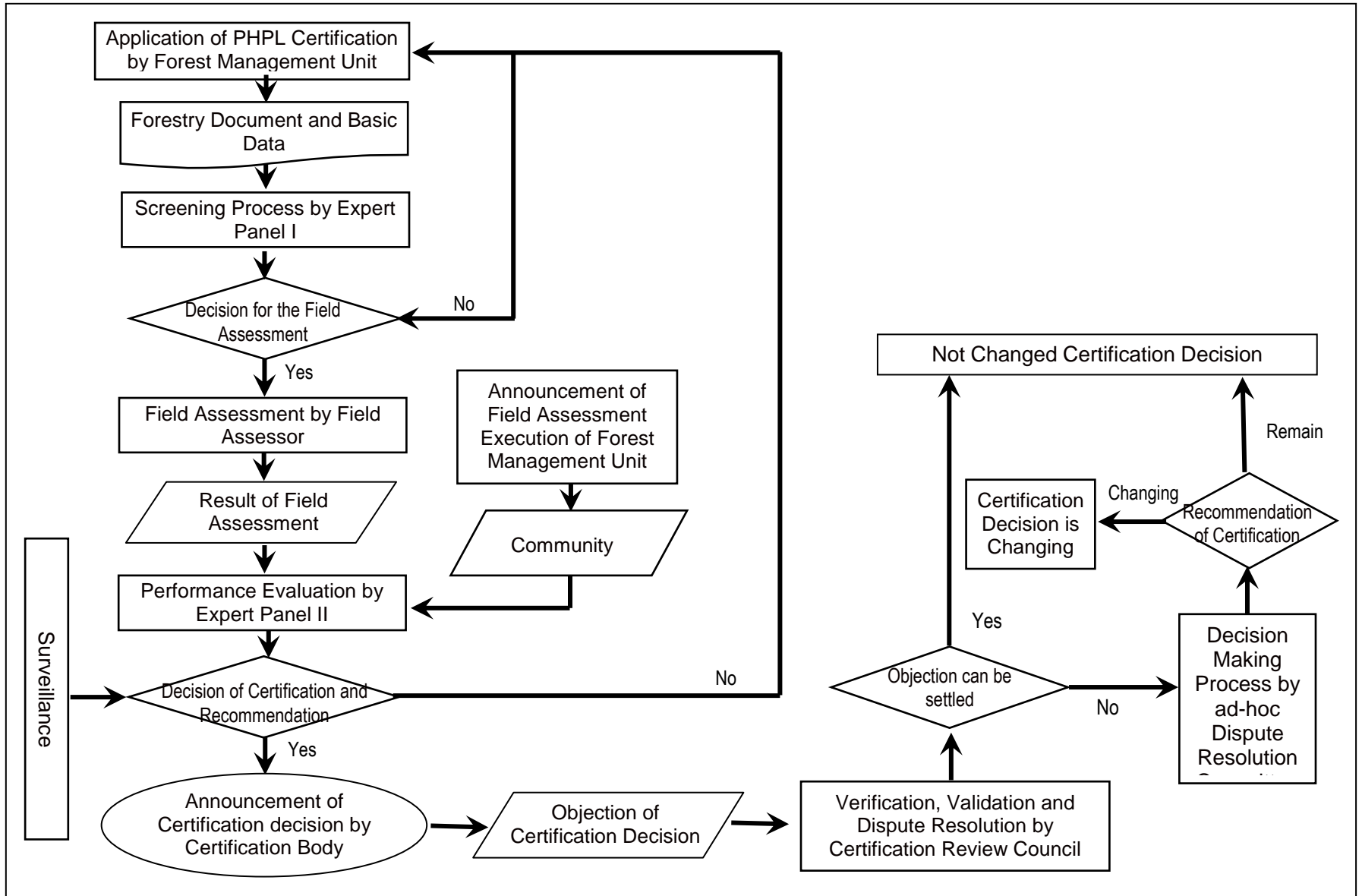


Figure 3. Third Party Verification System: Indonesian Ecolabelling System

Institution:

- Non Government Organisation,
- FSC acts as accreditation provider : Smart wood, SGS, Woodmark, SCS, SKAL, IMO & LUSO

Verification Procedure:

- Forest Management Unit shall apply to be certificated
- Procedure and mechanism are according to FSC
- It is Voluntary Scheme

Decision Making System and Objectives:

- Decision making system is according to FSC
- FSC and LEI execute the JCP (Joint Certification Program), mutually recognised each certification result (1999-2004)

3. International Tropical Timber Organization (ITTO)

Standar :

SEVEN CRITERIA – 66 INDICATORS

- Enabling Condition for Sustainable Forest Management (9 indicators)
- Forest Resource Security (5 indicators)
- Forest Ecosystem Health and Condition (5 indicators)
- Flow of Forest Produce (10 indicators)
- Biological Diversity (8 indicators)
- Soil and Water (9 indicators)
- Economic, Social and Cultural Aspects (18 indicators)

Institutions:

- Non Government Organisation
- Cooperation with Various tropical wood producing countries for the socialisation concept of Sustainable Forest Management, through workshop, seminar and also education and training about criteria and indicator of Sustainable Natural Production Forest (PHPL)

Verification Procedure:

- Does not release any verification

System of Decision Making and Objectives:

- Does not release any verification

4. The Nature Conservancy (TNC)

Standard:

SEVEN GENERAL PRINCIPAL OF LEGALITY, (16 CRITERIA AND 49 INDICATORS)

- Farm Domination and Exploiting Rights (3 criteria, 7 indicators)
- Social and Physic Environmental Impact (2 criteria, 4 indicators)
- Society Relation and Worker Rights (5 criteria, 14 indicators)
- Rules and Regulations of Wood Cropping (2 criteria, 7 indicators)
- Forestry Collection (1 criteria, 2 indicators)
- Identification of Balak, Evacuation and Transportation (3 criteria, 9 indicators)
- Wood Processed and Shipped (2 criteria, 6 indicators)

Institutions:

- As an Independent institution, cooperation team between Indonesia with UK
- TNC cooperation with Minister of Forestry, specially in developing and arranging the legality standard. LEI is an harmonisation facilitator of legal up to now.

Verification Procedure:

- Overcoming illegal logging through legal standard verification, specially for Indonesia
- Legal Standard Development process with an approach to multi stakeholder

System of Decision Making and Objectives:

- Target : socialisation about legal standard that wood is considered legal if wood origin, logging permission, logging system and procedure, administration and documentation of transportation, trading and processing are able to be proved legal against applicable regulations → CERTIFICATION AND ERADICATE ILLEGAL LOGGING IN INDONESIA

5. Tropical Forest Foundations (TFF)

Standard:

Wood product source legality verification standard which is exported from Indonesia, Eight Principles – 14 Criteria and 24 Indicators

- Legal Enlisted Chain Company (1 criteria, 1 indicator)
- Rights for Cropping/Hewing (2 criteria, 4 indicators)
- Environmental Impact (2 criteria, 3 indicators)
- Relation with local society (1 criteria, 1 indicator)
- Rules and Regulations of Wood Cropping (2 criteria, 6 indicators)
- Forest Lease (1 criteria, 2 indicators)
- Log Identification, Transporting and sending (4 criteria, 6 indicators)
- Wood Processing (1 criteria, 1 indicator)

Institutions:

- Non Government Organisation with major attention to:
- Legality and verification about wood source, specially in Europe, as reflection and care from NGO and bodies at the wood market, about logging and the legal wood commerce that mostly occurs in tropical countries
- Concern to the increasing deforestation area in tropical countries
- Care about issues which cause pressure to European Forestry importer to initiate verification about source legality and forestry product industry legality

Verification Procedure:

- Socialising wood product source legality standard for export from Indonesia
- Through education, training, and samples to develop and test the verification standard of source and wood legality and also forestry industrial product from Indonesia

Decision Making System and Objectives:

- Target : importers be more comprehend to the legality verification standard aspect of wood product source from Indonesia
- Legality to be more advanced at the framework of applicable rules and regulations

6. Global Forest And Trade Network (GFTN)

Standard:

Standard – requirements given for:

- All members of GFTN (6 conditions)
- Special for forestry members (7 conditions)
- Special for commerce members (7 conditions)

Institution:

- Represent global network whose aim is to push, commercialising, and using forest product which comes from sustainable forest management by recruiting new member with similar commitment
- In Indonesia GFTN-WWF program is called as “Program Nusa Hijau”
- Those who are eligible to GFTN member are : Forest manager (IUPHH/HPH), Management Unit (KPH) of Perum Perhutani; Processor (upstream/downstream wood processing industry); and also the owner/manager of community based forest management

Verification Procedure:

- GFTN-WWF Program basically employs *Phased Approach to Certification* or *Stepwise Forest Certification*
- This approach is used to give *rewards* or incentives to management who has attempted toward complete certification standard in every phase.

Decision Making System and Objectives:

- The phases attained shall not be more than 5 years
- Since year 0, the members have access and information regarding to certificated product market, and the others. For this purpose, GFTN has a membership scheme.

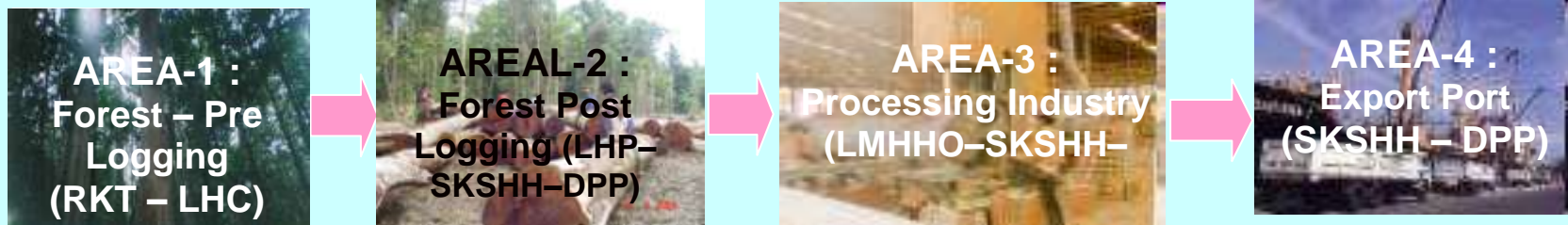
D. Harmonisation of Verification Systems

With up to 17 monitoring and audit processes in place, steps need to be taken to harmonise the verification systems in ways that bring greater complementary between mandatory verification by government on the one hand and self-reporting as well as third-party independent certification on the other, at each stage of the production chain. This is essential in strengthening the mandatory ‘backbone’ of the system (see Figure 4).

SECOND PARTY – GOVERNMENT – MANDATORY BASIS

1. Environmental Impact Assessment (AMDAL)
2. Annual Report of Forest Management Unit to Ministry of Forestry
3. Independent Assessment Bodies (LPI)
 - Restructuring Working Group of Natural Forest Concessions
 - Timber Administration (PUHH)
 - Forestry Industry Revitalisation Agency (BRIK)
 - Sustainable Forest Operation (OHL) Program

FIRST PARTY – FOREST MANAGEMENT UNIT – MANDATORY/VOLUNTARY



THIRD PARTY – INDEPENDENT INSTITUTION – VOLUNTARY / MARKET DRIVEN

- LEI : Certification of Natural Forest, Plantation Forest, Community Forest, and Chain of Custody (CoC)
- Forest Stewardship Council (FSC)
- International Tropical Timber Organization (ITTO)
- The Nature Conservancy (TNC)
- Tropical Forest Foundation (TFF)
- Global Forest And Trade Network (GFTN)

Figure 4. Gap Analysis – Verification System Harmonisation

E. Enabling Conditions

To enable harmonisation and strengthening of mandatory verification systems, there is a need to revise and overhaul enabling law and policy. This does not yet constitute a clear and consistent basis for monitoring and audit, and is currently very complex.

E.1 Policy Support of Ministry of Forestry

Greater standardisation of national sustainable forestry management systems is needed, including the revision of minimum requirements for principles, criteria and management indicator of sustainable forest management, and their application to all components of the production chain as specified in Ministerial Decree No.126/Kpts-II/2003 on Timber Administration, that is :

- a. Area-1: Sustainable Forest Management (SFM) – origin sustainable
- b. Area-2: Chain of Custody (CoC) – legal origin and legal compliance
- c. Area-3: Minimum waste, environmental friendly– sustainable industry – Environmental Management System (EMS/SML)
- d. Area-4: Sustainable and fair trade – premium price

E.2 Legislative and regulatory support

- a. Origin sustainable – clear and consistent legislation is need to sanction Forest Management Units with respect to breaches of Sustainable Forest Management (SFM) standards
- b. Legal origin – clear and consistent legislation is needed to sanction illegal logging and trade
- c. Legal compliance –clear and consistent legislation is needed with respect to the division of roles and responsibilities between central, provincial and district governments, as well as individual Forest Management Units.