

Validation Report MTCC

10 March 2009

The Board of Experts declares that it has validated the Malaysian Timber Certification System (MTCS) for all its FMU's and the related Chain of Custody, against the criteria as laid down in the Keurhout Protocol for the Validation of Certification Systems, version 31/08/2007:



This report may only be issued integrally

The following documents have been included in the validation:

1. MTCS General documents

- National Steering Committee, 2004. Malaysian Criteria & Indicators for Forest Management Certification (MC&I-2002).
- MTCC, 2004. Requirements for Chain of Custody Certification (RCOC)
- MTCC, 2004. Procedures in MTCC Timber Certification Scheme
- MTCC, 2004. Format of Assessment Report MC&I-2002
- MTCC, 2008. Letter on implementation of New Institutional Arrangement for MTCS
- MTCC, 2008. The Malaysian Timber Certification Scheme (MTCS) and its implementation arrangement (MTCS 2008/01)
- MTCC, 2008. Procedure for the Investigation and Resolution of Complaints and Appeals
- MTCC, 2008. Logo Use Rules Manual
- MTCC, 2008. Rules on Standard Setting Process for Development of Timber Certification Standards
- MTCC, 2008. Procedure for PEFC Notification of Certification Bodies operating Forest Management System and/or CoC Certification

2. Other MTCS documents

- www.mtcc.com.my
- Lists of MTCC certificate holders for forest management and Chain-of-Custody.
- MTCC, 2006-2008 Certificates for Forest Management (MC&I 2002)
- MTCC, 2006-2008 Certificates for Chain of Custody (RCOC)

3. Other materials

- DSM, 2005. Accreditation certificates of SIRIM-QAS for ISO Guide 62
- DSM, 2007. Accreditation certificates of SIRIM-QAS for and ISO Guide 65 and ISO Guide 66
- DSM, 2006. Accreditation Certificate of SGS-M for ISO Guide 62
- DSM, 2007. Accreditation Certificate of SGS-M for ISO Guide 66
- DSM, 2008. Accreditation certificates of Moody International for and ISO Guide 62 and ISO Guide 66
- PEFC Annex 4
- Public Summaries audit reports for forest management
- Audit reports for forest management
- Audit reports for CoC

Other material integrated in the validation:

In addition to the documents mentioned above other documents derived from the MTCC website (www.mtcc.com) have been taken into account. Moreover MTCC and its related CB's provided information on request .

GLOSSARY

AR	Audit Report
BoE	Keurhout Board of Experts
CAR	Corrective Action Request
CBD	Convention on Biodiversity
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CB	Certification Body
CS	Certification System
CoC	Chain of Custody
DSM	Department of Standards, Malaysia
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFD	Federal Forestry Department
FMP	Forest management plans
FMU	Forest Management Unit
FSC	Forest Stewardship Council
GIS	Geographic Information Systems
ha	hectare
IAF	International Accreditation Forum
ILO	International Labour Organization
ISO	International Standards Organization
KH	Keurhout
KH-LET	Keurhout Legal system
KH-SFM	Keurhout Sustainable system
KH-SYS	Keurhout Protocol for the Validation of Certification Systems
LP	Legality of Production
MA	Main Audit
MC&I	Malaysian Criteria and Indicators for Forest Management Certification
MTCC	Malaysian Timber Certification Council
MTCS	Malaysian Timber Certification Scheme
NC	Non-Conformity
NGB	National Governing Body
NGO	Non-Governmental Organization
NTFP	Non-Timber Forest Products
NTTA	Netherlands Timber Trade Association
PEFC	Programme for the Endorsement of Forest Certification Schemes
RCOC	CoC standard of MTCC
RPS	Removal Pass System
SFD	State Forestry Department
SFM	Sustainable Forest Management
SGS-M	SGS Malaysia Sdn Bhd (CB)
SGS	Société Générale de Surveillance S.A.
SIA	Social Impact Assessment
SIRIM-QAS	SIRIM-QAS International Sdn Bhd (CB)
SMS	Selective Management System
SOP	Standard Operation Procedures
TL	Team Leader
TTS	Tree Tagging System
UNCCC	United Nations Conference on Climate Change
UNFF	United Nations Forum on Forests
VA	Verification Audit

1) Validation process

Keurhout (KH) has undertaken a validation of the Malaysian Timber Certification Scheme (MTCS). The assessment was performed against the *Keurhout Protocol for the Validation of Certification Systems (KH-SYS)*, which was developed in 2005 by the Netherlands Timber Trade Association (NTTA) and was amended August 31st 2007. The validation concerns the entire MTCS, which to date covers the forest management of approximately 4.482.000 ha, divided over 9 valid Forest Management Unit (FMU) certificates in Malaysia. The chain of custody (CoC) to date comprises approximately 122 valid certificates.

The KH-SYS protocol consists of five parts. Part I is the Validation procedure, the other four parts are normative documents regarding Legal Origin (Part II.a), CoC (Part III), Certification Bodies (Part IV) and the organisation and stability of the Certification System itself (Part V). The requirements are structured in the form of criteria with indicators grouped under various Principles. All criteria of the standards contained in Parts II.a to V are to be assessed. Indicators serve as practical parameters to assess compliance with the criteria. Compliance with all criteria leads to a positive decision concerning the validation of the certificate.

In February 2008 the KH Board of Experts (BoE) received a request from a representation of KH-participants to validate the MTCS at *system level* within the context of Legal Origin. This was followed by a formal request from the System Manager of MTCS in May 2008. The assessment was carried out as a desk study between October 2008 and February 2009.

2) MTCS

Description of the system

MTCS is the national certification scheme of Malaysia operated by the Malaysian Timber Certification Council (MTCC). The MTCC was established in 1999 and the scheme became operational in 2001. The basic document was: "MTCC, 2004. Procedures in MTCC Timber Certification Scheme" This document was complemented by the latest standards for forest management (MC&I-2002) and Chain of Custody (RCOC) and some other additions. Since July 2008 a new scheme document is in place: "The Malaysian Timber Certification Scheme (MTCS) and Its Implementation Arrangement (MTCS 1/2008)" to guide the implementation of the scheme under a new institutional arrangement.

The MC&I-2002 were developed by the National Steering Committee which comprises representatives of the various stakeholder groups in Peninsular Malaysia, Sabah and Sarawak. The structure is based on the principles and criteria of the Forest Stewardship Council (FSC); the Indicators and Verifiers were developed by the stakeholder groups taking into account conditions at the national and regional levels.

The MTCS deals with all the requirements for forest certification: requirements for forest management, CoC, and the accreditation and quality of external auditing. MTCC is member of the PEFC Council and is actively working towards endorsement by PEFC International.

The MTCS has been designed to verify that timber has been produced in a sustainable way and sold by a particular forestry or timber company. The certified timber is traced and verified throughout the supply chain. The process embodies a combination of auditing, monitoring, inspection and checking activities that are deployed with the aim to confirm both the sustainability and the traceability of specific timber products.

Within the context of this Keurhout Legal Origin assessment, the MTCS is considered to consist of two components: the forest management component, which verifies the legal origin of forest products. This component also contains evaluation on traceability (CoC) at the FMU level. The second component, a Chain of Custody (CoC) component, is applied to

companies further down the chain. It enables confirmation that timber products under MTCS are derived from legally compliant forestry operations.

Organisation of MTCS

The MTCS is run by the Malaysian Timber Certification Council (MTCC), which plays the role of the National Governing Body (NGB). Prior to 1 July 2008, MTCC registered assessor companies to implement assessments of FMU's or CoC's against its respective standards. For forest management assessments MTCC normally also involves two independent peer reviewers. The Board of Trustees of MTCC established a Certification Committee that was responsible for registration of assessor companies, registration of peer reviewers and decision on applications. Day-to-day management of the scheme is handled by a Chief Executive Officer with his staff. The operational office is in Kuala Lumpur. In view of its planned application for endorsement by PEFC International, MTCC announced that from April 1st 2007 it would only register CB's which had been accredited by the National Accreditation Body, DSM (Department of Standards Malaysia) under ISO Guide 62, ISO Guide 65 and/or ISO Guide 66 for certification of ISO 9001 and/or ISO 14001. Actually DSM has finalised the specific accreditation programme for forest management certification, and is in the process of developing the accreditation programme for CoC. These accreditation programmes will be used in near future. To further strengthen the acceptance of the MTCS in the international market, MTCC implemented a new institutional arrangement, whereby the accredited CB's are directly responsible for the certification decisions. The CB's are monitored by DSM, which is a member of the International Accreditation Forum (IAF). This new arrangement has become functional since July 1st 2008.

Standard setting and revision

The Standard for Forest Management (MC&I 2001) was revised through a multi-stakeholder consultation process in 2002, resulting in the MC&I 2002. MTCC started using the MC&I 2002 for forest management certification in October 2005, and as a transition measure, existing certificate holders are allowed to undergo surveillance audits against the requirements of the MC&I 2001, within the validity period of the *Certificate for Forest Management*. However, no new assessments to MC&I 2001 are allowed.

Similarly the earlier CoC/RAP standard was phased out and replaced by the current RCOG standard. New rules on the standard setting process are included under the MTCS implementation arrangement. These are in line with the PEFC-International requirements for such procedures. The rules cover among others the independence between standard setting and certification or accreditation processes, balanced representation of relevant stakeholder groups, working group establishment and functioning, decision making (by consensus), public consultation procedures, pilot testing and periodical review (at least once every 5 years).

Forest management

Forest Management Units (FMU's) in Peninsular Malaysia are defined at the level of Permanent Reserved Forests (PRFs). Such PRFs are managed by the State Forestry Department (SFD) and normally consist of forests at different locations. For the PRFs, a pre-harvest 10% inventory is conducted to determine the optimum cutting limits to be prescribed based on a selective management system (SMS). Subsequently, a 100% Tree Tagging System (TTS) is carried out to tag all harvestable trees in a given licensed harvest area, based on the prescribed cutting limits. The FMU's do not include the other two categories of forests that may occur in the State: "forest on stateland" (normally conversion forest) and "forest on alienated land" (forest managed and owned by third parties). Accordingly timber from these two categories cannot be included as certified timber. Forest management is managed and planned, in accordance with the requirements of the National Forestry Act (1984), through 10-year forest management plans (FMP's) and annual operational plans.

Certification process

Accredited CBs conduct audits that include document review, interview with staff and field visits to check on compliance with the requirements of the standard. All criteria are checked. After the audit a draft assessment report is prepared, which is forwarded to the responsible State Forestry Department, that can provide its comments with respect to possible non-conformities identified in the draft report. After that, the draft with comments of the forest manager are presented to the independent peer reviewers. Finally, based on its findings and the feed-back of the forest manager and the peer reviewers the CB (until July 2008) produced a final report, with certification recommendation, which was presented to the MTCC Certification Committee. The MTCC Certification Committee makes its certification decision based on the recommendation of the CB. Since July 2008 the accredited and notified CBs are fully responsible for the certification decisions. Certificates used to be granted for five years; with the new institutional arrangement a re-assessment audit is required every 3 years.

Annual surveillance audits are carried out to monitor compliance with SFM requirements at the FMU level. Such audits use the same standard and approach, but may pay special attention to specific issues, based on possible weaknesses identified in the previous audit. Results of audits are being fed back into the management of FMU's and the long-term FMP; the latter is revised every 5 years. The MTCC system manager organises regular meetings with the registered CB's to assure common interpretation of requirements.

In case a FMU is not granted a certificate during the main audit (MA), due to the issuance of one or more Major Corrective Action Requests (CAR's), it may request a verification audit (VA) when the necessary adjustments have been made. In such audits in principle all criteria will be dealt with and special attention will be given to earlier identified Major and minor CAR issues.

Transition period

As from July 1st 2008 the existing certificates will be replaced by new certificates, provided the applicants comply with the respective standards. CoC companies may be verified against either the RCOC or PEFC Annex 4. Due to the requirement for annual surveillance the transition is expected to be completed by mid 2009.

3) Results of the Keurhout validation

The system has been assessed against the four normative documents of the Keurhout System validation process.

The summary of the findings of the Board of Experts is presented below. Under each Principle (P) the assessment of the related criteria is briefly summarized. This summary is captured in an overall validation per Principle with the following indication:

- OK = Satisfactorily addressed
- OK - = Minor deficiency
- = Major deficiency

Validation Part II.a: Requirements regarding the Legal Origin.

P 1 OK	The timber shall come from a legal source.
Twelve criteria. The criteria concern valid registration and permits to operate, clear definition and identification of FMU boundaries, legally required impact assessments, payment of taxes and royalties, respecting of customary cutting rights, respecting of logging restrictions (species, dimensions, volumes, protected zones, approved harvesting and operational plans), monitoring of compliance of the mentioned aspects for all timber sourced from the area and internal control. <i>The FMU's are state owned, established by gazettelement, and managed by the respective State Forestry Departments. These SFDs comply with the laws and regulations and also control their contractors with respect to registrations and licences.</i> <i>Outer boundaries of FMUs are normally well identified in the field by cleaned lanes of 1-2 m width in combination with painted trees and demarcation signs prohibiting trespassing without permission.</i> <i>For areas licensed for logging, the licensed area (compartment) boundaries are clearly demarcated on the ground and confirmed by the Forestry Department prior to the commencement of the logging operations. Forest Management Plans (FMP's) include maps, establishing outer boundaries and inner boundaries (based on different functional classes).</i> <i>The law prescribes only an EIA for licence areas > 500 ha; licences issued normally concern smaller areas. The implementation of EIA's at landscape level is required by the standard and promoted by the SFD. So far these have been implemented for several FMUs; compliance is checked by the CB.</i> <i>SFD's maintain records on all tax payments and inform and pay the State Government accordingly. Audit teams are provided with figures on royalties and cess received.</i> <i>Traditional use rights are respected. All national and local laws and regulations have to be complied with. This implies that within the provision of the law, the local people who wish to exert their right to harvest trees for own consumption are legally allowed to do so.</i> <i>Zoning is applied and logging is not permitted in conservation zones (areas above 1,000 m.a.s.l, Virgin Jungle Reserves, etc). Compartments for logging are identified as production forest. Also in these production zones certain general rules are applicable, which relate to the protection of certain species (e.g. fruit tree species for animals), terrain conditions (e.g. too steep) or location (e.g. too close to a water course or to the shore of a water body). The CB checks compliance with the zoning and general regulations.</i> <i>The standard requires compliance with all relevant regulations with the aim to ensure that protected species are identified and dealt with according to the rules. The CB's control this.</i> <i>Guidelines are available for conducting pre- and post felling inventories. The audit teams verify inventory records in the field and indicate whether tree dimension limits have been respected. The CB's confirm in the AR's whether SFD's comply with the volume requirements for secondary forest (<61 m³/ha) and primary forest (<85 m³/ha) as well as the requirement that at least 32 trees/ha (of commercial species, in good shape and diameter of 30 cm and above) shall remain.</i> <i>Timber harvesting and transport is controlled through the Tree Tagging and Removal Pass System. The system is well implemented and controlled at several levels.</i> <i>Both the licence holder and the CB monitor the full scope of legal origin requirements.</i> <i>All these criteria are either fully or sufficiently covered by the MTCS.</i>	

Conclusion:

Based on the above observations, requirement Part II.a is considered to be sufficiently met.

Validation Part III: Requirements regarding the chain of custody

P 1 OK	The timber shall be traced and monitored from the moment of felling through all its possible stages of processing and transport up to the moment of being imported in the EU.
Six criteria. The criteria require that parties in the CoC have valid permits to operate, an operational management system for sound timber product tracking, well documented procedures for timber tracking in the forest and through processing, register percentages and mix with at least legal origin timber in case of mixed products, and apply physical and administrative segregation and identification of third party verified timber (products). <i>The first criterion is covered indirectly. CoC AR's generally include information on company policies, SOP's, compliance with these and relevant national laws and regulations and registration. The experience over the years has shown that all parties with a MTCC certificate were properly registered and operating with valid licenses. The same control mechanisms are in place now.</i> <i>With respect to the following three criteria, the CoC requirements are described in the MTCC CoC standard: RCOC, which includes criteria on the availability of an adequate and operational timber tracking system. Most AR's (and SOP's attached to them) indicate in detail how these systems function. The connection between the certified FMU and the primary processing unit is made through the legally prescribed application of the Tree Tagging system in combination with the Removal Pass system. RP's are issued by the SFD. Control takes place by the SFD, the FFD and by accredited auditors. CB's conduct sampling of the accuracy of the tags and diameters and confirm correct implementation of the system in the AR's. The RCOC requires a well documented procedure for tracing of timber through processing.</i> <i>The 5th criterion is not applicable at FMU level. The percentage of certified timber that leaves the forest is 100 % (no mixing takes place) This is registered/controlled through the Tree Tagging System. All forest products that are removed from the forest require a valid Removal Pass.</i> <i>The CoC standard provides for the application of physical separation or application of a percentage based system during processing. In practice MTCS CoC companies apply full physical and administrative identification and separation.</i> <i>With respect to third party supplies, the RCOC explicitly verifies timber from external sources and possible controversial sources.</i> <i>The criteria are either fully or sufficiently covered by the MTCS.</i> <i>Similarly the PEFC system has a standard for CoC (PEFC-Annex 4) that complies with the KH-Legal requirements. MTCS CoC parties may choose the RCOC or PEFC Annex-4 for CoC certification.</i>	

Conclusion:

Based on the above observations, requirement Part III is considered to be sufficiently met

Validation Part IV: Requirements regarding the certifying body

P 1 OK	The certification body shall be able to demonstrate that it is capable of assessing forest management and the management system and/or the Chain of Custody.
Seven criteria. The first three criteria concern the expertise and independence of the CB. The following four criteria refer to the assessment scheme. They address audit procedures including the identification of relevant legislation and existing (customary) rights, requirements for the audit report and for monitoring of continuous compliance. <i>As per 01/04/07 MTCC requires independent third party assessor companies to be adequately accredited by the National Accreditation Body of Malaysia (DSM), according to ISO Guides 62 and/or 65 and/or 66. DSM has developed a special accreditation programme for forest management and is in the process of developing the accreditation programme for CoC, which are to be used for accreditation of CBs in the near future.</i>	

Until July 2008 the MTCC Certification Committee issued certificates, based on the recommendations of the accredited assessor. The CM consists of 4 members representing each of the interested parties (industry, research, NGO's, GO's). A new institutional arrangement, whereby MTCC remains as National Governing Body and the certificates are being issued directly by the assessor companies, is in place since July 2008.

The new arrangement is considered to be fully compliant; the old arrangement had a set-up that could be criticized, but its practical implementation was in line with the internationally accepted norms. The audits are implemented by selected/trained auditors. Assurances are given that the auditors and peer reviewers are independent of the verified companies. Audit teams are carefully selected to assure the relevant expertise. Auditors CV's are attached to the audit reports. The audit scheme is considered to be well developed in all its aspects. The CB's are accredited in line with internationally accepted standards by DSM.

The MTCS standard requires all relevant legislation and existing customary rights to be identified, any conflicts to be evaluated and appropriate mechanisms for dispute resolving to be applied.

The guidelines on the contents of the audit report are defined as per "Format of Assessment Report for MC&I 2002" (FAR) which is normally attached to the ToR of the CB. Forest management AR's normally have the same structure and detail findings for each criterion and indicator of the standard. The same applies for CoC audit reports.

Guidelines for the monitoring of continued compliance with the system standards are present at different levels. Surveillance checks are required normally on an annual basis.

The criteria are sufficiently complied with.

Conclusion:

Based on the above observations, requirement Part IV is considered to be sufficiently met.

Validation Part V: Requirements regarding the certification system

P 1 OK	The organisation management shall clearly act independently.
One criterion. The criterion requires that the CS is managed by a well structured and contactable organisation. <i>MTCS is properly managed and contactable. Contact information and information on organisation structure can be downloaded from the MTCC website.</i> <i>This criterion is considered to be fully complied with.</i>	
P 2 OK	The system manager shall be responsible for the quality and monitoring of the Certification System.
Eight criteria. Criteria address the establishment process of the system, the procedures to implement the system, procedures to monitor compliance with requirements imposed by the system, the access to certification reports, appeal procedures against decisions by the certification body, access to information on the certification system. <i>The system is well structured and includes a well developed set of procedures, work instructions and related documents. This includes monitoring of compliance by verified parties as well as monitoring of the functioning of the CS, rules for the prevention of misuse of the logo and the availability of appeals procedures, among others. The system manager sets the requirements to be complied with by the verified parties and auditors. System documents such as procedure documents, standards, audit report public summaries and the certificate lists can be downloaded from the website.</i> <i>These criteria are considered to have been sufficiently met.</i>	
P 3 OK	The development process of the generic standard, regional and national standards and the standard for the chain of custody shall be fair and transparent.
Two criteria. The criteria pertain to fair transparent standard setting and field testing. <i>The current standards have been established by MTCC, based on a multi-stakeholder consultation process, providing opportunity for the involvement of all relevant stakeholders. Field testing has been</i>	

done prior to adoption of standard and the standard adopted will be subjected to periodic review. These criteria are considered to have been sufficiently met.	
P 4 OK	The universal standard and the regional and national standards for Sustainable Forest Management and the standard for the Chain of Custody shall be supported and formally accepted by the system manager.
Two criteria. The criteria concern the establishment and adjustment procedures of (local) standards. <i>The standards are formally accepted by the system management. The rules for standard setting and review are compliant with the PEFC-International rules for such procedures. The criteria are sufficiently complied with.</i>	
P 5 OK	The standard shall be clearly structured, complete, usable and allow for objective assessment.
Three criteria. The criteria refer to the suitability to apply the standard at the FMU level, consistency in terms of structure and reasoning, and compatibility with national and international laws. <i>The standards are quite comprehensive and are based on the relevant local laws and regulations and take into consideration any relevant treaties or international agreements. The forest management standard is based on the set-up of the FSC standard and considered to be well structured and consistent. It is applicable at FMU level. All criteria are fully covered.</i>	
P 6 OK	Certification Bodies shall comply with international accepted standards of professionalism and independency.
Three criteria. The criteria require the CS to set requirements as to the status (accreditation) and professionalism of the CB and its procedures. <i>The MTCS requires CB's to be accredited for SFM and CoC certification (based on ISO/IEC Guides 17021 and 65 respectively) by the National Accreditation Body of Malaysia (DSM). Specific accreditation programme for forest management is already in place while programme for CoC is being finalised. Requirements and procedures are in place for the selection of auditors, their training level, expertise and independency, among others. Thereby the criteria are sufficiently covered.</i>	
P 7 n.a.	Group Certification shall be based on compliance with the performance standards for individual forest management units, respectively CoC participants, and in addition specific requirements regarding group organisation and management.
Two criteria. The criteria require that the Group Certification system specifies the tasks and responsibilities of the group leader and that the standard imposes requirements for the management system and the expertise of the group leader. <i>So far group certification is not an option. Certification takes place of consolidated FMU's which may exist of forests at different locations. CoC companies are certified on individual basis. Therefore the criteria are considered to be not applicable.</i>	
P 8 OK	The certification System shall offer facilities for the filing of complaints and/or appeals
One criterion. The criterion requires establishment of adequate procedures for handling of complaints and appeals. <i>The related parties have relevant procedures in place. The criterion is sufficiently covered.</i>	

Conclusion:

Based on the above observations, requirement Part V is considered to be sufficiently met.

Summary of Principles with deficiencies

Part	OK	OK -	-	NA
II a	P 1			
III	P 1			
IV	P 1			
V	P 1, 2, 3, 4, 5, 6, 8			P 7

Overall conclusion:

In general it is observed that all four normative parts of the Keurhout System are being sufficiently covered by the requirements and procedures of the MTCS.

The BoE **accepts** the MTCS as described in the studied documents which constitute the system to the **Keurhout Legal system** without further conditions.

Keurhout recommends that special attention is being paid to CoC companies, in order to assure that full physical and administrative separation is maintained.

For assembled timber products it is allowed to mix Keurhout Legal timber with timber from other sources which have been admitted to either the KH-Legal or the KH-Sustainable system, provided the complete CoC is certified.

- *In the former case the mix will result in **KH-Legal timber products**.*
- *In the latter case the mix will result in **KH-Legal timber products** if < 70 % of the input consists of KH Sustainable timber.*
- *In case the percentage KH Sustainable timber input is equal or > 70 % this will result in **KH-Sustainable level 2 timber products** (KH Sustainable level 1 consists of only 100 % KH Sustainable timber, thus may not be mixed).*

In addition:

MTCS shall provide Keurhout with full copies of annual surveillance audit reports, related to the FMU's and related CoC's, whenever requested.

MTCS shall inform Keurhout at least one month in advance on any changes of its standards as well as of changes in relevant legislation and/or regulations.

MTCS shall provide Keurhout once every six month's with an up-dated overview of all valid certificates.

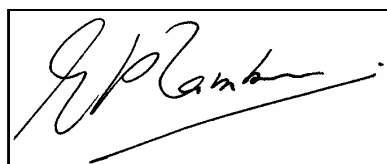
Failure to do so may result in suspension of the admission to the Keurhout Legal system.

Date: March 10th, 2009

Signed:

Ir. E.P. Zambon

Prof. C.J. Jepma



(Secretary)



(Chairman)