



Directie Duurzame Leefomgeving en Circulaire Economie  
Directoraat-Generaal  
Milieu en Internationaal Ministerie Infrastructuur & Waterstaat

Rijnstraat 8 -  
2515 XP Den Haag



<i>Date:</i>	13 November 2025
<i>Re:</i>	Memorandum concerning TPAC's report "Final Judgement Detailed Research MTCS"
<i>Contact:</i>	Paul Wolvekamp, e-mail: <a href="mailto:pw@bothends.org">pw@bothends.org</a> ; tel +31 (0)6-45530641

Thank you for sharing the report of the Dutch Timber Procurement Assessment Committee (TPAC) Commission, "Final Judgement Detailed Research MTCS – 11 June 2025". With this letter, we want to share our response to the TPAC report and convey our deep concerns about the Ministry of Infrastructure and Water Management (I&W)'s decision to uphold recognition of the Malaysian Timber Certification Scheme (MTCS) based on this report.



The MTCS has continuously been monitored by the Malaysian indigenous organisations SAVE Rivers and Keruan, by The Borneo Project, the Bruno Manser Fund and the other signatories. The indigenous organisations spend much of their time in the field, working directly with communities on urgent issues. In this role, they are well-positioned to carefully gather community perspectives, verify data, conduct field observations, and gather relevant technical details. It is such locally rooted data collection and documentation which helped signal the shortcomings of MTCS that signatories have identified and communicated to relevant actors. For this reason, we are profoundly concerned that this information is not given due consideration in the TPAC report, whilst in fact the report frames incorrect accusations. It is also to emphasize our concern that TPAC based its conclusions and recommendations on an ultrashort field visit, through an inadequately prepared consultation process, which is far removed from the realities and complexities experienced by local communities and their organisations.


Drafting a considered response to the TPAC report, based on verification with local stakeholders, requires time. It is with deep concern and dismay that we note the Ministry of Infrastructure and Water Management (I&W), instead of awaiting our input, has proceeded in haste to decide to uphold the recognition of MTCS based on the TPAC report. This is particularly troubling given that the signatories to this written response have consistently offered constructive input and information – and have waited many years for the Dutch government to take meaningful action in response to the persistent concerns raised regarding MTCS–PEFC certified concessions.

We look forward to receiving a detailed response to the serious omissions, as well as the erroneous assumptions and conclusions, identified in the TPAC report. More specifically, we request that the Ministry of I&W clarifies how it intends to develop and implement a monitoring framework that is more robust and reliable than that employed by TPAC over the past seven to eight years. It is essential

that such a framework prevents the Dutch authorities and downstream private sector actors from becoming entangled in violations of fundamental environmental and human rights principles and safeguard policies.

With best regards,

On behalf of SAVE Rivers, Keruan, The Borneo Project, Bruno Manser Fund, Mr. E. Wakker, Mr. E. Roos and Both ENDS,



Paul Wolvekamp,  
Sr. Policy Advisor

