

November 11, 2011

Comments from Germany on Cambodia's Provincial roads improvement project – climate proofing of roads in Prey Veng, Svay Rieng, Kampong Chhnang and Kampong Speu provinces

Dear Patricia and Andrea,

pls find attached our comments for the above mentioned project proposal and SPCR's as discussed in the PPCR meeting.

Thank you again for your as always extremely helpful preparation, support and guidance for the meetings!

Kind regards
Annette

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Climate Policy and Climate Financing
Federal Ministry for Economic Cooperation and Development

Comments on proposed project:

Cambodia

Provincial roads improvement project – climate proofing of roads in Prey Veng, Svay Rieng, Kampong Chhnang and Kampong Speu provinces

Summary

We welcome the proposed project, and would like to commend all involved parties for submitting the proposal. There are, however, some issues that, from our point of view, would require the results framework of the proposal and its indicators to be revisited and amended, as outlined in our recommendations below (see **bold** highlights). While revisiting the results framework, some other amendments should ideally be made to the proposal as well, as is also outlined in our recommendations.

Individual comments on the proposed project

The proposed project has a volume US\$ 17 mio of PPCR financing. It is embedded into an overall much larger project, the ADB-financed *Provincial Road Improvement Project*, with a total volume of US\$ 79.1 mio, which includes a US\$ 52 mio ADF loan, and US\$ 10.1 million in-kind counterpart financing. This overall project has five outputs: (1)

provincial roads and a cross-border facility rehabilitated; (2) improved road asset management by the *Ministry of Public Works and Transport*; (3) increased road safety, institutional efficiency, and awareness of potential social problems; (4) increased resilience of project roads to climate change; and (5) efficient project management. The PPCR financing contributes to two outputs of the (overall) project, namely outputs (1) and (4). Of the US\$ 17 mio of PPCR financing, US\$ 8.95 mio will be used as part of output (1) to make “climate resilience related adjustments ... to civil works” in two provinces, US\$ 5.05 mio will be used as part of output (4) for “complementary soft measures” that aim to “reduce the vulnerability of the projects roads to climate change”. “Soft measures” include (1) vulnerability analyses; (2) reviews of the *Ministry of Public Works and Transport’s* engineering designs, standards and guidelines; (3) training programmes for the *Ministry of Public Works and Transport*; (4) a “planting program engaging vulnerable communities including women”; (5) “completion and piloting of a plan for water capture and storage systems integrated in road construction features”; and (6) contributions “to strengthening national emergency management efforts by piloting an emergency management system” in one province. This project design is reflected in the project essentially having two results frameworks: the “design and monitoring framework” of the overall project, and a framework of “key results and indicators for success” for the PPCR-financed part.

We very much appreciate that the PPCR-financed part of the project is embedded into the larger framework of the ADB-financed project. This is in line with the PPCR’s objective “to pilot and demonstrate ways to integrate climate risk and resilience into core development planning”. This integration is also mirrored at the level of practical measures implemented by the project, as evidenced for instance by the approach of rehabilitating selected existing and new borrow-pits (which are dug anyhow during road construction), for improved water capture and storage in a planned manner to increase resilience against climate-induced water shortage. We are also very glad to see that the project considers the bigger picture, taking HIV as an important social problem into account and reflecting this in one of the performance indicators of the overall project.

However, there are a number of issues that deserve further attention.

A matter of particular concern is the results framework of the PPCR-financed part. Most indicators in this results framework do not match standard quality criteria for indicators: they are neither specific nor measurable, and are not suitable for measuring whether overall climate resilience and its components have actually increased. For instance, the indicator “Access to markets and other social services for communities improved” (d/v) is formulated as an objective rather than an indicator, and no baseline is provided. In its present form, one would need additional indicators plus associated baselines to measure whether access to markets or access to social services has actually improved, and by how much. Furthermore, in some cases there is no logical connection between results and indicators: for instance, it is not apparent to us how measures of an *increase in climate resilience-related economic opportunities* (indicator d/iv) or of an *improved access to markets and other social services* (indicator d/v) would indicate an *enhanced capacity of provincial roads to withstand climate change* (result d). **We therefore recommend that the results framework of the PPCR-financed part be revisited**

and its indicators reformulated according to standard quality criteria for indicators.

With the overall project having two results frameworks, we see a certain risk results framework of the PPCR-financed part will receive less attention and will be less diligently monitored than the results framework of the overall project. It would appear to us that the latter is more carefully designed, having indicators that do match standard quality criteria. **We therefore recommend that particular attention be paid during future project progress reviews to the monitoring of the results framework of the project's PPCR-financed part.**

Furthermore, a number of indicators in the results framework have no corresponding activities or outputs. For instance, the detailed description of the PPCR-financed part of output 4 does not contain hints towards activities that would strengthen the *Ministry of Public Works and Transport's* collaboration "with Cambodian universities to integrate climate change in curriculum of environmental and transport engineering" (an indicator), or support MPWT in organising "climate resilience related conferences annually in collaboration with the Ministry of Environment" (another indicator). The "Outline Terms of Reference for Consultants" do specify the task to "develop a capacity building and training program" for the "Team leader/Adaptation Specialist", which is however far from being enough to achieve actual cooperation between the *Ministry of Public Works and Transport* and Cambodian universities or other Cambodian ministries. **We therefore recommended that the results framework and/or the outputs/activities be redesigned to achieve a sufficient degree of plausibility in the project design.**

It strikes us that all milestones under the heading "climate resilience" are to be achieved only "by 2017". This does not seem plausible, since one would expect activities (the completion of which is indicated by milestones) to build on each other in a logical manner. For instance, the "detailed vulnerability map for climate change for project provinces" would not be of much use if it became available only at the end of the project in 2017, as one would expect vulnerability analyses and maps to form the basis for planning of at least some of the physical measures implemented by the project. The same applies to some of the indicators: evacuating "all residents at risk ... within 72 hours after a typhoon occurs in the pilot province for emergency management, 2017 onwards" might not be a particularly useful and verifiable indicator for the project, as the project itself ends already in 2017. **We therefore recommend that, when redesigning the results framework and/or the outputs/activities, the timing and sequence of indicators and milestones under the heading "climate resilience" also be re-examined and arranged in a more plausible manner.**

At a more detailed level, we very much appreciate that an entire task is dedicated to establishing a detailed vulnerability map for climate change for project provinces, which is meant to cover numerous aspects of vulnerability far beyond mere transportation issues. Establishing such a map is an interdisciplinary exercise, which needs input from a number of disciplines. It is also an excellent opportunity for building of analytical capacity. And finally, the data created need to be made available to institutions other than the *Ministry of Public Works and Transport* only. It is not clear to us, however, if any of these issues – interdisciplinary cooperation, building of analytical capacity, and data sharing – will be addressed by the project. The wording of the proposal rather

suggests that vulnerability mapping is a task to be performed by the consultants. **We therefore recommend that the project proposal provide more detail how interdisciplinary cooperation, building of analytical capacity, and data sharing will be addressed as part of the vulnerability mapping undertaken by the project.**

There is ample experience in the *Ministry of Public Works and Transport* how to do this, as the ministry, with Japanese support, established an entire new series of topographic maps for the country in the late 1990s. Interdisciplinary cooperation, building of analytical capacity, and data sharing were all integral parts of this exercise.

The proposal contains a number of references to ecosystem-based adaptation measures. Upon closer inspection, this turns out to be “Green planning” and planting ... along at least 100 km of roads to improve flood and drought management”. While this is commendable, it has very little to do with ecosystem-based adaptation¹, but rather constitutes some form of green engineering. **We therefore reiterate our recommendation made when commenting on the SPCR document, and recommend either revisiting the concept, devising genuine ecosystem-based adaptation strategies and measures, and including them in the SPCR and project documents (clearly our preferred option), or dropping the use of the term ecosystem-based adaptation from the SPCR and project documents altogether.** On a related note, the proposal remains very vague on the location and size of areas to be (re)planted. If project implementers seriously intend “to improve the water conservation characteristics of the watershed”, this will take much more than planting along roads. **We therefore recommend that the proposal be more explicit about location and size of areas to be (re)planted.**

On early warning systems, a wealth of experience has been accumulated in Cambodia, especially through the work of the Mekong River Commission. However, we find no reference to this work in the proposal. **We therefore recommend that a section be added to the proposal on how work on early warning systems will make use of existing experiences and incorporate existing approaches, especially those of the Mekong River Commission.**

Comments on cross-cutting issues

Gender

The proposal falls seriously short of addressing gender issues. In the indicators of the PPCR-financed part of the project, gender is addressed only at the meta-level (“decision making appropriately reflects vulnerability (including gender dimension)”, “women participate in regional climate change adaptation forums”), with one exception, namely the “percentage of women in climate resilience-related economic opportunities increased”. At first glance, this seems commendable. However, on closer inspection (of the overall proposal) this turns out to be merely women “engaged in climate resilient measures including planting and green maintenance”. **We therefore recommend that gender aspects be much more prominently incorporated in the results framework,**

¹ Compare e.g. definition by IUCN: „Sustainably **managing, conserving** and **restoring** ecosystems so that they continue to provide the services that allow people to adapt to climate change is known as Ecosystem-based Adaptation.“

with economic benefits to women not merely limited to participating in planting and green maintenance. Obvious areas for improvement are for instance addressing the specific requirements women and female headed households may have towards early warning systems, and the special consideration given to gender issues during evacuation.

Learning

It is appreciated that preparing “a knowledge collection and monitoring plan, including objectives, roles and responsibilities and communication and dissemination plan” is part of the team leader’s detailed tasks. However, the proposal appears to provide rather few concrete suggestions as to how the *Ministry of Public Works and Transport* itself would improve its own knowledge management in a substantial manner, and it remains unclear how knowledge management and learning together with partner organisations would be promoted. How and from when onwards, for instance, would the *Ministry of Public Works and Transport* cooperate with “Cambodian universities to integrate climate change in curriculum of environmental and transport engineering” (an indicator in the results framework)? **We therefore recommend that the proposal provide more detail on how knowledge management and learning will be addressed within the *Ministry of Public Works and Transport* itself and in cooperation with third parties such as universities**, beyond merely requiring individual consultants to “be responsible for monitoring and assessing .. learning mechanisms and include them in their final reports and recommendations”. **We furthermore recommend that results indicators on knowledge management measure whether the knowledge generated is actually being *used*, instead of merely measuring whether events and cooperation take place that could possibly, but will not necessarily, result in knowledge being used, as is presently the case** (“MPWT organizes ... conferences”, “MPWT collaborates with Cambodian universities”).