

November 14, 2012

**Response of ADB on the Approval by Mail: Cambodia: Enhancement of Flood and Drought Management in Pursat Province (ADB)**

Dear Andrea,

Please find attached the comments-response matrix addressing the comments of the PPCR Subcommittee members on the proposed Enhancement of Flood and Drought Management in Pursat Province under the endorsed Cambodia SPCR. We have also attached the revised template for project approval request in response to these comments.

Thanks

Regards

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**CAMBODIA: ENHANCEMENT OF FLOOD AND DROUGHT MANAGEMENT IN  
PURSAT PROVINCE**

**Responses to comments by the PPCR sub-committee**

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<b>Germany</b>		
1	<p>We appreciate that the proposal mentions baselines for its indicators. However, the baselines do not in all cases provide the necessary information in relation to the respective indicator. The two baselines listed in connection with the five outcome indicators do not correspond clearly to these indicators. We therefore recommend specifying the baselines for the outcome indicators more carefully. The expected impact is “reduced ... losses from flood or drought events”. The baseline for the impact indicator however list only losses due to floods, and only on the basis of 2011 flood damages. We therefore recommend adding a drought baseline as well, and using a longer time period for establishing both the flood and drought baselines (as 2011 could have been an exceptional year).</p>	<ul style="list-style-type: none"> <li>• <u>Addition of baselines for various indicators:</u> We agree with the suggestion. For example, the average annual losses from drought in the project area have been estimated to be between \$3.7 million and \$3.9 million but we consider that more work is necessary during the early phase of the project implementation.</li> <li>• <u>Use of a longer time period for establishing baselines:</u> The project will use a five-year period (2008-2012) for establishing the baseline. In the current document, the flood loss baseline data is based on the 2011 flood damages, estimated at a 1 in 10 year flood. The damage estimates are then extrapolated for a 1:5, 1:20 and 1:50 year return periods using an ‘S’ curve.</li> </ul>
2	<p>The negative impacts of the project appear to be significant, with an estimated 792 households (3.960 people) having to be resettled. <b>The project proposal does not clearly discuss what causes the necessity of resettlements, and whether alternatives to resettling people have been considered.</b> Only the monitoring framework provided some fragmented detail, mentioning that that resettlement plans will be implemented for primary, secondary and tertiary canals. Considering the impact of this measure on the affected population, <b>we would like to receive more information on the resettlement issue in the project proposal itself (instead of in the resettlement plan, a separate document, only), and clarifying in greater detail, in the project proposal itself, which activities require a</b></p>	<ul style="list-style-type: none"> <li>• As suggested, additional information on the resettlement issue in the project is included in the Summary – Project/Program Approval Request (see section 20).</li> </ul> <p><b><u>Scope and location of land acquisition and resettlement impacts.</u></b> A total of 280.8 ha of lands will need to be acquired in the main canal and the four secondary canals as well as private lands surrounding the Boeng Preah Ponley Reservoir, which will be inundated after the rehabilitation of the main canal. A total of 792 households (HH) will be affected, of which 384 HH will be severely affected (i.e. losing more than 10% of lands). The number of relocating HH is 125. The breakdown by subproject area is as follows:</p> <ul style="list-style-type: none"> <li>• <u>Existing main canal (EMC):</u> A total of 23.9 ha of ROW land in EMC that are occupied or used by local residents will be cleared for the Project. Of these, 1.81% (5.1 ha) is used for residence, while 4.29% (12.1</li> </ul>

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	<p>resettlement, how the resettlement will be undertaken, and what alternatives have been considered.</p>	<p>ha) are cultivated, and 2.39% (6.7 ha) are forestland with no activities. All affected plots of land in EMC are inside the ROW and covered without title but with permission or legally recognized proof of occupation or ownership. 87 HH will be affected.</p> <ul style="list-style-type: none"> <li>• <u>New canal alignment (NCA)</u>: A total of 153.8 ha of ROW land in NCA that are occupied or used by local residents will be cleared for the Project. Of these, 2.87% (8.1 ha) is used for residence, while 25.01% (70.2 m<sup>2</sup>) are cultivated, and 26.90% (75.6 ha) are forestland with no activities. All affected plots of land in NCA are inside the ROW and covered without title but with permission or legally recognized proof of occupation or ownership. 51 HH will be affected.</li> <li>• <u>Secondary Canal 1 (SC1)</u>: A total of 19.7 ha of ROW land in SC1 that are occupied or used by local residents will be cleared for the Project. Of these, 0.22% (0.6 ha) is used for residence, while 6.81% (19.1 ha) are cultivated. All affected plots of land in SC1 are inside the ROW and covered with title and with permission or legally recognized proof of occupation or ownership. 341 HH will be affected.</li> <li>• <u>Secondary Canal 2 (SC2)</u>: A total of 23.6ha of ROW land in SC2 that are occupied or used by local residents will be cleared for the Project. Of these, 0.01% (0.03 m<sup>2</sup>) is used for residence, while 8.41% (23.6 ha) are cultivated. All affected plots of land in SC2 are inside the ROW and covered with title and with permission or legally recognized proof of occupation or ownership. 219 HH will be affected.</li> <li>• <u>Secondary Canal 3 (SC3)</u>: A total of 12.9 ha of ROW land in SC3 that are occupied or used by local residents will be cleared for the Project. Of these, 0.05% (0.14 ha) is used for residence, while 4.55% (12.8 ha) are cultivated. All affected plots of land in SC3 are inside the ROW and</li> </ul>

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		<p>covered with title and with permission or legally recognized proof of occupation or ownership. 21 HH will be affected.</p> <ul style="list-style-type: none"> <li>• <u>Secondary Canal 4 (SC4)</u>: Some 22.0 ha of ROW land in SC4 will be cleared for the Project. Of the total area, 7.82% is used for paddy field, while no residential land was identified during the IOL Survey. All affected plots of land in SC4 are inside the ROW and covered with title and with permission or legally recognized proof of occupation or ownership. 7 HH will be affected.</li> </ul> <p><b><u>Efforts to minimize or avoid involuntary resettlement impacts.</u></b></p> <p>Design stage:</p> <ul style="list-style-type: none"> <li>• Several design alternatives had been discussed with stakeholders to minimize resettlement impacts. The need for physical displacement has been minimized as much as possible by selecting alignments of improved canals and location of structures in existing Right of Way (ROW).</li> <li>• Owners of affected farmlands were involved during the demarcation of the ROW to ensure the minimal effects of land acquisition.</li> <li>• Interventions with widespread and serious negative impacts with regard to resettlement and landtake were considered but subsequently excluded from the project design. Examples: <ul style="list-style-type: none"> <li>○ A proposed reservoir in Pursat to increase dry season water storage dramatically was excluded from the design as it would require excessive resettlement. The dam and reservoir was likely to permanently inundate about 700ha of land. Instead, the project will promote traditional field reservoirs.</li> <li>○ The project originally considered investing in Kratie Province. However, the proposal for a 5 km of flood protection would have caused substantial involuntary resettlement that could not be justified against the</li> </ul> </li> </ul>

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		<p>expected benefits. Therefore, the investment in Kratie was dropped.</p> <p>Implementation stage:</p> <ul style="list-style-type: none"> <li>• The following measures will be undertaken during implementation, in strict compliance with ADB’s Safeguard Policy Statement: <ul style="list-style-type: none"> <li>○ Conduct public consultations with concerned leaders of the districts, communes and villages and validate with them the availability of relocation site before the affected HHs are resettled.</li> <li>○ Solicit the support of the leaders of districts, communes and villages for the implementation of the RP.</li> <li>○ Replacement houses and their associated utilities, such as toilets and deep wells, will be constructed in advance in the originating villages of APs to avoid or shorten the impacts of relocation.</li> <li>○ The project implementation consultants will closely coordinate with the civil works contractor on the schedule of implementing the civil works so that the affected HHs and village leaders shall not be pressured and be able to prepare their relocation consistent with the schedule proposed in the Resettlement Plan.</li> </ul> </li> </ul> <p><b><u>Project Resettlement Plan (RP)</u></b></p> <ul style="list-style-type: none"> <li>• A Project Resettlement Plan (RP) has been developed defining the compensation and entitlements of displaced persons. Special attention has been given to vulnerable persons. All affected households are entitled to participate in an income restoration program to restore their income and livelihoods to at least pre-project conditions.</li> <li>• The RP has been endorsed by the government of Cambodia through its Interministeral Resettlement Committee and disclosed on ADB’s website since August 2012</li> </ul>

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		<p>(<a href="http://www.adb.org/projects/documents/flood-and-drought-risk-management-mitigation-cambodia-damnak-choeukrom">http://www.adb.org/projects/documents/flood-and-drought-risk-management-mitigation-cambodia-damnak-choeukrom</a>)</p> <ul style="list-style-type: none"> <li>• The Government of Cambodia will finance 100% of the costs of land acquisition and resettlement, estimated at \$2.95 million.</li> <li>• The basic compensation and rehabilitation principles adopted in the RP are: (i) Loss of 10% or more of the household's assets shall be considered as threshold; (ii) Project affected people, without legal or recognizable legal claims to land acquired, will be equally entitled to participation in consultations and benefit schemes of the project where possible, and be compensated for their lost non-land assets such as dwellings and structures occupied before cut-off date. They will be entitled to resettlement assistance and other compensation and social support to assist them to improve or at least restore their pre-project living standards and income levels; (iii) Where appropriate land based compensation is not viable, replacement cost surveys will be carried out by the project staff to ensure that project rates for all categories of loss will be equivalent to replacement cost at current market value, to be updated at the time of compensation and combined with other assistance and livelihood restoration measures to ensure full restoration and improvements; (iv) Physically displaced (relocated) APs are to receive relocation assistance, secured tenure to relocated land, better housing at resettlement sites with comparable access to production and employment opportunities, and civic infrastructure and community services as required, transitional support and development assistance such as land development, credit facilities, training or employment opportunities; (v) Full compensation at replacement cost will be paid for all affected structures without any deductions for salvageable materials or depreciation, full replacement costs, based upon: a) fair market value, b) transaction costs, c) interest accrued, d) transitional and restoration costs, and (e) other applicable payments; (vi) Affected business owners are</li> </ul>

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		<p>entitled to a) costs of re-establishing commercial activities elsewhere, b) the net income lost during the transition period, and c) costs of transferring and reinstalling plant, machinery and equipment; (vii) The district resettlement committee (DRC) must certify that the AP has a business in current operation and approve the level of lost income; (viii) The EA must appoint an independent external monitor and undertake internal monitoring according to the critical indicators; and (ix) Public consultation will begin before project approval and continue as an ongoing process.</p> <ul style="list-style-type: none"> <li>• The provisions for assistance to APs, such as the one-time allowance, transportation, and special one-time assistance of US\$100 to vulnerable AHs are described in the RP. The relocation of 22 AHs who are landless will be addressed at the village level and this will be monitored closely, with assistance as defined in this RP. For APs who do not have lands, they will be provided lands in the villages with security of tenure. Job opportunities for any members of AHs are also defined, such as in the dismantling and reconstruction of affected houses and hiring of local labor for subproject construction. Women will also be allowed to sell their goods nearest the subproject temporary work stations to earn extra incomes for their households.</li> <li>• The cut off dates for eligible households have been established and agreed.</li> </ul> <p><b><u>Implementation framework of the RP</u></b></p> <ul style="list-style-type: none"> <li>• <b>IRC-RD:</b>The Interministerial Resettlement Committee Resettlement Depart (IRC-RD) will: (i) take the lead in conducting the detailed measurement survey (DMS); (ii) approve the compensation rates for the calculation of budgets for the updated RP; (iii) endorse to and request for the approval of RP by IRC higher management; (iv) disbursement of funds to the Provincial Department of Economy and Finance (PDEF) for payment of compensation and delivery of assistance to APs, based on the RP approved by IRC and concurred by ADB; (v)</li> </ul>

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		<p>hire the services of an external monitoring agency (EMA) for the external monitoring of RP implementation; and (vi) coordinate with CPMU the completion of RP implementation to MOWRAM, in requesting ADB for its “No Objection” for the award of civil works contract to civil works contractor.</p> <ul style="list-style-type: none"> <li>• <b>Project Implementation Consultants (PICs).</b> Through the international and the national Social Safeguards Specialist (SSS), it will be responsible for updating the RP and the assessment, orientation, and training of people who will be involved in resettlement activities prior to RP implementation. The SSS will attend all subproject disclosures and public consultations to record all resettlement issues from subproject-based stakeholders and the APs for taking into consideration in the updated RP.</li> <li>• <b>MOWRAM Resettlement Unit (MOWRAM-RU)</b> The Resettlement Unit of MOWRAM will guide, support and coordinate with the project implementation unit (PIU) in Pursat. It will coordinate with IRC and PRSC the conduct of public consultations and detailed measurement survey as well as the review and compilation of monthly PMU reports into quarterly progress reports for CPMU and PICs.</li> <li>• <b>Provincial Management Unit.</b> As the working group of IRC-RD in Pursat province, the PRSC will: (i) guide, support and supervise the working group in subproject disclosure, consultations with AHHs and subproject-based stakeholders; (ii) support the IRC in the conduct of detailed measurement survey (DMS) based on detailed subproject design; (iii) coordinate, guide and support the district and commune authorities, community organizations and other stakeholders to address the requirements for relocation; (iv) negotiate and finalize compensation with AHHs; (v) coordinate with PMU and assist the Provincial Department of Economy and Finance (PDEF) in paying compensation to AHHs; and (vii) extend full support to the external monitoring agency (EMA) for external monitoring of RP implementation.</li> </ul>

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		<ul style="list-style-type: none"> <li>• <b>ADB.</b> ADB will monitor compliance with its Safeguard Policy Statement. ADB will also monitor compliance of resettlement-related loan covenants.</li> <li>• <b>Independent external monitoring</b> agency will also monitor the implementation of the RP (see below on monitoring and reporting)</li> </ul> <p><b><u>Monitoring and reporting</u></b></p> <ul style="list-style-type: none"> <li>• <b>Internal monitoring.</b> Indicators subject to integrated internal monitoring are those related to process and immediate outputs and results, such as the following: (i) information campaign and consultations with affected HHs and stakeholders; (ii) conduct of detailed measurement survey (DMS); (iii) payments of compensation; (iv) delivery of assistance to PAPs; and (v) grievance redress, among others. In the updated version of this RP, additional indicators will be developed by the international social safeguards specialist for implementation by IRC-RD and PRSC.</li> <li>• <b>External monitoring.</b> The IRC-RD will hire the services of the EMA for the external monitoring and evaluation every six months until completion of RP implementation. The EMA shall be selected from independent entities, such as an academic or research institution, NGO, or local consulting firm with experience in resettlement monitoring and evaluation. EMA’s assessment on the satisfactory compliance with RP implementation as coordinated by IRC-RD to CPMU will justify MOWRAM’s request to ADB for its “No Objection” for the award of the civil works contract and the subsequent release of funds for civil works. The duties and responsibilities of the EMA will cover the following: <ul style="list-style-type: none"> <li>(i) Appraisal of the approved RP and prepare a work program for the conduct of external monitoring prior to verification of activities undertaken and the documentation made thereon.</li> <li>(ii) Verify the accounting records at PDEF or PRSC and the internal monitoring reports and validate them with AHs as to the payments of compensation,</li> </ul> </li> </ul>

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		<p>entitlements, and assistance, in cash or in kind, and with their host populations, such as: (a) replacement for housing materials that could not be salvaged from the affected structures; (b) labor for dismantling and transfer of affected houses and structures; (c) provision of food allowance; (d) compensation for trees; and (d) impacts of relocation to their livelihoods. The EMA will also verify the status of vulnerable groups defined in the updated RP document and assess the level of compliance on assistance committed due them.</p> <p>(iii) Interview a random sample of project affected HHs in an open discussion to assess their knowledge and concerns about the resettlement process, their entitlements, and assistance measures;</p> <p>(iv) Observe the functioning of resettlement management operation at all levels to assess the effectiveness of, and compliance with RP;</p> <p>(v) Verify the nature of grievance issues and the functioning of grievance redress mechanism by reviewing the processing of appeals at all levels by interviewing the aggrieved APs;</p> <p>(vi) Where feasible, survey the standards of living of APs and the people in the unaffected portion nearest the civil works sites before and after displacement to assess the effects of resettlement on PAPS' standard of living; and</p> <p>(vii) Advise the IRC-RD, MOWRAM-RU, CPMU and PMU on possible improvements in RP implementation.</p> <p><b><u>Consultation and Participation</u></b></p> <ul style="list-style-type: none"> <li>• <b>Design stage.</b> During the inventory of loss surveys, the potential Affected Peoples were consulted on their initial preferences for resettlement and informed of the compensation and entitlement. The first</li> </ul>

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		<p>consultation and disclosure was held in October 2010. A second set of consultations was held in June 2012. The questions from the affected peoples are recorded in tables 11-12 of the resettlement plan. In general, the affected households had positive perceptions on the project since it seeks to reduce drought risks which are the main cause of rice production shortage in their area. Project Information Booklets written in the local language were distributed and explained to the participants during the consultation meetings. The involvement and participation of the affected population during project implementation will be carried out in total compliance with the ADB Safeguard Policy Statement.</p> <ul style="list-style-type: none"> <li data-bbox="834 800 1481 1331">• <b>RP updating stage.</b> Although the chiefs of three affected communes have confirmed during the consultations that there is no need for relocation sites, the CPMU and PICs will work closely with IRC-RD at its national office to validate this confirmation. The IRC-RD will mobilize the PRSC to validate if there is a need for relocation that will be carried out through meaningful consultation with AHs during the updating of this RP. Minutes of consultation meetings will be prepared and annexed to the updated RP. Women will be invited to participate in information sharing and planning in all stages of consultation during RP preparation. The updated RP will be uploaded at the ADB website.</li> <li data-bbox="834 1339 1481 1839">• <b>Implementation stage.</b> There will be close coordination between the CPMU and IRC-RD during RP implementation, with the latter taking the lead. Information education campaign (IEC) materials will be produced in popularized form for all APs across implementation levels, guided by ADB's 2009 Safeguard Policy Statement requirements (SR 2) and ADB's Public Communication Policy. Minutes of every consultation meeting will be recorded and maintained as reference in case of resolving grievances and for external monitoring. Women will be invited to participate in information sharing in all stages of consultation during RP implementation.</li> </ul>

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		<p data-bbox="833 226 1271 262"><b><u>Grievance Redress Mechanism</u></b></p> <ul style="list-style-type: none"> <li data-bbox="833 296 1482 961">• The objective of the grievance redress provisions are to resolve complaints as quickly as possible and at the local level through a process of conciliation; and, if that is not possible, to provide clear and transparent procedures for appeal. AHs are entitled to lodge complaints regarding any aspect of the preparation and implementation of the RP without prejudice to their right to file complaints with the Provincial Courts at any point in the process. A well-defined grievance redress and resolution mechanism will be established to resolve AH grievances and complaints in a timely and satisfactory manner. AHs were made fully aware of the grievance redress mechanism, and the detailed grievance redress procedures will be publicized through an effective public information campaign. The grievance redress process includes four stages: <ul style="list-style-type: none"> <li data-bbox="930 968 1482 1430">○ <b>First stage:</b> AHs will present their complaints and grievances verbally or in writing to the village chief, commune chief or IRC and PRS working groups. The receiving agent will be obliged to provide immediate written confirmation of receiving the complaint. If after 15 days the aggrieved AH does not hear from the village and commune chiefs or the working groups, or if he/she is not satisfied with the decision taken in the first stage, the complaint may be brought to the District Office.</li> <li data-bbox="911 1436 1482 1667">(i) <b>Second stage:</b> The District Office has 15 days within which to resolve the complaint to the satisfaction of all concerned. If the complaint cannot be solved at this stage, the District Office will bring the case to the Provincial Grievance Redress Committee.</li> <li data-bbox="911 1673 1482 1900">(ii) <b>Third stage:</b> The Provincial Grievance Redress Committee meets with the aggrieved party and tries to resolve the situation. The Committee may ask for a review of the detailed measurement survey (DMS) by the external monitor (IMO). Within 30 days of the</li> </ul> </li> </ul>

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		<p>submission of the grievance, the Committee must make a written decision and submit copies to the MOWRAM, PDOWRAM, PDRD, EMA, PRS/IRC and the AH.</p> <p>(iii) <b>Final stage:</b> If the aggrieved AH does not hear from the Provincial Grievance Redress Committee or is not satisfied, he/she will bring the case to Provincial Court. This is the final stage for adjudicating complaints. The Court will make a written decision and submit copies to the MOWRAM, PDOWRAM, EMA, PRS/IRC and the AH. If any party is still unsatisfied with the Provincial Court judgment, he/she can bring the case to a higher-level court.</p> <ul style="list-style-type: none"> <li>• It is recognized that many AHs do not have the writing skills or communications skill to express their grievances verbally. However, AHs will be encouraged to seek assistance from the EMA, nominated local NGOs or other family members, village heads or community chiefs to have their grievances recorded in writing. All AHs will be assisted to have access to the DMS or other documentation and the survey and valuation of their assets, to ensure that if disputes do occur all the details have been recorded accurately enabling all parties to be treated fairly.</li> <li>• MOWRAM, through the CPMU, will shoulder all the administrative and legal fees including other costs borne out from the resolution of the grievance or complaint. The EMA will evaluate the efficiency of the procedures for and the resolutions of grievances and complaints. It may also recommend further measures for the redress of unresolved grievances. The PICs will train the resettlement committee staff to enhance their skills on handling grievance procedures and strategy.</li> </ul>
3	<p><b>Participation.</b> In the paragraph c. Local participation, the resettlement of the estimated 3.960 concerned people, and options to involve them in decision making, are not being mentioned.</p>	<ul style="list-style-type: none"> <li>• <u>Participation of the affected population (resettlement) is indeed crucial and is a key requirement of ADB's Safeguard Policy Statement.</u> All provisions are fully detailed in the publicly disclosed resettlement plan.</li> </ul>

No.	Comments	Response
	<p>However, we consider participation of the concerned population as very crucial in resettlement processes. We therefore recommend making provisions to maximise the involvement and participation of the to-be-resettled population during project planning and implementation.</p>	<ul style="list-style-type: none"> <li>• Additional information has been added to Summary – Project/Program Approval Request (see section 20). For example, during the inventory of loss surveys, the potential Affected Peoples were consulted on their initial preferences for resettlement and informed of the compensation and entitlement. The first consultation and disclosure was held in October 2010. A second set of consultations was held in June 2012. The questions from the affected peoples are recorded in tables 11-12 of the resettlement plan. In general, the affected households had positive perceptions on the project since it seeks to reduce drought risks which are the main cause of rice production shortage in their area. The affected people were given public information booklets and also made aware of the grievance mechanism. The involvement and participation of the affected population during project implementation will be carried out in total compliance with the ADB Safeguard Policy Statement.</li> <li>• Stakeholder consultations were conducted during the Project preparation in 2010 as well as in 2012, for example, during the discussion on disaster risk and preparedness, resettlement plan preparations and socio economic surveys in all areas. Stakeholders including Project District governments and officials of the communes, representatives of Women’s Unions, Youth Organizations and potential affected people participated in various consultations. Focus group discussions with women and vulnerable group were conducted to ensure that their concerns and priorities are captured in the project design and in the training design of Community Based Disaster Risk Management (CBDRM). Project Information Booklets written in the local language were distributed and explained to the participants during those meetings.</li> </ul>
4	<p><b>Gender.</b> We welcome that the proposal addresses gender aspects in a very comprehensive way. It provides a gender analysis and detailed options for addressing gender issues through a</p>	<ul style="list-style-type: none"> <li>• We note the request for information about the twice-yearly results of tracking the Gender Action Plan, in particular with regard to the resettlement issue. Such information will be included in the annual SPCR progress report</li> </ul>

No.	Comments	Response
	<p>Gender Action Plan. It further stresses the importance of gender issues by formulating three gender related indicators, two of which are aiming at promoting the equal treatment and stronger involvement of women. The regular monitoring of the Gender Action Plan is planned to take place twice a year. We very much appreciate the degree of attention being given to gender issues, and would, at an appropriate future time, ask for being informed about the twice-yearly results of tracking the Gender Action Plan, in particular with regard to the resettlement issue.</p>	<p>to be submitted to the PPCR sub-committee.</p> <ul style="list-style-type: none"> <li>• Gender related targets are incorporated in the loan covenants. The government's compliance with the covenants will be tracked during the twice-yearly review missions.</li> </ul>
5	<p><b>Learning.</b> Knowledge development and sharing between Cambodia, the Lao PDR and Vietnam is part of the project design. The project summary does outline the linkages with projects in these two countries, and the ample opportunity for cross learning. However, tracking the results of sharing knowledge between the countries is not part of the monitoring framework. We therefore recommend including a mechanism for measuring the frequency and quality of knowledge sharing practices between the countries, or pointing the reader towards such a mechanism, if it already exists.</p>	<ul style="list-style-type: none"> <li>• As noted by the reviewer, there is ample opportunity for cross learning and linkages. Output 1 has explicitly built in activities to ensure knowledge sharing (for example the transboundary – Vietnam and Cambodia - flood management study) through activities such as regional workshops. <u>Both the frequency and quality of knowledge sharing</u> between the countries will be monitored, especially in cooperation with SPCR TA (Capacity Development Technical Assistance on Mainstreaming Climate Resilience into Development Planning), which has been recently approved by the PPCR sub-committee.</li> <li>• At least two regional workshops will be held to discuss the transboundary flood and drought management options.</li> <li>• The quality of knowledge sharing will be measured through monitoring and evaluation of the knowledge sharing events.</li> <li>• The outcome of successful knowledge sharing and cross fertilization of best practices will be: (i) the agreed transboundary flood management measures (Cambodia-Viet Nam), (ii) successful implementation of the CBDRM component which builds on lessons and strengths of the CBDRM programs in the three countries and (iii) properly operation forecasting and warning systems that link up to the regional forecasting systems.</li> <li>• The other project activities benefit from synergy of designing and implementing the projects in the three countries at the same</li> </ul>

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		<p>time. For example, an international project management specialist has been mobilized to assist countries with project readiness (to avoid long delays at start up) and is in the process of mobilizing a community based disaster risk management specialist who will cover all three countries, so as to be able to take the experience in Vietnam through the national CBDRM program and the previous experience in Cambodia (completed ADB TA 4574-CAM on Community Self-Reliance and Flood Risk Reduction technical assistance) to elaborate practical guidance to the three countries for project implementation and knowledge sharing.</p>
6	<p><b>Synergies with German Climate Change Related Engagement in the Country / Region.</b> We highly appreciate that the project proposal is seeking synergies with past and on-going flood and drought initiatives in the lower Mekong region. The Mekong River Commission's Flood Management and Mitigation Programme (FMMP), which is supported by Germany through a project funded by the German Federal Ministry for the Environment, Nature Conservation and Nuclear Safety, is listed as an important regional partner in the PPCR project proposal. The FMMP has the goal to support the relevant line agencies of the four lower Mekong riparian countries Cambodia, Laos, Thailand and Vietnam in improving their flood forecasting and management capacities on the basis of regionally linked climate data and information systems. In its plan for 2013, FMMP is envisaging to make the enhanced flood forecasting system available to the national flood forecasting centres of the MRC member countries. Against this background, we suggest close coordination in planning and implementation with the MRC's FMMP. Furthermore, the MRC's Drought Management Programme (DMP) and the MRC's Climate Change and Adaptation Initiative (CCAI) are both planning to undertake studies related to climate change and drought in 2013. Since</p>	<ul style="list-style-type: none"> <li>We appreciate the information on the German climate change support in the region and have incorporated this in the linked document to the ADB Report and Recommendation to the President (RRP) on development partner coordination and highlighted this synergy in the Summary – Project/Program Approval Request (section 18). Close coordination with MRC's FMMP, DMP and CCAI will be ensured.</li> </ul>

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	<p>drought is also being addressed by the planned project, we recommend liaising with the MRC's DMP and CCAI as well, as their results could serve as an input for the proposed project, and/or vice versa the project's results could be fed into the DMP's and CCAI's work.</p>	
<b>United Kingdom</b>		
1	<p><b>Output 1:</b> is there a mechanism in place for cooperation between Cambodia and neighbouring countries (Lao PDR and Vietnam), to share knowledge of flood and/or drought management? The project is likely to depend considerably on the Mekong River Commission in this area and it will be important to ensure direct coordination and communication between the Cambodian authorities and those of other countries.</p>	<ul style="list-style-type: none"> <li>• In general, the regional cooperation to share knowledge on flood and drought management is channeled through the national Mekong Committees of the three countries, which have been active stakeholders in the development of the project.</li> <li>• The Mekong River Commission will be a key stakeholder in the project and a potential candidate as service provider for the support to the national flood forecasting center (quality based selection) if they choose to bid for provision of such support.</li> <li>• The GMS Flood and Drought Risk Management and Mitigation Project covers all three countries, with a similar impact and outcome and output structure. The activities in the three countries will be coordinated especially in terms of data exchange protocols and lessons learnt.</li> <li>• Under Output 1, for example, an important study will be conducted on transboundary flood management options in both Viet Nam and Cambodia. The Project has built in activities for transboundary consultations, and similarly the proposed project in Viet Nam has incorporated activities to ensure coordination and communication with the Cambodian authorities.</li> </ul>
2	<p><b>Output 4:</b> it is important to strengthen capacity of the Executing and Implementing Agencies to undertake the project effectively. However, is there any mechanism to incorporate or apply knowledge and skill from this project management into national government systems? It is also important to improve the government's capacity to implement the project sustainably and is essential that knowledge application is taken into account here.</p>	<ul style="list-style-type: none"> <li>• The ADB water sector portfolio in Cambodia includes the Water Resource Management Sector Development Program, which supports policy and institutional reforms and capacity development in the water sector in Cambodia. This Sector Development Program is an important vehicle through which project sustainability of the water portfolio is addressed (for example, through improving the regulatory environment for farmer water user committees as discussed in our response to Comment #8 below).</li> </ul>

No.	Comments	Response
3	<p><b>Expected key result “reduced economic and human losses from floods and droughts”:</b> is there enough reliable data on current economic losses due to floods and droughts to measure the three indicators stipulated in project document?</p>	<ul style="list-style-type: none"> <li>• During project preparation, data was used from the National Committee on Disaster Management, which appeared adequate for design purposes.</li> <li>• As noted earlier in response to comments from Germany, further efforts to establish reliable baselines for various indicators will be done during early stages of project implementation. For example, the monitoring and evaluation specialist (8 person months) will refine the monitoring framework more thoroughly to measure the progress for various indicators.</li> </ul>
4	<p><b>Expected key result “enhanced capacity of communities to manage flood and/or drought events”:</b> project documents do not discuss the roles and involvement of local authorities (community councils, heads of villages, village development committees, etc.). The document states that “disaster risk management plans” are expected to be developed, and the involvement of local authorities in the project is of paramount importance, both during and after implementation. Local authorities play a crucial role in facilitating usage and management of infrastructure and resolving conflicts among beneficiaries. How will stakeholders be involved in this area?</p>	<ul style="list-style-type: none"> <li>• The project team fully recognizes the important role and involvement of local authorities. Successful community based disaster risk management is not possible without effective involvement of local authorities.</li> <li>• Community-based disaster risk management (CBDRM) can equip communities, especially women, to access information on disaster risks and enhance their preparedness. Two-way channels for information sharing between local communities, local authorities, river basin management systems, national early warning centers, and disaster forecasting centers are necessary.</li> <li>• Careful attention will be given to the community and technical agency interface since the success of engaging the community as part of operations and maintenance will depend greatly on the willingness of both parties to recognize the legitimacy of the other.</li> <li>• The Project will benefit from lessons and experiences of the completed ADB TA 4574-CAM Community Self-Reliance and Flood Risk Reduction technical assistance which was funded by the UK Poverty Reduction Cooperation Fund. This technical assistance has already developed, in partnership with the Asia Pacific Disaster Center, modalities for engaging stakeholders such as the Government agencies, NGOs, local authorities and local leaders for participating planning and ensuring two-way information flows. The improved participatory flood risk</li> </ul>

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		<p>management principles by village development councils were adopted in pilot areas and the Project will upscale these experiences.</p> <ul style="list-style-type: none"> <li>• In terms of facilitating the usage and management of infrastructure and resolving potential conflicts among beneficiaries, the project through the institutional strengthening of farmer water users communities (FWUC) and capacity building for improved water management is expected to reduce the level of conflicts amongst stakeholders.</li> <li>• In terms of project management structure, the Central Project Management Unit in MOWRAM includes a community/FWUC development officer and similarly, the Project Implementation Unit in the Provincial Department of Water Resources and Meteorology includes a full time FWUC officer. These full time government officers will be expected to work with FWUCs and communities to ensure smooth implementation of the project.</li> </ul>
5	<p><b>Results</b> included in project summaries should reflect the PPCR funds and not the totality of all investment in the projects.</p>	<ul style="list-style-type: none"> <li>• The Summary–Project/Program Approval Request (section 15) has been updated.</li> <li>• The structural results (output 2) relate to PPCR, ADB and Government financing as the financing structure has been drawn up in an integrated and blended manner. For example, the Government is contributing \$2.95 million in land acquisition and resettlement costs which is a non-negotiable prerequisite for any civil works.</li> <li>• The incremental structural climate resilience measures attributed to the PPCR funds include the following measures: <ul style="list-style-type: none"> <li>○ Enhanced capacity of the barrage by 260 m<sup>3</sup>/s by constructing an additional 3 gates</li> </ul> </li> </ul> <p>Projected climate change will increase flood flows in the Pursat River. Under current climate conditions the 50-year design flow at the barrage site is 870m<sup>3</sup>/s. With anticipated climate change the 50-year design flow will increase to 1,130m<sup>3</sup>/s. For the barrage to manage this 260m<sup>3</sup>/s increase in design flow it requires additional flood gates. This additional capacity requires the barrage to</p>

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		<p>use nine gates rather than six, increasing the size and cost of the structure by nearly 35%.</p> <ul style="list-style-type: none"> <li>○ Increased capacity of weirs: In addition, the design was improved to increase the capacity of the two Sway Donkeo weirs to ensure they will be protected from the additional diversion flows. Because this project will impact on these weirs, their upgrade will include allowance for anticipated climate change impact on flood flows.</li> <li>○ Runoff from local catchments above the main canal and also within the project area will increase as a result of the anticipated climate change. The size of necessary drainage channels and structures (drainage inlets, canal overflow weirs and drainage outlets) will need to be increased appropriately. The increase in extreme rainfall owing to anticipated climate change is estimated to be 30%. Assuming a linear relationship between rainfall and runoff, the size and cost of the drainage channels is also expected to increase by 30%.</li> <li>○ The impact of projected climate change will manifest as delayed onset of the wet season (and hence a shorter wet season) and drier dry seasons. Anticipated climate change will halve dry-season water availability from the current climate conditions. There are primarily two solutions available to adapt to this impact: (i) utilise the abundant runoff and non-consumed flow during the wet season by providing bulk storage for use in both the dry season and also to bridge the intermittent wet-season droughts. <u>Increased bulk storage through development of small distributed field reservoirs</u>: small distributed field reservoirs which are a local traditional water management system will be developed to increase bulk storage. This construction of this intervention comprises mainly of earthworks. On average 1 million m<sup>3</sup> of earthworks will cost on average about \$200,000 and provide an additional dry season flow of 130l/s. This</li> </ul>

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		<p>additional flow will increase the dry season command area by 40ha under current climate conditions and 80ha under anticipated climate change conditions. A total storage volume of about 3.6 million m<sup>3</sup> is achievable and, if used over the 90-day dry season period, will supplement water supply by 470l/s.</p>
6	<p><b>“Design and Monitoring Framework”</b>: it would be useful to have an explanation of underlying assumptions, for example: Assumption - O&amp;M budgets sufficient to maintain infrastructure – what is the basis for this assumption?</p>	<ul style="list-style-type: none"> <li>• The economic model analyzing the efficiency of the subproject assumes adequate maintenance of irrigation infrastructure. For example, the irrigation system should be able to maintain its expected benefits for 25 years before another major renovation is required. Therefore we assume that O&amp;M budgets are sufficient for periodic and routine maintenance to maintain the infrastructure.</li> <li>• Under the ADB supported Water Resource Management Sector Development Program, an important area of work is on policy dialogue to ensure the provision of adequate budgets for operation and maintenance (O&amp;M); as well as capacity development of government staff and farmers to carry out sustainable O&amp;M.</li> </ul>
7	<p><b>Monitoring and evaluation</b>: this could be strengthened. Would it be cost-effective for an external M&amp;E team be tasked to conduct evaluation of project to ensure effective project implementation and sustainability of infrastructure?</p>	<ul style="list-style-type: none"> <li>• Further efforts will be made to strengthen monitoring and evaluation during project implementation. External monitoring is already envisaged to ensure that the safeguards (in particular involuntary resettlement) are carried out in compliance with ADB’s Safeguard Policy Statement.</li> <li>• For tracking project implementation, the internal M&amp;E system will be developed in line with best practices from other ADB projects in Cambodia and the region. The use of project implementation consultants will provide quality control of the design and implementation of the M&amp;E framework. ADB will ensure to allocate resources for evaluation of the project.</li> <li>• MOWRAM and PDWRAM’s capacity for monitoring and evaluation will be strengthened.</li> <li>• At the local level, better organized and strengthened FWUCs will be able to hold local authorities and PDWRAM accountable and monitor the budgets committed for operations and maintenance.</li> </ul>

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		<ul style="list-style-type: none"> <li>• MOWRAM staff will apply the indicators in the the sector M+E manual.</li> </ul>
8	<p>A mechanism is needed to ensure sustainable and effective <b>Farmer Water User Committees</b> (FWUC) after project completion, and to strengthen the capacity of and raise awareness of FWUCs to ensure project sustainability / sustainability of infrastructure. Increased local authority engagement here would facilitate this.</p>	<ul style="list-style-type: none"> <li>• Sustainability of FWUC and their role in ensuring project sustainability is indeed crucial. The project will fully engage local authorities to ensure this.</li> <li>• Besides direct actions in the Project to build up financial and governance mechanisms, the FWUCs in the Project area will benefit from the Water Resource Management Sector Development Program, under which the Government has committed to improve the enabling environment for FWUC operations and sustainability, including ensuring that FWUC legislation provides sufficient autonomy for farmers to undertake activities cooperatively and assign both responsibility and rights to the FWUC.</li> </ul>
9	<p><b>Gender:</b> we will welcome regular reporting on progress with ensuring minimum levels of female participation in the program as identified in the PAM</p>	<ul style="list-style-type: none"> <li>• The targets in the Gender Action Plan will be monitored during twice-yearly review missions.</li> </ul>
10	<p><b>Governance &amp; anti-corruption:</b> we will welcome regular reporting on the governance aspects identified, including application of the ADB's Anti-Corruption Policy, and periodic inspection of contractors' fund withdrawals and settlements. We will also expect regular reporting on how the implementation arrangements are ensuring, in practice, the quality of construction work under the programme to the required climate resilient standards.</p>	<ul style="list-style-type: none"> <li>• The governance aspects and implementation progress including the quality of construction work will be monitored during the twice-yearly review missions.</li> <li>• As mentioned in the procurement plan (pages 39 – 42 of the Project Administration Manual [PAM]), ADB will undertake prior review of all international competitive bidding for works and goods, and for all recruitment of consulting firms. ADB will undertake prior review of the first contracts for national competitive bidding, shopping and community procurement regardless of their value. Subsequent contracts for similar work will be subject to post-review.</li> </ul>