

Environmental Monitoring Report

3rd Semestral Report
November 2021

Cambodia: Second Greater Mekong Subregion Corridor Towns Development Project

Prepared by the Ministry of Public Works and Transport for the Kingdom of Cambodia and the Asian Development Bank.

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Semi-Annual Environmental Monitoring Report

KINGDOM OF CAMBODIA

Ministry of Public Work and Transport

Project Number: 46443-001

Second Greater Mekong Subregion Corridor Towns Development Project

Sub-Project

Wastewater Collection & Treatment and Urban Drainage and Landfill in Kampot Town

Reporting Period: January-June 2021

SEMR Report Number: 3

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1 ENVIRONMENTAL SAFEGUARDS SUMMARY

1. The Third Semi-annual Environment Monitoring Report (SEMR) covers the period of (January – June 2021) for Second Greater Mekong Subregion Corridor Towns Development. The SEMR has been prepared to fulfil the safeguard policy requirement of ADB.
2. The SEMR is prepared by support consultant and checked by PMU.

1.1 Summary of Project Progress

3. The following table gives a brief summary of the project progress for contract award/Civil Works (CW) packages, construction and key activities in this reporting period:

Table 1 Project Progress Summary

Safeguards Category	Environment	B	
Reporting Period:	Jan-Jun 2021	Date Last Report Issued:	Disclosed January 2021
Contracts Awarded to Date:	<p>SBPH ENGINEERING AND CONSTRUCTION CO., LTD (CW01) Contract awarded: 21st October 2019 Starting date: 25th October 2019 Date of completion: 09 October 2021 Contract duration: 720 days</p> <p>Heng Sambat Co.,Ltd. Import Export Transportation and Construction (CW02) Contract signed: May 2021 Starting date: 17th June 2021 Date of completion: 17th June 2022 Contract duration: 12 months</p>		
Construction Progress to Date:	<p>As of June 2021, the progress is</p> <ul style="list-style-type: none"> - CWO1 Kampot Wastewater Treatment Plant (WWTP) and Drainage work: 31.27 % - CW02 Kampot Controlled Landfill: 16.85 % 		
Key Sub-project Activities in this Reporting Period:	<p>Construction Activities CW01</p> <ol style="list-style-type: none"> 1. Training on Health, HIV and COVID-19 2. Cleaning existing drainage 3. Checking Rebar, Form Work and Casting Concrete of Wall for Anaerobic Pond at WWTP 4. Welding, Water testing pressure of HDPE 450 mm at Force Main Line 5. Excavation, Installation and back filling of HDPE 450 mm along the Force Main pipe line 6. Checking of Rebar, Formwork and Casting Concrete for Top Slab Anaerobic Pond at WWTP 7. Final disposal of UXO (along existing drainage) in May, identified in January 8. Action on COVID-19 testing and Close PIU office 9. Stump Test of Top Slab Part II for Anaerobic Pond at WWTP 10. Curing Water of Top Slab Part II for Anaerobic Pond at WWTP 11. Water Test Pressure of HDPE 450mm, Force Main Pipe Line from MPS to WWTP. 12. Excavation, Installation and Backfilling of HDPE 450mm, Force 		

	Main Pipe Line from MPS to WWTP. Construction activities CWO2 Not started as of June 2021.
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1.2 Summary of EMP Implementation

4. EMP implementation is summarised in the following points, for this reporting period:
- PPE is now adequate on the construction site.
 - No significant issues affecting project environmental performance are observed at CW01 but a number of outstanding preventative issues remain outstanding.
 - UXO identified in drain clearance has been disposed of appropriately.
 - CW01 WWTP construction camp flooded therefore implementation of camp mitigation measures continue to be affected as landfilling the WWTP area and camp area is required to raise the land level above flood risk.

1.3 Summary of EMP Monitoring

5. EMP monitoring is summarised in the following points, for this reporting period, noting that COVID-19 has impeded site visits:
- Number of Monitoring Visits to Construction Site and wider area:
 - Every week visits by PIU as COVID-19 allowed, totalling 15 days of site visits per each of the following months: January, March, April, May.
 - Every day visits by CSC as COVID-19 allowed
 - Visits by Project Implementation Support and Capacity Building (PISCB) team (including national environment specialist).
 - Number of Environmental Samples Tested: overdue for CW01.

1.4 Summary of Complaints, Issues and Corrective Action

6. Any complaints, issues and corrective action identified or implemented are summarised in the following points, for this reporting period:
- Issues Raised: No issues raised on construction sites
 - Grievances Raised with GRM: None
 - Corrective Action issued by project to Contractor:
 - Contractor must rearrange the worker camp
 - Contractor must reconstruct toilets and fuel storage area.

2 SAFEGUARDS STAFF, TRAINING AND DOCUMENTATION

2.1 Implementation Arrangements

7. The EMP defines the Environmental Safeguards roles and responsibilities. The roles are required to be filled in order to meet the EMP requirements. The following table gives the status of the key roles for EMP implementation:

Table 2. Status of Environmental Safeguard Roles

Safeguards Role	Status & Comment			
PISCB N/IES <ul style="list-style-type: none"> Provide technical advice/assistance, e.g., preparation of Semi-Annual EMR for ADB, review of results of environmental effects monitoring. Environmental related training for PMU, PIU, contractors and other stakeholders Support PMU/PIU with appropriate consultation Site visits to check on construction, EMP implementation and affected people, in collaboration with PMU 	Date Started:	February 2018	Full Time/ Part Time	[PT]
	Comment	Ms. Rachel Wildblood (International) and Mr. Chea Mong (National)		
PMU-ESO <ul style="list-style-type: none"> PMU- Environmental Safeguard Officer (ESO) Conduct inspections and spot checks to monitor the performance of the Contractor in implementing the C-EMP/EMP Review & verify (through site visits) Monthly Environmental Progress Reports of Contractor EMP implementation site visits Review environmental quality monitoring results. Prepare the Project's Semi-Annual environmental Monitoring Reports for submission to ADB. Implement the Grievance Redress Mechanism (GRM) for environmental issues Conduct appropriate consultation and monitoring of effect of construction on affected people Participate in training provided by PISCB 	Date Started:	May-2020	Full Time/Part Time	[PT]
	Comment	Mr. Penh Socheat		
PIU Environmental And Social Safeguards Staff <ul style="list-style-type: none"> Collate monthly EMRs of Contractor, and submit to the PMU. If a licensed laboratory will be engaged to do independent environmental quality monitoring, oversee & manage the quarterly conduct of the environmental effects monitoring 	Date Started:	December-2019	Full Time/ Part Time	[PT]
	Comment	Mr. Kong Rasmey		

<ul style="list-style-type: none"> Prepare the draft Semi-Annual EMR and submit to the PMU for finalization and incorporation to the Project's Semi-Annual EMR. Implement the GRM for environmental issues Conduct appropriate consultation and monitoring of effect of construction on affected people Participate in training provided by PISCB 				
CSC <ul style="list-style-type: none"> EMP monitoring during construction Preparing monthly monitoring report 	Date Started:	20-08-2020	Full Time/ Part Time	[FT]
	Comment	Mr. Sy Hayean		
Contractor Environment Health & safety Staff (CW01) <ul style="list-style-type: none"> Appoint a qualified Environment Health and Safety (C-EHS) staff member to be responsible for EMP implementation and reporting Implement mitigation measures & conduct internal EMP implementation monitoring. Conduct environmental quality monitoring as prescribed in SPS-compliant EMP. (If an independent Licensed Laboratory will not be engaged.) Prepare Monthly EMRs. 	Date Started:	01-11-2019	Full Time/ Part Time	[FT]
	Comment	Mr. Sreng Kreasna		
Contractor Environment Health & safety Staff (CW02) <ul style="list-style-type: none"> Appoint a qualified Environment Health and Safety (C-EHS) staff member to be responsible for EMP implementation and reporting Implement mitigation measures & conduct internal EMP implementation monitoring. Conduct environmental quality monitoring as prescribed in SPS-compliant EMP. (If an independent Licensed Laboratory will not be engaged.) Prepare Monthly EMRs. 	Date Started:		Full Time/ Part Time	[FT]
	Comment	Staff member will commence in July 2021.		

8. The project concludes that the environmental safeguards roles are enough to mitigate the impact from the project but communication on the contractor's requirements is hampered by COVID-19 restricting travel (national and international) and time limitations of staff given that the PISCB, PMU and PIU environmental staff are all part time.

2.2 Training & Capacity Building

9. The following table gives the environmental safeguards training courses that have been completed during this reporting period and the planned training courses for the next six months. Note that all planned training will only be conducted if COVID-19 allows and COVID-19 has impacted on the ability of the project to provide face to face training:

Table 3. Environmental Safeguards Training Provided and Planned

Training Course Title	Training Date	Participants	Training Provider
Health, HIV, COVID 19 Training	18 February 2021	Contractor staff on site	Contractor
Planned Training:			
EMP development and implementation (CW 02) ¹	Q 4 of 2021	PMU, PIU, Contractor	PISCB Team
CEMP development and implementation (CW 02)	Q 4 of 2021	PMU, PIU, Contractor	PISCB Team
Consultation with affected people	Q 4 of 2021	PMU, PIU, Contractor	PISCB Team
Environmental protection	Q 4 of 2021	PMU, PIU, Contractor	PISCB Team
Environmental monitoring	Q 4 of 2021	PMU, PIU, Contractor	PISCB Team

Note: future training is required but dates will be confirmed in compliance with any requirements for protection against COVID-19

2.3 ADB Clearances

10. The following table gives information on the status of the safeguards documents.

Table 4. Status of Environmental Safeguard Documents

Safeguards Documents	Update Issued (Latest Version)	Submitted to PMU	Submitted to ADB	ADB Clearance Status
IEE – Consolidated	12-02-2020 IEE split by subproject Oct. 2020	-	-	IEE split requested by ADB
IEE Kampot Drainage, Sewerage & WWTP (CW01)	14-12-20 to include scope change and variation order	14-12-20	Dec 2020	Cleared & Disclosed
EMP for drainage and Sewerage system (CW01)	14-12-20 to include scope change and variation order	14-12-20	Dec 2020	Cleared & Disclosed

¹ Solid Waste Management in Kampot town or Kampot Control landfill
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IEE Kampot Landfill (CW02)	See ADB website	-	November 2020	Cleared & Disclosed
EMP for Kampot landfill (CW02)	See ADB website	-	November 2020	Cleared & Disclosed

2.4 National Approvals

11. The following table gives an update on the necessary national approvals required for the project to proceed.

Table 5. Status of National Approvals for Environmental Documents

Documents	Submitted to MoE	Approved By MoE:	Status – if not approved	Comment
Initial Environmental and Social Impact Assessment (IESIA) (Drainage and Sewerage system)	Final submission 04-09-2019	21-06-2019		
IESIA (Landfill)	First submission: 08-04-2020	23-11 2020		

2.5 Construction Environmental Management Plan (CEMP) Approvals

12. The following table confirms the status of the Construction Environmental Management Plan (CEMP) for each Civil Works package and it is confirmed by the project implementation staff that the provision of a CEMP is not impacting on the Contractor's implementation of the EMP provided in the bidding documents:

Table 6. Status of CEMP Approvals

Civil Works Package/ Subproject	CEMP Given to PMU	Approved By PMU:	Comment:
Waste water collection & Treatment and Urban drainage (CW01)	30 days after contract award	Yes 03-01-2020	Easy to monitor, generally complies with ADB.
Control Landfill (CW02)	Will be provided after contract award	Not Applicable in this reporting period	

3 EMP IMPLEMENTATION

3.1 Environmental Performance

13. The following table gives the environmental impact mitigation measures in the Borrower (Project) EMP and the corresponding CEMP and how the project is progressing with implementing the mitigation measures, for each subproject.

14. The evidence for the compliance is through a combination of:

- Site visits to observe site practices;
- Regular environmental monitoring/reporting from CSC and Contractor.

Table 7. Status of EMP Compliance for CW 01 Sewerage & Drainage

No	EMP Requirement (Mitigation Measure)	Compliance & Description (Yes, No, Partial)	Comment or Further Explanation if Needed	Reasons for Not Full Compliance
1	Flora	Yes	- No unnecessary flora damage	
2	Water Quality	Not Applicable	- Water sampling didn't start. No impacts on water observed.	- Due to COVID-19 the team from MOE has not been gone to the field for conducting water sampling. This activity is the responsibility of the contractor to arrange, in conjunction with MoE. Contractor will follow up with MoE team to do this work as soon as they can.
3	Noise and Dust Management	Yes	- The heavy construction and work near community has not yet started.	
4	Spoil Management Plan implementation	Yes	- The contractor arranges the site for stocking the spoil during excavation.	
5	Waste Management Plan implementation	Yes	- The contractor provides bins and waste is collected by waste collection company. - Waste from drain clearance was taken to the Kampot existing dumpsite.	

6	Camp Management Plan implementation	Partial	- The worker camp moved during the flooding period, flooded July 2020	<ul style="list-style-type: none"> - The contractor needs to construct the new worker camp in WWTP and Main Pumping Station and provide the camp facilities such as toilet, Firefighting etc - This is outstanding since July 2020
7	Community Health, Safety and Urban Access Plan implementation	Partial	- The construction work has been started along the road	<ul style="list-style-type: none"> - The contractor needs to provide further traffic signs in construction sites and do the public consultation with local people is limited due to COVID-19.
8	Traffic Management Plan implementation	Yes	- Adequate signs are provided	-
9	Transport, Storage and Use of Construction Materials	Yes	- Trucks all covered during transport of materials	
10	Machinery & Equipment	Yes	- Machinery well maintained	
11	Storage and Use of chemicals and fuels	No	- The contractor needs to prepare the concrete bund around the fuel tank	<ul style="list-style-type: none"> - Due to changing of construction camp from WWTP to MPS the contractor must prepare the concrete bund around the fuel tank. - This is outstanding since July 2020 – the contractor is waiting to complete the landfilling of the site.

15. The contractor followed the required project procedure when the UXO was discovered in a manhole in January, informing their point of contact in PMIS. PMU and CMAC were then informed. Temporary storage was in a public area within the town which was clearly labelled as UXO, warning members of the public. It was not on the public highway. CMAC were paid for UXO removal in May 2021

16. The following table will be completed for CW-02 in the next SEMR; works are planned to start from July 2021.

Table 8: Status of EMP Compliance for CW 02 Solid Waste Management

No	EMP Requirement (Mitigation Measure)	Compliance & Description (Yes, No, Partial)	Comment or Further Explanation if Needed	Reasons for Not Full Compliance
1	Flora	-	-	-
2	Water Quality	-	-	-
3	Noise and Dust Management	-	-	-
4	Spoil Management Plan implementation	-	-	-
5	Waste Management Plan implementation	-	-	-
6	Camp Management Plan implementation	-	-	-
7	Community Health, Safety and Urban Access Plan implementation	-	-	-
8	Traffic Management Plan implementation	-	-	-
9	Transport, Storage and Use of Construction Materials	-	-	-
10	Machinery & Equipment	-	-	-
11	Storage and Use of chemicals and fuels	-	-	-

Table 9. Status of EMP Compliance for CW02 Landfill

No	EMP Requirement (Mitigation Measure)	Compliance & Description (Yes, No, Partial)	Comment or Further Explanation if Needed	Reasons for Not Full Compliance
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1	N/A		-	
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17. For all 'Partial' or 'No' compliance issues in the table above, the actions needed to solve the compliance issues are in the table below. A number of continued non-compliances remain, from the previous monitoring report and again in this report:

Table 10. EMP– Actions Needed for Compliance for CW01 Sewerage & Drainage

No.	EMP Requirement	Further Action to Take	Date for Action	Who will Implement Action	Resolution?
2	Water Quality	The contractor needs to conduct the sampling during the six months period	Jan 2021 New action date 31 st August 2021	Contractor	Current issue, and outstanding from a previous SEMR. Please see Table 12.
6	Camp Management Implementation: Reconstruction of Worker Camp at WWTP	Contractor needs to reconstruct the new worker camp in WWTP and MPS after landfilling for these two locations is complete.	Contractor-31 st January 2021- New deadline is Q4 2021	Contractor	Current issue, and outstanding from a previous SEMR. Please see Table 12. VO-2 signed on 10 June 2021 with the contractor, which allows the process of landfilling to go ahead, which is needed for WWTP and camp works.
7	Community Health, Safety and Urban Access Plan implementation including Public consultation with local people	The contractor needs to provide further traffic / warning signs in construction sites Contractor needs to do public consultation in every road section before starting construction.	31 st January 2021 New action date 31 st August 2021	Contractor	Current issue, and outstanding from a previous SEMR. Please see Table 12.

No.	EMP Requirement	Further Action to Take	Date for Action	Who will Implement Action	Resolution?
11	Fuel storage on impermeable surface with bund	Contractor needs to prepare fuel storage area.	Contractor – 31 st January 2021 - New deadline is on end of August 2021.	Contractor	Current issue, and outstanding from a previous SEMR. Please see Table 12.

Table 11. EMP– Actions Needed for Compliance for CW02 Landfill

No.	EMP Requirement	Further Action to Take	Date for Action	Who will Implement Action	Resolution?
	N/A		VO-2 sign on 10 June 2021 and the contractor on the process of landfilling.		

18. The following table gives information on environmental performance issues from previous Environmental Monitoring Reports. This table confirms that the action was completed or that the action is outstanding. Note the previous SEMR did not include CW02 because landfill works had not started.

Table 12. EMP Compliance and Outstanding Issues from SEMR Previous Report(s) for CW01 Sewerage & Drainage

No.	EMP Requirement	Further Action to Take	Responsibility and Timing	Resolution	Required Action
2	Water Quality; Air quality, noise and Vibration	The contractor needs to conduct the sampling during the six month period	Jan 2021 New action date 30 September 2021	Not resolved	The contractor has not completed this due to COVID-19 epidemic in Kampot.
6	Camp Management Implementation: Reconstruction of Worker Camp at WWTP	Contractor needs to reconstruct the new worker camp after flooding	Jan 2021 New action date 31 st September	Not Resolved.	VO2 has been signed (June) to allow this to progress.

			2021		
7	Consultation with local people	Contractor needs to do public consultation in every road section before starting construction. PIU is also required to conduct consultation with affected people as part of environmental impacts monitoring.	31 st January 2021 New action date 30 September 2021	Not resolved.	Consultation is required, which could be by phone if site visits are restricted.
8	Traffic Management Plan Implementation	Install signs for traffic along force main construction site	31 January 2021	Resolved. Traffic warning signs were installed and checked 23 June 2021, see Annex 2.	
11	Fuel storage on impermeable surface with bund	Contractor needs to prepare fuel storage area.	May 2020, then 31 st Jan 2021 New action date 30 September 2021	Not resolved.	The contractor has not completed this. It is required as part of the reconstruction of worker camp and storage area. As temporary measure the contractor will store fuel on the impermeable plastic sheeting.

3.2 Health and Safety Performance

19. The following table gives the Health and Safety impact mitigation measures in the Borrower EMP and how the project is progressing with implementing the mitigation measures, for all subprojects.

Table 13. Status of Community and Occupational Health and Safety Compliance - ALL subprojects

No	Health and Safety Requirement	Compliance & Description (Yes, No, Partial)	Comment or Further Explanation if Needed	Reasons for Not Full Compliance
1	Occupational H&S Plan Workers Need to wear protective clothing, boot, helmet and gloves	Yes	Subproject: CW01 Workers have adequate PPE. The contractor has issued PPE each month where it was required. Including hard hats, safety shoes and high visibility clothing.	
2	First Aid kit needed on site	No	Subproject: CW01 First Aid Kit not available in site offices	For fire fighting/emergency procedures are not in place
3	Emergency Procedures	No	Subproject: CW01 The fire fighting equipment not available on site	- Worker camp at WWTP has not yet been reconstructed - First Aid kits are on the active construction site. - There is only temporary camp site for pre-cast concrete work.
4	Reconstruct of worker camp (CW-01)	Partial	Subproject: CW01 The worker camp is not constructed	- There is only temporary small cottage in WWTP site, inadequate to be considerate a full construction work camp.
5	Community Health and Safety Measures	Yes	Subproject: CW01 The contractor provides enough traffic sign in Force Main construction site and other construction sites.	
6	COVID-19 measures	Yes	Subproject: CW01 COVID-19 training provided and in May, testing was undertaken amongst PIU and Contractors when the PIU office was closed because of a positive COVID-19 case.	

20. For all 'Partial' or 'No' compliance issues in the table above, the actions needed to solve the compliance issues are in the table below:

Table 14. Health and Safety Actions Needed for Compliance - ALL subprojects

No	Health and Safety Requirement	Further Action to Take	Date for Action	Who will Implement Action	Action was in previous SEMR (Y/N)?
2	First Aid kit needed on site CW01	Providing first aid kit in worker camps site	New dateline 30 September 2021	Contractor	Yes, 1 st SEMR deadline July 2020
3	Emergency procedures and equipment is needed CW01	Provide fire fighting equipment at camps and offices	New dateline 30 September 2021	Contractor	Yes, 1 st SEMR deadline July 2020
4	Reconstruction worker camp CW01	Reconstruction of worker camp in WWTP site	New dateline 30 September 2021	Contractor	Yes, deadline Jan 2021

4 EMP MONITORING

4.1 Environmental Quality Monitoring

21. Environmental quality monitoring requirements are defined in the Monitoring Plan section of the EMP. The following table gives a summary of the environmental quality monitoring requirements for each subproject. PISCB is responsible for ensuring baseline monitoring is conducted, either via a suitable organisation or via the national IEIA. The Contractor is responsible for monitoring during construction. For CW01 Baseline monitoring for surface water was undertaken during IEIA preparation in March 2018. The results are in the appendices of this SEMR.

Table 15. EMP Environmental Quality Monitoring Requirements for CW01 and CW02

Subproject	Environmental Issue Monitored	Location	Parameters	Responsible Organisation	Frequency	Monitoring Timing During Construction (indicative)
CW01	Ambient air quality	1- Main pumping station (MPS)	As per EMP	PISCB / Contractor	Pre-Construction / every 6 months during construction	Every April & October from April 2020

CW01	Ambient noise and Vibration	2-WWTP Site 3-Hospital 4-Central Market	As per EMP	PISCB / contractor	Pre-Construction / every 6 months during construction	Every April & October from April 2020
CW01	Surface water quality:	Kbal Romeas river Prek Kampong Bay Sample x2	As per EMP	PISCB / Contractor	Pre-Construction / every 6 months during construction	Every April & October from April 2020
CW02	Ambient air quality	Receptor houses 1 & 2	As per EMP	PISCB / Contractor	Pre-Construction / every 3 months during construction	In September for 2021 and February and September for 2022
CW02	Noise	Receptor houses 1 & 2	As per EMP	PISCB / Contractor	Pre-Construction / every 3 months during construction	In September for 2021 and February and September for 2022
CW02	Surface Water	Nearest Agricultural Pond	As per EMP	PISCB / Contractor	Pre-Construction / every 6 months during construction	
CW02	Ground Water	Site g/w well	As per EMP	Contractor	Once after well completion	

22. No environmental quality monitoring implemented, during this reporting period. CW01 monitoring is overdue.. Also the following baseline monitoring will be required for CW-02 when the contractor begins the contract, following the NOL to be issued by ADB; note as of June 2021 no civil works have started.

Table 16. EMP Environmental Quality Monitoring implemented

Subproject	Environmental Issue Monitored	Location	Monitoring Date
The following will be implemented in the next reporting period:			
CW01	Ambient air quality	<ul style="list-style-type: none"> • Main pumping station (x=411050, Y=1172290); • WWTP site (X=413914, Y=1176221) Main Hospital (if construction is in adjacent road) Main market (if construction is in adjacent road)	October 2021

CW01	Ambient noise and Vibration	<ul style="list-style-type: none"> • Main pumping station (x=411050, Y=1172290); • WWTP site (X=413914, Y=1176221) Main Hospital (if construction is in adjacent road) Main market (if construction is in adjacent road)	October 2021
CW01	Surface water quality	Kbal Romeas river (X=414377, Y=1176433); <ul style="list-style-type: none"> • Prek Kampong Bay Sample 1 (X=410301, Y=1172212) • Prek Kampong Bay Sample 2 (X=409296, Y=1173844) 	October 2021
CW02	Ambient air quality	X=414163, Y=1183802	September 2021 before construction starts
CW02	Ambient noise and Vibration	X=414163, Y=1183802	September 2021 before construction starts
CW02	Surface water quality	X=414307, Y=1183989	December 2021 before construction starts

4.2 Construction Phase Affected People Consultation

23. During the construction phase, the following table gives information on the consultations that were undertaken in order to understand the impact of the project on Affected People and how effective the EMP Mitigation measures are for residents, businesses and other affected people around the construction sites.

24. No consultation has taken place so far. This did not happen as planned in 2021 to date, therefore it will take place in Q3 or Q4 2021 as long as COVID-19 restrictions allow and the team undertaking the consultations are comfortable with travelling for work and working in the field.

Table 17. Construction Phase Affected People Consultation

Subproject	Consultation Date	Person Consulted / Location	Outcome / Issues	Corrective Action Needed	Action Implemented by (person/date)
CW-01	Q4 2021	Affected people	Ensure affected people's views on current project implementation are understood	-	To be completed by PIU with support from PISCB.

5 COMPLAINTS, ISSUES, CORRECTIVE ACTION

5.1 Information Disclosure

25. The following table gives information on any information disclosure activities undertaken during this reporting period.

Table 18. Information Disclosure

Topic / Reason for Information	Disclosure Date	Method of Disclosure	Outcome / Results
SEMR	Jan 2021	ADB website	www.adb.org/projects/documents/cam-46443-002-emr-0

5.2 Grievance Redress Mechanism

26. The Grievance Redress Committee (GRC) was established in 2017. The member of GRC include: deputy governor, director of PDPWT, director of PDE&F, director of PDLMP&C, director of MoE, director of provincial military police, Teuk Chhou district governor, provincial town governor, Kg Trach district vice-governor, related chiefs of Sangkat/commune and chiefs of villages.

27. The GRM dissemination to Local Authorities took place through training on 14th January 2020.

28. The following table gives information on complaints about the project the Project Team is aware of, during this reporting period. PMU will log any grievances raised by members of the public, stakeholders or any affected people through all communication channels including the formal project GRM and social media. The table includes:

- Complaints made thorough GRM entry points
- Issues raised in consultation;
- Issues raised any other way that the project team is aware of.

29. For issues that have already been solved, this is confirmed in the final column of the table. Where possible the project tries to solve all issues as quickly as possible through informal discussions between the affected people and the contractor.

Table 19. Project Complaints or Issues

Details of Complaint / Issue Raised	Detail of Person (Date, Name, Contact Details)	Action Needed & Date	Comment / Resolved?
No Complaints Raised			

30. The following table gives information on all issues raised in previous SEMRs which are not yet resolved:

Table 20. Project Complaints or Issues – Not resolved from previous reports

Details of Complaint	Detail of Person (Date, Name, Contact Details)	Action Needed & Date	Reason this is still not resolved
Not Applicable			

5.3 Corrective Action

31. The following table gives information on any formal corrective action that has been issued to the contractor in order to improve environmental performance. This does not include any informal corrective action that the CSC issues on site when immediate issues are presented:

Table 21. Corrective Action Issued

No	Reason for Corrective Action	Date Issued	Outcome	Comment / Follow Up
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1	No formal worker camp at WWTP	19 November 2020	31 st January 2021	Contractor needs to reconstruct the worker camp at WWTP and MPS after finish landfilling on both sites. This remains outstanding from 2020.
2	No toilets for workers and staffs	19 November 2020	31 st January 2021	Contractor needs to construct the toilets for workers and staffs after finish landfilling on both sites. This remains outstanding from 2020.

6 CONCLUSION & RECOMMENDATION

Conclusion:

32. The contractor is failing to perform on a number of issues which are recurring in monitoring reports; this is also reflected in the limited construction which has taken place. These will be checked by PMU and PIU and where necessary, formal corrective actions will be issued. The concerns are:

33. Health and Safety:

- First aid kits are required. Evidence is needed that they are provided and contain adequate materials in case of accidents. Outstanding from 1st SEMR.
- Fire fighting equipment is required at all work camps, sites and offices. Outstanding from 1st SEMR.
- Worker camp reconstruction remains incomplete. This remains outstanding since flooding in mid-2020.

34. Environmental Monitoring:

- No monitoring environmental quality monitoring has been performed. The requirements for Monitoring are set out in the EMP and are the responsibility of the contractor to arrange or implement directly.
- Affected People consultation in order to monitor project impacts on people is required to be conducted by PIU, with support from PISCB. This can be undertaken as the PIU conduct their regular site visits.

35. Environmental Protection:

- Fuel Storage. Bund and impermeable surface is required and remains outstanding.

- Community issues & Consultation. There is a lack of consultation and signage for road works at construction sites. Consultation with affected people is a joint responsibility of the contractor, prior to starting construction on a new area, and the PIU as part of monitoring activities.
36. Challenges remain regarding COVID-19 and since March 2020 the national and international safeguard specialists from PISCB have not been able to conduct joint training or site visits as international travel is not advised at the moment. Cambodia has been subject to various internal travel restrictions and outbreaks of COVID-19 have been experienced in Kampot including at the PIU office. This has meant there are understandable concerns from the team members involved, with regards to travel for work. In addition, Kampot was subject to very heavy flooding in June 2021 which impacted on works.
37. The contractor is now consistently replacing PPE when it is required, and reporting on the number of items of PPE issued in the monthly reports which are submitted on time by the contractor to PMU/PISCB.

Recommendations:

1. The PMU will:

- Ensure the CW01 contractor understand the importance of completing the outstanding issues identified in this report and as outlined above in the Conclusions.
- Ensure environmental monitoring is completed according to the agreed frequency and locations for CW01 and CW02
- Ensure follow up on the corrective actions and other actions needed to ensure compliance with ADB's Safeguard requirements.

2. The contractor will follow the recommendations from CSC and NJS/KCC consultant as follows:

- Implement Actions in regarding outstanding issues for EMP compliance for CW01
- Complete overdue actions not yet completed from previous SEMR
- Undertake the environmental quality monitoring identified in the EMP

3. The PISCB will:

- Deliver training on consultation overdue from the previous SEMR.
- Support the PIU in the field with conducting informal or formal consultation as part of its on-going EMP monitoring.
- Support the PMU in ensuring EMP requirements are implemented across the subprojects.

4. The PIU will:

- Begin consultation with affected people within and around the construction sites which is overdue from the previous two SEMRs.
- Ensure site visits to check on Worker Camp installation progress.

Annex 1 Environmental Quality Monitoring Results

None undertaken

Annex 2 Photo Record – Visits, Training activities (CW-01)



Flooding Kampot town centre 21st June 2021



Road sign warning for Force Main as part of traffic management plan









Site Inspection from provincial governor and Consultant team



COVID-19 testing and close of PIU office

Annex 3 Corrective Action Plan

CW01 Kampot drainage and WWTP

CORRECTIVE ACTION PLAN FOR:	CW01 Kampot Drainage and WWTP		
PMU Staff Responsible: (name and role)	Name: Mr Socheat Penh	Role: PMU Environment Specialist	
Date this form issued to Contractor:	30 November 2021		
Deadline for Corrective Action:	31 January 2022		
Is there an immediate risk to health and safety of people?	Yes	<input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is there an immediate risk to the environment?	Yes	<input type="checkbox"/>	No <input checked="" type="checkbox"/>
Correct Action(s) Required:			
Details of the non-compliance with EMP	<p>1) Non-compliance with EMP requirement, including in Bidding Documents, that requires the worker camp to have adequate accommodation, sanitation, drainage for flood protection, fire fighting equipment and COVID-19 prevention measures within the camp.</p> <p>Any worker camp, a the Main Pumping Station site or WWTP site must follow these standards.</p> <p>2) Non-compliance with EMP requirement, including in Bidding Documents, for Storage and Use of Chemicals and Fuels, that requires:</p> <p>-Refueling only in designated areas which are to be 50 m from a water course and drip trays to be used when refueling or topping up / changing machinery fluids</p>		

	<p>-Construction fluids such as oils, and fuels should be stored and handled on a bunded impermeable surface; a bund will be provided around any above ground fuel storage tanks with a capacity of 110% of the largest single tank.</p> <p>- All chemicals and fuels will be in labeled containers.</p>
Corrective Action	<p>ACTION 1) Worker Camp. Develop and maintain a worker camp(s) with adequate accommodation, including living and sleeping and cooking areas, adequate sanitation* including toilets/showers for men and women, drainage for flood protection, fire fighting equipment and COVID-19 prevention measures within the camp. Additional measures such as health and safety signage, first aid provision as required in the EMP will also be included in the camp.</p> <p>*International Labor Organization defines adequate sanitary facilities for worker camps to include a minimum of one toilet, one wash basin and one shower for every six persons</p> <p>ACTION 2) Chemical/Fuel Storage. Develop a fuels storage area including the environmental protection/ spill control measures as defined in the EMP. Label all containers of chemicals and fuels. Designate area with signs/barriers for refuelling. Provide drip trays for maintenance.</p>
Corrective Action is required by (CW package and Date)	<p>ACTION 1) 31 January 2022</p> <p>ACTION 2) 31 January 2022</p>