

Environmental Monitoring Report

January 2021 to June 2021
August 2021

Cambodia: Fourth 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 Environment Monitoring Report

CAMBODIA

Ministry of Public Works and Transport (MPWT)

**Fourth Greater Mekong Subregion Corridor Towns
Development Project (CTDP4 Project)
(ADB L3686/G0592/G0593 CAM)**

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(as of October 2020)

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ABBREVIATIONS

ADB	–	Asian Development Bank
CTDP4	–	Fourth Greater Mekong Subregion Corridor Towns Development Project
DED	–	Detailed Engineering Design
EMC	–	Environmental Monitoring Consultant
EMP	–	Environmental Management Plan
FT	–	Full Time
GRM	–	Grievance Redress Mechanism
IEE	–	Initial Environmental Examination
IESIA	–	Initial Environmental and Social Impact Assessment
MoE	–	Ministry of Environment
MPWT	–	Ministry of Public Works and Transport
NR	–	National Road
n/a	–	Not applicable
PT	–	Part Time
PIU	–	Project Implementation Unit
PMC	–	Project Management Consultants
PMU	–	Project Management Unit
SEMR	–	Semi-annual Environment Monitoring Report
TL	–	Team Leader
WW	–	Wastewater
WWTP	–	Wastewater Treatment Plant

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1 ENVIRONMENTAL SAFEGUARDS SUMMARY

1.1 Introduction

1. The Royal Government of Cambodia has obtained a loan and grant from the Asian Development Bank (ADB) towards the costs of the Fourth Greater Mekong Subregion (GMS) Corridor Towns Development Project (hereinafter referred to as CTDP4). The location of the project towns is shown in **Figure 1**.

Figure 1: Location of Project Towns



2. This is the 3rd Semi-Annual Environmental Monitoring Report (SEMR) covering the period from 01 January 2021 to 30 June 2021 for the CTDP4 (ADB L3686/G0592/G0593 CAM).
3. The SEMR presents the status of project implementation, details of compliance with environmental regulations of the Royal Government of Cambodia and policies of ADB, details of compliance with environmental loan covenants, details of complaints received and their redressal and the status of compliance with various aspects of Environmental Management Plans (EMPs). The SEMR has been prepared to fulfil the safeguard policy requirements of ADB.
4. The SEMR is prepared by the Project Management Consultant (PMC) team (Ramboll Danmark A/S in Joint Venture with Oriental Consultant Global Co., Ltd. and SCE in association with Tancons (Cambodia) Co., Ltd) for the CTDP4 Project.
5. The Ministry of Public Works and Transport (MPWT) is the Project's Executing Agency, and the Ministry manages the implementation of the Project's outputs through a Project Management Unit (PMU) based in MPWT's main office in Phnom Penh (**Table 1**).
6. Project Implementation Units (PIUs) have been established in each of the Project towns. These are embedded within the provincial Departments of Public Works and Transport (DPWT) for the relevant provinces.

Table 1: Project Basic Data

ADB Grant/Loan number:	ADB Loan 3686-CAM, and ADB Grant 0592-CAM and Grant 0593-CAM (Grant funded by Asian Development Fund and Republic of Korea e-Asia and Knowledge Partnership Fund)
Project Title:	Fourth Greater Mekong Subregion Corridor Towns Development Project

Beneficiary:	Royal Government of Cambodia
Executing Agency:	Ministry of Public Works and Transport
Implementing Agency:	(i) Kampong Cham Provincial Government and Kampong Cham Provincial Project Implementation Unit (ii) Kratie Provincial Government and Kratie Provincial Project Implementation Unit (iii) Stung Treng Provincial Government and Stung Treng Provincial Project Implementation Unit
Date of Effectiveness:	14 December 2018
Closing Date:	30 June 2024

7. The CTDP4 includes 8 subprojects. No construction activities have started within the reporting period. Therefore, there are only few activities to be included in the Semi-Annual environmental Monitoring Report. When no activities can be reported in the below sections, the term not applicable (n/a) will be used.

1.2 Summary of Project Progress

8. **Table 2** provides a brief summary of the project progress in terms of contract awards, construction works and other key activities in this reporting period.

Table 2 Project Progress Summary

Safeguards Category	Environment	B
Reporting Period:	January-June 2021	Date Last Report Issued: 07-Apr-2021
Contracts Awarded to Date:	No contracts awarded within the reporting time.	
Construction Progress to Date:	As of 30 June 2021 no physical construction activities have been implemented	
Key Sub-project Activities in this Reporting Period:	<p>During the reporting period, the Ministry of Environment has issued letters of approval for the following Initial Environmental and Social Impact Assessment Reports related to the subprojects:</p> <p>Date of Approval - Subproject IESIA 02 March 2021, IESIA for Kampong Cham Wastewater and Drainage 06 April 2021, IESIA for Kratie Wastewater and Drainage 20 May 2021, IESIA for Stung Treng Wastewater and Drainage 20 May 2021, IESIA for Kratie Solid Waste Management 30 June 2021, IESIA for Stung Treng Solid Waste Management</p>	

1.3 Summary of EMP Implementation

1.3.1 Subproject

9. EMP implementation is summarised in the following points, for this reporting period:
- No contracts awarded, n/a.

1.4 Summary of EMP Monitoring

10. EMP monitoring is summarised in the following points, for this reporting period:
- Number of Monitoring Visits to Construction Site and wider area:**
 - No contracts awarded, n/a
 - Number of Environmental Samples Tested:**
 - No contracts awarded, n/a

1.5 Summary of Complaints, Issues and Corrective Action

11. Any complaints, issues and corrective actions that have been identified or implemented are summarised in the following points, for this reporting period:
- Issues raised: No issues raised
 - Grievances raised with GRM: No grievances filed
 - Corrective Actions required undertaken by Contractors: No contracts awarded, n/a

2 SAFEGUARDS STAFF, TRAINING AND DOCUMENTATION

2.1 Implementation Arrangements

12. The EMP defines the institutional arrangements including division and allocation roles and responsibilities for ensuring compliance with the Environmental Safeguards. **Table 3** provides a status of the relevant appointments at the PMU and for each subproject. The Table indicates that all currently required positions have been filled.

Table 3. Status of Environmental Safeguard Roles

Safeguards Role	Status & Comment			
Project Management Consultant: International Environmental Specialist	Date:	March 2020	Full Time / Part Time	Part Time
	Comment	Dr Jamlong Suthin (March 2020 – October 2020) Dr Pau Prat Busquets (October 2020 – December 2020) Mr Peter Gammelgaard Jensen (January 2021)		
Project Management Consultant: National Environmental Specialist	Date:	July 2019	Full Time/ Part Time	Part Time
	Comment	Mr. Chamman Yin		
PMU - Environmental Control Officer	Date Started:	May 2020	Full Time / Part Time	Full Time
	Comment	Mr. Socheat Penh		

Kampong Cham – Kampong Cham Province				
Safeguards Role	Status & Comment			
PIU Environmental and Social Safeguards Staff	Date Started:	September 2019	Full Time / Part Time	Full Time
	Comment	Mr. Norn Phirun		

PIU GRM Focal Point	Date:	September 2019	Full Time / Part Time	Full Time
	Comment	Mr. Khim Sovanney		
Contractor Environment Health & Safety Staff	Date:		Full Time / Part Time	
	Comment	To be filled when a contract has been awarded		
Contractor GRM Person	Date Started:		Full Time / Part Time	
	Comment	To be filled when a contract has been awarded		

Kratie – Kratie Province				
Safeguards Role	Status & Comment			
PIU Environmental and Social Safeguards Staff	Date Started:	September 2019	Full Time / Part Time	Full Time
	Comment	Mr. Moun Sovanna		
PIU GRM Focal Point	Date:	September 2019	Full Time / Part Time	Full Time
	Comment	Mr. Sao Sophal		
Contractor Environment Health & Safety Staff	Date:		Full Time / Part Time	
	Comment	To be filled when a contract has been awarded		
Contractor GRM Person	Date Started:		Full Time / Part Time	
	Comment	To be filled when a contract has been awarded		

Stung Treng – Stung Treng Province				
Safeguards Role	Status & Comment			
PIU Environmental and Social Safeguards Staff	Date Started:	September 2019	Full Time / Part Time	Full Time
	Comment	Mr. Yen Run		
PIU GRM Focal Point	Date:	September 2019	Full Time / Part Time	Full Time
	Comment	Mr. Doung Sam Ol		
Contractor Environment Health & Safety Staff	Date:		Full Time/ Part Time	
	Comment	To be filled when a contract has been awarded		
Contractor GRM Person	Date Started:		Full Time / Part Time	
	Comment	To be filled when a contract has been awarded		

2.2 Training & Capacity Building

13. Table 4 summarises the environmental safeguards training events that have been completed during this reporting period and the planned training events for the next six months. Environmental and social safeguards training will be implemented as soon as practicable after a construction contract has been awarded and the contractor has mobilized on site. The trainees will include members of the relevant PIU, PMC site engineers, the contractor's environment, health and safety officer(s) and site engineers. The training will be delivered by the PMC. Note that in the Table "-" means that construction contract is not likely to be awarded within the next 6 months.

Table 4. Environmental Safeguards Training Planned and Delivered

Package	Subproject	Training Subject	Planned Jul-Dec 2021	Delivered Jan-Jun 2021
CW06	Kampong Cham: Wastewater and Drainage	1. EMP Implementation Overview 2. Grievance Redress Mechanism 3. Mitigation Measures and Pollution Control 4. Environmental Monitoring	1. December 2021 2. December 2021 3. - 4. -	n/a
CW03	Kampong Cham: Solid Waste Management	1. EMP Implementation Overview 2. Grievance Redress Mechanism 3. Mitigation Measures and Pollution Control 4. Environmental Monitoring	1. - 2. - 3. - 4. -	n/a
CW07	Kratie: Wastewater and Drainage	1. EMP Implementation Overview 2. Grievance Redress Mechanism 3. Mitigation Measures and Pollution Control 4. Environmental Monitoring	1. - 2. - 3. - 4. -	n/a
CW04	Kratie: Solid Waste Management	1. EMP Implementation Overview 2. Grievance Redress Mechanism 3. Mitigation Measures and Pollution Control 4. Environmental Monitoring	1. - 2. - 3. - 4. -	n/a
CW08	Stung Treng: Wastewater and Drainage	1. EMP Implementation Overview 2. Grievance Redress Mechanism 3. Mitigation Measures and Pollution Control 4. Environmental Monitoring	1. - 2. - 3. - 4. -	n/a
CW05	Stung Treng: Solid Waste Management	1. EMP Implementation Overview 2. Grievance Redress Mechanism 3. Mitigation Measures and Pollution Control 4. Environmental Monitoring	1. - 2. - 3. - 4. -	n/a

2.3 ADB Clearances

14. **Table 5** gives information on the status of the safeguard documents.

Table 5. Status of Environmental Safeguard Documents

Safeguards Documents	Update Issued (Latest Version)	Submitted to MPWT	Submitted to ADB	Comments
IEE CW06 – Kampong Cham: Wastewater and Drainage	June 2021	04-Jun-2021	07-Jun-2021	ADB cleared the updated DED stage IEE on 10 June 2021 and uploaded the report to the ADB website for disclosure on behalf of the borrower
EMP CW06 – Kampong Cham: Wastewater and Drainage	June 2021	04-Jun-2021	07-Jun-2021	ADB cleared the updated DED stage EMP on 10 June 2021 and uploaded the report to the ADB website for disclosure on behalf of the borrower
IEE CW07 – Kratie: Wastewater and Drainage	May 2018	n/a	n/a	Version: Being updated in parallel with DED Status: PMC to update after DED
EMP CW07 – Kratie: Wastewater and Drainage	May 2018	n/a	n/a	Version: Being updated in parallel with DED Status: PMC to update after DED
IEE CW08 – Stung Treng: Wastewater and Drainage	May 2018	n/a	n/a	Version: Updated after PPTA and approved Status: PMC to update after DED
EMP CW08 – Stung Treng: Wastewater and Drainage	May 2018	n/a	n/a	Version: Updated after PPTA and approved Status: PMC to update after DED
IEE CW03 – Kampong Cham: Solid Waste Management	May 2018	n/a	n/a	Version: Being updated in parallel with DED Status: PMC to update after DED
EMP CW03 – Kampong Cham: Solid Waste Management	May 2018	n/a	n/a	Version: Being updated in parallel with DED Status: PMC to update after DED
IEE CW04 – Kratie: Solid Waste Management	July 2021	13-Jul-2021	13-Jul-2021	ADB cleared the updated DED stage IEE including ECA of 2 dumpsites on 14-Jul-2021
EMP CW04 – Kratie: Solid Waste Management	July 2021	13-Jul-2021	13-Jul-2021	ADB cleared the updated DED stage EMP on 14-Jul-2021
IEE CW05 – Stung Treng: Solid Waste Management	May 2018	n/a	n/a	Version: Being updated in parallel with DED Status: PMC to update after DED
EMP CW05 – Stung Treng: Solid Waste Management	May 2018	n/a	n/a	Version: Being updated in parallel with DED Status: PMC to update after DED

2.4 National Approvals

15. **Table 6** provides a summary of the status of necessary national environmental approvals required for the project to proceed. The Table shows that all the required IESIA reports have been approved by the Ministry of Environment, except with respect to Kampong Cham Solid Waste Management because the Ministry of Environment did not approve the initially proposed location of the landfill site. An alternative landfill site has been identified and is currently under review and consideration by the PMU.

Table 6. Status of Initial Environmental Impact Assessment (IEIA).

Document	Latest Submission to MoE	Date of MoE Approval	Comments
IESIA CW06 – Kampong Cham: Wastewater and Drainage	12 Jan 2021	02 March 2021	
IESIA CW07 – Kratie: Wastewater and Drainage	19 Feb 2021	06 April 2021	
IESIA CW08 – Stung Treng: Wastewater and Drainage	25 Feb 2021	20 May 2021	
IESIA CW03 – Kampong Cham: Solid Waste Management	-	-	The initially proposed site was not approved by MoE. An alternative site is under consideration
IESIA CW04 – Kratie: Solid Waste Management	Mar 2021	20 May 2021	
IESIA CW05 – Steung Treng: Solid Waste Management	June 21	30 June 2021	

2.5 Construction Environmental Management Plan (CEMP) Approvals

16. Table 7 confirms the status of the Construction Environmental Management Plan (CEMP) for each CW package, no CW has been awarded within the reporting period. In December 2020 the subprojects of CTDP4 are under detailed design. The CEMPs will be prepared after the contractors for subprojects have been selected.

Table 7. Status of CEMP Approvals

Civil Works Package/ Subproject	CEMP Given to PMU	Approved By PMU:	Comment:
CW06 – Kampong Cham: Wastewater and Drainage	n/a		

CW07 – Kratie: Wastewater and Drainage	n/a		
CW08 – Stung Treng: Wastewater and Drainage	n/a		
CW03 – Kampong Cham: Solid Waste Management	n/a		
CW04 – Kratie: Solid Waste Management	n/a		
CW05 – Stung Treng: Solid Waste Management	n/a		

3 EMP IMPLEMENTATION

3.1 Environmental Performance

17. Table 8 gives the environmental impact mitigation measures in the Project EMPs and the corresponding CEMPs and how the project is progressing with implementing the mitigation measures, for each subproject.
18. The status of compliance with environmental requirements is based on a combination of:
- Site visits to observe site practices;
 - Consultations with affected people and/or grievances files by affected people
 - Regular environmental reporting by the contractor
 - Environmental quality monitoring data

3.1.1 Subproject

19. The status of compliance with EMP requirements are summarised in **Table 8** for each subproject.

Table 8. Status of EMP Compliance *subproject*

	EMP Requirement (Mitigation Measure)	Compliance & Description (Yes, No, Partial)	Comment or Further Explanation if Needed	Reasons for Not Full Compliance
1	n/a			
2				

	EMP Requirement (Mitigation Measure)	Compliance & Description (Yes, No, Partial)	Comment or Further Explanation if Needed	Reasons for Not Full Compliance
3				
4				
5				
6				

20. For all 'Partial' or 'No' compliance issues in **Table 8**, the actions needed to solve the compliance issues are summarised in **Table 9**.

Table 9. EMP– Actions Needed for Compliance subproject

	EMP Requirement	Further Action to Take	Date for Action	Who will Implement Action
	n/a			

3.2 Health and Safety Performance

21. **Table 10** gives the Health and Safety impact mitigation measures in the Project EMPs and how the project is progressing with implementing the mitigation measures, for all subprojects.

Table 10. Status of Health and Safety Compliance - ALL subprojects

	Health and Safety Requirement	Compliance & Description (Yes, No, Partial)	Comment or Further Explanation if Needed	Reasons for Not Full Compliance
	n/a			

22. For all 'Partial' or 'No' compliance issues in **Table 10**, the actions needed to solve the compliance issues are in **Table 11**.

Table 11. Status of Health and Safety Actions Needed for Compliance - ALL subprojects

	Health and Safety Requirement	Further Action to Take	Date for Action	Who will Implement Action
	n/a			

23. **Table 12** follows up on Health and Safety performance issues from previous Environmental Monitoring Reports for the subprojects. This table confirms that the action was completed or that the action is outstanding.

Table 12. EMP Compliance Outstanding Issues from Previous Report(s) – All subprojects

Issue	Required Action	Responsibility and Timing	Resolution	Required Action
n/a				

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4 EMP MONITORING

4.1 Environmental Quality Monitoring

4.1.1 Subproject

24. Environmental quality monitoring requirements are defined in the Monitoring Plan section of the EMPs. **Table 13** gives a summary of the environmental quality monitoring requirements for each subproject:

Table 13. EMP Environmental Quality Monitoring Requirements - Subproject

Environmental Issue Monitored	Location	Parameters	Responsible Organisation	Frequency
n/a				

25. **Table 14** summarises environmental quality monitoring implemented during the reporting period.

Table 14. EMP Environmental Quality Monitoring implemented - Subproject

Subproject	Environmental Issue Monitored	Location	Monitoring Date
n/a			

- 26. Summary of Results – Noise.
- 27. n/a
- 28. Summary of Results – Surface Water quality.
- 29. n/a
- 30. Summary of Results – Groundwater quality.
- 31. n/a
- 32. Summary of Results – Air quality.
- 33. n/a

4.2 Construction Phase Consultations with Affected People

34. **Table 15** provides a summary of consultations undertaken during the reporting period of the construction phase to inform about construction related environmental issues of concern to the affected people and how these concerns have or will be addressed.

Table 15. Construction Phase Affected People Consultation

Subproject	Consultation Date	Person Consulted / Location	Outcome / Issues	Corrective Action Needed	Action Implemented by (person/date)
n/a					

4.3 ADB Missions

35. A virtual ADB mission was undertaken from 01-05 March 2021. **Table 16** summarises the implementation status of the environmental safeguard activities required under the Mission Aide Memoire of 05 March 2021.

Table 16: Implementation Status of Actions Required under the ADB Mission Aide Memoire

Item	Action	Target Date	Status as of 30-Jun-2021
4.1	PMC to carry out early screening of proposed site for Stung Treng landfill and provide feedback to ADB to confirm location within Ramsar site and important bird and biodiversity areas.	31-Mar-21	PMC submitted a Site Selection and Environmental Due Diligence Screening Report to ADB on 31 March 2021. Comments from ADB were received on 07 April 2021 and it was agreed to deal with these in the updated IEE for the subproject
4.2	PMU to arrange for establishment of GRM for environmental safeguards.	30-Apr-21	GRM fully established Provincial Grievance Regress Committees established: Kampong Cham, 4 February 2019. Kratie, 31 January 2019. Stung Treng, 18 January 2019.

5 COMPLAINTS, ISSUES, CORRECTIVE ACTIONS

5.1 Information Disclosure

36. Table 17 summarises information disclosure activities during the reporting period. There have not been any information disclosure activities during the reporting period.

Table 17. Information Disclosure

Topic / Reason for Information	Subproject	Disclosure Date	Method of Disclosure	Outcome / Results

5.2 Grievance Redress Mechanism

37. The GRM is designed to receive, evaluate and facilitate the resolution of residents' concerns, complaints and grievances during project implementation. A Grievance Redress Committees (GRC) has been established in each of the three cities and are operational. The GRM contact details for each subproject are listed in **Error! Reference source not found.** GRC establishment was done with the following reference letters:
- Kampong Cham: PGRC with reference letter 031/19 SSR and PRSC with reference letter 030/1E SSR dated on **4 February 2019**.
 - Kratie: PGRC with reference letter 004/19 SSR and PRSC with reference letter 002/19 SSR dated on **31 January 2019**.
 - Stung Treng: PGRC with reference letter 021/19 SSR and PRSC with reference letter 004/19 SSR dated on **18 January 2019**.
38. **Table 18** gives information on complaints about the project the Project Team is aware of, during this reporting period. The table includes:
- Complaints made thorough GRM entry points
 - Issues raised during consultations;
 - Issues raised any other way that the project team is aware of.
39. For issues that have already been solved, this is confirmed in the final column of **Table 18**. The project aims to solve all issues as quickly as possible through informal discussions between the affected people and the contractor.

Table 18. Project Complaints or Issues

Details of Complaint / Issue Raised	Detail of Person (Date, Name, Contact Details)	Action Needed & Date	Comment / Resolved?
n/a			

40. **Table 19** gives information on all issues raised in previous SEMRs which have not yet been resolved.

Table 19. 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
n/a			

5.3 Corrective Actions

41. **Table 20** gives information on corrective actions required to be undertaken by the contractors to improve environmental performance.

Table 20. Corrective Action Issued

Reason for Corrective Action	Date Issued	Outcome	Comment / Follow Up
n/a			

6 CONCLUSION & RECOMMENDATIONS

6.1 Conclusion

42. No construction activities have started within the reporting period. During the monitoring period the principal activities regarding the environmental safeguards have involved final consultations with local authorities and the Ministry of Environment as part of the review and approval of the IESIA reports for the subprojects. All subproject IESIA reports have been approved except for Kampong Cham Solid Waste Management because the proposed landfill site was not approved by the ministry. An alternative landfill site is now under consideration by the PMU.

6.2 Recommendations

43. To be well-prepared for the start of construction on several of the subprojects, it is recommended to put additional efforts into building the capacity of the PMU/PMC/PIU in undertaking effective compliance assurance. The capacity building should include:
- On-the-job training of designated environmental officers, consultants and site engineers of the PMU, PMC and PIUs.
 - Development of project specific inspection guidelines and checklists.
 - Development and application of compliance assurance procedures (non-compliance reporting, imposing sanctions).
44. The PMC will strengthen the implementation of environmental inspections (in addition to the above-mentioned capacity building) by:
- Including environment and health and safety issues in the weekly inspections and reporting of the site engineers.
 - Introduce standard procedures for environmental inspections.
 - Develop inspection and monitoring plans.
45. The PMC will strengthen the efforts to inspect community and occupational health and safety issues, in particular with respect to trench excavations for sewers, drainpipes and pump stations.
46. To improve the quality of the CEMPs, the PMC will develop a project specific CEMP template which will be included in the tender documents. PMC will improve the tender documents and ensure that environmental quality monitoring budget lines are included in the Bill of Quantities and priced in the financial proposals

Annex 1 Environmental Quality Monitoring Results

None

Annex 2 Photo Record – Visits, Monitoring, Consultation

Photographs of Site Visits

Photographs of Environmental Quality Monitoring

Photographs of Consultation

Annex 3 Grievance Redress Mechanism

GRIEVANCE REDRESS MECHANISM

GRM Objective

A grievance redress mechanism (GRM), consistent with the requirements of the ADB Safeguard Policy Statement (2009) will be established to prevent and address community concerns, reduce risks, and assist the project to maximize environmental and social benefits. In addition to serving as a platform to resolve grievances, the GRM has been designed to help achieve the following objectives: (i) open channels for effective communication, including the identification of new environmental issues of concern arising from the project; (ii) demonstrate concerns about community members and their environmental well-being; and (iii) prevent and mitigate any adverse environmental impacts on communities caused by project implementation and operations. The GRM is accessible to all members of the community.

The GRM contact details for each Subproject are listed in table below.

Contact Details for GRM (to be updated as contacts are decided)

Province	Subproject	Contact person for GRM			
		Commune	Province	PIU	Contractor
KCH	SWM				
	WWTP				
KRT	SWM				
	WWTP				
	Town center				
STR	SWM				
	WWTP				
	Town center				

Proposed GRM System

In Cambodia, there is currently no existing legally established system to resolve environmental concerns and complaints. The MPWT, as the Executing Agency of the Tonle Sap II will establish the GRM. The setup shall be made before commencement of site works and have members from the PMU, district authority and commune councils. Grievances can be filed in writing or verbally with any entry point of the GRM. The committee will have 15 days to respond with a resolution. The PMU's Environment Safeguards Officer (PMU-ESO) will oversee the implementation/observance of the mechanism and will be responsible for keeping the PMU informed. The PIU Safeguards Focal Point (PIU-SFP) will be responsible for ensuring GRM implementation at the subproject level.

The GRM will accommodate both informally and formally lodged eligible, grievances. Informally lodged grievances are those received by the contractor during construction. Formally lodged grievances are those received at District and Commune Council offices or direct to the PIU. Commune Councils evaluate complaints for eligibility and then report to PDPWT. The PDPWT and PMU maintain record of all grievances, informally and formally lodged, eligible and ineligible. The PMU will inform the MPWT, as necessary, and report on the observance/implementation of the GRM in the monthly progress reports and in the periodic Environmental Monitoring Report that will be submitted to the MPWT.

Access to the Mechanism

Any person who has environmental issues pertaining to the subproject during detailed design, construction and operation phases will have access to the mechanism free of charge. The PMU, through its Environment Safeguards Officer (PMU-ESO) and staff in the MPWT, will ensure that:

- (i) The public and all stakeholders are aware of their rights to access, and will have access to, the GRM free of administrative and legal charges; and
- (ii) The GRM is fully disclosed prior to construction: (a) in public consultations, (b) through posters displayed in the commune office (posters to include names and contact details of the PIU-SFP)

The Access Points to the GRM are critical for ensuring it is useable for affected people (APs). The GRM Access points for this project, as set out in this GRM Mechanism will be:

- ▶ The Contractors
- ▶ District and Commune Councils
- ▶ The PIU office
- ▶ The Provincial Department of Public Works and Transport (PDWT).

GRM Steps and Timeframe

Grievances raised on environmental impacts are critical to the health and safety of APs. Hence, the proposed mechanism intends to be easily accessible and promptly responsive to APs' complaints.

Informal Approach

Informally, APs can lodge complaints directly to the contractor during construction. PMU to provide contractor with GRM contact details which the contractor will use to print 'GRM Contact Cards' for its staff to hand to complainants and will keep cards with all vehicles, machinery and site managers/foremen.

Contractor to raise awareness of all workers on how to respond when an AP or member of the public has a complaint i.e. direct the person to the most senior site manager present at the time and/or Contractor GRM focal point and prepare a 'GRM Contact Card'.

The contractor shall document and assess the complaint immediately. If assessment validates the complaint as within the scope of the GRM/eligible, the contractor shall act on the complaint within three days from receipt of complaint. MPWT shall obtain a written confirmation of satisfaction from the AP after 7 days from completion of resolution by the contractor

If assessment invalidates the complaint (i.e., reveals the complaint as ineligible or not associated with the project's environmental performance), the contractor shall direct the AP to the Commune Council and shall report the complaint to MPWT within 2 days from receipt of complaint, stating reasons for ineligibility.

Formal Approach

If complaint is eligible but is not acted on within three days from receipt of complaint, or if AP is not satisfied with the resolution undertaken by the contractor, he/she can access the formal mechanism, as shown below:

GRM Steps

Step	Action
Step 1: Lodging a Complaint (Day 1)	AP lodges complaint, by him/herself or with assistance from the village chief or district council, at the access point with the Commune Council. The complaint may also be lodged with the PIU or PDPWT,
Step 2: Documentation & Registration of Complaint (Day 1)	Commune Council, PIU/PMU or PDPWT documents/registers lodged complaint, makes sure these are referenced and provides AP with a copy of referenced complaint. The commune forwards complaint document to the MPWT. A copy of a proposed GRM Complaint Form is in Annex 3.
Step 3: Assessment and Discussion (Day 1 to 3)	<p>AP shall be informed if the grievance is eligible or ineligible. If it is ineligible, AP shall be directed to the district. If complaint is eligible, AP shall be informed of the expected action timelines as set out in the established mechanism</p> <p>If both of the AP and contractor/operator are available, the complaint shall be immediately reviewed, investigated and discussed. If not, both parties should agree to undertake the review, investigation and discussion within 3 days. The discussion will centre on the cause and action/measure to implement and will engage the PIU/PMU.</p> <p>After review and investigation, agreement on actions and measures and time involved shall be made with the AP. Agreement shall be properly documented and filed; MPWT, PIU/PMU, Commune Council and AP shall have copies</p>

	(Day 3 to Day 4) If complaint is minor, i.e., not requiring further investigation and would be easy to resolve, the contractor/operator shall immediately implement agreed on action/resolution. (To be implemented by Day 8)
Step 4: Implementing the Agreed Resolution	If further investigation and/or procurement of supplies/parts would be necessary, the contractor/operator shall: (i) immediately provide the most suitable interim measure to reduce the magnitude of the impact; and (ii) start work on the final measure within 15 days from the day the complaint is lodged.
Step 5: Acceptance of Resolution (1 week after completion of action/measure taken)	If, according to the AP, the impact has been resolved satisfactorily, MPWT shall obtain a written confirmation of satisfaction from the AP. This confirmation will signify closure of grievance and will form part of the grievance documentation. The PIU, Commune Council and AP shall retain their copies of the confirmation.
Step 6: Monitoring and Evaluation (for 1 week after closure of grievance)	The MPWT shall monitor the effectiveness of the resolution for at least a week after closure of grievance (that is, when action implemented has been satisfactorily confirmed in writing by the complainant). Monitoring and evaluation shall be properly documented and included in the Environmental Monitoring Report.
Step 7: Appeal for Dissatisfied AP	When dissatisfied (or, in the event the issue/impact persists despite actions undertaken), AP can appeal for assistance from the district in the elevation of his/her complaint to the provincial authority. The provincial authority shall call all parties concerned to review the history of the grievance and resolution process taken and assess the validity of the appeal.

Appeals. If appeal is found not valid, the provincial authority shall write the AP and declare the grievance closed. In the event of an appeal, the MPWT shall immediately report to the PMU. The PMU shall ensure that the ADB is immediately informed.

If appeal is assessed to be valid, provincial authority and the parties discuss and agree on the quick resolution of the issue. The PMU requires the contractor and operator to implement the agreed resolution. Should the issue continue to persist despite the second action, or the AP remain dissatisfied, the following steps will be taken:

Special Mission or Judicial System. If the complainant is still unsatisfied, the PMU/Executing Agency will inform ADB to convene a special mission to attempt a resolution prior to use of the Cambodian judicial system.

Accountability Mechanism of the ADB. In addition, affected people may always contact the Complaints Receiving Officer of the ADB via the following addresses which will be included in the subproject signboard:

Complaints Receiving Officer, Accountability Mechanism
Asian Development Bank
ADB Headquarters, 6 ADB Avenue, Mandaluyong City 1550, Metro Manila, Philippines
(+632) 632-4444 loc. 70309
(+632) 636 2086
amcro@adb.org

1. Instructions available here: <http://www.adb.org/site/accountability-mechanism/how-file-complaint>.

Sufficient communication on the GRM including signs containing contact details of the GRM access points will be displayed at strategic locations to sustain the effective implementation of the mechanism.