

# Environmental Monitoring Report

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July 2021 to December 2021  
March 2022

## 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**

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## **CAMBODIA**

### **Ministry of Public Works and Transport (MPWT)**

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

**Reporting Period:** *July-December 2021*

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### CURRENCY EQUIVALENTS

(as of October 2020)

Currency unit	–	riel (KR)
KR 1.00	=	\$ 0.000250
\$1.00	=	KR 4,000

### 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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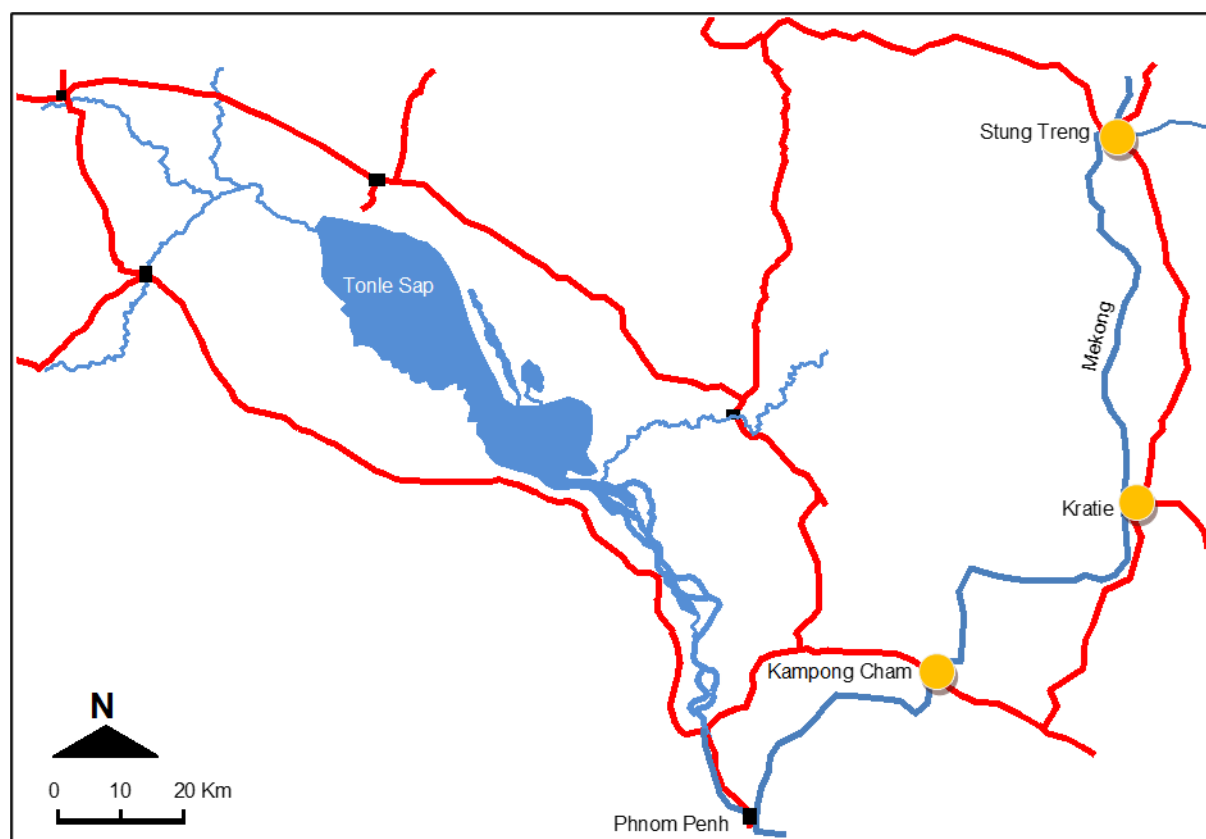
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# 1 ENVIRONMENTAL SAFEGUARDS SUMMARY

## 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 three project towns (Stung Treng, Kratie and Kampong Cham) is shown in **Figure 1**.

**Figure 1: Location of Project Towns**



2. This is the 4<sup>th</sup> Semi-Annual Environmental Monitoring Report (SEMR) covering the period from 01 July 2021 to 31 December 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:	July-December 2021	Date Last Report Issued:	20/08/2021
Contracts Awarded to Date:	No contracts awarded within the reporting period		
Construction Progress to Date:	As of 31 December 2021, no physical construction activities have been implemented		
Key Sub-project Activities in this Reporting Period:	<p>Only the Kampong Cham Solid Waste Management Subproject has not yet completed the preparation of the Initial Environmental and Social Impact Assessment (IESIA) Report. However, the new alternative landfill site was approved by MoE on 11 October 2021.</p> <p>As indicated below, all other CT-4 subprojects have been granted approval of their respective IESIA reports by the Ministry of Environment:</p> <p><b>Date of Approval - Subproject IESIA</b>  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	Start of Assignment and Name of Specialist/Officer			
Project Management Consultant: International Environmental Specialist	Start Date:	March 2020	Full Time / Part Time	Part Time
	Name:	Dr Pau Prat Busquets (October 2020 – December 2021) Mr Peter Gammelgaard Jensen (January 2021- ongoing)		
Project Management Consultant: National Environmental Specialist	Start Date:	July 2019	Full Time/ Part Time	Part Time
	Name:	Mr. Chamman Yin		
PMU - Environmental Control Officer	Start Date:	May 2020	Full Time / Part Time	Full Time
	Name:	Mr. Socheat Penh		

Kampong Cham – Kampong Cham Province				
Safeguards Role	Start of Assignment and Name of Officer			
PIU Environmental and Social Safeguards Staff	Start Date:	September 2019	Full Time / Part Time	Full Time
	Name:	Mr. Norn Phirun		
PIU GRM Focal Point	Start Date:	September 2019	Full Time / Part Time	Full Time

	<b>Name:</b>	Mr. Khim Sovanney		
<b>Contractor Environment Health &amp; Safety Staff</b>	<b>Start Date:</b>		Full Time / Part Time	
	<b>Name:</b>	To be filled when a contract has been awarded		
<b>Contractor GRM Person</b>	<b>Start Date:</b>		Full Time / Part Time	
	<b>Name:</b>	To be filled when a contract has been awarded		

<b>Kratie – Kratie Province</b>				
<b>Safeguards Role</b>	<b>Start of Assignment and Name of Officer</b>			
<b>PIU Environmental and Social Safeguards Staff</b>	<b>Start Date:</b>	September 2019	Full Time / Part Time	Full Time
	<b>Name:</b>	Mr. Moun Sovanna		
<b>PIU GRM Focal Point</b>	<b>Start Date:</b>	September 2019	Full Time / Part Time	Full Time
	<b>Name:</b>	Mr. Sao Sophal		
<b>Contractor Environment Health &amp; Safety Staff</b>	<b>Start Date:</b>		Full Time / Part Time	
	<b>Name:</b>	To be filled when a contract has been awarded		
<b>Contractor GRM Person</b>	<b>Start Date:</b>		Full Time / Part Time	
	<b>Name:</b>	To be filled when a contract has been awarded		

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

13. Training & Capacity Building 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	Delivered Jul-Dec 2021	Planned Jan-Jun 2022
CW06	Kampong Cham: Wastewater and Drainage	1. EMP Implementation Overview 2. Grievance Redress Mechanism 3. Mitigation Measures and Pollution Control 4. Environmental Monitoring	1. n/a 2. - 3. - 4. -	1. June 2022 2. June 2022
CW03	Kampong Cham: Solid Waste Management	1. EMP Implementation Overview 2. Grievance Redress Mechanism 3. Mitigation Measures and Pollution Control	1. n/a 2. - 3. -	n/a

Package	Subproject	Training Subject	Delivered Jul-Dec 2021	Planned Jan-Jun 2022
		4. Environmental Monitoring	4. -	
CW07	Kratie: Wastewater and Drainage	1. EMP Implementation Overview 2. Grievance Redress Mechanism 3. Mitigation Measures and Pollution Control 4. Environmental Monitoring	1. n/a 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. n/a 2. - 3. - 4. -	1. April 2022 2. April 2022
CW08	Stung Treng: Wastewater and Drainage	1. EMP Implementation Overview 2. Grievance Redress Mechanism 3. Mitigation Measures and Pollution Control 4. Environmental Monitoring	1. n/a 2. - 3. - 4. -	1. June 2022 2. June 2022
CW05	Stung Treng: Solid Waste Management	1. EMP Implementation Overview 2. Grievance Redress Mechanism 3. Mitigation Measures and Pollution Control 4. Environmental Monitoring	1. n/a 2. - 3. - 4. -	1. April 2022 2. April 2022

## 2.2 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

Safeguards Documents	Update Issued (Latest Version)	Submitted to MPWT	Submitted to ADB	Comments
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: DED stage IEE Status: Internal draft prepared
EMP CW07 – Kratie Wastewater and Drainage	May 2018	n/a	n/a	Version: DED stage EMP Status: Internal draft prepared
IEE CW08 – Stung Treng Wastewater and Drainage	May 2018	05-Oct-2021	05-Oct-2021	ADB cleared the updated DED stage IEE on 23-Oct-2021 and uploaded the report to the ADB website for disclosure on behalf of the borrower
EMP CW08 – Stung Treng Wastewater and Drainage	May 2018	05-Oct-2021	05-Oct-2021	ADB cleared the updated DED stage EMP on 23-Oct-2021 and uploaded the report to the ADB website for disclosure on behalf of the borrower
IEE CW03 – Kampong Cham Solid Waste Management	May 2018	n/a	n/a	Version: DED stage IEE Status: To be prepared together with final draft DED
EMP CW03 – Kampong Cham Solid Waste Management	May 2018	n/a	n/a	Version: DED stage EMP Status: To be prepared together with final draft DED
IEE CW04 – Kratie Solid Waste Management	July 2021	13-Jul-2021	13-Jul-2021	ADB cleared the updated DED stage IEE and ECA of 2 dumpsites on 14-Jul-2021 and uploaded the report to the ADB website for disclosure on behalf of the borrower
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 and uploaded the report to the ADB website for disclosure on behalf of the borrower
IEE CW05 – Stung Treng Solid Waste Management	May 2018	16-Sep-2021	17-Sep-2021	ADB cleared the updated DED stage IEE and dumpsite ECA on 17-Sep-2021 and uploaded the report to the ADB website for disclosure on behalf of the borrower
EMP CW05 – Stung Treng Solid Waste Management	May 2018	16-Sep-2021	17-Sep-2021	ADB cleared the updated DED stage EMP on 17-Sep-2021 and uploaded the report to the ADB website for disclosure on behalf of the borrower

## 2.3 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 and Social Impact Assessment (IESIA)**

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. A new alternative site has been proposed and approved by MOE. The IESIA is under preparation
IESIA CW04 – Kratie Solid Waste Management	Mar 2021	20 May 2021	
IESIA CW05 – Steung Treng Solid Waste Management	June 2021	30 June 2021	

## 2.4 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				
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				

Issue	Required Action	Responsibility and Timing	Resolution	Required Action

## 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. There have not been any virtual or physical ADB missions during Q3 and Q4 2021.

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

Item	Action	Target Date	Status as of 31-Dec-2021
			No missions during Q4 2021

# 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 **Annex 3**. 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			

Reason for Corrective Action	Date Issued	Outcome	Comment / Follow Up

## 6 CONCLUSION & RECOMMENDATIONS

### 6.1 Conclusion

42. No construction activities have started within the reporting period. During the reporting period the principal activities regarding the environmental safeguards have involved finalization of the IEEs and EMPs for the wastewater and drainage, and the solid waste management subprojects in Kratie and Stung Treng. During the reporting period, ADB cleared the IEE/EMP for Kratie Solid Waste Management, the IEE/EMP for Stung Treng Wastewater and Drainage and the IEE/EMP for Stung Treng Solid Waste Management. The IEE/EMP for Kratie Wastewater and Drainage is expected to be submitted to ADB in early 2022. An alternative site for the landfill in Kampong Cham was identified and the site has been approved by MoE on 11 October 2021.

### 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.
  - A project specific inspection guideline with checklists has been drafted and is ready to be applied in practice
  - 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 ensure that environmental quality monitoring budget lines are included in the Bill of Quantities and priced in the financial proposals from the contractors.



## **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

#### Stung Treng Wastewater and Drainage Subproject, Site Visit, Stung Treng City

Component	Site visits and meeting with PIU and Town authority for CTDP4
Type of Activity	Site visit and meeting at Stung Treng City
Sub-project/s	Wastewater Treatment Plant and Drainage subproject in Stung Treng Town, Stung Treng province
Start date	22-09-2021
End date	23-09-2021
Planned Activities	The PMC team conducted site visit and consultations with PIU and Stung Treng Town Authorities
Activities Carried Out	The team visited sensitive sites within wastewater and drainage network, pump stations in the urban town area and the WWTP site. The site visits identified key environmental-social issues / receptors near that may be impacted by the subproject. The team discussed the design with the local authorities and received their comments on how to mitigate the impacts.
<b>Appendix 1: Participants</b>	
<b>Appendix 2: Pictures</b>	
Noted by	Yim Chamnan, National Environmental Specialist

#### Consultation Meeting in meeting room of PDPWT, Stung Treng Town

On 22 September 2021 at 8:30 am in the meeting room of the Provincial Department of Public Works and Transport (PDPWT) / (PIU) of Stung Treng province.

The Participants came from PMC Team, PDPWT/PIU Staffs and Stung Treng Town Authority. A list of attendees is attached in appendix 1.

#### **Objectives:**

- Brief about the project location and engineering design.
- Identify potential impacts and impacted areas
- Receive feedback and comments from the local authorities.
- Establish collaborating with provincial authorities and relevant departments

#### **Discussion:**

- The Provincial Governor supports the proposed sites for subproject facilities including all 03 pump stations which are located on public land (school land and provincial army camp).
- The support from provincial authorities to the proposed design and location is important.
- The drainage and sewage system are located on the RoW of road in the town is public land.
- There are some public and private structures such as: water supply, electric line/poles, trees, and other structures are in the ROW that may be affected.
- The IRC/GDR and PMC team is conducting surveys to identify impacts on private land or assets that may have to be compensated. The resettlement process will be implemented by General Department of Resettlement (GDR) of MEF.
- Some local business places/small shops at the market will be impacted during construction.

- For public and private properties, the PMC will try to minimize the impacts. There may be about 100 cases with impacts on assets.
- The construction of the pump stations near the school and army campsite may generate noise impacts that have to be minimised. The pump stations are closed structures without noise emissions to the surroundings.
- The participants discussed the possibility of doing construction during the night at the market to reduce impacts on shopkeepers.
- The existing access road to WWTP site have some narrow sections with the wooden fences.

### Conclusion

The meeting concluded that Stung Treng Town Authorities and PIU/PDPWT support the subproject design and location of structures and facilities. The project management (PMC, PMU and PIU) will collaborate with relevant provincial departments/agencies and local authorities to resolve relevant issues before construction starts.

The solution to mitigating impacts on shops on the market during construction will be decided by the provincial governor (more to new place or work in night-time).

The project management should present the study results and the detailed design to the Provincial Governor and relevant departments of Stung Treng province to obtain their support.









### Appendix 1: List of Participants

No	Name	Sex	Institution	Position	Phone
1	Sar Kimnath	M	PDPWT	Director Department	012 852 388
2	Pich Ramy	M	Stung Treng Town	Deputy District Governor	092 996 0244
3	Seng Virak	M	Provincial Hall	Chief of Administration office	097 721 6684
4	Duong Samnov	M	PDPWT	Chief office	097 380 2111
5	Ho Ratha	M	PMC Team	DTL	012 870 047
6	Yim Chamnan	M	PMC Team	National Environment	012 945 546
7	Nup Robert	M	MPWT/PMU	PM	011 624 626
8	Kong Sothea	M	PDPWT/PIU	Deputy director department	012 609 735
9	Yin Somean	M	PMC Team	Solid Waste Engineer	078 794 042
10	Chan Narith	M	PMC Team	National Social Safeguards	089 566 998
11	Keo Cheatra	M	PDPWT/PIU	Deputy chief office	097 761 3667
12	Nou Vanna	M	PDPWT/PIU	Chief of sewage/culvert office	097 899 0204

### Appendix 2: Pictures





	
	
<p>The subproject sites in urban area of Stung Treng town on the ROW of the roads.</p>	
	
<p>The pumping station is near the pagoda and school</p>	<p>The pumping station is near the army camp</p>
	



The condition of the existing access road to WWTP site



## 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 in **Error! Reference source not found.**

### 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>

Step 4: Implementing the Agreed Resolution	(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)
	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 <b>15 days</b> 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](mailto: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.