

Environmental Monitoring Report

July 2020 to December 2020
April 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 Environmental 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)**

Reporting Period: *July-December 2020*

Date: *April 2021*

SEMR Report Number: 2

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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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 2nd Semi-Annual Environmental Monitoring Report (SEMR) covering the period from 01 July 2020 to 31 December 2020 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 different 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 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.
8. PMC has adapted this report in order to include the environmental safeguards information for each subproject once a work contract starts. Once a work contract starts, the term “subproject” in the section titles will be replaced by the package number – package name (e.g. CW06 – Kampong Cham: Wastewater and drainage).

1.2 Summary of Project Progress

9. 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 2020 | Date Last Report Issued: NA |
| Contracts Awarded to Date: | No contracts awarded within the reporting time. | |
| Construction Progress to Date: | As of end of December 2020 no physical construction activities implemented | |
| Key Sub-project Activities in this Reporting Period: | As of 31 December 2020, the following permits were obtained: None | |

1.3 Summary of EMP Implementation

1.3.1 Subproject

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

1.4 Summary of EMP Monitoring

11. 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

12. Any complaints, issues and corrective actions that have been identified or implemented are summarised in the following points, for this reporting period:

- Issues raised: n/a
- Grievances raised with GRM: n/a
- Corrective Actions required undertaken by cContractors: n/a

2 SAFEGUARDS STAFF, TRAINING AND DOCUMENTATION

2.1 Implementation Arrangements

13. 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 3. Status of Environmental Safeguard Roles

| Safeguards Role | Status & Comment | | | |
|--|----------------------|--|-----------------------|-----------|
| Project Consultant 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) | | |
| Project Consultant 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 | Part 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 after contract is awarded | | |
| Contractor GRM Person | Date Started: | | Full Time / Part Time | |
| | Comment | To be filled after contract is 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 after contract is awarded | | |
| Contractor GRM Person | Date Started: | | Full Time / Part Time | |
| | Comment | To be filled after contract is awarded | | |

| Steung Treng – Steung 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 after contract is awarded | | |
| Contractor GRM Person | Date Started: | | Full Time / Part Time | |
| | Comment | To be filled after contract is awarded | | |

14. The project concludes that the environmental safeguards roles are on place.

2.2 Training & Capacity Building

15. Table 4 gives the environmental safeguards training courses that have been completed during this reporting period and the planned training courses for the next six months:

Table 4. Environmental Safeguards Training Provided and Planned

| Training Course Title | Participants | Provided | Planned | Training Provider |
|--|--------------|----------|---------|-------------------|
| The environmental and social safeguards training will provide to PIU, site engineers of PMC and will conduct after the site engineers of PMC and contractors are mobilized for subprojects | | | | |
| n/a | | | | |
| | | | | |

| Training Course Title | Participants | Provided | Planned | Training Provider |
|-----------------------|--------------|----------|---------|-------------------|
| | | | | |
| | | | | |
| | | | | |

2.3 ADB Approvals

16. 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 | Comment |
|--|--------------------------------|-------------------|------------------|--|
| IEE CW06 – Kampong Cham: Wastewater and drainage | May 2018 | n/a | n/a | Version: Being updated in parallel with DED Status: PMC to update after DED |
| EMP CW06 – Kampong Cham: Wastewater and drainage | May 2018 | n/a | n/a | Version: Being updated in parallel with DED Status: PMC to update after DED |
| 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 | May 2018 | n/a | n/a | Version: Being updated in parallel with DED Status: PMC to update after DED |
| EMP CW04 – Kratie: Solid waste management | May 2018 | n/a | n/a | Version: Being updated in parallel with DED Status: PMC to update after DED |
| IEE CW05 – Steung Treng: Solid waste management | May 2018 | n/a | n/a | Version: Updated after PPTA and approved Status: PMC to update after DED |
| EMP CW05 – Steung Treng: Solid waste management | May 2018 | n/a | n/a | Version: Updated after PPTA and approved Status: PMC to update after DED |

2.4 National Approvals

17. Table 6 gives an update on the status of necessary national approvals required for the project to proceed.

Table 6. Status of Initial Environmental and Social Impact Assessment (IESIA).

| Document | Submitted to MoE | Approved By MoE: | Status – if not approved | Comment |
|--|-----------------------------------|------------------|---|--|
| IESIA CW06 – Kampong Cham: Wastewater and drainage | Final draft in Dec 2020 | n/a | Prepared final draft based on comments from Inter-Ministry meeting | License expected in Q1 2021 |
| IESIA CW07 – Kratie: Wastewater and drainage | 2 nd draft in Nov 2020 | n/a | Submitted 2 nd draft in November 2020 for Inter-Ministry meeting | National consultant revised the report for Inter-ministry meeting to be held in January 2021 |
| IESIA CW08 – Stung Treng: Wastewater and drainage | 2 nd draft in Nov 2020 | | Submitted 2 nd draft in November 2020 for Inter-Ministry meeting | National consultant revised the report for the Inter-ministry meeting to be held in January 2021 |
| IESIA CW03 – Kampong Cham: Solid waste management | Cancelled | | | The landfill subproject is on hold, due the proposed site is not approved from MoE. |
| IESIA CW04 – Kratie: Solid waste management | 1 st draft in Aug 2020 | | Revised 1 st draft based on comments from MoE | National consultant is revising the IESIA report (information data, and project designing) based on comments from the 1 st review meeting with MoE. |
| IESIA CW05 – Steung Treng: Solid waste management | 1 st draft in Aug 2020 | | Revised 1 st draft based on comments from MoE | National consultant is revising the IESIA report (information data, and project designing) based on comments from the 1 st review meeting with MoE. |

2.5 Construction Environmental Management Plan (CEMP) Approvals

18. 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

19. 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.
20. The evidence for the compliance is through a combination of:
- Site visits to observe site practices;
 - Consultation with affected people;
 - Regular environmental reporting

3.1.1 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 | | | | |

21. 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 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

22. 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 | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

23. 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 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 | | | |
| | | | | |
| | | | | |

24. 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 | | | | |
| | | | | |

4 EMP MONITORING

4.1 Environmental Quality Monitoring

4.1.1 Subproject

25. 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 | | | | |
| | | | | |
| | | | | |

26. Table 14 gives information on the environmental quality monitoring implemented during this reporting period. Detailed results compared to relevant national / international standards are in Conclusion: No construction activities have started within the reporting period. During the monitoring period the principal activities regarding the environmental safeguards have been observations and consultations with local authorities and the PIUs.
27. Recommendations: The IEE and EMP for these subprojects have been prepared in a single document. These documents are being prepared in parallel with the DED, and they will also include necessary COVID-19 provisions as per national requirements. The next step is to prepare standalone documents for each of the subprojects and monitor the IESIA.

28. Annex 1.

Table 14. EMP Environmental Quality Monitoring implemented - Subproject

| Subproject | Environmental Issue Monitored | Location | Monitoring Date |
|------------|-------------------------------|----------|-----------------|
| n/a | | | |
| | | | |
| | | | |

29. Summary of Results – Noise.

30. n/a

31. Summary of Results – Surface Water quality.

32. n/a

33. Summary of Results – Groundwater quality.

34. n/a

35. Summary of Results – Air quality.

36. n/a

4.2 Construction Phase Consultations with Affected People

37. Table 15 gives information on the consultations that were undertaken during the construction phase 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.

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 | | | | | |

5 COMPLAINTS, ISSUES, CORRECTIVE ACTION

5.1 Information Disclosure

38. Table 16 gives information on information disclosure activities.

Table 16. Information Disclosure

| Topic / Reason for Information | Subproject | Disclosure Date | Method of Disclosure | Outcome / Results |
|--------------------------------|--------------|-----------------|---|---|
| IEE/DED preparation | Stung Treng | 9 June 2020 | Meeting/Site visit with Stung Treng PIU and representatives of municipal and provincial authorities | Introduction of TL and other team members, site visits, discussion on project components The PPTA for Strung Treng proposed a combined sewer system, but agreement has been reached that this subproject will provide separate sewer and drainage systems. PIU indicated that the priority area for wastewater and drainage is the town centre |
| IEE/DED preparation | Kratie | 10 June 2020 | Meeting and Site visit Kratie PIU and representatives of municipal and provincial authorities | Introduction of TL and other team members, site visits, discussion on project components. The PPTA for Kratie proposed a combined sewer system, but agreement has been reached that this subproject will provide separate sewer and drainage systems. The city is by the river and generally low-lying, so the design of a gravity separate sewer system will be complicated, and likely to require several pumps. |
| IEE/DED preparation | Kampong Cham | 11 June 2020 | Meeting and Site visit Kampong Cham PIU and representatives of municipal and provincial authorities | Introduction of TL and other team members, site visits, discussion on project components. The PPTA for Kampong Cham proposed a combined sewer system, but agreement has been reached that this subproject will provide separate sewer and drainage systems. The WWTP site is not big enough. More land is required to design a WWTP with enough capacity in order to serve phases 1 and 2. |
| IEE/DED preparation | Stueng Treng | 23-24 Apr | Meeting and Site visit | National DTL visited and followed up the location of WWTP with PMU PMC engineer to review the WWTP site |

5.2 Grievance Redress Mechanism

39. 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**.

40. Table 17 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.

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

Table 17. Project Complaints or Issues

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

42. Table 18 gives information on all issues raised in previous SEMRs which are not yet resolved:

Table 18. 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

43. Table 19 gives information on corrective actions required to be undertaken by the contractors to improve environmental performance.

Table 19. Corrective Action Issued

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

6 CONCLUSION & RECOMMENDATION

44. Conclusion: No construction activities have started within the reporting period. During the monitoring period the principal activities regarding the environmental safeguards have been observations and consultations with local authorities and the PIUs.
45. Recommendations: The IEE and EMP for these subprojects have been prepared in a single document. These documents are being prepared in parallel with the DED, and they will also include necessary COVID-19 provisions as per national requirements. The next step is to prepare standalone documents for each of the subprojects and monitor the IESIA.

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

1 GRIEVANCE REDRESS MECHANISM

1.1 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.

Table 20: 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 | | | | |

1.1. 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.

1.1.1. 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).

1.1.2. 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.

1.1.3. 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.

1.1.4. 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 Table 21:

Table 21: 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) | 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 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. |

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|--|---|
| | 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 |
| 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 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.