Annex 10: Safeguard Issues
CAMBODIA: Demand for Good Governance Project

A. Background

1. At the Concept Review stage, the proposed project was classified as Category C under OP 4.01 (Environmental Assessment). Since the nature of the activities envisaged did not entail any significant environmental risks, no assessment would be required. However, during the project preparation, two issues emerged which merited additional attention. The safeguard classification of the project has accordingly been changed to Category B, which requires a Partial Assessment.

2. This annex summarizes the issues and the impacts that are likely to arise. It also outlines the approach proposed in both cases for further analysis of environmental/social impacts and to adequately address these, based on the findings of the analysis. This framework has been agreed with the Region’s Safeguard Team, will be adopted by the Government, and made public before appraisal.

B. Civil Works under Components 1 and 3

3. Minor civil works are envisaged in two cases. Under Component 1C, construction and/or renovation of offices for the OWSO and DO that will be established in the participating districts is foreseen. Under Component 3, similar works may be required to accommodate the PCO. In both cases, it is expected that existing buildings will be rehabilitated and that new construction will be minor. The IAs have confirmed that all works will be done on existing RGC property and there will be no land acquisition or involuntary relocation. The IAs will follow established guidelines and good practices for construction, to be agreed upon by the RGC and IDA by project appraisal. Civil works have been excluded from potential activities to be funded under Component 2 (Non-state Institutions).

C. Transmitter Repairs under Sub-component 1D

4. The issue. During project preparation RNK requested IDA financing of about $290,000 for repairs and spare parts needed to restore its existing 200 KW transmitter which currently is operating at only 40% of its rated capacity, and a standby 25 KW transmitter. A technical assessment of the transmission system was undertaken jointly by RNK and AusAID-supported transmission engineers and revealed that repairs are feasible, are the least-cost option to increase the transmitter’s effective power output, and allow better coverage in remote areas in the country. The study observed however that there could be potential health and safety issues associated with repair and operation of the transmitter and the transmission antenna tower. (Over time the current location has become surrounded by residential development which is encroaching on the station site. It is estimated that approximately 450 households live in the vicinity of the station.) It therefore recommended that a due diligence analysis be done to: (i) determine whether the increase in output can be done within the internationally recognized limits for
emagnetic radiation (EMR); and (ii) assess whether, and what, measures are necessary to ensure safety of workers and nearby residents.

5. **Due diligence analysis and emerging scenarios and options.** RNK has agreed to conduct the recommended due diligence analysis of safety and health issues. As a result of this analysis, two scenarios may emerge:

(a) **Scenario 1:** The levels of exposure to electromagnetic radiation (EMR) at full capacity do not exceed acceptable limits. If the EMR readings and analysis by Radio Australia engineers provide conclusive evidence that the transmitter, restored to full power at its present location, will not expose the residents of nearby houses to levels of EMR that exceed internationally recognized acceptable limits, the repairs/refurbishing could proceed as proposed.

(b) **Scenario 2:** The levels of exposure to EMR exceed acceptable limits at full restored capacity. If this is the result of the due diligence, RNK will then have two options:

(i) **Option 1: Relocation of the transmitter.** An Environmental Management Plan (EMP) will need to be carried out to address the impacts of construction and operation of the tower and antennas at the new location and of decommissioning the existing tower, in accordance with Bank’s OP 4.01. The EMP will be implemented, monitored and evaluated during the DFGG project implementation period in a manner satisfactory to the Bank. (The project would continue to be classified as Category B.)

(ii) **Option 2: Relocation of the residents exposed to excessive levels of EMR.** This would trigger OP 4.12, requiring preparation of a Resettlement Plan satisfactory to the Bank, including consultations with the displaced and host populations. The resettlement plan would need to be implemented, monitored and evaluated in a manner satisfactory to the Bank. (The project would accordingly be classified as Category A.)

6. **Preliminary considerations and interim measures.** RNK has advised that, over the medium term, they plan to relocate the transmitter to an unoccupied site and the Option 2 above is highly unlikely. However, since full analysis, a final decision, and implementation of the preferred option will extend over several months, they still plan to repair the transmitter at the current site. Accordingly, the following safety and security initiatives are underway:

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1 As specified in the Guidelines of the International Commission on Non-Ionizing Radiation Protection.
(c) RNK has ordered a spare part that will enable it do preliminary repairs to the transmitter and has arranged to take EMR readings immediately after the repair. The part was due for delivery and installation by the end of February 2008. The engineers from ABC Radio Australia are scheduled to return at that time to take the readings and submit a report.

(d) ‘Highly Dangerous Voltages’ warning signs (in both Khmer and English) have been posted on the front and rear of the power transformer cabinet, as recommended in the assessment.

(e) The services of an experienced national civil engineer with international qualification have been engaged to inspect the transmission tower and determine if it poses any safety issues.

(f) RNK has committed to operate the transmitter at its current location at output levels that do not violate acceptable limits. It will submit itself to independent monitoring of EMR levels and publicly disclose the information.

(g) RNK has started to explore the feasibility of relocating the transmission facilities to a new location, away from populated areas, and is currently evaluating alternative sites, including potential environmental and social impacts at each location.

7. **Next steps**. During the appraisal, the due diligence findings and recommendations will be reviewed by RNK and the Bank. Scenarios, options, and associated environmental/social implications will be discussed, and a “best option” agreed. An Environmental Management Plan, comprising the set of mitigation measures associated to the selected option, and the timetable for preparing and publicly disclosing detailed plans, will be agreed and included in the legal documents. The overall framework described above will be adopted by the Government by appraisal.

8. **Public disclosure**. The RNK-AusAID technical assessment has been made public and posted on the internet. RNK will also publicly disclose the findings of the due diligence analysis before the appraisal, and, once concluded, of the preliminary analysis of alternatives sites for possible relocation of the transmitter, if this option is deemed feasible and likely to be further pursued. The overall framework described above will also be made public before the appraisal.

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2 Grey shading means “to be confirmed/verified”.