KINGDOM OF CAMBODIA
Nation Religion King

Ministry of Rural Development

Cambodia Road Connectivity Improvement Project (CRCIP)

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK
DRAFT

March 2020
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<th>Acronym</th>
<th>Description</th>
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<td>AH</td>
<td>Affected Household</td>
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<td>COI</td>
<td>Corridor of Impact</td>
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<td>CRCIP</td>
<td>Cambodia Road Connectivity Improvement Project</td>
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<tr>
<td>DDIS</td>
<td>Detailed Design Implementation and Supervision (Consultants)</td>
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<td>DED</td>
<td>Detailed Engineering Designs</td>
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<td>EIA</td>
<td>Environmental Impact Assessment</td>
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<td>ESCP</td>
<td>Environment and Social Commitment Plan</td>
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<td>ESF</td>
<td>Environment and Social Framework</td>
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<td>ESMF</td>
<td>Environmental and Social Management Framework</td>
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<td>ESMP</td>
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<td>ESS</td>
<td>Environment and Social Standard</td>
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<td>FPIC</td>
<td>Free Prior and Informed Consent</td>
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<td>GBV</td>
<td>Gender-Based Violence</td>
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<td>GDR</td>
<td>General Department of Resettlement</td>
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<td>HIV/AIDS</td>
<td>Human Immunodeficiency Virus / Acquired Immune Deficiency Syndrome</td>
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<td>IDA</td>
<td>International Development Association</td>
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<td>IP</td>
<td>Indigenous Peoples</td>
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<td>IPF</td>
<td>Investment Project Financing</td>
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<td>IPP</td>
<td>Indigenous People’s Plan</td>
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<td>Indigenous People Planning Framework</td>
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<td>IRC</td>
<td>Inter-Ministerial Resettlement Committee</td>
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<td>LAR</td>
<td>Land Acquisition and Involuntary Resettlement</td>
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<td>MEF</td>
<td>Ministry of Finance</td>
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<td>MPWT</td>
<td>Ministry of Public Works and Transport</td>
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<td>NGO</td>
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<td>OPBC</td>
<td>Output and Performance-Based Contracts</td>
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<td>Protected Area</td>
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<td>RGC</td>
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<td>Unexploded Ordinance</td>
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EXECUTIVE SUMMARY

Project Description
The Cambodia Road Connectivity Improvement Project (CRCIP) will support the improvement of climate resilient road accessibility in targeted provinces. The RGC has requested the World Bank (WB) provide an Investment Project Financing (IPF). Targeted provinces under the proposed investment include Kampong Cham, Kratie, and Tboung Khmum with a total population of over 2.3 million people. The design of the proposed project builds on a network connectivity approach to improve road accessibility in rural areas, between rural areas and urban centers, and to the main network. The project provinces were selected considering several criteria including density of rural population, agricultural potential, vulnerability to floods, condition of roads, and connectivity of provincial road networks to cover larger geographic area.

The CRCIP Component 2 will be implemented by the MRD and will support improvement of prioritized rural roads in the targeted provinces and design and supervision services. It is estimated that the component will finance about 250km priority rural roads in project area through Output and Performance-Based Contracts (OPBC) covering road improvement and maintenance phases. Road improvement works will include upgrading existing earth and laterite roads to Double Bituminous Surface Treatment (DBST) along the existing alignment (carriageway and shoulders), improving the capacity of drainage systems, concrete pavement on flood prone areas, widening shoulders in areas where land is available, as well as site specific flood protection solutions and road safety measures to be identified during design works.

Purpose of the ESMF
This ESMF sets out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts of Component 2 of the CRCIP. The ESMF contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts, provisions for estimating and budgeting the costs of such measures, and information on the agency or agencies responsible for addressing project risks and impacts, in line the World Bank’s Environment and Social Framework (ESF).

The ESMF sets out the following:
- Brief details on the project description;
- RGC Legislative Framework guiding the project and the WB ESF, including a gap analysis;
- Potential Environment and Social Risks and Impacts, and Mitigation Measures;
- ESMF Procedures for Screening and Preparation of ESMPs, including institutional arrangements;
- Capacity assessment to implement the ESMF and other instruments;
- Grievance Redress Mechanism;
- Monitoring and Reporting;
- Indicative Budget.

The ESMF includes as annexes a template for the ESMP, Chance-Find Procedures, Screening & Scoping Form, Labor Management Procedures, Codes of Conduct and Monitoring checklists, among others.

In addition to this ESMF, the MRD has prepared, consulted and disclosed the following environmental and social frameworks for the rural roads financed under Component 2 of the CRCIP: a Resettlement Framework (RF), an Indigenous Peoples Planning Framework (IPPF) and a Stakeholder

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1 A consultation workshop at national level to present and discuss a draft version of this ESMF was carried out in Phnom Penh on March 5, 2020. The consultation’s report has been included in the project’s SEP, Annex 3.
2 https://www.mrd.gov.kh/crcip/
Engagement Plan (SEP). Full details of the project are available in the World Bank’s Project Appraisal Document.

**Potential Impacts and Mitigation Measures**

At this stage of project preparation, since specific road sections have not been identified, it is not possible to accurately detail the extent of environment and social impacts that Component 2 of the CRCIP may have. Nevertheless, it is possible to make some assumptions which will need to be updated once road sections are defined. Based on the World Bank’s ESF, Component 2 of the CRCIP will follow a mitigation hierarchy to:

a) Anticipate and avoid risks and impacts;
b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels;
c) Once risks and impacts have been minimized or reduced, mitigate; and
d) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.

The project will potentially bring significant benefits to the communities: reduce the travel time to reach schools, health, and other public service centers, expand access to markets and work opportunities, enhance connectivity during the rainy season, improve road safety, and improve air quality due to dust dispersion from unpaved road surfaces, among others. Section 3, Table 7, lists potential project risks and mitigation measures, including air and water quality, traffic hazards, occupational hazards, Gender-Based Violence (GBV), Violence Against Children (VAC), labor influx and land acquisition, among others. In addition, Table 8 lists specific measures in order to mitigate the risk of GBV.

**ESMF Procedures**

The purpose of the ESMF is to manage potential adverse impacts by establishing a guidance document that will inform MRD, Detailed Design Implementation and Supervision (DDIS) consultants, related government ministries, as well as contractors, of the agreed set of environmental and social procedures and measures for Component 2 of the CRCIP. The ESMF is also a guidance document which outlines the process for conducting future, site-specific, ESMPs, once road sections are known.

As an overarching guideline document, the ESMF seeks to ensure that:

- Road sub-projects consider potential environmental and social issues, especially for different populations who would be directly impacted (positively or adversely) by the sub-projects;
- Road sub-projects consider socio-cultural and gender sensitivities and environmental issues prevailing in areas where the proposed sub-projects would be implemented;
- During project formulation and design, adverse environmental and social impacts may arise during construction and operational phases and appropriate mitigation/enhancement measures need to be designed with a monitoring plan developed to track implementation of site-specific instruments (ESMPs, RPs, IPPs);
- Environmental and social management instruments such as ESMP, RP or IPP are suitably prepared and followed;
- The contents of the project’s Stakeholder Engagement Plan (including its provisions on grievance mechanisms) are applied for all the road sub-projects;
- Environment and social instruments are compliant with the World Bank ESF as well as national legislation;
- Project design takes into consideration the guidance in this ESMF and the mitigation hierarchy for environment and social impacts;
- Screening mechanism is determined for E&S risks and impacts once road sections are identified;
- Procedures and responsibilities for the development of site-specific ESMPs are established.
The ESMF describes procedures for screening and scoping, as well as detailed steps to prepare ESMPs, including the information required, responsibilities and capacity needs and training necessary for project staff in charge of ESMP monitoring. Institutional arrangements for the project at the MRD and government-level, as well as for consultants and contractors, is also described in Section 4 of this report.

**Consultations and Stakeholder Engagement**

Component 2 of the CRCIP will conduct consultation activities and stakeholder engagement as per the project’s Stakeholder Engagement Plan (SEP). The SEP seeks to ensure that Project communities, as well as other Project stakeholders, are informed and involved in all the stages of the Project. The Project recognizes the need to seek representative and inclusive feedback. Consultations on this ESMF took place on March 5, 2020 with interested-project stakeholders, to discuss the project, ESMF and measures in place for future ESMPs. The ESMF will be publicly disclosed in the MRD website and library, as well as the World Bank website.

**Grievance Redress**

The grievance mechanism seeks to resolve concerns promptly, using an understandable process that is culturally appropriate and readily accessible at no cost. Grievances can be submitted if someone believes the Project is having a detrimental impact on the community, the environment, or on their quality of life. Stakeholders may also submit comments and suggestions. The GRM is described in full in the project’s SEP, as well as in Section 6 of this report.

In the CRCIP it is envisaged there could be four types of grievances:
- a) Grievances relating to land acquisition, that follow the Resettlement Plan’s GRM (detailed in the project’s RF);
- b) Grievances directly related to program implementation (including relating to environmental and social impacts, health, road safety, etc.), detailed in this ESMF;
- c) Grievances related to Indigenous Peoples (detailed in the IPPF), and
- d) Worker-related disputes (detailed in the LMP in Annex 8).

The GRM described in this ESMF is specifically relevant to (b).

**Monitoring and Reporting**

Monitoring is the method of ensuring mitigation measures are being implemented and are effective. Monthly, quarterly- and semi-annual monitoring reports will need to be undertaken in order to:

- Improve environmental and social management practices;
- Ensure the efficiency and quality of the environmental and social assessment processes;
- Establish evidence- and results-based environmental and social impact assessment; and
- Provide an opportunity to report the results of the implementation of mitigation measures in future ESMPs and other project related documents.

During road sub-project implementation, the MRD Social and Environment Officer (SEO) will conduct monthly internal monitoring activities on the ESMPs to determine how mitigation measures are being implemented and the extent of their effectiveness. Assisted by the DDIS Consultant, the MRD SEO will monitor that the required mitigation measures of the ESMP and other applicable documents are considered and implemented by the civil works contractor and/or other responsible agency. The SEO will also monitor grievance redress, implementation of land acquisition activities as described in the project’s RF, ensuring adequate scoping for Indigenous Peoples in the project roads as per the project’s IPPF – and preparation of required documents if needed – and the implementation of the SEP consultation and disclosure activities.
**Budget**
ESMF implementation cost will include the development of the specific site-specific environment and social instruments, including staff costs, travel, consultation workshops, translation and trainings. The total indicative cost reviewed by the World Bank and MRD is estimated at 341,000 USD (Table 2) plus the costs of specific mitigation measures in the ESMP, RP and IPP (if applicable). Funds will be sourced by a combination of IDA and counterpart financing, from the project management component.
1 PROJECT DESCRIPTION

1.1 Overview
The Cambodia Road Connectivity Improvement Project (CRCIP) will support the improvement of climate resilient road accessibility in targeted provinces. The RGC has requested the World Bank (WB) provide an Investment Project Financing (IPF). Targeted provinces under the proposed investment include Kampong Cham, Kratie, and Tboung Khmum with a total population of over 2.3 million people. The design of the proposed project builds on a network connectivity approach to improve road accessibility in rural areas, between rural areas and urban centers, and to the main network. The project provinces were selected considering several criteria including density of rural population, agricultural potential, vulnerability to floods, condition of roads, and connectivity of provincial road networks to cover larger geographic area.

Road works will help to improve climate resilience and safety of road infrastructure. The scope of works will include paving/sealing of the roads with climate adaptation and resilience measures and improving bridges and other road structure to climate-resilient standards. The technical design will ensure that the identified climate-resilient measures reduce transportation costs and flooding risks and achieve the target of creating durable access to the main road network, markets, and services for the rural population.

Roads will be improved along the existing alignment of the carriageway and shoulders. Engineering designs will aim to avoid, and if not possible minimize, land acquisition. In cases where there would be no land acquisition, wider alignment could be considered to improve road safety and reduce congestion. Road safety will be improved by sealing shoulders, through better marking and signage, specific traffic calming measures at critical locations, and close consultations with communities living close to the road as is described in the project’s Stakeholder Engagement Plan (SEP). Full description of the CRCIP, including rationale for the project, can be found in the World Bank’s Project Appraisal Document (PAD).

For its environmental and social aspects, the World Bank’s new Environmental and Social Framework (ESF), which came into effect in October 2018, is applied to this project.

1.2 Detailed Description of Components
The CRCIP consists of four project components: two of which are institutional components and two of which are project investments; of the latter, only one is the subject of this Environment and Social Management Framework (ESMF). The project investment component being implemented by the Ministry of Public Works and Transport (MPWT), will not be discussed in this ESMF as this component has prepared site-specific Environment and Social Management Plans (ESMPs). This ESMF will only apply to the project investment component being implemented by the Ministry of Rural Development (MRD), since the road sections of rural roads to be financed have not been defined. Once MRD road components are defined, they will go through a robust prioritization and environmental and social impacts screening to ensure the project activities will not cause major environmental impacts, as will be discussed later in this ESMF.

The CRCIP Component 2 will be implemented by the MRD and will support improvement of prioritized rural roads in the targeted provinces and design and supervision services. It is estimated that the

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3 Full description of the CRCIP, including rationale for the project, can be found in the World Bank’s Project Appraisal Document (PAD).
4 For information on Component 1, please refer to the World Bank’s Project Appraisal Document (PAD), Environment and Social Management Plans (ESMPs) and Resettlement Plan (RP) prepared by MPWT.
component will finance about 250km priority rural roads in project area through Output and Performance-Based Contracts (OPBC) covering road improvement and maintenance phases. Road improvement works will include upgrading existing earth and laterite roads to Double Bituminous Surface Treatment (DBST) along the existing alignment, improving the capacity of drainage systems, concrete pavement on flood prone areas, widening shoulders in areas where land is available, as well as site specific flood protection solutions and road safety measures to be identified during design works.

Robust prioritization approach will be applied for selection of rural roads for investment. The prioritization process will consider socio economic impacts, climate resilience needs and flood vulnerability and road accessibility including access to markets, schools and hospitals. Prioritization of roads and preparation of designs will be carried out by specialized design consultancy services to be procured after project approval (Detailed Design Supervision Implementation – DDIS – consultants).

Figure 1. Map of MRD Network in the Project Area

1.3 Overview of Project Provinces

Kampong Cham and Tbong Khmum provinces are located in the central and eastern lowlands of Cambodia with the Mekong River flowing through them. Agriculture and industrial crops are the most common land use in both provinces, followed by forest, flooded land, plain land, and red soils. Kratie province has narrow floodplains caused by the Mekong, including undulating uplands and lowlands. For all the three provinces, there are large fluctuations in water levels between dry and rainy seasons. Periodic floods are a common cause of temporary loss of connectivity, mainly in rural areas. Kampong Cham and Tbong Khmum provinces are characterized by about 11 percent and 22 percent of forest cover, respectively (Cambodia Forest Cover 2016). There are no protected areas, Ramsar site or important bird area (IBA) in these two provinces. Meanwhile, Kratie province has greater forest cover (61 percent) and consists of rich natural resources such as forests, Ramsar sites, wetland areas, IBA and Mekong dolphin protected area. In the future, once MRD roads are defined, Environment and
Social Management Plans (ESMPs) may need to pay particular attention in Kratie province to potential construction impacts on flora and fauna.

In general, Cambodia’s climate is dominated by the monsoon which causes distinct wet and dry seasons. The southwest monsoon typically brings the rainy season from May to October. The northeast monsoon brings drier and cooler air from early November to March, then hotter air prevails in April and early May. Flooding is quite common in the country, often damaging roads and disconnecting villages for weeks or months.

From a social point of view, Kampong Cham and Tbong Khmum provinces are in a growing process of urbanization and industrialization. Taking advantage of its strategic location, Kampong Cham province has become a transportation hub for Cambodia with a relevant number of garment manufacture plants. Meanwhile, Kratie province remains mostly rural with significant economic and social exchanges with its neighbor Vietnam (trade, migrations, family networks, etc). The province’s significant forest, grazing and farming lands are being increasingly converted to plantations and rice paddies due to economic development pressures. Tourism is also an increasing source of revenue in the province, mainly due to the presence of the Irrawady Dolphin. The Poverty Provincial Surveys conducted between 2014 and 2016 by the Government of Cambodia reported above-average percentages of poor households (level 1 & 2 poverty categories) for Kratie (24.6 percent), and average ratings for Kampong Cham (18.1 percent) and Tbong Khmum (19.2 percent).

Each of the three provinces has its own rich and diverse socio-cultural features, with the presence in different proportions of Indigenous Peoples (IP). The 2018 Commune Database, for instance, notes a number of IP minority groups in Kratie province, in particularly Kuoy, Phnong, Mil, Kruol, Thmor, Khaonh, Kroal and Stieng groups, primarily in Chet Borei and Sambour Districts, as well as Snoul District. The Commune Database does not list any IP groups in Kampong Cham province, but it does list Stieng households in Memot District, Tboung Khmum province. In the future, once MRD roads are defined, Environment and Social Management Plans (ESMPs) may need to pay particular attention to impacts of labor influx in Kratie province, and ensuring that land pressures are not exacerbated by road rehabilitation, in particular if Indigenous Peoples are found in the project area.

Additional environment and social baseline information is included in Annex 1.

1.4 Purpose and Scope of the ESMF

The World Bank is supporting the Royal Government of Cambodia (RGC) to deliver the CRCIP. This ESMF sets out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts of Component 2 of the CRCIP. The ESMF contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts, provisions for estimating and budgeting the costs of such measures, and information on the agency or agencies responsible for addressing project risks and impacts, in line with Environment and Social Standard (ESS) 1, Assessment and Management of Environmental and Social Risks and Impacts, of the World Bank’s Environment and Social Framework (ESF).

The ESMF sets out the following:

- Brief details on the project description;

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5 Location of IP groups in Cambodia should be indicative only, and field verification is needed to ensure accuracy of information – i.e. when project components are defined, field-based data gathering will need to focus on whether there are IPs associated with the roads being rehabilitated based on the World Bank criteria established on para 8 of the ESS7 of the WB’s Environmental and Social Framework: self-identification; collective attachment; customary cultural, economic, social or political institutions; distinct language or dialect.

6 Which would also need to be considered in Indigenous Peoples Plans.
• RGC Legislative Framework guiding the project and the WB ESF, including a gap analysis;
• Potential Environment and Social Risks and Impacts, and Mitigation Measures;
• ESMF Procedures for Screening and Preparation of ESMPs, including institutional arrangements;
• ES capacity assessment to implement the ESMF and other instruments;
• Grievance Redress Mechanism;
• Monitoring and Reporting;
• Indicative Budget.

In addition to this ESMF, the MRD has prepared, consulted\(^7\) and disclosed\(^8\) the following environmental and social frameworks for the rural roads financed under Component 2 of the CRCIP: a Resettlement Framework (RF), an Indigenous Peoples Planning Framework (IPPF), and a project-wide Stakeholder Engagement Plan (SEP).

This ESMF includes as annexes a template for the ESMP, Chance-Find Procedures, Screening & Scoping Form, Labor Management Procedures, Codes of Conduct and Monitoring checklists, among others.

1.5 Application of the ESMF
The ESMF will be integrated into the preparation and implementation stages of Component 2 and the selected rural roads to be financed by this project. It must be followed through the entire project cycle from planning, including site identification, design, implementation and operation/maintenance, to attain the above outlined purpose and objectives.

1.6 Revision / Modification of the ESMF
The ESMF will be a ‘live document’ enabling revision, when and where necessary. Any unexpected situations and/or relevant changes in the design of Component 2 would be assessed and appropriate management measures would be incorporated by updating the ESMF. Revisions will require the Non-Objection from the World Bank.

\(^7\) A consultation workshop at national level to present and discuss a draft version of this ESMF was carried out in Phnom Penh on March 5, 2020. The consultation’s report has been included in the project’s SEP.
\(^8\) [https://www.mrd.gov.kh/crcip/](https://www.mrd.gov.kh/crcip/)
2 INSTITUTIONAL AND LEGAL FRAMEWORK

2.1 RGC Environmental Laws, Regulations, Guidelines, and Standards

The Constitution of the Royal Kingdom of Cambodia (1993) is the overarching legal framework for the country and guarantees all Khmer citizens the same rights regardless of race, color, language and religious belief. The constitution includes protections for social, indigenous, gender rights and equality (articles, 36, 45). It also includes provisions for the protection of workers (article 75) and worker’s rights to establish associations (article 42) and representative unions (article 36). It specifically prohibits all forms of discrimination against women (article 45). On environment, article 59 requires the State to protect the environment and balance of abundant natural resources and establish a precise plan of management of land, water, air, wind, geology, ecological system, mines, energy, petrol and gas, rock and sand, gems, forests and forestry products, wildlife, fish and aquatic resources and it is within this constitutional context that the Ministry of Environment (MOE) was established.

Aside from the Constitution, the Government of Cambodia has established specific laws and regulations for forests, protected areas, and land law to ensure sustainable development. The national agencies that oversee environment and natural resources management are listed below:

- Ministry of Environment (MOE)
- Ministry of Agriculture, Forestry and Fisheries (MAFF)
- Ministry of Water Resources and Meteorology (MOWRAM)
- Ministry of Mines and Energy (MOME)
- Ministry of Industry, Science, Technology, and Innovation (MISTI)
- Ministry of Land Management, Urban Planning and Construction (MLMUPC)
- Ministry of Tourism (MOT)
- Ministry of Public Works and Transport (MPWT)
- National Climate Change Committee (NCCC)

The ministries are technically and administratively represented and supported at the provincial, municipal, and district/commune levels by its line departments and technical offices. The provincial departments are responsible and accountable to extend and implement the mandate of their parent ministries to the sub-national administrations including province, district/municipality, and commune/Sangkat level.

The MOE is the primary agency tasked to promote environmental protection and conservation of natural resources, thus contributing to improvement of environmental quality, public welfare, and the economy. The EIA Department of the MOE oversees and regulates the Environmental Impact Assessment (EIA) process, quality control on EIA report and coordinates the implementation of projects in collaboration with project executive agencies and concerned ministries. The MOE has the following responsibilities:

- Review, evaluate, and approve submitted environmental impact assessments in collaboration with other concerned ministries; and
- Monitor to ensure a project owner (the executing agency of the project) satisfactorily implements the Environment Management Plan (EMP) throughout pre-construction, construction and operational phases of the projects.

2.1.1 Law on Environmental Protection and Natural Resources Management

In 1996, the Law on Environmental Protection and Natural Resources Management (NS/RKM/1296/36) came into force. The law requires the government to prepare national and regional environmental plans and sub-decrees concerning a wide range of environmental issues, including EIAs, pollution prevention and control, public participation, and access to information. The
Law on Environmental Protection and Natural Resource Management (1996) is the enabling legislation which allows the MOE to pass sub-decrees and regulations to protect the environment.

2.1.2 Sub-Decree on Environmental Impact Assessment Process #72 ANRK.BK9 (1999)
This Sub-decree sets out the current statutory requirements for Environmental Impact Assessment (EIA) process for private or public projects, including providing avenues for public participation (in particular Prakas on Public Participation in the EIA Process 2017). It sets out the minimum requirements for the nature and size of projects and activities (both existing and proposed) that shall be subject to EIAs. The Prakas on Categorization of EIA for Development Project\(^9\) issued on 03 February 2020, classifies the road improvements projects: for 10 to <30 km requires Environmental Management Contract and 30 to <50 km requires Initial Environmental Impact Assessment (IEIA) and >100 km requires Full Environmental Impact Assessment (Full EIA). The guidance for preparing IEIA / EIA report is provided in the Prakas on General Guideline for Preparing IEIA and Full EIA, 2009 N. 376 BRK.BST. The Guidelines also list the specific content required in EIA reports, including: (i) introduction (ii) legal framework, (iii) project description, (iv) description of the baseline environment, (v) public participation/stakeholder engagement, (vi) assessment of impacts and mitigation measures, (vii) environmental management plan, (viii) economic assessment and valuation of environmental damages and losses, (ix) conclusion and recommendations.

The Project Proponents/Owner (public or private) is required to submit the necessary project document (IEIA / Full EIA Report) to the MOE for review and approval. The IEIA / Full EIA report shall be prepared by a registered company authorized by the MOE on behalf of the Project Proponent / Owner.

Guidelines stipulate that the provisional and municipal authorities shall review EIAs for all investment capital less than US$2 million as well as “follow up, monitor, and take appropriate measures to ensure that Project’s Owner will follow the EMP during project construction, operation and closure as stated in the EIA report approved.”

2.1.4 Protected Area Law (No. NS/RKM/0208/007)
Cambodia has a network of 23 natural Protected Areas managed through the MOE. These areas cover 2.2 million hectares, or 18% of Cambodia’s land area, and include most of its important habitats. The Protected Area Law defines the framework of management, conservation and development of protected areas to ensure the conservation of biodiversity and sustainable use of natural resources in protected areas.

Article 11 divides the protected area into 4 zones namely, core zone, conservation zone, sustainable use zone and community zone.

Article 36 strictly prohibits all types of public infrastructure in the core zone and conservation zone; allows development of public infrastructures in the sustainable use zone and community zone with approval from the Royal Government at MOE’s request.

Article 41 provides for the protection of each protected area against destructive/harmful practices such as destroying water quality in all forms, poisoning, using of chemical substances and disposing of solid and liquid wastes into water or on land.

Article 44 requires all proposals and investments within or adjacent to protected area boundary, to conduct an Environmental and Social Impact Assessment.

Each protected area shall be divided into four (4) management zoning systems:

1. Core zone: management area(s) of high conservation values containing threatened and critically endangered species, and fragile ecosystems. Access to the zone is prohibited except the Nature Conservation and Protection Administration's officials and researchers who, with prior permission from the MOE, conduct nature and scientific studies for the purpose of preservation and protection of biological resources and natural environment with the exception of national security and defense sectors.

2. Conservation zone: management area(s) of high conservation values containing natural resources, ecosystems, watershed areas and natural landscape located adjacent to the core zone. Access to the zone is allowed only with prior consent of the Nature Conservation and Protection Administration at the area with the exception of national security and defense sectors. Small-scale community uses of Non-Timber Forest Products to support local ethnic minorities' livelihood may be allowed under strict control, provided that they do not present serious adverse impacts on biodiversity within the zone.

3. Sustainable use zone: management area(s) of high economic values for national economic development and management, and conservation of the protected area(s) itself thus contributing to the local community, and indigenous ethnic minorities’ livelihood improvement. After consulting with relevant ministries and institutions, local authorities, and local communities in accordance with relevant laws and procedures, the Royal Government of Cambodia may permit development and investment activities in this zone in accordance with the request from the MOE.

4. Community zone: management area(s) for socio-economic development of the local communities and indigenous ethnic minorities and may contain existing residential lands, paddy field and field garden or swidden (Chamkar).

2.1.5 Sub-Decree on the Control of Air Pollution and Noise Disturbance, #42 ANK/BK11 (2000)

This sub-decree outlines the measures for protecting environment quality and public health from air pollutants and noise disturbance through monitoring, curbing and mitigating activities. It lists air quality standards and noise emission levels. For dust control, there should no visible emissions from stockpiles of materials, crushers or batching plants. At locations with sensitive receptors, the standard of total suspended particulates should be < 0.33 milligrams/cubic meter, PM10 <0.05 and PM2.5 <0.025, at 24-hour average (see Table 1). All vehicles should be well maintained and comply with the air quality regulations. The noise regulations do not stipulate a level of noise from construction sites but refer to mixed commercial and/or industrial and residential property or type of land use in the immediate vicinity that maybe affected by noise (see Tables 2 and 3).

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21 http://www.bigpond.com.kh/Council_of_Jurists/a00-Anukret/ANK00_07_42_E.htm80
Table 1. Ambient Air Quality Standard

<table>
<thead>
<tr>
<th>Parameter</th>
<th>1-Hour Average (mg/m3)</th>
<th>8-Hour Average (mg/m3)</th>
<th>24-Hour Average (mg/m3)</th>
<th>1-Year Average (mg/m3)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon monoxide</td>
<td>20.0</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Nitrogen dioxide</td>
<td>-</td>
<td>0.1</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Sulphur dioxide</td>
<td>-</td>
<td>0.3</td>
<td>0.1</td>
<td>-</td>
</tr>
<tr>
<td>Ozone</td>
<td>0.2</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Lead</td>
<td>-</td>
<td>0.005</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total Suspended Particulate</td>
<td>-</td>
<td>-</td>
<td>0.33</td>
<td>0.1</td>
</tr>
<tr>
<td>PM10</td>
<td></td>
<td></td>
<td>0.05</td>
<td></td>
</tr>
<tr>
<td>PM2.5</td>
<td></td>
<td></td>
<td>0.025</td>
<td></td>
</tr>
</tbody>
</table>

Source: Praksa on the Implementation of the Term of Reference for Infrastructure and Tourism Development Project, 11 April 2018

Table 2. Maximum Permitted Vehicle Noise in Public and Residential Areas

<table>
<thead>
<tr>
<th>Category of Vehicle</th>
<th>Maximum Noise Level Permitted [dB(A)]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Motorcycles, cylinder capacity of the engine does not exceed 125cm³</td>
<td>85</td>
</tr>
<tr>
<td>Motorcycles, cylinder capacity of the engine exceeds 125cm³</td>
<td>90</td>
</tr>
<tr>
<td>Motorized tricycles</td>
<td>90</td>
</tr>
<tr>
<td>Cars, taxis, passenger vehicle of not more than 12 passengers</td>
<td>90</td>
</tr>
<tr>
<td>Passenger vehicle constructed for carriage of more than 12 passengers</td>
<td>85</td>
</tr>
<tr>
<td>Truck permitted maximum weight does not exceed 3.5 tons</td>
<td>85</td>
</tr>
<tr>
<td>Truck permitted maximum weight exceeds 3.5 tons</td>
<td>85</td>
</tr>
<tr>
<td>Truck engine is more than 150 kilowatts</td>
<td>89</td>
</tr>
<tr>
<td>Tractor or any other truck not classified here</td>
<td>91</td>
</tr>
</tbody>
</table>

Source: ADB, Cambodia Rural Road Improvement Project III

Table 3. Maximum Permitted Ambient Noise [dB(A)]

<table>
<thead>
<tr>
<th>Area</th>
<th>Period of Time (hours)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>16:00-18:00</td>
</tr>
<tr>
<td>Quiet areas: hospitals, libraries, school, kindergarten</td>
<td>45</td>
</tr>
<tr>
<td>Residential area: hotels, administration offices, houses</td>
<td>60</td>
</tr>
<tr>
<td>Commercial and service areas and mix</td>
<td>70</td>
</tr>
<tr>
<td>Small industrial factoring intermingling in residential areas</td>
<td>75</td>
</tr>
</tbody>
</table>

Source: ADB, Cambodia Rural Road Improvement Project III

2.1.6 Sub-_Decree on Water Pollution Control #27 ANRK.BK\(^\text{12}\) (1999)

This sub-decree regulates water pollution control measures in order to prevent and reduce the water pollution of the public water areas. As a minimum, all discharges of liquid wastes from construction camps, work sites or operations, to streams or water courses should conform to standards listed in Table 4.

Table 4. Selected Effluent Standard for Pollution Sources Discharging Wastewater to Public Areas or Sewer Access

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Unit</th>
<th>Allowable limits for pollutant substance discharging to</th>
</tr>
</thead>
<tbody>
<tr>
<td>Biochemical oxygen demand</td>
<td>mg/l</td>
<td>&lt;30</td>
</tr>
<tr>
<td>Chemical oxygen demand</td>
<td>mg/l</td>
<td>&lt;50</td>
</tr>
<tr>
<td>Total suspended solids</td>
<td>mg/l</td>
<td>&lt;50</td>
</tr>
<tr>
<td>Detergent</td>
<td>mg/l</td>
<td>&lt;5.0</td>
</tr>
<tr>
<td>Total dissolved solids</td>
<td>mg/l</td>
<td>&lt;1,000</td>
</tr>
<tr>
<td>Temperature</td>
<td>°C</td>
<td>&lt;45</td>
</tr>
<tr>
<td>pH</td>
<td></td>
<td>6-9</td>
</tr>
<tr>
<td>Oil and grease</td>
<td>mg/l</td>
<td>&lt;5.0</td>
</tr>
<tr>
<td>Dissolved oxygen</td>
<td>mg/l</td>
<td>&gt;2.0</td>
</tr>
</tbody>
</table>

Source: ADB, Cambodia Rural Road Improvement Project III

2.1.7 Sub-Decree on Solid Waste Management (No. 36 ANRK.BK 2009)
Under Article 7 of the Sub-Decree on Solid Waste Management, “the disposal of waste in public sites or anywhere that is not allowed by authorities shall be strictly prohibited”

2.1.8 Law on Forestry Management
The Law on Forestry Management prohibits the hunting of wildlife within protected areas. Aside from maintaining check points and providing rangers, the MOE has an active community education program to promote environmental awareness especially within the rural communities.

2.1.9 Draft Environmental and Natural Resources Code
A new Environmental and Natural Resources Code of Cambodia is being developed in Cambodia (10th draft after rounds of internal consultations). The draft Code includes general principles, environmental impact assessment, strategic environmental assessment, and biodiversity and protection of endangered species. It establishes biodiversity conservation corridors to provide linkages and protection for high-conservation areas. It also addresses protection of cultural heritage, public participation and access to information, a collaborative management process and dispute resolution procedures. The Code is, however, still pending the approval.

2.1.10 Additional Environmental Standards
There is no standard for vibration in Cambodia, therefore the vibration levels at any vibration sensitive property or location should be less than 1 millimeter/second (mm/s) peak particle velocity (PPV). The level of 1 mm/s PPV is a good “standard” derived from the United States Bureau of Mines publications for avoidance of damage and the United Kingdom Greater London Council standard for avoidance of nuisance.

There is also no specific regulation for hazardous waste management and substances in Cambodia. However, this aspect is in the Sub-Decree on Water Pollution Control Annex 1, and Sub-Decree on Solid Waste Management, which give details of classifications of what are defined as hazardous

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13 While the Sub-Decree on Waste Management has no quantitative parameters, sensible practice is expected as detailed in this ESMF. Such practices would include (i) all general waste and food waste should be removed to a government approved landfill; (ii) all demolition waste must be removed to a government-approved location; (iii) all waste oil and grease should be disposed by a registered sub-contractor; (iv) the final destination of the oily wastes should be established.
wastes and substances. Any hazardous wastes and substances must be stored correctly and only disposed in a manner approved by MOE.

2.1.11 International Conventions and Treaties on Environment

Cambodia has entered into the following international agreements on environment:

- International Conventions and Agreements Kyoto Protocol ratified – 2002
- Convention on Biological Diversity (CBD) – 1995
- Cartagena Protocol on Biosafety – 2003
- UN Convention to Combat Desertification (UNCCD) ratified – 1997
- World Heritage Convention – 1991
- ASEAN Heritage Convention (National Parks: Bokor and Virakchey) (regional) – 2003
- Measures on prevention of climate change, ozone depletion, on freshwater resource protection and on sustainable forest ASEAN – 1999
- Convention on Wetlands of International Importance (RAMSAR) – 1999
- Vienna Convention and Montreal Protocol on Substances that Deplete Ozone Layer – 2001

2.2 RGC Laws, Regulations and Standards on Social, Land and Indigenous Matters

2.2.1 Law on Protection of Cultural and National Heritage (1996)

This is the general law in Cambodia which covers all national monuments. The law widely recognizes the value of tangible and intangible cultural heritage as an asset for development and an integral part of people’s identity. This is supplemented by the “Decision on the Definition of Three Zones to Protect Temple and Surrounding Areas in all Provinces and Municipalities except Angkor Wat” (1996).

2.2.2 Labor Law

This is the overarching legal instrument that regulates and protects workers in Cambodia. The law governs relations between employers and workers. The Law considers that the rules, obligations and rights are the same for casual or permanent workers. The law prohibits discrimination in any form, including by sex, religion, social origin, or ethnicity (art 12). Employers are required to make available a copy of the Law to workers at all business locations/operations (art 15) and forced compulsory or the hiring of workers to pay off debts is prohibited (art 16). The Law defines the role and nature of labour contracts be they written or verbal, and sets out the acceptable working terms and conditions. Article 106 reaffirms equal conditions and wage for all work regardless of origin, age and sex for the same types of work. The Law establishes the limit for working hours to 8 hours per day and 48 hours per week as well as rates for working overtime and on public holidays.

The allowable minimum age for wage employment is set at 15 years (art 177). Children from 12-15 years of age can be hired to do light work (see Section 2.24) provided that (a) the work is not hazardous to their health or mental and physical development, and (b) the work will not affect their regular school attendance, their participation in guidance programmes or vocational training approved by a competent authority. The Law recognises statutory maternity leave on half wages (art 183), and for
the performance of light duties for a further two months. Employers are prohibited from laying off women during their maternity leave (art 182).

Chapter eight of the Labor Law covers the health and safety of workers and requires maintaining standards of hygiene and sanitation in working environments and requirements for individual protective instrument and work clothes, lighting and noise levels (art.229). Machinery, mechanisms, transmission apparatus, tools, equipment and machines must be installed and maintained in the best possible safety conditions. The Ministry of Labor and Vocational Training (MoLVT) shall monitor working conditions and enforce compliance notices. All enterprises and establishments covered by this Law and employing at more than fifty workers must have a permanent infirmary on the premises/workshop/ or work sites (art.242). Workplaces/ sites with more than 200 workers must have areas for hospitalising injured or sick workers before transferring to a health facility and must be able to handle two per cent of the workers at the site. The Law requires that every manager of a workplace shall have someone take all appropriate measures to prevent work related accidents (art. 248). Workplaces must provide the primary health care to their workers and the levels of this vary according to the numbers employed (with 50 and 200 workers thresholds being specifically mentioned). The Law also mandates that a general insurance system obligatory for workers shall be set up and this system shall be managed under the insurance of the National Social Security Fund (art. 256).

2.2.3 Prakas on the Prohibition of Hazardous Child Labour (MoSALVY #106, April 28, 2004)
The Prakas prohibits the employment of anyone under the age of 18 in any of the 38 scheduled hazardous works / activities listed in the Prakas. Nine of the 38 are likely related to some aspects of road construction including:
   a) Operating cranes, hoists, scaffold winches or other lifting machines;
   b) Lifting, carrying, handling and moving of heavy loads;
   c) Operating or assisting to operate transportation equipment such as bulldozers, pile driving equipment, trailers, road rollers, tractor lifting appliances, excavators, loading machines, trucks, buses, and taxis;
   d) Maintenance of heavy machinery;
   e) Work carried out at construction sites, except in designated and safe areas for a child as permitted by a labour inspector;
   f) Demolition work;
   g) Work carried out on a ladder or scaffold at a height of over 2.5 meters;
   h) Work involving exposure to harmful chemical, physical, electromagnetic or ionizing agents, including tar, asphalt or bitumen;
   i) Operating power-driven spinning and winding machine.

2.2.4 Prakas on Light Work (2008)
Outlines 15 categories of light work that children between 12-15 years are allowed to do, limited to 12 hours per week outside of school time and 35 hours during periods of school holidays. It prohibits hazardous labor as noted above.

2.2.5 Law on the Prevention of Domestic Violence and the Protection of Victims, (NS/RPM/1005/031), 2005
The objective of the law is to prevent domestic violence, protect victims, and strengthen the culture of non-violence.

2.2.6 Law On Road Traffic, PREAH REACH KRAM NS/RKAM/0115/001, 2015
This law is intended to ensure road traffic safety and order, and protection of human and animal health and lives, properties and environment. Its establishment a requirement for all motor vehicles,
trailers, and semi-trailers moving on the road to obtain a technical inspection certificate. It also outlines road safety requirements.

2.2.7 Law on the Protection and Promotion of the Rights of Persons with Disabilities 2009 (Royal Kram NS/RKM/ 0709/010))
The goal of the law is to protect and promote the rights of persons with disabilities in the country, and prevent, reduce and eliminate discrimination against persons with disabilities. The law also seeks to ensure that persons with disabilities are able to participate fully and equally in activities within society and provide equal opportunities for employment.

2.2.8 Expropriation Law (2010)
This is the main legal framework that governs land acquisition and involuntary resettlement. It lists the development of public infrastructure as one of its objectives. The expropriation of the ownership of immovable property and real right to immovable property can be exercised only if the Expropriation Committee has paid fair and just compensation in advance to the owner and/or holder of real right.

Key articles include:

a) Article 2: The law has the following purposes: (i) ensure reasonable and just deprivation of a legal right to ownership of private property; (ii) ensure payment of reasonable and just prior compensation; (iii) serve the public and national interests, and (iv) development of public physical infrastructure;

b) Article 7: Only the State may carry out an expropriation for use in the public and national interests;

c) Article 22: An amount of compensation to be paid to the owner of and/or holder of rights in the real property shall be based on the market value of the real property or the alternative value as of the date of the issuance of the Prakas on the expropriation scheme. The market value or the alternative value shall be determined by an independent commission or agent appointed by the expropriation committee;

d) Article 29: For the expropriation of a location that is operating business activities, the owner of the immovable property shall be entitled to additional fair and just compensation for the value of the property actually affected by the expropriation as of the date of the issuance of the declaration on the expropriation project. A tenant of the immovable property who is operating a business shall be entitled to compensation for the impact on their business operation and to additional assistance at fair and just compensation to the capital value actually invested for the business operation activities as of the date of the issuance of the declaration on the expropriation project.

2.2.9 Standard Operating Procedures for Externally Financed Projects in Cambodia on Land Acquisition and Involuntary Resettlement (2018), Sub-Decree No. 22 ANK/BK
The SOP reflects RGC’s laws and regulations relating to the acquisition of land and the involuntary resettlement of affected households and the safeguard policies and procedures of Development Partners (DPs). Where appropriate, the SOP includes references to international good practices in resettlement planning, implementation, monitoring and reporting. It includes details on how land acquisition must be conducted, consultation procedures, provision of entitlements and disclosure of information, among others. The SOP applies to all externally financed projects in the Kingdom of Cambodia, such as the proposed CRCIP.

2.2.10 The Land Law (2001)
The Land Law sets out the legal rights of natural persons and legal entities in land ownership. The government can acquire private land for public purposes but has to pay a fair and just compensation
in advance of the land acquisition. The law recognizes the right of indigenous communities in Cambodia to own immovable property - their land - with collective title.

Other provisions of the Land Law that may be relevant include:

a) Article 6: Legal possession as defined by the Law is the sole basis for ownership, and all transfers or changes of rights of ownership shall be carried out in accordance with the required general rules for sale, succession, exchange and gift or by court decision;

b) Article 15: State public land includes, among other categories, any property a) that has a natural origin, such as forests, courses and banks of navigable and floatable rivers or natural lakes; b) that is made available for public use such as roads, tracks, oxcart ways, pathways, gardens, public parks and reserved land, or c) that is allocated to render a public service, such as public schools, public hospitals or administrative buildings;

c) Article 26: Ownership of the lands is granted by the State to indigenous communities as collective ownership, including all the rights and protections enjoyed by private owners. The exercise of collective ownership rights are the responsibility of the traditional authorities and decision-making mechanisms of the indigenous community, according to their customs and subject to laws such as the law on environmental protection;

d) Article 28: No authority outside the community may acquire any rights to immovable properties belonging to an indigenous community;


The Policy sets out government policies related to indigenous peoples in the fields of culture, education, vocational training, health, environment, land, agriculture, water resources, infrastructure, justice, tourism, industry and mines and energy. It is an umbrella document that defines principles for formal registration of indigenous communities as legal entities with their own bylaws and enables their participation in economic development that affects their lives and cultures. The Policy calls for the conduct of impact assessments for all infrastructure projects affecting indigenous peoples.

2.2.12 Policy on Registration and Right to Use of Indigenous Communities (2009)

This policy takes as its basis the recognition in the Land Law of 2001, of the right of indigenous communities to possess and use land as their collective ownership. The policy states that the registration of indigenous communities as collective ownership is different from the registration of individual privately-owned land parcels because the land registration of the indigenous communities is the registration of all land parcels belonging to the communities as a whole, consisting of both State Public Land and State Private Land in accordance with the articles 25, 26, and 229 of the Land Law and related Sub-decrees. These land parcels are different in size and can be located within the same or different communes/sangkat. Therefore, the registration of land parcels of indigenous communities requires a separate Sub-decree supplementing existing procedure of sporadic and systematic land registration.

2.2.13 The Organic Law (2008)

Recognizes indigenous peoples’ vulnerability. Councils at provincial and district levels (capital, municipal and khan levels in urban areas) are given authority to formulate development plans (including physical plans and socio-economic development plans) that identify the needs of vulnerable groups including indigenous peoples. Certain functions are being delegated from national government (ministries) to sub-national level, such as in health, education, land management and urban planning aspects, and basic services to be delivered to local citizens.
2.2.14 Relevant International Agreements on Indigenous Peoples

Cambodia is a signatory to a number of international instruments that protect the rights of indigenous peoples, as well as the Convention on Biological Diversity (1992), which recognizes the role of indigenous people in protecting biodiversity. In 1992, the Cambodian Government ratified the International Covenant on Economic, Social and Cultural Rights. This includes the rights to practice specific culture and the rights to means of livelihoods, NGO Forum on Cambodia. Other relevant international agreements Cambodia has signed up to include:

- The UN Declaration on the Right of Indigenous People (2007)
- The International Convention on the Elimination of all Forms of Racial Discrimination
- The International Covenant on Economic, Social and Cultural Rights

2.3 Institutional Responsibilities on RGC Legislation

There are a number of different government departments responsible for the areas highlighted in the legislation above. MRD has responsibility for the construction, maintenance and rehabilitation of rural roads, while the Ministry of Public Works and Transport (MPWT) has responsibility for national and provincial roads. The Ministry of Environment is responsible for approving EIAs and monitoring compliance on environmental matters, as well as enforcing environment-related legislation such as on protected area management. Responsibility with issues relating to water is with the Ministry of Water Resources and Meteorology (MOWRAM).

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14 This includes the International Covenant on Economic, Social and Cultural Rights (ICESCR), the International Covenant on Civil and Political Rights (ICCPR), the United Nations Declaration on the Rights of Indigenous People and more generally the Universal Declaration of Human Rights.
Meanwhile the Ministry of Women’s Affairs (MOWA) is the leading agency responsible for promoting gender equality and preventing violence against women\textsuperscript{15}, but other departments may also play a role, such as the Cambodian National Council for Women (CNCW). The Ministry of Labor and Vocational Training (MLVT) is the leading ministry in charge of labor and workforce-related matters, including minimum age of workers, wages and rights of labourers. On land acquisition, the General Department of (GDR) in the Ministry of Economy and Finance (MEF), is the main agency responsible. Meanwhile a number of government departments deal with issues relating to Indigenous Peoples,

mainly the Ministry of Rural Development, the Ministry of Interior (MOI) and the Ministry of Land Management, Urban Planning and Construction (MLMUPC).

In Cambodia, national-level ministries have departments at the provincial level. For instance, MRD will have a Provincial Department of Rural Development in each of the project provinces, as will MOWA, MPWT and others. These Provincial-level departments will also have District-level counterparts. As project roads are identified, MRD will have to liaise with the relevant provincial departments and keep them well informed about the project, consultation activities, project impacts and mitigation measures, etc. There will also need to be coordination with elected government representatives, such as Commune and Village chiefs, who are an important link between the national, provincial and district-level government departments and the local communities. For instance, the commune and village level will be essential for the effective management of issues that may directly affect communities, such as those related to Gender-Based Violence (GBV) and Violence Against Children (VAG), among others. At the Commune level there may also be various important committees, such as the Commune Committee for Women and Children who are responsible for the welfare of women and children in their commune. Civil society and NGOs may also play an important role in supporting the project and the government to implement some of the mitigation measures that will be outlined in this ESMF. The project’s SEP analyses these stakeholders and outlines the best methods, and timings, to engage them (a summary is provided in Section 5 of this ESMF).

The project’s Institutional Arrangements are further described in Section 4.4 of this ESMF.

2.4 Applicable World Bank Environment and Social Standards (ESS)

At this stage of project preparation, without MRD roads being defined, the key Environmental and Social Standards (ESS) that are deemed likely relevant to Component 2 of the CRCIP (and that may require specific instruments to be prepared) are:

- ESS1 – Assessment and Management of Environmental and Social Risks and Impacts;
- ESS2 – Labor and Working Conditions;
- ESS3 – Resource Efficiency and Pollution Prevention and Management;
- ESS4 – Community Health and Safety;
- ESS5 – Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
- ESS6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- ESS7 – Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities;
- ESS8 – Cultural Heritage; and
- ESS10 – Stakeholder Engagement and Information Disclosure.

The following ESS is not relevant to Component 2 of the CRCIP:

- ESS9 – Financial Intermediaries

As a result of this assessment, at this stage of project preparation the Ministry of Rural Development is required to prepare the following instruments in accordance with the World Bank’s Environmental and Social Framework (ESF):

- Environment and Social Management Framework (and future Environment and Social Management Plans)
- Resettlement Framework (and future Resettlement Plans if necessary)
- Indigenous Peoples Planning Framework (and Indigenous Peoples Plan if necessary)
- Stakeholder Engagement Plan (SEP) – this Plan is shared with MPTW’s component
- Environmental and Social Commitment Plan (ESCP) – this Plan is shared with MPTW’s component
This ESMF is an integral part of compliance with the ESF. At this stage of project planning the World Bank has assessed the potential for environment and social risks and impacts as substantial.

2.5 Project Environment and Social Risks (referenced by WB ESS)

2.5.1 ESS1: Assessment and Management of Environmental and Social Risks and Impacts
Component 2 of the CRCIP will support rural road improvement and maintenance which may including road widening within the existing ROW, overlaying, elevating flood-prone sections, improving small bridges and drainage, among others. By widening, this project means increasing the existing carriageway on the existing two-lanes to improve safety and reduce congestion, mostly affecting road shoulders which will be paved/sealed to enable motorbikes and bicycle’s to use it instead of main carriageway. Based on that, potential adverse impacts to the environment will be derived primarily from labor influx, dust, noise, vehicle emissions, generation of various streams of wastes and other forms of pollution (e.g. accidental spills of oil) at the construction sites and project facilities such as construction camps, material plants and borrow pits, drainage blockage/flooding, traffic interruption, removal of vegetation, as well as increased traffic flow and speed during operations. There are also expected impacts related to temporary labor influx of workers in low density areas, and risk of Gender-Based Violence (GBV), Violence Against Children (VAC), and potentially child labor. These impacts are expected to be mostly temporary and manageable. This ESMF has been prepared to manage these risks.

While no physical displacement is expected, the potential social risks and impacts are likely to result from a small number of roadside vendors and fences of houses/farms encroaching the right-of-way. In some project locations indigenous peoples could be found. To manage these risks, a Resettlement Framework and Indigenous Peoples Planning Framework has been prepared.

The social benefits of improved road connectivity are increased access to schools, markets and health centres and better connectivity to family, friends and main towns. This is particularly beneficial to those who may be considered vulnerable due to disabilities, pregnant women, children, farmers and roadside vendors, among others, as it connects them with needed services, reduces travel time, brings in customers, etc. Social risks are mainly expected during civil works due to labor influx, although an ongoing and future risk is speeding and road safety. This will need to be managed carefully as road accidents are the number one source of death in the country.

MRD has prepared this ESMF to comply with World Bank requirements under ESS 1. Future ESMPs will be prepared, as necessary, once MRD road sections are defined.

2.5.2 ESS2: Labor and Working Conditions
The ESMF has included a Labor Management Procedure (see Annex 8) to address any gaps between the national Labor Law with the ESS2. The LMP should be an integral part of the bidding documents and construction contracts. In addition, the ESMF has annexes on Occupational Health and Safety (OHS) (Annex 9), Codes of Conduct (Annexes 10 and 11) and guidelines for Worker’s Camps (Annex 12).

While child labor in road projects in Cambodia is not reported to be an issue, there is potential that children could be employed in unskilled jobs and/or could be working in the supply chain (such as in factories providing raw materials for road construction). There is also a risk of Occupational Health and Safety (OHS) from operating machinery and therefore the World Bank’s General Environmental Health and Safety (EHS) Guidelines on Occupational Health and Safety apply (see Annex 8 and 9).
Potential project workers in Component 2 of the CRCIP include MRD staff and their consultants working directly for MRD (direct workers), employees of civil works contractor and subcontractors (contracted workers), primary supply workers (i.e. providers of construction materials) and hired community workers (especially for the rehabilitation and maintenance of rural roads).

The Labor Management Procedure (Annex 8), describes a minimum age requirement of 18 years for all project workers. Section 3, Table 7, of this ESMF also describes procedures and relevant provisions that contractors need to prepare, implement and monitor on all construction sites for ensuring basic safety around work sites, use of personal protective equipment, training and awareness education for workers and grievance redress. This will be updated in the ESMP.

2.5.3 ESS3: Resource Efficiency and Pollution Prevention and Management

Water will be consumed for suppressing dust at the construction sites, in the process of producing/batching of construction materials at the material plants and for washing the construction machinery and domestic needs at the campsites. Section 3, Table 7, of the ESMF describes suggested mitigation measures, such as requirements for the Contractors to obtain permits indicating water sources and permissible volumes and to ensure local water users are not adversely impacted. As the project activities only involve improvements/maintenance of existing roads, it will neither consume large amount of energy and raw materials, nor use or procure pesticides. Section 3, Table 7, identifies mitigation measures for efficient use of water and energy resources and measures to prevent use of resources from unlicensed sources.

Typical pollutions generated from road improvement activities include: (i) dust and other forms of air pollution from construction site, transportation and auxiliary facilities; (ii) noise and vibration; (iii) solid waste (domestic waste and construction waste including used oil and lubricant); and (iv) wastewater from workers camps. These impacts are temporary, site-specific and can be managed through a set of mitigation measures highlighted in Section 3, Table 7, of this ESMF – which will be later updated in the ESMPs. The respective site-specific ESMPs will elaborate on the measures for waste water and solid waste management, including procedures and arrangements for the collection, sorting, removal, transportation and disposal of wastes. Where feasible, the ESMPs will envisage re-use and/or re-cycling of certain types of wastes. These procedures will be closely monitored by MRD during project implementation.

It is important to note that the project is expected to improve air quality, in particular dust. At present, the poor state of the roads means that there is a lot of dust along the roads, often causing problems for communities living along the road corridor. Once roads are sealed, the amount of dust generated by road traffic is expected to decrease drastically.

2.5.4 ESS4: Community Health and Safety

Community health and safety issues are expected to include road safety and pedestrian safety, potential Gender-Based Violence (GBV) and Violence Against Children (VAC) as a result of labor influx, higher incidence of HIV/AIDS due to a market for sex workers to service construction workers, labor rights and child labor. This ESMF, in Section 3, Table 7, identifies risks and mitigation measures. In addition, specific provisions to prevent GBV and VAC, as well as to protect the health and safety of workers, is included in the Labor Management Procedures (Annex 8), OHS Guidelines (Annex 9) and Manager’s and Individual’s Code of Conducts (Annexes 10 and 11).

As noted above, there are also pollution risks, in particular water and air quality, though the latter is expected to improve in the long-term, as a result of the project.
It is likely that temporary workers’ camps will have to be installed, in particular in road sections that are far from main towns. A criteria for selection of camp site will be established in the respective ESMPs and guidance on the setting up of worker’s camps is provided in Annex 12. This would focus on some key aspects such as a sufficient distance from water resources, schools, pagoda and/or physical cultural resources, land leasing/purchasing agreement/records, and from the biodiversity conservation zones, etc. Section 3, Table 7, of this ESMF includes an assessment on project induced labor influx and Gender-Based Violence (GBV), with clear procedures and institutional responsibilities to help minimize community conflicts, misunderstandings, and exposure to communicable diseases (also see Annexes 8-11). Among others, there are provisions to promote local recruitment of workers, especially low-skilled, plus mitigation measures such as a worker code of conduct (including provisions for both worker-community and worker-worker interactions). Additional measures to mitigate against GBV risks include: conducting trainings on GBV with workers and also community members (in particular women), HIV/AIDS awareness program, and strengthening the grievance mechanism to ensure people feel safe reporting any incidents and appropriate measures are taken.

While the project may exacerbate road safety risks – as an improved road often leads to higher speeds – the project uses a comprehensive approach to improve road safety. On the physical side, the technical design of roads will incorporate recommendations of the road safety audit and public feedback provided by residents during consultations. Traffic safety aspects will be embedded in the performance criteria and service levels under the OPBRC. Road safety will be improved by widening and sealing shoulders, where land is available, through better marking and signage, introducing traffic calming measures at critical locations. Physical features also include enhanced measures to safeguard pedestrians’ safety, including for women and children from local communities who use roads to travel to and from schools, markets, and hospitals. To complement the physical measures, the project will also support implementation of social measures focusing on communication and awareness raising on road safety during project implementation.

Future ESMPs will include road traffic plans once MRD identifies road sections and road design is available. Local consultations should discuss accessibility and safety needs of socially vulnerable groups (women, elderly, people living with disabilities, children) and reflect this in engineering design solutions when possible.

Section 3, Table 7, of this ESMF also briefly describes potential exposure to natural hazards, in particular flooding.

2.5.5 ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Even if most of the Right-of-Ways (ROWs) for the financed roads is expected to be public land, there may be a limited number of assets that are too close to the road shoulder, in particular driveways, market stalls, fences and/or fruit trees that may need to be cut or shifted back. MRD has consulted on and prepared for Component 2 a Resettlement Framework (RF) which details procedures for avoiding, minimizing or mitigating land acquisition, as well as procedures for the compensation at full replacement costs to the affected persons and, when applicable and desirable, Voluntary Donations in line with footnote 10, para 4 of ESS5. Once MRD project sections are identified and the Corridor

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16 Footnote 10, para 4 of ESS5 states that: In some circumstances, it may be proposed that part or all of the land to be used by the project is donated on a voluntary basis without payment of full compensation. Subject to prior Bank approval, this may be acceptable providing the Borrower demonstrates that: (a) the potential donor or donors have been appropriately informed and consulted about the project and the choices available to them; (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor’s remaining land area below that required to maintain the donor’s livelihood at current levels; (d) no household relocation is involved; (e) the donor is expected to benefit directly from the project; and (f) for community or collective land, donation can only occur with the consent of individuals using or occupying the land. The Borrower will maintain a transparent record of all consultations and agreements reached.
of Impact (COI) is defined, Resettlement Plans following ESS5 requirement will be prepared if required and/or Voluntary Donations will be thoroughly documented following guidelines in the RF.

2.5.6 ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
It is anticipated that impacts on biodiversity and habitats are limited to the construction sites since the project activities will only involve improvements and minor widening of existing roads. Any activities that may adversely affect critical habitats such as protected areas and wildlife reserves will not be allowed. Section 4 of this ESMF provides practical guidance for rural road screening against ineligibility criteria (also see Annex 2), impacts screening check list (see Annex 3), and identification and preparation of an environmental and social management tool once rural roads are identified. Such mechanisms should ensure that those rural roads whose rehabilitation may cause significant adverse impacts on biodiversity and natural resources, will be screened out. Section 3, Table 7, also includes guidance to ensure that (i) cutting of trees and vegetation is limited to a minimum and justified by technical requirements; (ii) relevant national legislation is followed, and (iii) replanting is undertaken where feasible.

2.5.7 ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
As mentioned, the Government’s 2018 Commune Database notes a number of IP minority groups in Kratie province, in particularly Kuoy, Phnong, Mil, Kruol, Thmor, Khaonh, Kroal and Stieng groups, primarily in Chetr Borei and Sambour Districts, as well as Snouk District. The Commune Database does not list any IP groups in Kampong Cham province, but it does list Stieng households in Memot District, Tboung Khmum province. In general terms, this project is not expected to result in adverse impacts on Indigenous Peoples, but there is a need to ensure that groups are not excluded, and there is equity in the benefits.

An Indigenous Peoples Planning Framework (IPPF) has been prepared, consulted and disclosed (in March 2020) consistent with ESS7, to screen the presence of indigenous communities with collective attachment to the project area following the four criteria included in WB’s ESS7, as well as procedures to conduct a Social Assessment and Indigenous Peoples Plans (IPPs) if needed. In addition, both the project’s IPPF and SEP include provisions to ensure meaningful and culturally appropriate consultations with IPs.

2.5.8 ESS8: Cultural Heritage
Compared to other parts of Cambodia, the presence of tangible and intangible cultural heritage assets in the three project provinces is low. However, close to roads, there may be temples, mosques, stupas and graves. While these are likely to not be impacted by road works, certain considerations may need to be taken in consultations with local stakeholders, including local authority, the Ministry of Culture and Fine Arts (MoCFA) if relevant and, if relevant, religious leaders and/or indigenous village chiefs. These mitigation measures, are described in Section 3, Table 7, and a Chance Find Procedure is annexed (Annex 4).

2.5.9 ESS9: Financial Intermediaries
At this stage no financial intermediaries are expected to be involved in the project.

2.5.10 ESS10: Stakeholder Engagement and Information Disclosure
Stakeholder engagement is important to ensure that project communities, as well as other project stakeholders, are informed and involved in all the stages of project preparation and implementation. MRD, together with MPWT, has prepared a Stakeholder Engagement Plan (SEP). The SEP will be
implemented and updated by MRD throughout the different phases of the project life cycle. The project’s SEP includes a Project Grievance Mechanism. The SEP was disclosed by MRD during national-level consultations on March 5, 2020. The consultation’s report/minutes are included in Annex 3 of the SEP.

2.6 Gap Analysis: WB ESF and RGC Legislation
While Cambodia has a relatively strong regulatory and planning framework on environment, several opportunities remain to further strengthen its legal instruments and the Government’s capacity to enforce and implement the identification and mitigation of environmental impacts. There are also existing legal frameworks in Cambodia to cover the rights of workers, deal with occupational and safety hazards, as well as traffic laws and measures that seek to protect women against violence. However, some of these regulations are sometimes weakly enforced and may need enhanced monitoring. On land acquisition, the WB’s ESS5 and the RGC’s SOP both cover objectives and principles of land acquisition and involuntary resettlement, and the principles of both are largely similar. While there is consistency between the national system and donor agencies’ standards on indigenous peoples, there are no sufficiently detailed regulations or operating procedures to facilitate full implementation of Indigenous Peoples Plans in Cambodia. These gaps are further analysed in Table 5 below.

Table 5: Summary of Main Gaps Between RGC’s SOP and WB’s ESS5

<table>
<thead>
<tr>
<th>Items with Difference</th>
<th>RGC</th>
<th>WB’s ESF</th>
<th>Measures to Address Differences</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Assessment of project impacts</strong></td>
<td>RGC legislation focuses on project impacts from an environmental point of view and does not consider social, gender and labor impacts, among others, as well as cumulative and transboundary impacts. Also does not consider the specific needs of vulnerable people (the poor, elderly, women-headed households, people living with a disability, etc.)</td>
<td>ESS1 is comprehensive and considers the full scope of project impacts from an environmental and social perspective, integrating all these aspects. In addition, the ESF has particular standards that deal with labor, gender and community health and safety, among others, as well as ensuring disadvantaged and vulnerable people/groups are not disproportionately affected by projects’ adverse impacts or disadvantaged in sharing development benefits.</td>
<td>This ESMF covers both direct, indirect and cumulative environment and social risks/impacts and proportionate mitigation measures, taking a holistic approach to the project and looking at impacts in an integrated way, including considering the needs of disadvantaged and vulnerable persons or groups. Future ESMPs will also detail how to conduct detailed impact and risk assessment and the definition of proportionate mitigation of measures.</td>
</tr>
<tr>
<td><strong>Mitigation hierarchy</strong></td>
<td>There is no mitigation hierarchy in RGC legislation.</td>
<td>WB ESF, in particular ESS1 (but also ESS 5, 6 and 7), discusses the need to have a mitigation hierarchy when planning projects, in order to avoid, minimize or, if not possible, mitigate project impacts. Having a mitigation hierarchy allows project planners to plan their projects with potential for environment and social impacts in mind.</td>
<td>This ESMF discusses a mitigation hierarchy to be followed by project planners when choosing road sections for rehabilitation and conducting detailed engineering designs.</td>
</tr>
<tr>
<td><strong>Minimum working age</strong></td>
<td>Minimum working age in Cambodia is 15, though according to the legislation children between 12-15 years can perform light work that does not conflict with schooling. No hazardous work is permitted for children under 18. However, stricter enforcement is needed.</td>
<td>ESS 2 para 19, and footnote 13, notes that a child under the age of 18 may be employed or engaged in connection with the project if there is no hazardous work, an appropriate risk assessment is conducted prior to the work commencing, and the Borrower conducts regular monitoring of health, working conditions, hours of work.</td>
<td>This ESMF will propose a minimum working age of 18 years due to the potential for hazardous work related to road rehabilitation. The ESMF will provide monitoring guidelines and requirements of the Borrower and contractors (see LMP in Annex 8).</td>
</tr>
<tr>
<td><strong>Traffic safety</strong></td>
<td>No regulations in infrastructure projects to consider traffic safety.</td>
<td>Ensuring the safety of the community, including relating to traffic accidents, is under the provisions in ESS4.</td>
<td>The ESMF will suggest measures to ensure pedestrian safety during construction and over the life of the road, including undertaking road safety trainings and public awareness activities.</td>
</tr>
<tr>
<td><strong>Voluntary Donations</strong></td>
<td>RGC’s SOP deals with land acquisition and involuntary resettlement and therefore does not provide guidance on voluntary donations.</td>
<td>According to footnote 10 of ESS5, voluntary land donations are acceptable if: (a) the potential donor or donors have been appropriately informed and consulted about the project and the choices available to them; (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor’s remaining land area below that required to maintain the donor’s livelihood at current levels; (d) no household relocation is involved; (e) the donor is expected to benefit directly from the project; and (f) for community or collective land, donation can only occur with the consent of individuals using or occupying the land.</td>
<td>The RF developed provides guidance on when voluntary donations would be appropriate as per WB ESS5, and the process of carrying out the donations, including documentation which will need to be followed by MRD.</td>
</tr>
<tr>
<td><strong>Procedures for implementing Indigenous Peoples Plan</strong></td>
<td>No detailed regulations on how to avoid impacts to Indigenous Peoples or how to include them in project benefits.</td>
<td>Among others, WB ESS7 seeks to ensure that projects respect the rights and culture of IPs, adopt a mitigation hierarchy to impacts, ensure benefits to IPs and conduct meaningful consultation and FPIC when necessary and/or desirable.</td>
<td>An IPPF has been prepared on the basis of WB ESS7 and considering relevant Cambodian policies and regulations. The IPPF details clear procedures for preparing IPPs and meaningful/culturally appropriate consultations if necessary.</td>
</tr>
<tr>
<td><strong>Protecting intangible</strong></td>
<td>No provisions in the legislation to protect</td>
<td>WB ESS8 also covers intangible cultural heritage, which includes practices, representations, expressions, knowledge,</td>
<td>This ESMF details the need to develop Heritage Management</td>
</tr>
</tbody>
</table>
culturalheritage | intangible cultural heritage | skills—as well as the instruments, objects, artefacts and cultural spaces, that communities associate as part of their cultural heritage. | Plans and annexes a Chance Find Procedure (Annex 4) in case of impacts on heritage, whether tangible or intangible.

Stakeholder Engagement | While there are provisions for stakeholder engagement in various legislation (including EIA and SOP), there are gaps in maintaining stakeholder relations during the length of the project cycle, ensuring appropriate disclosure of information, meaningful consultations and means to grievance redress. | WB ESS 10 stresses the importance of stakeholder engagement at all stages of the project cycle. Stakeholders must be meaningfully consulted and engaged, have opportunities to provide inputs to projects and be informed how their concerns were considered, have avenues to voice their grievances and seek resolution, and receive information disclosed in an appropriate manner, place and language. | A Stakeholder Engagement Plan (SEP) has been developed following the guidelines of ESS10.

<table>
<thead>
<tr>
<th>Items for Strengthening</th>
<th>RGC Legislation</th>
<th>WB’s ESF</th>
<th>Clarifications</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gender, Gender-Based Violence (GBV), Violence to Children (VAC) and HIV/AIDs</td>
<td>There are regulations in Cambodia that protect the rights of women, violence against women and children, and the information dissemination on HIV/AIDS. However, this is not directly required in road projects.</td>
<td>ESS2, for workers, and ESS4 for the wider community, protect the rights of all community members, but in particular women and children and the vulnerable, from violence and other forms of abuse, as well as the risks of sexually transmitted diseases. Due to an influx of labor, these issues are particularly relevant in road projects.</td>
<td>This ESMF provides guidelines on how to address the identification and mitigation measures associated with these issues. Specific guidelines will be provided in terms of Labor Management Procedures and Staff Code of Conduct (see Annexes 8-11).</td>
</tr>
<tr>
<td>Forced labor</td>
<td>Regulations against forced labor exist in Cambodia. However, there are claims that this is not strictly enforced, and there are particular “hotspot” areas such as brick kilns.</td>
<td>WB ESS2 strictly prohibits any form of forced labor. ESS2 and ESS4 requirements are embedded in the Standard Bidding Document (SBD) of the Bank, requiring contractors to comply with.</td>
<td>The ESMF provides provisions to monitor compliance by contractors and of their primary suppliers in bidding documents and supervision contracts (see Annex 8).</td>
</tr>
<tr>
<td>Livelihood restoration and assistance as a result of land acquisition</td>
<td>The RGC SOP details specific measures to restore livelihoods which are land-based, employment-based and business-based.</td>
<td>Provision of livelihood restoration and assistance to achieve WB ESS5 objectives.</td>
<td>Based on SOP, an Income Restoration Program will be provided in order to re-establish sources of livelihoods for those APs who have permanently lost their sources of livelihood. If applicable in CRCIP, DRPs will include provisions to ensure livelihood</td>
</tr>
</tbody>
</table>

Table 6: Additional Areas for Strengthening
<table>
<thead>
<tr>
<th><strong>Restoration Programs</strong></th>
<th>Restoration programs are robust and can accurately meet the livelihood restoration objectives in line with WB ESS5.</th>
</tr>
</thead>
</table>
| **Grievance Redress Mechanism** | There is not GRM described in the environment legislation or as a requirement in the labor legislation.  
On land acquisition, Appendix 8 of the SOP provides the structure and details on the operating guidelines and procedures of an effective functioning Grievance Redress Mechanism. It provides a 3-step process including, the registration and recording of complaints and the judicial process if the complaints remain unresolved at the administrative level. The detailed procedures for at each step are also provided in the SOP.  
No provisions for grievance redress are specified in terms of IPs or environmental impacts.  
ESS10 requires a Grievance Mechanism in place for all project as part of the SEP, including covering areas such as environmental impacts, worker’s grievances, grievances of IPs and grievances on land acquisition.  
A SEP has been developed which details a GRM for the project covering all project aspects, including concerns about environmental and social impacts. This is included in Section 6 of this ESMF. A specific GRM for land acquisition is detailed in the RF and a specific GRM for IPs is detailed in the IPPF. The LMP (Annex 8) in this ESMF also describes a specific GRM for workers that contractors must have in place.  
All GRMS must be accessible to all APs, in particular vulnerable APs and women. |
| **Consultations and Stakeholder Engagement** | There are some provisions for consultations on environmental impacts as part of the EIA regulations.  
On land acquisition, the SOP details steps to carry out consultations at various stages of the land acquisition process and compensation. SOP also discusses disclosure of project documents.  
ESS1 requires that stakeholder engagement with affected and interested stakeholders will be throughout the project cycle in line with the project’s Stakeholder Engagement Plan (SEP), including ongoing consultations and document disclosure. This applies to all aspects of the project including environment, social impacts, land acquisition and indigenous peoples, among others.  
This ESMF discusses the requirements of the SEP in terms of consultations and disclosure. A SEP consistent with ESS 10 has been prepared for the CRCIP. |
3 POTENTIAL E&S RISKS AND IMPACTS, AND MITIGATION MEASURES

At this stage of project preparation, since specific road sections have not been identified, it is not possible to accurately detail the extent of environment and social impacts that Component 2 of the CRCIP may have. Nevertheless, based on similar projects in the country, the general environment and social context of the three provinces, the analysis of secondary data, field visits, random interviews with stakeholders, plus the results of the consultation workshop carried out for the preparation of this project, it is possible to make some assumptions which will need to be updated once road sections are defined. Based on the World Bank’s ESS1, Component 2 of the CRCIP will follow a mitigation hierarchy to:

- e) Anticipate and avoid risks and impacts;
- f) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels;
- g) Once risks and impacts have been minimized or reduced, mitigate; and
- h) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.

The MRD has identified over seventy road sections representing more than 1600 kilometres across the three provinces that need periodic maintenance and climate resilience improvements – of these 200-250km will be selected to be financed under Component 2 of the CRCIP. This project will potentially bring significant benefits to the communities: reduce the travel time to reach schools, health, and other public service centers, expand access to markets and work opportunities, enhance connectivity during rainy season, improve road safety and improve air quality due to dust dispersion from unpaved road surfaces.

3.1 Impacts and Mitigation

Given that the project is focused on rehabilitating existing roads, no major environmental and social impacts are expected. However, some – mostly manageable and temporary – direct impacts associated with road rehabilitation are expected, mostly during construction, though some may be relevant during the maintenance phase, and life, of the project, in particular road safety.

At this stage, the types of potential adverse impacts and possible mitigation measures are suggested, but they will need to be updated with site-specific information once project roads are identified and the extent of impacts, and their timing, is known. The impacts described below are expected to occur during the implementation of the above activities. The intensity of the impacts will depend on the duration of the project activities, location, quantities and types of materials used, the type of activities that will be performed and the engaged staff and construction equipment and vehicles.

Therefore, Table 7 should be used as a guide to prepare site-specific Environment and Social Management Plans (see Section 4). Screening (see Annex 3) of the type of temporary and permanent risks/impacts listed in Table 7 will need to be conducted once road sections are known to see which apply, and to appropriately assess the extent of impacts and determine the most appropriate mitigation measures (the suggested ones, or additional ones). This process is discussed in Section 4 of this report.
<table>
<thead>
<tr>
<th>Type of Potential Impact</th>
<th>Description of Potential Impact</th>
<th>Potential Mitigation Measure</th>
<th>Reference to WB ESS</th>
<th>Responsibility / Estimated Project Stage</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Environment</strong></td>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>
| Sediment and Erosion    | During roadworks, there could be possible erosion and run-off to water bodies during earthworks. This would be particularly relevant near river banks and/or other water bodies. | • On hill slopes and other potentially erodible places along the roadside, appropriate native vegetation that retards erosion should be planted.  
• As much as possible, construction activities in hilly areas should be undertaken during the dry season only.  
• Road embankments and slopes should be monitored during construction for signs of erosion, vegetative cover should be provided on slopes by planting native grass and creepers on erosion prone sections.  
• Long-term material stockpiles should be covered with native species of grass or other suitable materials to prevent wind erosion.  
• Appropriate erosion control and stabilizing measures should be used such as benching, geotextiles, mats, fiber rolls, soil binders, etc. that are not toxic to the environment, or vegetation measures/temporary landscaping in disturbed areas and on graded slopes. | ESS 1 | Contractor / During Construction |
| **Air Quality**         | Impacts would likely be temporary due to dust during construction from earthworks, stockpiling, extraction, transport of materials and gaseous emissions from construction trucks and other vehicles. A positive benefit will be that, in the long run, road rehabilitation will improve air quality by upgrading the road and reducing the amount of dust that is generated by road users, which has been a | • Construction equipment maintained to a good standard. Immediate repairs of any malfunctioning construction vehicles and equipment.  
• Equipment and vehicles not in use should be switched off.  
• Machinery and vehicles causing excessive pollution (e.g., visible smoke) will be banned from construction sites.  
• All construction equipment and vehicles shall have valid certifications indicating compliance to vehicle emission standards.  
• Siting of bitumen plants, concrete mixing plants, crushing plants, quarries and other facilities that cause high dust and/or gaseous emissions should be at least 500 m from settlements and other sensitive receptors (schools, hospitals, etc.).  
• Necessary environmental clearance/approval shall be obtained prior to establishment and operation of asphalt mixing plants, crushing plants and other facilities. Contractors are encouraged to use existing areas and facilities for such purposes whenever possible. | ESS 1, 3 and 4 | Contractor / During Construction and Maintenance |
| **Key Complaint of Local Communities** | • On rainless day undertake watering, at least twice per day (adjust according to conditions) on dusty and exposed areas at construction yards, materials stockpile, construction sites, access roads, quarry areas, borrow sites and other project areas where residential sites and other sensitive receptors are located nearby.  
• Tightly cover trucks transporting construction materials (sand, soil, cement, gravel, etc.) to avoid spills and dust emission.  
• Impose speed limits on construction vehicles to minimize dust emission along areas where sensitive receptors are located (houses, schools, hospitals, temples, etc.).  
• Position any stationary emission sources (e.g., portable diesel generators, compressors, etc.) as far as is practical from sensitive receptors.  
• Burning of wastes generated at the construction sites, work camps and other project-related activities shall be strictly prohibited.  
• Provide temporary covers (e.g., tarpaulins, grass, etc.) on long term materials and spoils stockpiles.  
• Clean road surfaces of debris/spills from construction equipment and vehicles.  
• Install temporary fencing or barriers around particularly dusty activities in vicinity of sensitive receivers.  
• Locations for stockpiling spoils, fill and other materials with high dust content shall be at least 500 m from the nearest residential areas and other sensitive receivers. |
| **Noise and Vibration** | • Elevated noise and vibration levels are likely to be experienced during construction phase due to site works and operation of various equipment and vehicles.  
• No noisy construction-related activities will be carried out from 21:00 hours to 06:00 hours along residential areas, hospitals, schools and other sensitive receptors.  
• Noisy construction activities will be avoided during religious or cultural events in close proximity to the roadside such as Friday prayers attended by Muslim Cham (if relevant), when ethnic Khmer are attending temple festivals or holding weddings, or similar applicable to IP if relevant, etc.  
• All construction equipment and vehicles shall be well maintained, regularly inspected for noise emissions, and shall be fitted with effective muffler and other appropriate noise suppression equipment consistent with applicable national and local regulations.  
• Use only vehicles and equipment that are registered and have necessary permits. |

| **ESS** | 1, 3 and 4 | **Contractor / During Construction and Maintenance** |
Truck drivers and equipment operators shall avoid, as much as possible, the use of horns in densely populated areas and where there are other sensitive receptors found such as schools, temples, hospital, etc.

- Impose speed limits on construction vehicles to minimize noise emission along areas where sensitive receptors are located (houses, schools, temples, hospitals, etc).
- Provide temporary noise barriers (3–5 meter high barrier can reduce 5–10 dB(A)), as necessary, if site works will generate high noise levels that could disturb nearby households, hospital, school and other sensitive receptors.
- Avoid noisy construction activities in vicinity of sensitive receivers during night time or other sensitive periods (e.g. during school hours in vicinity of schools).
- Restrict use of vibrating rollers and operation of heavy equipment near sensitive structures.

| Waste Management | Various construction activities and operation of workers camps will generate solid wastes. Poor waste management could cause odor and vermin problems, pollution and flow obstruction of nearby watercourses and could negatively impact the landscape. | • Segregate and regularly collect wastes at worker camps and offices.
• Construction/workers’ camps shall be provided with garbage bins with covers.
• Prohibit disposal of solid wastes into canals, rivers, other watercourses, agricultural fields and public areas.
• There will be no site-specific landfills established by the contractors. All solid waste will be regularly collected and removed from the work camps and disposed to areas approved by local authorities.
• Contractor to reuse materials whenever feasible to reduce waste.
• Prohibit burning of construction and domestic wastes.
• Recyclables shall be recovered and sold to recyclers.
• Residual and hazardous wastes shall be disposed of in disposal sites approved by local authorities.
• Ensure that wastes are not haphazardly dumped within the project site and adjacent areas.
• Workers camp location and facilities shall be located at least 500 m from settlements and agreed with local communities and local officials.
• Drainage shall be provided to facilitate the rapid removal of surface water from all areas and prevent flooding and accumulation of stagnant water. | ESS 1, 3 and 4 | Contractor / During Construction |
- Wastewater effluents from contractors’ workshops and equipment washing-yards will be passed through gravel/sand beds and all oil/grease contaminants will be removed before wastewater is discharged. Oil and grease residues shall be stored in tightly covered drums. Such wastes shall be disposed consistent with national and local regulations.
- Construction/workers camps shall be cleaned up after use to the satisfaction of MRD and local community. All waste materials shall be removed and disposed to disposal sites approved by local authorities.
- Land used for campsites shall be restored to the original condition as far as practicable and the area shall be planted with appropriate trees/shrubs as soon as practicable after it is vacated and cleaned.

| Water Quality | Contractor campsites, bridge works, stockpiling of construction materials and spoils, use of hazardous materials and earthworks if not properly managed are likely to cause deterioration of surface water quality, flooding and flow obstruction of watercourses. | Camp wastewater shall be fully treated first before discharged to adjacent or nearby waterbodies. Firmly consolidate river banks using stones, concrete and other suitable retaining measures at each bridge construction site and ensure that water courses are kept free of excavation spoil and construction debris, floating and submerged. Spoils, construction wastes and construction materials stockpile area shall be located away from water bodies and under no circumstances will these materials be dumped into watercourses. Do not fill up canals and creeks at the construction site. In case filling of local drainage system is necessary, consultation with local authorities shall be undertaken and their permission obtained beforehand. An alternative drainage shall be established before the existing canal is filled-up. Prohibit placement of construction materials, waste storage areas or equipment in or near drainage channels and water courses. Discharge of oily wastewater, fuel, hazardous substances and wastes, and untreated sewage to watercourses/canals and on the ground/soil shall be prohibited. Provide adequate drainage at the construction sites and other project areas to avoid flooding of surrounding areas and minimize flow obstruction of existing watercourses. Regularly inspect and maintain all drainage channels to keep these free of obstructions. | ESS 1, 3 and 4 | Contractor/ During Construction |
- Slope stabilization measures (e.g., planting of fast growing native species of grass and shrubs, etc.) shall be implemented on exposed surfaces along river embankments to reduce material wash-away.
- Construct retaining structures such as gabion baskets, rip-rap, etc. for riverbank protection.
- Obtain required permits indicating water sources and permissible volumes
- Through engagement with local communities, ensure that local water users are not adversely impacted.

<table>
<thead>
<tr>
<th>Quarry and Borrow Sites</th>
<th>Sites may be needed to extract gravel and other road materials, which may cause erosion, pollution and issues with air and water quality.</th>
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<tbody>
<tr>
<td></td>
<td>Sourcing of quarry and borrow materials from existing licensed sites shall be preferred over establishment of new sites, as much as possible.</td>
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<td>Quarries and borrow pits shall not be established in national, provincial, district and village conservation forests and other ecologically sensitive and protected areas.</td>
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<td></td>
<td>Borrow/quarry sites shall not be located in productive land.</td>
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<td></td>
<td>In case the Project will involve new quarry/borrow sites/spoil disposal sites, environmental assessment and approvals will be needed. Such sites shall be located over 500 m away from residential, school, hospital and other sensitive receptors.</td>
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<td></td>
<td>Prior to extraction, topsoil (about 15 cm) shall be stockpiled, preserved and then refilled after completion of quarry/borrow pit operation for rehabilitation purposes after excavation is over.</td>
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<td></td>
<td>Dust control during excavation and transport (i.e. water spraying on access roads and provision of truck cover) shall be undertaken in areas where there are sensitive receptors such as residential areas, school, hospital, etc.</td>
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<td>Long-term material stockpiles shall be covered to prevent wind erosion.</td>
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<td></td>
<td>During quarry and borrow site operation, provide adequate drainage to avoid accumulation of stagnant water.</td>
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<td>The use of river bed sources shall be avoided, as much as possible. However, if this is unavoidable, the contractor shall minimize use and avoid small rivers and streams. Alluvial terraces or alluvial deposits which lie on the river beds but not covered by water in normal hydrological conditions shall be preferred. Extraction of these materials if necessary, shall have prior approval from MRD, MOE and provincial authorities.</td>
</tr>
</tbody>
</table>

| ESS 1, 3 and 4 | Contractor / During Construction |
• Confine quarrying of river bed materials to less than 20% of river width in any location and keep away from river banks. Extraction of materials shall have prior approval from MRD, MOE and relevant provincial authorities.

• Protect and reinstate river banks if unexpected erosion occurs.

• Quarry and borrow sites must be selected amongst those offering the highest ratio between extractive capacity (both in terms of quality and quantity) and loss of natural state.

• Quarry and borrow sites lying close to the alignment, with a high level of accessibility and with a low hill gradient, are preferred.

• Upon completion of extraction activities, re-contour borrow/quarry pit wall or fill-up when there are available and suitable materials such as excavation spoils, replace topsoil, and re-vegetate with native species such as grasses and fast-growing shrubs and trees.

• Upon completion of extraction activities, borrow pits shall be dewatered and fences shall be installed, as appropriate, to minimize health and safety risks.

• In quarries located in mountainous or hilly areas, or wherever slopes are important, terraces shall be cut after extraction, and drainage system and vegetation cover shall be provided for rehabilitation to enhance slope stability.

• Implement compensatory planting (at least one to one ratio) if trees will have to be removed at quarry and borrow sites.

• Borrow pits will be left in a tidy state with stable side slopes and proper drainage in order to minimize soil erosion, siltation of nearby bodies of water and to avoid creation of water bodies favorable for mosquito breeding.

• To avoid or prevent people from drowning when pits become water-filled, measures such as fencing, providing flotation devices such as a buoy tied to a rope, etc. shall be implemented.

• It is possible that villagers may request borrow pits to be left excavated so that they may be used as water reservoirs or fishponds. If this were to be agreed between the contractors and the villagers, all the full safety measures detailed above must be observed. Such agreements would be formalized in writing between the
<table>
<thead>
<tr>
<th>Disposal of Hazardous Materials</th>
<th>Pollution and safety risks due to use of hazardous materials and disposal of hazardous wastes</th>
<th>ESS 1, 3 and 4</th>
<th>Contractor / During Construction</th>
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<tbody>
<tr>
<td></td>
<td>• Store fuel and hazardous substances and wastes on bunded paved area with roof and interceptor traps so that accidental spills do not contaminate the environment. If spills or leaks do occur, undertake immediate clean up.</td>
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<td></td>
<td>• Train relevant construction personnel in handling of fuels and other hazardous substances as well as spill control and clean-up procedures.</td>
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<td>• Ensure availability of spill clean-up materials (i.e. absorbent pads, etc.) specifically designed for petroleum products and other hazardous substances where such materials are being stored.</td>
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<td></td>
<td>• Segregate hazardous wastes (oily wastes, used batteries, fuel drums) and ensure that storage, transport and disposal shall not cause pollution and shall be undertaken consistent with national and local regulations.</td>
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<td></td>
<td>• Store waste oil, lubricant and other hazardous materials and wastes in tightly sealed containers to avoid contamination of soil and water resources.</td>
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<td></td>
<td>• Ensure all storage containers of hazardous substances and wastes are in good condition with proper labelling.</td>
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<td></td>
<td>• Regularly check containers for leakage and undertake necessary repair or replacement.</td>
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<td></td>
<td>• Store hazardous materials above flood level.</td>
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<td></td>
<td>• Storage areas for fuel, oil, lubricant, bitumen and other hazardous substance will be located at least 100 m away from any watercourses.</td>
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<td></td>
<td>• Storage, transport and disposal of hazardous wastes, including spill wastes, shall be consistent with national and local regulations.</td>
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<td>• Wherever possible, refuelling will be carried out at a fuel storage area.</td>
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<td>• Refuelling shall not be permitted within or adjacent to watercourses.</td>
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<td>• Where significant amount of oily wastewater or spill/leakage of oil and grease may occur (i.e. equipment maintenance areas), drainage leading to an oil-water separator shall be provided for treatment of wastewater. The oil-water separator shall be regularly skimmed of oil and maintained to ensure efficiency.</td>
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<td></td>
<td>• Vehicle maintenance and refuelling will be confined to designated areas in</td>
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</table>
| **Materials Management** | Poorly planned and unsupervised dumping of spoils can affect biodiversity and also block watercourses, cause stagnant water, impact the water quality of rivers and streams, block access to people’s homes and businesses, and damage people’s property | • Collection of waste, especially oil, not dumped into canal or any water body around construction site  
• Excavated soil shall be transported away and not dumped in the rice field, river, or any other areas around communities or construction site  
• Compensation in case of adverse impacts to land/rice field | ESS 1, 3 and 6 | Contractor / During Construction |
| --- | --- | --- | --- | --- |
| **Climate Change** | Roads are particularly at risk of floods and unpredictable rain patterns and flooding levels may affect road surfaces, cause erosion, etc. | • During Detailed Engineering Design, climate resilient measures must be taken into consideration to ensure roads can withstand potential climate change impacts, in particular flooding.  
• Contractor to construct as per design.  
• Periodic monitoring and maintenance of roads is of utmost importance, to ensure any problems are fixed promptly and not allowed to worsen with time. | ESS 1 | Detailed Design Consultants and MRD SEO (on monitoring and maintenance), Contractors (on construction) / During Design Stage, Construction and Maintenance |
| UXOs | Clearance of road sections, extraction sites and worker’s camps could unearth Unexploded Ordinances (UXOs). | • Conduct assessment of UXO risks before clearance, which may involve engaging outside experts.  
• If UXOs are found, engage outside experts for removal.  
• Conduct training and awareness activities with the community in terms of UXO risks and chance finds. | ESS 1 | Detailed Design Consultants and MRD SEO / Design Stage |
|---|---|---|---|
| Flora and Fauna | As the Project is not expected to involve road widening, only minimal vegetation clearing is expected. However, operation of construction equipment and vehicles as well as improper disposal of spoils may cause damage to existing vegetation. Hunting of wildlife and cutting of trees for fuel may not be undertaken by workers and strict prohibitions should be imposed by the contractor. | • The project will not finance road improvement that could provide access to critical habitats such as wildlife sanctuaries and protected areas or may cause deforestation.  
• Spoils and all types of wastes shall not be dumped into forested areas, agricultural land, densely vegetated areas, and water courses.  
• Workers shall be prohibited from cutting trees for firewood and/or for use in construction-related activities and from hunting wild animals.  
• When possible, ensure that construction works are carried out without unnecessary clearing of roadside vegetation.  
• Cutting of trees should be avoided or kept to a minimum in all circumstances and replanting of trees should be undertaken when feasible.  
• Construction vehicles to operate within the corridor of impact, i.e. approximately within ROW, to avoid damaging soil and vegetation. Avoid soil compaction around trees. Avoid driving heavy equipment or trucks anywhere into the 'drip-line' of a tree (defined as imaginary line around a tree where rainwater falls freely to ground unimpeded by the tree's foliage).  
• The contractor will not use or permit the use of wood as a fuel for the execution of any part of the works, including but not limited to the heating of bitumen and bitumen mixtures, and to the extent practicable shall ensure that fuels other than wood are used for cooking, and water heating in all camps and living accommodations.  
• Contractor shall not buy or use wood from the illegal sources (that come from the illegal logging).  
• Construction camps, asphalt mixing plants, material storage sites and other project facilities shall not be located in the wildlife sanctuary, forest areas and other densely vegetated sites.  
• Contractor will take all precautions necessary to ensure that damage to | ESS 1 and 6 | Contractor / During Construction |
vegetation is avoided due to fires resulting from execution of the works. The Contractor will immediately suppress the fire, if it occurs, and shall undertake replanting to replace damaged vegetation.
- Bridge works, if any, should try to be scheduled in dry season to minimize adverse impacts to fishery, river water quality and other aquatic resources.

Protected Areas (PAs), wetlands, biodiversity zones
Impacts from construction if roads are close to important biodiversity zones.
- Screening would need to be undertaken to assess whether PAs or other zones are impacted. The project will not finance road improvement that could provide access to critical habitats such as wildlife sanctuaries and/or protected areas or those that may cause deforestation.
- If necessary, MRD will undertake the preparation of Biodiversity Management Plans to ensure any impacts and mitigation measures are properly identified and assessed.

<table>
<thead>
<tr>
<th>Type of Potential Impact</th>
<th>Description of Potential Impact</th>
<th>Potential Mitigation Measure</th>
<th>Reference to WB ESS</th>
<th>Responsibility / Estimated Project Stage</th>
</tr>
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<tbody>
<tr>
<td>Social</td>
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</table>
| Labor influx and Worker’s Camps | Safe and clean conditions must be provided at worker’s camps if these are set up. | - Minimize labor influx as much as possible promoting local recruitment  
- Provide adequate housing for all workers at the construction camps and establish clean canteen/ eating and cooking areas.  
- Portable lavatories (or at least pit latrines in remote areas), male and female, shall be installed and open defecation shall be prohibited and prevented by cleaning lavatories daily and by keeping lavatory facilities clean at all times.  
- Provide separate hygienic sanitation facilities/ toilets and bathing areas with sufficient water supply for male and female workers.  
- Toilet facilities for women should be accessible from place of work.  
- Code of Conduct for workers with special attention their relationship with the local communities (Annexes 10 & 11).  
- See Guidelines for Worker’s Camps (Annex 12).  
- See Labor Management Procedures (LMP) (Annex 8). | ESS 1, 2 and 4 | Contractor / During Construction |
| Labor rights, gender and non-discrimination | Risks of not complying with labor code, paying workers inadequate rates, discrimination of women, those with | - MRD will develop LMP (Annex 8) which should be adhered by all contractors/ sub-contractors which includes protection of all workers engaged to work on and or supply the project related activities in compliance with the Labor Law and WB ESS2, including prohibition on child labor, zero tolerance of | ESS 2 | Contractor (to implement measures) and MRD SEO and DDIS (for developing LMP, encouraging women to apply to |
| **disabilities or other vulnerable persons.** | **GVB and VAC, awareness and protection of all workers from HIV/AIDS and OHS protection as described in other sections of this Table.**  
*• Ensure salaries and/or daily rates are in line with guidelines in Labor Law and that at least the minimum wage in Cambodia is paid for unskilled jobs, and that workers are paid consistent rates (i.e. the same type of work should be paid the same, whether done by a male or female worker).*  
*• Encourage the hiring of local labor, in particular for unskilled jobs in construction, as well as for providing services to the worker's camps if applicable (i.e. food preparation or cleaning services).*  
*• Encourage the hiring of women and make at least 15-20% of unskilled jobs available to them, and ensure these are paid at the same rate as similar unskilled jobs that are available for men.*  
*• When feasible, encourage people living with a disability or other vulnerable people to apply to jobs that may be available.*  
*• Provide rights to workers to form groups or unions, if applicable.*  
*• Ensure access to grievance redress mechanism.*  
*• See Codes of Conduct (Annex 10 & 11).** | **jobs, grievance redress monitoring and also all provisions apply to MRD-hired workers) / During Design Stage, Construction and potentially during Maintenance.** |
|---|---|
| **Child labor** | **Risk of hiring children under 15 years to perform hazardous jobs, in contradiction of RGC legislation and WB ESF. Potential for children to be taken out of school to engage in construction jobs. Risk of child labour in the supply chain (i.e. the primary providers of materials for road construction).**  
*• Adopt a minimum working age of 18 and check identities/birth records when hiring.*  
*• Conduct screening of providers of materials for road construction (and other primary supply workers) to ensure they do not engage in child labor.*  
*• See LMP (Annex 8) and Codes of Conduct (Annexes 10 & 11).** | **ESS 2**  
Contractor (and MRD for MRD-hired workers) / During Construction and potentially during Maintenance |
| **Indentured labor** | **Risk of indentured labor, particularly in supply chain.**  
*• All persons hired by the contractor must be paid a fair and adequate salary as per provisions in ESS2 (see LMP Annex 8).*  
*• Conduct screening of providers of materials for road construction to ensure they do not engage in indentured labor.*  
*• Ensure access to grievance redress mechanism.* | **ESS 2**  
Contractor and MRD (for grievances and for MRD-hired workers) / During Construction and potentially during Maintenance |
<table>
<thead>
<tr>
<th><strong>Gender-Based Violence (GBV) and/or Violence to Children (VAC)</strong></th>
<th><strong>Risks of violence to women in the workforce. Risks of violence to community women or children due to labor influx, in particular in more remote areas.</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Strict Code of Conduct for workers with no tolerance for physical or verbal abuse of women or children (see Annexes 10 &amp; 11).</td>
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<td>• Training to workers on maintaining good community relations, with emphasis on proper conduct around women and children.</td>
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<td></td>
<td>• Training on GBV and VAC for community members, in particular women and girls (may be done separately for men and women).</td>
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<td></td>
<td>• Ensuring workers sites are situated (at least 500m) from schools and/or other areas where children congregate.</td>
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<td></td>
<td>• Children prohibited from construction site and worker’s camp.</td>
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<tr>
<td></td>
<td>• Ensure access to grievance redress mechanism.</td>
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<td>• A Gender Action Plan has been developed, included in the World Bank Project Appraisal Document, and should be adhered to.</td>
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<td>• Support (in the form of training, awareness raising, etc.) to local law enforcement to act on community complaints regarding GBV and VAC.</td>
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<td></td>
<td>• Provision of information to local communities about the contractor’s policies and responsibilities, including the Contractor’s Code of Conduct and minimum working age (see Annexes 8, 10 &amp; 11).</td>
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<td>• Additional guidelines on GBV are provided in Section 3.2, Table 8.</td>
</tr>
<tr>
<td><strong>Health and Safety</strong></td>
<td><strong>Main risks during the construction stage may arise from: failure to implement measures to avoid accidents and injuries involving workers and the public; introduction of sexually transmitted or other diseases by non-local workers; outbreaks of diseases such as malaria, diarrhea, etc. in the labor force; gender-based violence (discussed above), inadequate sanitation in worker’s camp</strong></td>
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<td></td>
<td>• Appoint an Environmental Health and Safety Officer (EHSO) who shall be responsible for training, monitoring and reporting on EHS concerns and implementing health and safety related-programs.</td>
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<td>• Conduct orientation for construction workers regarding emergency response procedures and equipment in case of accidents (i.e. head injury from falling, burns from hot bitumen, spills of hazardous substances, etc.), fire, etc.; health and safety measures, such as on the use of hot bitumen products for paving of project roads, etc.; prevention of HIV/AIDS, malaria, diarrhea, and other related diseases, as well as Code of Conduct (including discussion of sex and GBV).</td>
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<td>• Provide fire extinguish equipment and appropriate emergency response equipment (based on on-going construction activities) at the work areas and at construction and workers camps.</td>
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<td>• Provide first aid kits at each camp and working sites that are readily accessible by workers. In addition, the contractor shall prepare emergency procedures detailing</td>
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(discussed in section on Worker’s Camp); pressures on existing health systems at the local level. Particular attention should be paid to women and other vulnerable persons.

arrangements with commune health center(s) or nearest hospital(s) to accommodate emergency cases from the work location.

- Provide workers with appropriate safety equipment/devices (such as dust mask, safety helmets, safety shoes or boots, goggles, ear plugs, etc.) and strictly require them to use these as necessary.
- Install sign boards, lighting system at the construction sites, borrow pits, or places which may cause accidents for vehicle, people and workers.
- Strictly impose speed limits on construction vehicles along residential areas and where other sensitive receptors such as schools, pagodas, hospitals, and other populated areas are located.
- Educate drivers on safe driving practices to minimize accidents and to prevent spill of hazardous substances and other construction materials by providing covers over transporting dump trucks.
- Barriers (i.e. temporary fence) shall be installed at construction areas to deter pedestrian access to these areas except at designated crossing points.
- Sufficient lighting at night as well as warning signs shall be provided in the periphery of the construction site.
- The general public/local residents, and in particular children, shall not be allowed in high-risk areas, i.e. excavation sites and areas where heavy equipment is in operation.
- Provide fencing on all areas of excavation greater than 2m deep.
- Ensure reversing signals are installed on all construction vehicles.
- Measures to prevent malaria if in areas where malaria is an issue, shall be implemented (i.e. provision of insecticide treated mosquito nets to workers, spraying of insecticides, installation of proper drainage to avoid formation of stagnant water, etc.).
- Discharge of untreated sewage shall be prohibited.
- Conduct road safety trainings for workers and roadside community.
- Conduct trainings on HIV/AIDS and STDs with workers and the community (separately) – see additional guidance in Section 3.2, Table 8.
- Conduct trainings on GBV and VAC with workers and the community (separately) – see additional guidance in Section 3.2, Table 8.
- Ensure particular attention is provided to the needs of women and other vulnerable persons, for instance conducting specific trainings for them led by appropriate trainers (i.e. women-only training on HIV/AIDS and/or GBV led by a woman).
- Ensure access to grievance redress mechanism.
- Ongoing consultations and awareness raising of local communities.
- Free testing for HIV/AIDS.
- Establish health facilities at worker’s camps and/or take measures to support or enhance existing health centers at the village, commune or district level (see Annex 12).

| Damage to Community Facilities | Transport of materials and spoils, operation of construction equipment and various construction activities may damage community facilities. | • Not allow overloading of trucks used for all project-related activities.
• Immediately repair any damage caused by the Project to community and/or private facilities such as water supply, power supply, irrigation canals, drainage, structures, trees, etc. The contractor to pay adequate compensation to affected parties, as necessary.
• Access roads damaged during transport of construction materials and other project-related activities shall be reinstated upon completion of construction works.
• All affected communities will be made aware of the project grievance redress mechanism and will be provided information in advance on construction activities that may cause public nuisance and disturbance. | ESS 1 and 4 Contractor and MRD SEO (to disseminate GRM) / During Construction and potentially during Maintenance |

| Traffic Disruption | Road construction works are expected to cause traffic disruption and congestion and obstruction of access to roadside properties and establishments. Lack of proper traffic warning signs and other safety measures could cause accidents. | • In cooperation with the local traffic authorities, properly organize transport of materials for the project to avoid congestion.
• Set up clear traffic signal boards and traffic advisory signs at the roads going in and out the road and bridge construction sites to minimize traffic build-up.
• Regularly monitor traffic conditions along access and Project roads to ensure that project vehicles are not causing congestion.
• Provide sufficient lighting at night within and in the vicinity of construction sites.
• Implement suitable safety measures to minimize risk of adverse interactions between construction works and traffic flows through provision of temporary signals or flag controls, adequate lighting, fencing, signage and road diversions.
• Provide temporary accesses to properties and businesses affected by disruption to their permanent accesses. | ESS 1 and 4 Contractor and MRD SEO (for trainings) / During Construction and potentially during Maintenance |
- Reinstate good quality permanent accesses following completion of construction.
- Provide safe vehicle and pedestrian access around construction areas.
- Provide adequate signage, barriers and flag persons for traffic control.
- If necessary, traffic will be diverted for safe and smooth movement of vehicles to ensure smooth traffic flow and minimize accidents, traffic hold ups and congestion.
- Temporary by-passes should be constructed and maintained (including dust control) during the construction period particularly at bridge crossings. Location of temporary by-passes shall be agreed with local authorities and such sites shall be reinstated upon completion of works.

<table>
<thead>
<tr>
<th>Road Safety</th>
<th>During construction, but mostly once road works are completed, improved roads could cause vehicles to travel faster and lead to road accidents.</th>
<th>Road design should make safety a priority, such as by widening and sealing shoulders, where land is available, through better marking and signage, introducing traffic calming measures at critical locations, and measures to safeguard pedestrians’ safety, including for women and children from local communities who use roads to travel to and from schools, markets, and hospitals.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Road safety programs should be developed and delivered to road side community and other frequent road users (such as schools). Special attention to women, in particular mothers, and young men (most likely victim of traffic accidents) should be delivered.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Safety crossings trainings for school children should be conducted, as well as riding/walking safely using road shoulders.</td>
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<td></td>
<td></td>
<td>Managerial (MRD/WB) support of RGC’s Road Safety Agenda, in particular at the local level.</td>
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<td></td>
<td></td>
<td>Strengthening local enforcement mechanisms, such as additional support to local-level government to monitor road safety and implement road safety awareness activities.</td>
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<td></td>
<td></td>
<td>Billboards and/or other awareness raising information (such as in radio-format).</td>
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<tr>
<td></td>
<td></td>
<td>Road Safety Plans.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ongoing consultations and awareness raising of local communities.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Disruption which may cause by the excavations/digging for installation of side drains.</th>
<th>Limit/block access to shops, schools, hospitals, restaurants, etc, and lose of incomes.</th>
<th>Limit the activities to non-business hours (if possible) and complete the works soonest possible. A timeframe must be developed and consulted with affected parties before starting the works.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Provide appropriate temporary access (wood/steel platform) with handrails</td>
</tr>
</tbody>
</table>

|  |  | ESS 1 and 4 |
|  |  | DDIS, MRD SEO and Contractor / During Design, Construction and Maintenance |
|  |  | ESS1, ESS4 |
|  |  | Contractor / During Construction |
## Social Conflicts
The presence of workers could cause conflicts with local communities, including increased crime (or the perception of), and “followers” who may seek jobs and/or create additional pressures on the local community.

- Clear all construction material/equipment from the access path
- At school, hospitals/referral hospitals, provided traffic signs and flagmen to facilitate traffic
- Regularly inform in advance the local officials and affected residents of the location and schedule of construction activities which may cause impacts on the environment and life of people.
- Locate construction camps away from communities (at least 500 m away) in order to avoid social conflict in using resources and basic amenities such as water supply and to avoid close contact between workers and the community (in particular children).
- Maximize number of local people employed in construction and non-construction jobs.
- Maximize goods and services sourced from local commercial enterprises.
- Ongoing consultations and awareness raising of local communities.

## Land Acquisition
Impacts to people having assets close to the road shoulder who may have to cut them or move them back, voluntarily or involuntarily. Impacts may be more pronounced for women and other vulnerable persons.

- MRD, and GDR, as needed, to implement provisions in the Resettlement Framework and prepare Detailed Resettlement Plans if needed (includes procedures, consultations, grievance redress, etc.)
- Particular attention to be paid to women and other vulnerable persons.
- Include the RF in bidding documents for the contractors.

## Indigenous Peoples
While negative impacts are not expected for IP groups, there is a risk they could be excluded from project benefits, including job opportunities.

- If IPs are found in the project area, MRD will need to ensure Indigenous Peoples Plans are prepared, following the guidelines in the IPPF. Adequate Social Assessments, meaningful consultations and FPIC, if applicable, would need to be conducted to ensure IPs are not negatively affected and can benefit from the project.

## Cultural Heritage
If road sections are close to temples, grave sites or other tangible or intangible cultural heritage, these could be impacted by construction.

- MRD would need to undertake screening to assess whether tangible or intangible cultural heritage is impacted.
- MRD could consider ruling out road sections or prepare Cultural Heritage Management Plans to ensure impacts and mitigation measures are properly identified and assessed.
| Stakeholder Engagement and Grievances Redress | If stakeholders are not properly consulted, information is not disclosed and people are not informed about their rights, options for grievance redress or project timelines, there could be project delays, misunderstandings, conflict or loss of confidence in the community regarding the project. | • MRD needs to ensure provisions in the SEP are adequately followed by project planners and the contractors.  
• Include the SEP in bidding documents for the contractors.  
• Ensure the SEP, this ESMF, RF, IPPF are disclosed and consulted on.  
• Ensure that future ESMPs, RPs and IPPs, if applicable, are disclosed and consulted on.  
• Ensure the Grievance Redress Mechanism outlined in the SEP and this ESMF is shared and consulted with local communities, once road sections have been identified. | ESS10 | MRD SEO, DDIS and Contractors (refer to SEP) / During Design Stage, Construction and Maintenance |
| Gender | Women could face discrimination for construction jobs, may be physically or verbally abused by labourers and/or co-workers, may disproportionately suffer negative impacts from the project. | • Provisions for minimum hiring of 15% of women for unskilled jobs, and encouragement of women to apply to these jobs, as well as engaging women in non-construction work if possible (such as cleaning or cooking services).  
• Trainings for workers, and separately for women, on GBV, including mechanisms to report incidents (see Annex 8, 10 & 11).  
• Special attention to impacts to women in terms of land acquisition.  
• Ensuring women are included in the consultation process, including speaking to them separately if desirable.  
• Ensuring women are included and properly assessed as part of Social Assessment on IPs, if applicable.  
• Ensure community women are part of trainings, in particular on GBV, HIV/AIDS and road safety.  
• Ensure women have access to the grievance redress mechanism. | ESS 4, 5, 7 and 10 | MRD SEO and DDIS, and Contractor / During Design Stage, Construction and Maintenance |
| Vulnerable Groups (such as those with a disability, female-headed households, the elderly, the poor) | Vulnerable groups can be missed and excluded from the consultation process and may disproportionately suffer negative impacts from the project. They may also be targets for physical or verbal abuse. | • Special attention to impacts to vulnerable persons in terms of land acquisition.  
• Ensuring vulnerable persons are included in the consultation process, including speaking to them separately if desirable.  
• Ensuring vulnerable persons are included and properly assessed as part of Social Assessment on IPs, if applicable.  
• Ensure vulnerable persons are part of trainings, in particular on GBV, HIV/AIDS and road safety. | ESS 4, 5, 7 and 10 | MRD SEO and DDIS, and Contractor / During Design Stage, Construction and Maintenance |
3.2 HIV/AIDS Prevention and Gender Based Violence

Aside from the information highlighted in Table 7 above, it is important to note specific provisions relating to GBV as well as prevention of HIV/AIDS.

All employees, including managers, will be required to attend training prior to commencing work to reinforce the understanding of HIV/AIDS, GBV and VAC. Subsequently, employees must attend additional courses and refresher sessions, as detailed in the LMP (Annex 8).

Managers will be required to attend an additional manager training prior to commencing work on site to ensure that they are familiar with their roles and responsibilities in ensuring the HIV/AIDS, GBV and VAC standards are met on the project (also see Annex 8, 10 & 11). This training will provide managers with the necessary understanding and technical support needed to begin to develop a plan for addressing HIV/AIDS, GBV and VAC throughout the lifetime of the civil works, including monitoring and reporting. A Manager’s Code of Conduct, as well as Individuals Code of Conduct, are provided in Annex 10 & 11. All staff will be required to sign these.

3.2.1 HIV-AIDS Prevention

While mobilized for work, the Contractor shall produce and conduct an HIV-AIDS Information, Education and Consultation Communication (IEC) campaign undertaken by a recognized service provider. The cost of the campaign shall be funded by the Contractor from the provisional sum provided in the bill-of-quantity.

The Contractor shall undertake such other measures as are specified in the Contract, including the LMP, to reduce the risk of the transfer of the HIV virus between and among the Contractor’s personnel and the local community, to promote early diagnosis and to assist affected individuals. The Contractor shall not discriminate against people found to have HIV/AIDS as part of the campaign.

Prior to contractor mobilization, the contractor (and service provider as relevant) shall submit to the MRD for approval an action plan that will indicate:

a) The types and frequency of education activities to be done;

b) The target groups (as a minimum to all the Contractor’s employees, all Sub-Contractors and Consultants’ employees, and all truck drivers and crew making deliveries to the project site for construction activities, as well as immediate local communities);

c) Whether condoms shall be provided;

d) Whether STI and HIV/AIDS screening, testing, diagnosis, counselling and referral to a dedicated national STI and HIV/AIDS program, (unless otherwise agreed) of all Site staff and labour shall be provided;

e) Budget.

The IEC campaign shall be conducted while the Contractor is mobilized in accordance with the approved approach. It shall be addressed to all target groups identified concerning the risks, dangers and impact, and appropriate avoidance behaviour with respect to Sexually Transmitted Diseases (STD) and HIV/AIDS in particular.

3.2.2 Gender-Based Violence

In bidding documents and contracts, the Contractor will be required to implement the Labor Management Plan (Annex 8) and Codes of Conduct (Annexes 10 & 11) and Action Plan to Prevent
Gender Based Violence. The Contractor must arrange for trainings on GBV/IEC campaign to be provided by a recognized agency or NGO. The cost of the campaign shall be funded by the Contractor from the provisional sum provided in the bill-of-quantity. The contractor shall ensure that at least one refresher for workers is conducted each month to review materials provided.

Table 8: Actions to Address GBV Risks

<table>
<thead>
<tr>
<th>When</th>
<th>Action to Address GBV Risks</th>
<th>Timing for Action</th>
<th>Who is Responsible for Action</th>
<th>Ongoing Risk Management</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Sensitize the IA (MRD) as to the importance of addressing GBV on the project, and the mechanisms that will be implemented.</td>
<td>Preparation. Implementati on.</td>
<td>WB Task Team</td>
<td>WB Task team to monitor and provide additional guidance as necessary.</td>
</tr>
<tr>
<td></td>
<td>The project’s social assessment to include assessment of the underlying GBV risks, using the GBV risk assessment tool to provide guidance and keeping to safety and ethical considerations related to GBV data collection.</td>
<td>Preparation. Implementati on (before civil works commence).</td>
<td>MRD¹⁷ for social assessment and ESMP. Contractor for Contractor’s ESMP (CESMP) WB Task Team for GBV Risk Assessment Tool</td>
<td>Ongoing review during implementation on support missions. Update project ESMP and CESMP if risk situation changes.</td>
</tr>
<tr>
<td></td>
<td>Map out GBV prevention and response actors in project adjoining communities. This should incorporate an assessment of the capabilities of the service providers to provide quality survivor centered services including GBV case management, acting as a victim advocate, providing referral services to link to other services not provided by the organization itself.</td>
<td>Preparation Implementati on</td>
<td>MRD in ESMP Contractor for CESMP</td>
<td>Update mapping as appropriate</td>
</tr>
<tr>
<td></td>
<td>Have GBV risks adequately reflected in all environment and social instruments (i.e., Project ESMP, CESMP). Include the GBV mapping in these instruments.</td>
<td>Preparation Implementati on (before civil works commence).</td>
<td>MRD for social assessment and ESMP Contractor for CESMP</td>
<td>Ongoing review during implementation on support missions. Update project ESMP and CESMP if risk situation changes.</td>
</tr>
<tr>
<td></td>
<td>Develop a GBV Action plan including the Accountability and Response Framework as part of the ESMP. The contractor/consultant’s response to these requirements will be required to be reflected in their CESMP.</td>
<td>Preparation Implementati on (before civil works commence)</td>
<td>MRD</td>
<td>Ongoing review during implementation on</td>
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</table>

¹⁷ In all instances, MRD may be supported by DDJS staff.
<table>
<thead>
<tr>
<th>When</th>
<th>Action to Address GBV Risks</th>
<th>Timing for Action</th>
<th>Who is Responsible for Action</th>
<th>Ongoing Risk Management</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Review the MRD’s capacity to prevent and respond to GBV risk management.</td>
<td>Preparation, Implementation.</td>
<td>WB Task Team</td>
<td>Ongoing review during implementation of support missions. Update project ESMP if risk situation changes.</td>
</tr>
<tr>
<td></td>
<td>As part of the project’s stakeholder consultations, those affected by the project should be properly informed of GBV risks and project activities to get their feedback on project design and safeguard issues. Consultations need to engage with a variety of stakeholders (political, cultural or religious leaders, health teams, local councils, social workers, women’s organizations and groups working with children) and should occur at the start and continuously throughout the implementation of the project.</td>
<td>Consultations need to be continuous throughout the project cycle, not just during preparation.</td>
<td>MRD</td>
<td>Monitoring of implementation of Stakeholder Engagement Plan. Ongoing consultations, particularly when CESMP is updated.</td>
</tr>
<tr>
<td></td>
<td>The Stakeholder Engagement Plan of the project, which will be implemented over the life of the project to keep the local communities and other stakeholders informed about the project’s activities, to specifically address GBV related issues.</td>
<td>Consultations need to be continuous throughout the project cycle, not just during preparation.</td>
<td>MRD</td>
<td>Monitoring of implementation of Stakeholder Engagement Plan. Ongoing consultations, particularly when CESMP is updated.</td>
</tr>
<tr>
<td></td>
<td>Make certain the availability of an effective grievance redress mechanism (GRM) with multiple channels to initiate a complaint. It should have specific procedures for GBV including confidential reporting with safe and ethical documenting of GBV cases. Parallel GRM outside of the project GRM may be warranted for substantial to high risk situations.</td>
<td>Prior to contractor mobilizing.</td>
<td>MRD, but discussed and agreed upon with the WB Task Team</td>
<td>Ongoing monitoring and reporting on GRM to verify it is working as intended.</td>
</tr>
<tr>
<td></td>
<td>Clearly define the GBV requirements and expectations in the bid documents.</td>
<td>Procurement.</td>
<td>MRD</td>
<td>Review by WB Task Team.</td>
</tr>
<tr>
<td></td>
<td>Based on the project’s needs, the Bank’s Standard Procurement Documents (SPD), and the IA’s policies and goals, define the requirements to be included in the bidding documents for a CoC which addresses GBV (see Annexes 10 &amp; 11)</td>
<td>Procurement.</td>
<td>MRD</td>
<td>Review by WB Task Team.</td>
</tr>
<tr>
<td></td>
<td>For National Competitive Bidding (NCB) procurement, consider integrating the ICB SPD requirements for addressing GBV risks.</td>
<td>Procurement.</td>
<td>MRD with review by WB Task Team.</td>
<td></td>
</tr>
<tr>
<td>When</td>
<td>Action to Address GBV Risks</td>
<td>Timing for Action</td>
<td>Who is Responsible for Action</td>
<td>Ongoing Risk Management</td>
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<tr>
<td>Procurement</td>
<td>The procurement documents should set out clearly how adequate GBV costs will be paid for in the contract. This could be, for example, by including: (i) line items in bill of quantities for clearly defined GBV activities (such as preparation of relevant plans) or (ii) specified provisional sums for activities that cannot be defined in advance (such as for implementation of relevant plan/s, engaging GBV service providers, if necessary)</td>
<td>PROCUREMENT.</td>
<td>MRD</td>
<td>REVIEW BY WB TASK TEAM.</td>
</tr>
<tr>
<td></td>
<td>Clearly explain and define the requirements of the <strong>Codes of Conduct</strong> to bidders before submission of the bids.</td>
<td>PROCUREMENT.</td>
<td>MRD</td>
<td>REVIEW BY WB TASK TEAM.</td>
</tr>
<tr>
<td></td>
<td><strong>Evaluate the contractor's GBV response proposal</strong> in the CESMP and confirm prior to finalizing the contract the contractor’s ability to meet the project’s GBV requirements</td>
<td>PROCUREMENT.</td>
<td>MRD</td>
<td>REVIEW BY WB TASK TEAM.</td>
</tr>
<tr>
<td>Review CESMP</td>
<td>to verify that appropriate mitigation actions are included.</td>
<td>MRD</td>
<td>MRD</td>
<td>REVIEW BY MRD. REVIEW BY WB TASK TEAM.</td>
</tr>
<tr>
<td></td>
<td><strong>Review that the GRM receives and processes complaints</strong> to ensure that the protocols are being followed in a timely manner, referring complaints to an established mechanism to review and address GBV complaints.</td>
<td>IMPLEMENTATION.</td>
<td>WB TASK TEAM. MRD</td>
<td>ONGOING REPORTING. MONITORING OF COMPLAINTS AND THEIR RESOLUTION.</td>
</tr>
<tr>
<td>Implementation</td>
<td><strong>Codes of Conduct signed and understood (Annexes 10 &amp; 11)</strong> Ensure requirements in CoCs are clearly understood by those signing. Have CoCs signed by all those with a physical presence at the project site. Train project-related staff on the behavior obligations under the CoCs. Disseminate CoCs (including visual illustrations) and discuss with employees and surrounding communities.</td>
<td>INITIATED PRIOR TO CONTRACTOR MOBILIZATION AND CONTINUED DURING IMPLEMENTATION.</td>
<td>CONTRACTOR, CONSULTANT, MRD</td>
<td>REVIEW OF GBV RISKS DURING PROJECT SUPERVISION (E.G., MIDDLE TERM REVIEW) TO ASSESS ANY CHANGES IN RISK. SUPERVISION CONSULTANT REPORTING THAT COCS ARE SIGNED AND THAT WORKERS HAVE BEEN TRAINED AND UNDERSTAND THEIR OBLIGATIONS. MONITORING OF GRM FOR GBV COMPLAINTS. DISCUSSION AT PUBLIC CONSULTATIONS.</td>
</tr>
</tbody>
</table>

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18 Civil works supervision consultant’s monthly reports should confirm all persons with physical presence at the project site have signed a CoC and been trained.
3.2.2.1 GBV Response Services and Stakeholders

While section 4.4 further discusses the project’s institutional arrangements, this section details specific agencies in charge at the national and local level for GBV response, which may be helpful when planning GBV trainings and/or other interventions.

3.2.2.1.1 National Level

The Ministry of Women’s Affairs (MoWA) is the government agency responsible for women’s issues. Under the MoWA, there is a sub-working group on GBV under the Technical Working Group on Gender (TWG-G), which was established in order to work in partnerships with other government ministries, development partners and non-governmental organization. The Ministry of Interior (MOI) has the authority on the GBV mechanism via the Cambodian National Police, and the provincial, district and commune councils/governors, namely the provincial and district Women and Children’s Consultative Committee and the Commune Committee for Women and Children.19

Cambodian National Council for Women (CNCW) is a national mechanism which was established in 2001, aimed at coordinating and providing advice to the RGC on matters related to the promotion of Cambodian women’s status, roles and welfare of women to reduce and eliminate of all forms of discrimination against women. The MoWA and GMAG are accountable to this mechanism with regard to mainstreaming gender and the elimination of GBV.

Gender Mainstreaming Action Groups (GMAG) have been formed in all ministries since 2005 including MRD. This mechanism is led by a Secretary of State or Under Secretary of State level, Director General or Deputy Director General level, and includes members from all line departments.

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Technical Working Group on Gender (TWG-G) TWG-G was established in 2004 and it is chaired by MoWA, and UNDP and JICA as co-facilitators. Members of the TWG-G are representatives from 31 government agencies, 14 development partners and 15 civil society organizations.

Sub-Group on GBV Response was initiated in 2012 by the Ministry of Women’s Affairs in order to explore support and coordination in gender mainstreaming for the reduction of violence against women.20 This mechanism is lead by the representative of MoWA and other relevant ministries, including the MOI, MOH, MoSVY and others. Members of these working group are Development Partners and Non-Governmental Organizations, which are leading and active on GBV work, such as UNWOMEN, UNDP, UNFPA, UNICEF, DFAT (Australia), GIZ, AECID, PYD, CARE, GADC, ADHOC, and HI.

3.2.2.1.2 Sub-National Level
Provincial and District WCCCs. In 2009, the Provincial/Capital and Municipal/Khan/District WCCCs were established by the MOI’s Prakas in order to provide advice and recommendations to the councils, boards of governors, governors, and other committees of the councils on issues related to gender equality, women, youth and children within the authority, functions and duties of the councils. These mechanisms are advisory bodies which are chaired by women councilors at the provincial and district councils. Of the duties outlined, WCCCs can make suggestions and recommendations to the councils or boards of governors, which are executive bodies, to take measure to prevent harm to women, youth, and children. Members of WCCCs also include those representatives of the boards of governors, police, provincial departments of women’s affairs (PDoWA), health, and social affairs.

GBV sub-group is a multi-stakeholder GBV working group which was established in seven provinces and eight districts 21. These working groups are chaired by the Head of PWCC, the Deputy Provincial Governor, and permanently vice-chaired by the Directors of PDoWA. There are three main roles of these working groups. First, they strengthen sub sector services in responding to GBV effectively and on timely manner. Next, they support institutions to share and report on GBV issues. Finally, they monitor, manage GBV data and follow up progress on GBV issues.

Commune/Sangkat Committee for Women and Children (CCWC) is the lowest level and closest mechanism for GBV response which stays close to the communities. The CCWCs are advice-giving committees for a range of women’s and children’s issues, such as maternal and child health, community pre-school, hygiene and sanitation, gender equality and child protection.22 This mechanism comprises of the Commune/Sangkat Chiefs (chairs), the Second Vice Chief (Vice-chairs) and the Commune Women and Children Focal Point (permanent members); the focal points are under the structure of the Municipal/Khan/District Office of Women’s Affairs. Member of the CCWCs include Secretaries of the Commune/Sangkat, and representative of police post, schools, health centres/posts, and Village Chiefs. It is interesting to note that the CCWC structure is in line with the Village Commune Safety Policy. This policy provides that one of the five criteria of the safety commune/sangkat is “no women and children are trafficked or suffer from domestic violence.” Therefore, the role of CCWCs are of great significant as they are working closely with citizens in terms of providing services and implementing the Village Commune Safety Policy so that they can respond to any GBV issues appropriately.

NGOs working on GBV include three national networks on gender, namely the Cambodian NGO Committee on CEDAW (NGO-CEDAW), Gender and Development Network (GADNet), and the

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20 Ministry of Women’s Affairs “Decision 009 on the Establishment of Working Group on Gender Based Violence Response” (14 February 2012), Phnom Penh, Cambodia.
Committee to Promote Women in Politics (CPWP). Other active organizations include GIZ, UN WOMEN, UNFPA, ACCESS, The Asia Foundation, CARE, Hagar, LAC, TPO, and ACTED.

Annex 13 maps out the GBV-related stakeholders in the project provinces, and their responsibilities.
4 ENVIRONMENT AND SOCIAL MANAGEMENT PROCEDURES

The purpose of the ESMF is to manage potential adverse impacts by establishing a guidance document that will inform MRD, Detailed Design Implementation and Supervision (DDIS) consultants, related government ministries and contractors, of the agreed sets of environmental and social procedures and measures for Component 2 of the CRCIP. This ESMF highlights potential environmental and social risks and mitigation measures and describes the types of sub-projects which may be financed by Component 2 of the CRCIP. The ESMF is also a guidance document which outlines the necessary process for conducting future, site-specific, ESMPs, once road sections are known.

As an overarching guideline document, the ESMF seeks to ensure that:
• Road sub-projects consider potential environmental and social issues, especially for different populations who would be directly impacted (positively or adversely) by the sub-projects;
• Road sub-projects consider socio-cultural and gender sensitivities and environmental issues prevailing in areas where the proposed sub-projects would be implemented;
• During project formulation and design, adverse environmental and social impacts may arise during construction and operational phases, and appropriate mitigation/enhancement measures need to be designed with a monitoring plan developed to track implementation of site-specific instruments (ESMPs, RPs, IPPs);
• Environmental and social management instruments such as ESMP, RP or IPP are suitably prepared and followed;
• The contents of the project’s Stakeholder Engagement Plan (including its provisions on grievance mechanisms) are applied for all the road sub-projects;
• Environment and social instruments are compliant with the World Bank ESF as well as national legislation;
• Project design takes into consideration the guidance in this ESMF and the mitigation hierarchy for environment and social impacts;
• Screening mechanism is determined for ES risks and impacts once road sections are identified;
• Procedures and responsibilities for the development of site-specific ESMPs are established.

4.1 Proposed Sub-Projects

The proposed sub-projects will rehabilitate approximately 250 kilometres of rural roads in three provinces (Kampong Cham, Tboung Khmum and Kratie) to paved condition (DBST) or concrete pavement to make them resilient to climate change impacts. Given that the project focuses on “connectivity”, chosen roads will be key in connecting villages to main district towns or provincial centers. The rehabilitated roads will provide the three provinces with a safer, more cost-effective rural access road network with improved connectivity to important centres and all-year access to markets and other social services. The proposed sub-projects will also support a sustainable road maintenance regime in the MRD.

The MRD is in the process of identifying 200-250km of road sections based on a short-list of 1,000km of roads. The prioritization process will consider economic impacts, climate change and flood vulnerability and broader road accessibility needs in rural areas, including access to markets, agricultural growth potential, number of population and villages served, and access to schools and hospitals. The prioritization process will go through the following four-step process:

1. Initial screening: This initial step includes (a) mapping all rural roads in the selected districts and (b) grouping roads into three categories: (i) recently improved (last two to three years), (ii) roads which have earmarked financing (to be improved by other investments), and (iii) remaining network for potential investment consideration. This step is completed.
2. **Accessibility and climate resilience analysis**: The analysis will help assess the rural accessibility and climate resilience impact of the proposed investment. It will prioritize the long-list of roads with up to 1,000 km of critical network in the project area. The approach will use an innovative geospatial analysis tool to visualize rural accessibility and climate resilience impacts on access to markets, schools and hospitals and inform the evidence-based decision-making process.

3. **Environmental and social screening**: This step will further screen the list of identified roads to ensure that the proposed investment does not cause major negative environmental and social impacts following the ineligible/ negative list criteria (for example, avoiding “High risk” roads - new construction, significant widening and/or any road requiring full EIA according to national legislation-, excluding roads which provide access to protected areas, may cause deforestation and/or may require significant resettlement, among others) and maximize development gains for the beneficiaries, in line with the World Bank’s Environmental and Social Framework (ESF). This process is described in this ESMF.

4. **Priority list for investment**: Based on the above three steps, a final short list of roads (approximately 250 km) will be identified with a balanced representation on selected provinces, which are eligible for investment. MRD will contract DDIS consultants to prepare designs and tender documents for the prioritized roads, including site-specific ESMPs, updating of the SEP and relevant RPs and IPPs if applicable.

### 4.2 Screening, Approval and Scoping

Environmental and social screening is designed to identify and document potential impacts arising from proposed sub-projects. The environmental and social screening informs decision-makers about the need to implement measures or actions which avoid, minimize, mitigate or compensate for adverse impacts. Sub-projects are categorized according to the screening procedure depending on the type, location, sensitivity and scale of the project and the nature and magnitude of its potential environmental and social impact. A project may be deemed to have minor, moderate, substantial or high-risk impacts. This should be decided by MRD together with the World Bank.

As described in Section 4.1, MRD will conduct environment and social screening as they narrow down the list of roads and will follow an Ineligible/ Negative criteria list to rule out certain road sections (see Annex 2). Thus, road sections that are found to have significant environment or social impacts — such as going through a National Protected Area, new construction, significant widening and/or any road requiring full EIA according to national legislation — will not be considered by the MRD for financing under the CRICP. The MRD will balance road selection between need, benefit and impact — i.e. selecting roads that need to be rehabilitated and will benefit the local population but cause minor environment and social impacts. This screening will be done on the basis of secondary data (such as population census, location of protected areas, location of schools and markets, etc.), and site visits and discussions with provincial, district and local authorities. MRD will submit the final selected list of road sections, and expected impacts, to the World Bank for their Non-Objection.

Once the initial lists of roads have been selected, the MRD will conduct more detailed environment and social scoping, following the impact screening and scoping form in Annex 3. Scoping confirms the key environmental and social issues, risks and potential impacts identified during the initial screening process. The scoping stage can highlight potential issues at an early phase of sub-project development so as to allow planners to design changes which will avoid, minimize or mitigate potential environmental and social impacts. It could be possible that based on more detail scoping a selected road section is ruled out, or that a section that had been ruled out is reconsidered. Any changes in road selection would need to be cleared by the World Bank.
Once the World Bank has provided the Non-Objection to the selected road sections, the MRD and DDIS will adopt a mitigation hierarchy to the design of the selected roads which will:

a) Anticipate and avoid risks and impacts;

b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels;

c) Once risks and impacts have been minimized or reduced, mitigate, and

d) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.

Based on the environment and social scoping and mitigation hierarchy approach above, project planners will be able to understand in more detail the expected impacts of each selected road section, and the need to prepare, consult and disclose site-specific Environment and Social Management Plans (ESMPs), and potentially site-specific RPs and IPPs, following the guidelines in this ESMF and the Component 2’s RF, IPPF, as well as the SEP.

**Figure 3. ESMF Procedures on Approval, Scoping and E&S Plans**

### Subproject Management Steps

- Road subproject screening
- Road subproject preparation
- Road subproject implementation and monitoring
- Road subproject completion and evaluation and maintenance

### E&S Risk Management Activities

- Application of exclusion list by MRD
- Sub-project E&S risk screening and scoping by MRD
- Final list cleared by World Bank
- E&S documents preparation (ESMP, other) by DDIS to become part of civil works bidding documents
- E&S documents approved by MRD and World Bank and consulted and disclosed
- E&S documents include with bidding documents for civil works contract
- Civil works contract awarded with responsibility to comply with ESMP and other E&S documents
- DDIS, MRD and WB monitor performance
- E&S performance supervision, monitoring and reporting by MRD, DDIS and WB

**4.3 Preparation of Site-Specific Environment and Social Management Plans (ESMPs)**

Once project road sections have been identified, site-specific ESMPs will be required (by road section and/or by group of roads if adjacent or similar). The ESMP shall become part of the civil works contract (see Annex 5 for sample outline for an ESMP). The ESMP will establish the environmental and social standard and compliance mechanisms, and serve as the contractual basis for supervision and enforcement of good environmental and social practice during sub-project civil works. The ESMP should be guided by this ESMF, including the potential impacts and mitigation measures highlighted in Table 7, which should be further detailed to mitigate risks and impacts within specific locations and

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23 See section 4.4 for roles and responsibilities of different agencies.
specific civil work activities or amended as needed, including by breaking them down into impacts/mitigation during pre-construction, construction, operations and maintenance.

The environmental and social analysis, design and preparation of an ESMP for each road sub-section must be conducted in close coordination with the feasibility and engineering design of each individual road segment. The analysis should concentrate on environmental and social issues associated with direct impacts along the road alignment and the management of road construction impacts. The ESMP should also be conducted in close connection with other documents that may be required, such as Resettlement Plans (RP) or Indigenous Peoples Plans (IPP), and stakeholder engagement should follow the parameters outlined in the project’s Stakeholder Engagement Plan (SEP), and ensuring the SEP is updated. These should follow the guidance outlined in the existing Resettlement Framework (RF), Indigenous Peoples Planning Framework (IPPF) and SEP that have been prepared for Component 2 of the CRCIP. The MRD will make sure that the ESMPs (and other ESF tools if required) for each road sub-section are consulted and disclosed before the beginning of the construction works. The MRD will also ensure that a grievance mechanism is in place during the entire process to address any concern or suggestion for improvement coming from the stakeholders at local level.

4.3.1 Information Required in an ESMP

The ESMP should ensure adequate coordination with other relevant documents, such as RPs and IPPs and the SEP.

The ESMP shall include:

a) A social and environmental baseline assessment with available information concerning the general population distribution, concentrations of indigenous peoples if applicable, concentrations of low-income communities if applicable, areas of significant ROW encroachment, sensitive and/or critical natural habitats, major rivers and waterways, recorded cultural heritage sites, and any other potentially sensitive areas, based on recent census, official data and information garnered from civil society organizations as well as detailed site visits, for the proposed road section;

b) Identification of all physical, environmental and social risks or impacts along the road;

c) Identification of mitigation measures for all impacts identified, by kilometers along the alignment, including on GBV and road safety;

d) The environment and/or social instrument in which the mitigation measures will be included (i.e., RP, IPP, construction specifications, bidding documents, SEP, etc.);

e) Agency responsible for implementation, including capacity needs training necessary;

f) Timing for implementation of the mitigation measure (before construction, during construction, during planning, etc.);

g) Sources of funding for implementing the mitigation measure.

The ESMP should also identify specific community participation mechanisms, guided by the project’s Stakeholder Engagement Plan, to address environment and social issues, as well as a detailed Grievance Redress Mechanism to deal with stakeholder’s complaints or concerns.

The objectives of the ESMP will be to:

a) Establish specific environmental and social criteria for roadworks in Component 2 of the CRCIP;

b) Identify environmental and social impacts and define environmental and social criteria to avoid, minimize or mitigate such impacts, including working together with project planners to ensure road designs can address these impacts;

c) Ensure that road engineers and technicians can find solutions for any problems arising during road construction or maintenance activities; and
d) Ensure project affected and interested stakeholders have necessary project information, are consulted and engaged, and have a mechanism to submit grievances.

The requirements of the ESMP, and this ESMF, and the MRD’s commitment to implement the mitigation measures are included in the Environment and Social Commitment Plan (ESCP).

### Table 9: Example of Environment and Social Management Plan

<table>
<thead>
<tr>
<th>No.</th>
<th>Project Activity</th>
<th>Impact and Risks</th>
<th>Location</th>
<th>E&amp;S Doc</th>
<th>Mitigation</th>
<th>When</th>
<th>Who</th>
<th>Estimated Budget</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Ex.)</td>
<td>Project Road, PK XX-XX</td>
<td>Construction works</td>
<td>Dust</td>
<td>Province / District / Village / PK</td>
<td>ESMP</td>
<td>Watering 2 x per day</td>
<td>During works</td>
<td>Contractor</td>
</tr>
</tbody>
</table>

### 4.3.2 Responsibilities for Preparation and Bidding Documents

MRD will have overall responsibility for the preparation of site-specific ESMPs, and any other document required (RPs or IPPs for example), and all documents will need to be cleared by the World Bank, consulted on and publicly disclosed in local language (and English) and included as part of bidding documents for civil works contractors. Contractor would be in charge of implementation of the mitigation measures during construction while supervising engineer for implementing of monitoring plan.

These documents will be prepared by DDIS consultants. Therefore, this ESMF, and the RF, IPPF and SEP, should be part of bidding documents for the DDIS, as they will be tasked with the preparation of site-specific plans, including updating the SEP as required.

### 4.3.3 Responsibilities for Supervision and Monitoring on ESMP Implementation

MRD will have overall responsibility for supervising contractors (and their subcontractors if applicable) conducting the civil works for identified project roads in their implementation and compliance with the ESMPs once these are prepared. In this task, MRD will be assisted by DDIS, who will be responsible for training the MRD ESO and providing needing assistance, as further detailed in the sections below.
4.3.4 Capacity Assessment and Needs
MRD has significant experience with the application of the World Bank’s and Asian Development Bank’s safeguards policies through a number of similar road rehabilitation projects that have been implemented during the last years. Currently, among others, MRD is implementing the World-Bank

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24 See section 4.4 for roles and responsibilities of different agencies
financed South East Asia Disaster Risk Management Project (SEA-DRM), as well as the third installment of the ADB-financed Road Rehabilitation Improvement Project (RRIP III), with an improving track record on safeguards compliance. MRD keeps improving the internal capacities of their Social and Environment Office (ESO) in terms of staffing, qualifications and commitment. Some of the SEOs have experience in the field of engineering, environment, social or public administration, and all, or most, have received training by the World Bank and MRD international consultants on environment and social topics. However, most of the MRD SEO working on the CRCIP are new to road projects and/or to environment and social issues. The MRD SEO consists of a total 7 staff assigned for the project, of which 4 are women. The MRD SEO will need support throughout the implementation of Component 2 of the CRCIP from DDIS E&S specialized staff. Additional national consultants may be required as part of the DDIS and/or directly engaged by MRD to work alongside the SEO (for instance, MPWT has this type of arrangement in some road projects).

There is strong commitment in the MRD to ensure environment and social impacts are well identified and mitigated. However, as mentioned, the MRD SEO is mostly new and will require ongoing training and mentoring to ensure they can perform their role as will be described in Section 4.4.1.1. While the SEO has already undergone some initial training on the scope of the project and project documents (ESMF, RF, IPPF and SEP), including on the new World Bank ESF, it will be important for the DDJS to continue to train the SEO in order to ensure they can strengthen their skills and their ability to monitor compliance with environment and social measures. The DDJS may need to conduct a capacity assessment to have a better understanding of what support is needed as well as work alongside the SEO during project implementation.

At this stage, it is envisioned that training delivered by the DDJS to the SEO will need to be holistic and cover all aspects of the project, including (but may be expanded):

- a) Implementing the ESMP;
- b) Monitoring E&S compliance, including reporting;
- c) Gender-Based Violence, including how to conduct awareness raising on this topic;
- d) Violence Against Children, including how to conduct awareness raising on this topic;
- e) HIV/AIDS awareness, including how to conduct awareness raising on this topic;
- f) Occupational Health & Safety, including how to monitor and enforce this aspect;
- g) Labor Management Procedures, including how to monitor and enforce this aspect;
- h) Grievance Redress, including how to oversee and implement the GRM;
- i) Road Safety, including how to conduct awareness raising on this topic;
- j) Indigenous Peoples, including identifying IPs.

Land acquisition and voluntary donations training, conducted with/by GDR, will also be required. Additional training for the SEO by the World Bank on the ESF may also be desirable.

Training for the SEO on the topics above must commence as soon as DDJS are engaged. Additional support by a DDJS E&S officer(s) will be needed on a regular basis, likely on a monthly or bimonthly basis during construction, and quarterly or biannually during maintenance. This will need to be decided based on the selected road sections and the extent of environment and social impacts. An indicative budget for capacity training is described in Section 8. Site-specific ESMPs should include a training plan for the SEO with specific dates, location, topics and budget requirements.

There are no MRD SEO staff at the provincial or district level. Therefore, DDJS will also need to conduct training of Provincial Rural Development staff, as they will be instrumental in ensuring adequate field supervision. DDJS must also support the SEO to deliver training and/or awareness raising activities at the local level. MRD senior management will need to make sure that the SEO has adequate time and
budget to perform their role, including frequent travel to the provinces, and estimated budget provisions are made in Section 8.

4.4 Institutional Arrangements
At this stage of project planning, the following institutional arrangements and responsibilities are envisioned. Additional details are provided in the Resettlement Framework, Indigenous Peoples Planning Framework and Stakeholder Engagement Plan. These institutional arrangements should be further defined and specified in future, site-specific, ESMPs.

4.4.1 Ministry of Rural Development (MRD)
The MRD is the Implementing Agency responsible for CRCIP Component 2 and will implement project activities using their existing institutional setup and departments. The MRD will be the final responsible to ensure the implementation of the provisions of the ESMF by all parties, such as sub-project Borrowers and Contractors, including environmental and social monitoring, evaluation and reporting.

The Project Director (PD) at MRD will be responsible for overall guidance and policy advice, internal coordination, discussion and resolution of project matters with counterparts in the ministry and other government agencies, donor alignment and harmonization, and public disclosure and civil society involvement. The project manager (PM) at MRD will provide day-to-day support to the PD and will have the responsibility to ensure that the Project Operation Manual (POM) is followed, environment and social activities are implemented, all consultants follow their terms of reference and delivery schedule, project activities are carried out on schedule and within budget, and financial management reports are submitted on time.

As the IA, MRD is responsible for:
   a) Ensuring the project has adequate staffing (PD, PM and SEO);
   b) Provide agreed counterpart funds for project activities in a timely manner;
   c) Comply with the Environment and Social Commitment Plan (ESCP).

The PD and PM at MRD are specifically responsible for:
   a) Effective communication between all stakeholders;
   b) Recruiting consultants;
   c) Finalizing needed surveys, detailed design, bidding documents, and contract awards;
   d) Monitoring and evaluating project activities and outputs, including periodic reports;
   e) Involving stakeholders in all stages of project design and implementation as per the SEP;
   f) Conducting consultations and disclosure of project documents as per the SEP;
   g) Assuring quality of works, and services of consultants and counterpart staff;
   h) Establishing a strong financial management system and submit timely withdrawal applications to WB, conduct timely financial audits as per agreed timeframe and take recommended actions;
   i) Establishing and monitoring project grievance redress mechanism in accordance with the SEP;
   j) Providing monitoring reports to the World Bank on a quarterly basis, and a project evaluation at the end of the project.

4.4.1.1 MRD’s Social and Environment Officers (SEO)
MRD’s SEO will be instrumental in ensuring the environmental and social performance of Component 2 of the CRCIP. The MRD will assign for the ESF-related activities under Component 2 at least one Environmental Specialist and one Social Specialist. They will be responsible for ensuring proper environmental and management of all Project activities, conduct environmental and social supervision
by carrying out document reviews, site visits and interviews with the Contractor, Construction supervisors, workers, provincial-level government staff, local authorities and local communities.

The assigned environmental and social specialists of the MRD’s SEO should also supervise Contractors’ compliance with site-specific ESMPs and visit each sub-project location at least once a month during construction. Upon completion of each site visit, the SEO should prepare a Monitoring Report reflecting the main issues, and arrangements and timing for their solution. It is also recommended to hold regular meetings with the Project Manager, Contractor, DDIS consultant and the SEO on a monthly basis.

The SEO will report to the PM and PD and work under the guidance of the PM. The SEO is expected to work together with the Environment and Social Officers of the DDIS. The SEO will be responsible for:

a) Implementing and monitoring performance of environment and social mitigation measures, including road safety and gender elements;

b) Conducting screening and scoping on environment and social impacts (see Annex 3), including screening for land acquisition impacts based on the guidance in the RF and presence of Indigenous Peoples based on the guidance in the IPPF;

c) Conducting trainings on road safety, gender, GBV, VAC, labor rights, HIV/AIDS and the grievance redress mechanism to project communities, and monitoring the contractor in their delivery of trainings on GBV, Code of Conduct and HIV/AIDS to workers;

d) Monitor environmental and social activities of the project, in particular the implementation of the ESMP and any other relevant project documents (RP, IPP);

e) Coordinate the Grievance Redress Mechanism and include updates in monthly reports;

f) Lead consultations, disclosure and stakeholder engagement as per the provisions of the SEP and the ESMP;

g) Work collaboratively with the Provincial Department of Rural Development and other line ministries and/or departments as necessary (such as the General Department of Resettlement);

h) Provide monthly reports on implementation to the PM and PD.

4.4.1.2 Provincial Department of Rural Development (PDRD)

The PDRD of Kampong Cham, Tboung Khmum and Kratie will be responsible for working with MRD in project planning and implementation of specific road sections at the provincial level. The PDRD will also work and supervise project officers at the District level and be responsible for:

a) Executing and/or monitoring civil works in the respective provinces;

b) Provide effective coordination between all the stakeholders of the project at the provincial level including SEO, consultants, contractors, local authorities, provincial departments and project communities;

c) Assist project officers to monitor and evaluate the progress and performance of consultants and contractors;

d) Work with the SEO to conduct trainings on labor, gender, GBV, VAC, HIV/AIDS and road safety;

e) Work with the SEO to disseminate project information and conduct consultation activities, as well as ensuring the efficacy of the Grievance Redress Mechanism;

f) Work with the SEO to conduct screening and scoping of project roads and identifying environment, social, land acquisition impacts and presence of IPs;

g) Liaise with village authorities in relevant road sections to encourage women to apply to road jobs;

h) Collaborate as relevant with departments working on land acquisition and/or other environment or social mitigation measures.
4.4.2 Detail Design Implementation and Supervision (DDIS) Consultant

The DDIS consultant will be responsible for detailed design, construction supervision, implementation monitoring, as well as project performance monitoring and evaluation of the CRCIP. It is expected that the DDIS team will have an Environment and a Social officer(s) as part of the team. The DDIS E&S officer(s) will be responsible for:

a) Supporting the SEO to fulfill their roles, including by conducting capacity building training, helping with work plans, monitoring reports, conducting site visits, etc.;

b) Leading the drafting of required environment and social documents such as the site-specific ESMPs, RPs, IPPs and updating of the SEP as needed, and any other documents that may be required;

c) Working collaboratively with PDRD and other related departments such as GDR as needed;

d) Ensuring minimum disruption/damage to the environment and local communities by approval of contractors’ work statement/methodology on implementation of the ESMP, including monitoring the impact of construction works on the environment and local communities and assisting the SEO to provide monthly progress reports;

e) Incorporating into the project design the environmental protection and mitigation measures identified in the ESMP for the design/pre-construction stage;

f) Assist the Project PM and SEO to ensure that all environmental and social requirements and mitigation measures from the ESMP are incorporated in the civil works bidding documents and contracts;

g) Assist MRD in establishing the Grievance Redress Mechanism as described in the SEP and summarised in this ESMF;

h) Implement all mitigation and monitoring measures for various project phases specified as DDIS’ tasks in the ESMP based on guidance in this ESMF;

i) Undertake environmental and social management capacity building activities for the SEO as required;

j) Undertake regular monitoring of the contractor’s environmental and social performance as scheduled in the ESMP;

k) Supervise Contractors’ compliance with site-specific ESMPs and organize site visits to each sub-project;

l) Prepare Environmental and Social Monitoring Reports including Project Progress reports for each ongoing sub-project;

m) Participate in regular supervision missions and respond on WB requirements and MRD.

DDIS should have additional staff tasked with E&S compliance on site, such as Supervision Engineers tasked with ongoing supervision and compliance of ESMP mitigation measures.

4.4.3 Civil Works Contractor

The Civil Works contractor is expected to be responsible for implementing most, if not all, the measures recommended in the ESMP to mitigate environment and social impacts. The contractor may also have responsibilities linked to other documents such as the RPs, IPPs and SEP. The contractor will:

a) Designate a full-time Environment Health and Safety Officer for the assigned contract project;

b) Prepare and submit a management plan for review by the DDIS Consultant for approval by the MRD and the WB on how the contractor will comply with the ESMP (Contractor’s ESMP – CESMP) and other project documents if required (RP, IPPs, SEP);

c) Provide sufficient funding and human resources for implementation of the ESMP;

d) Ensure proper and timely implementation of required pre-construction and construction mitigation measures in the ESMP;

e) Implement additional environmental and/or social mitigation measures as necessary (this may include clearance of the COI after land acquisition activities have taken place), including having in place a grievance redress system and complying with other measures in the SEP.
4.4.4 Ministry of Economy and Finance

The Ministry of Economy and Finance (MEF), through its Inter-Ministerial Resettlement Committee (IRC), is responsible for land acquisition activities which are described in detail in the RF. The permanent Secretariat of the IRC is the General Department of Resettlement (GDR), which is the lead agency for the preparation, implementation, and monitoring and reporting of land acquisition and resettlement activities. There is also an IRC-Working Group at the provincial level and Provincial Resettlement Sub-Committees (PRSC) and their working groups, which are established when there are land acquisition activities. The MRD SEO and DDIS, and to some extent the contractor, will need to work collaboratively with these agencies in case of land acquisition as detailed in the RF.
Component 2 of the CRCIP will conduct consultation activities and stakeholder engagement as per the project’s Stakeholder Engagement Plan (SEP). The SEP seeks to ensure that Project communities, as well as other Project stakeholders, are informed and involved in all the stages of the Project. The Project recognizes the need to seek representative and inclusive feedback and the SEP looks to establish the role of women and vulnerable groups firmly within the consultation process. The Project also recognizes the importance of ensuring affected people are involved in mitigation measures, road safety programs, as well as continuing monitoring of project activities.

The objectives of the SEP are:

- To identify all project stakeholders including their priorities and concerns, and ensure the project has ways to incorporate these;
- Identify strategies for information sharing and communication to stakeholders, including project information on social risks and impacts, as well as consultation of stakeholders in ways that are meaningful and accessible throughout the project cycle;
- To specify procedures and methodologies for stakeholder consultations, documentation of the proceedings and strategies for feedback;
- To establish an accessible, culturally appropriate and responsive grievance mechanism, and
- To develop a strategy for stakeholder participation in the monitoring of project impacts.

The SEP is a living document and will continue to be updated as the project progresses from pre-civil works to civil works and operation.

Since Component 2 road sections of the CRCIP are not defined at this stage of project preparation, specific stakeholders cannot be defined at this stage, but a general list, which will have to be refined once project components are identified, is available. It will be the responsibility of MRD and the DDIS to update the SEP.

In general, there are two kinds of stakeholders, affected and interested stakeholders:

**Affected Stakeholders:** Those who will be likely impacted by the project positively or negatively. These stakeholders are mainly project communities or local businesses living or operating along the project roads. Impacts will vary depending on the stage of the project (design, civil works, post-civil works). For instance, civil works impacts may relate to dust/noise, labour influx and any land acquisition, while post-civil works impacts may relate to increased traffic or speeding cars. A guiding principle is that engagement with these stakeholders will be commensurate with the level of impacts they suffer. Affected stakeholders are expected to include:

- People living or running businesses along the road;
- People or businesses impacted by land acquisition, if any;
- People voluntarily donating assets to the project; and
- Indigenous Peoples with collective attachment to the project area, if any (and their leaders or representatives).

**Interested Stakeholders:** Those who are not impacted by the project but who may be interested in the Project outcomes and who may have an influence in the project. These stakeholders may include local people who are not directly impacted, government authorities working in relevant areas, NGOs, environmental groups working on dolphin conservation (since some of the project’s sections are close to those areas), road users and the media. Interested stakeholders are expected to include:

- Regular road users, such as people living in/close to the area or using the roads to go to markets, hospitals, schools;
Contractors in charge of civil works and their staff;

Relevant government departments at the national and provincial level involved in road rehabilitation including Ministry of Rural Development (MRD); Provincial Departments of Rural Development (DRD) and Provincial Departments of Public Works and Transport (DPWT) for Kratie, Kampong Cham and Tboung Khmum; Provincial, District, Commune and Village Authorities in selected road sections in Kratie, Kampong Cham and Tboung Khmum;

General Department of Resettlement (GDR), Inter-Ministerial Resettlement Committee (IRC), Provincial Resettlement Sub-Committee (PRSC) and Working Groups;

Representatives of Provincial, District and relevant Commune Women and Children’s Committees and Women’s Affairs, Gender Management Action Group (GMAG) in MRD;

Relevant government departments at the provincial level that may be interested in, or may need to be consulted on, road rehabilitation including: District Police along road corridors; Electricite du Cambodge (EDC); Provincial Department of Health; Provincial Department of Agriculture, Forestry and Fisheries; Provincial Department of Education Youth and Sport; Provincial Department of Labour and Vocational Training; Provincial Department of Women’s Affairs; Provincial Department of Cult and Religion; Provincial Department of Planning; Provincial Department of Land Management Urban Planning and Construction;

NGOs and civil society groups with an interest in gender, including gender-based violence, such as Bantey Srey NGO, NGO Forum;

Road Safety Network;

Supply chain providers of road materials for construction.

NGOs and civil society groups with an interest in Indigenous People’s issues (if relevant);

Road Safety Network;

Supply chain providers of road materials for construction.

More detail and analysis of project stakeholders, and suggested methods and timing for engagement, is provided in the SEP.

5.1 Consultations During Project Preparation

National Consultations were held by MRD on March 5, 2020, in order to disclose and discuss the draft versions of the ESMF, RF, IPPF and SEP with interested stakeholders. The minutes of the consultation can be found in Annex 3 of the SEP. The ESMF, RF, IPPF and SEP have also been publicly disclosed in the MRD and WB websites, and hard copies of all Executive Summaries are available in Khmer language in the MRD library and Provincial Departments of Rural Development.

5.2 Consultations During Project Implementation

It is expected that consultations and information disclosure will be an ongoing process of Component 2 of the CRCIP as detailed in the SEP. There will be ongoing local consultations with affected people, project workers, local authorities and vulnerable people, among others. Consultations will focus on the environmental and social impacts of the project, potential land acquisition impacts, procedures for voluntary donations, impacts to Indigenous Peoples if applicable, trainings on Gender-Based Violence, Worker’s Code of Conduct, labor rights and available job opportunities, among others. Specific details, including details of stakeholders, methods of consultations and timings, are provided in the SEP. The SEP should be updated by the DDIS once specific road sections are known, and therefore specific stakeholders are identified as well as specific timings for project works and consultation and disclosure activities. Future ESMPs and the updated SEP, as well as RPs and IPPs if applicable, will be consulted on and publicly disclosed.
<table>
<thead>
<tr>
<th>Activity</th>
<th>Project Phase</th>
<th>Timeline</th>
<th>Responsibility</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>National consultations to disclose and discuss documents for MRD components (RF, IPPF and ESMF)</td>
<td>Conceptual Design, Prior to World Bank Appraisal</td>
<td>March 5, 2020</td>
<td>MRD and consultants</td>
<td>Phnom Penh</td>
</tr>
<tr>
<td>Local consultations, to introduce project, screening on IPs, extent of land acquisition, voluntary donations, detailed design, project impacts, etc.</td>
<td>Implementation: Detailed Design</td>
<td>Expected fourth quarter of 2020 onwards</td>
<td>MRD and DDIS consultants</td>
<td>Project Provinces</td>
</tr>
<tr>
<td>If land acquisition impacts, detailed measurement and preparation of Detailed RPs.</td>
<td>Implementation: Detailed Design</td>
<td>TBD</td>
<td>GDR, MRD and DDIS consultants</td>
<td>Project Provinces</td>
</tr>
<tr>
<td>Disclosure of ESMP, voluntary donations, RPs if applicable</td>
<td>Implementation: Detailed Design</td>
<td>TBD</td>
<td>MRD and DDIS consultants (and GDR if land acquisition)</td>
<td>Project Provinces</td>
</tr>
<tr>
<td>If applicable, preparation of Indigenous Peoples’ Plan and Social Assessment</td>
<td>If IPs are found, in line with WB ESS7, in MRD project roads</td>
<td>TBD</td>
<td>SEOs with support from DDIS (additional IPP consultant may also be needed)</td>
<td>Project Provinces</td>
</tr>
<tr>
<td>Works commence, implementation of Detailed RP ahead of civil works (i.e delivery of entitlements), hiring of local workers, trainings on gender, GBV, HIV/AIDS, VAC, trainings for contractors and staff, etc. Delivery of IPP if applicable.</td>
<td>Civil Works</td>
<td>TBD</td>
<td>Contractor, SEOs, DDIS, GDR (if land acquisition)</td>
<td>Project Provinces</td>
</tr>
</tbody>
</table>

### Table 10: Expected Timeline of Consultation and Disclosure Activities as per the SEP

#### 5.3 Reporting Back to Stakeholders

Consultations with stakeholders will be the main mechanism to inform them of the project and to get their feedback. MRD SEOs, with the support of DDIS, will be responsible for ensuring there are notes of project meetings and consultations, and incorporation of comments into project documents when applicable. Stakeholders who provide specific suggestions will be followed up with after consultations with feedback on how their comments were considered. There will be particular attention to consider and incorporate gender aspects in the project. If applicable, comments and views of Indigenous Peoples will be incorporated in line with the project’s IPPF and WB ESF 7, under the umbrella of Free, Prior and Informed Consent.

The method of reporting back to stakeholders will depend on the stakeholder itself. There are essentially two main methods:

- For National-level stakeholders, an email and/or official letter will be sent after workshops on how comments/suggestions were considered;
- For local stakeholders, follow-up meetings/consultations will be conducted to let stakeholders know on how comments/suggestions were considered;
• For Indigenous Peoples, if relevant, ongoing consultations in line with this SEP and the IPPF will ensure that IP views are incorporated and that they are informed of this.
6 GRIEVANCE REDRESS

The grievance mechanism seeks to resolve concerns promptly, using an understandable process that is culturally appropriate and readily accessible at no cost. Grievances can be submitted if someone believes the Project is having a detrimental impact on the community, the environment, or on their quality of life. Stakeholders may also submit comments and suggestions. The GRM is described in full in the project’s SEP.

The MRD SEO will be responsible for receiving and resolving in a fair, objective, and constructive manner, all concerns or complaints raised by people affected by the project. The broad responsibilities of the SEO in terms of grievance management include:

- Developing and publicizing the grievance management procedures;
- Receiving, reviewing, investigating and keeping track of grievances (logbook to be established by clients);
- Adjudicating grievances;
- Monitoring and evaluating fulfilment of agreements achieved through the grievance mechanism.

For the interest of all parties concerned, the grievance mechanism is designed with the objective of solving disputes at the earliest possible time. GRM shall be made ready (in local language) before starting the civil works, consulted and phone/office contacts are made available/visible on sites. A recommended timeframe for the resolution of a complaint should be sought within two weeks.

In the CRCIP it is envisaged there could be four types of grievances:

a) Grievances relating to land acquisition, that follow the Resettlement Plan’s GRM (detailed in the project’s RF);

b) Grievances directly related to program implementation (including relating to environmental and social impacts, health, road safety, etc.), described in this ESMF;

c) Grievances related to Indigenous Peoples (detailed in the IPPF), and

d) Worker-related disputes (detailed in the LMP in Annex 8).

The GRM described below is specifically relevant to (b).

6.1 Steps in Grievance Redress

Wherever possible, the project team will seek to resolve the complaint as soon as possible, and thus avoid escalation of issues. However, where a complaint cannot be readily resolved, then it must be escalated.

- The first level of complaint resolution, following traditional methods in Cambodia, should be the Village and/or Commune level as described above who may be able to resolve issues on the spot. The Village/Commune level, should record the grievance and how it was resolved and communicate it to MRD’s SEO. In cases where grievance is related to a labour dispute, the grievance may be first submitted to the contractor and/or human resource staff of the contractor directly.

- In cases where grievances cannot be resolved on the spot, the second level of complaint people will be able to file grievances directly with the SEO. People will have been informed of the SEO’s contact information during consultations. The SEO will be able to record the

---

25 In the case of IPs, this may need to be adapted to an IP community leader.
grievance and offer a solution within 15 days, consulting with the MRD Project Manager and Director, as needed. This may include a visit to the project site by the SEO if necessary. There are no fees or charges levied for the lodgement and processing of grievances for level one or two.

In cases where grievance still cannot be resolved, or not resolved to the satisfaction of the person making the complaint, the person has the right to submit a complaint to the District or Province authorities, as desired by the complainant. The Complainant could also decide to submit to complaint directly to the Courts. The complainant will bear the cost for these steps, but will be reimbursed for their expenses by the IA if their complaint is successful.

### 6.2 Recording Grievances

Established and managed by the SEO, a complaints register will be established as part of the project to record any concerns raised by any stakeholder during the implementation of this project. Any serious complaint will be advised to the World Bank within 24 hours of receiving the complaint. A summary list of complaints received, and their disposition, along with key statistics on the number of complaints and duration taken to close out, must be reported yearly. Grievances will be recorded in a Grievance Logs (see Table 10). This information will include:

- Stakeholder name and contact details (if not anonymous);
- Details of the nature of the grievance;
- Date received, manner in which it was responded to, and
- How it was submitted, acknowledged, responded to and closed out.

Grievances can be submitted anonymously or the aggrieved person can also request their name be kept confidential. Responsibility for the Grievance Log will be with the SEO office and Project Directors/Managers in MRD.

**Table 11: Sample Grievance Log based on SEP**

<table>
<thead>
<tr>
<th>Grievance Log</th>
<th>Name of Complainant (or anonymous)</th>
<th>Sex (M/F)</th>
<th>Contact info</th>
<th>Date Received</th>
<th>Details of the nature of the grievance (environmental impacts, social impacts, labor, health, etc.)</th>
<th>To whom was grievance submitted</th>
<th>Actions to resolve grievance</th>
<th>Date grievance was settled (and what stage)</th>
<th>How was the response provided?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
7 MONITORING AND REPORTING

Monitoring is the method of ensuring mitigation measures are being implemented and are effective. Monthly, quarterly- and semi-annual monitoring reports will need to be undertaken in order to:

- Improve environmental and social management practices;
- Ensure the efficiency and quality of the environmental and social assessment processes;
- Establish evidence- and results-based environmental and social impact assessment; and
- Provide an opportunity to report the results of the implementation of mitigation measures in future ESMPs and other project related documents.

7.1 Internal Monitoring

During road sub-project implementation, the MRD SEO will conduct monthly internal monitoring activities on the ESMPs to determine how mitigation measures are being implemented and the extent of their effectiveness. The SEO reports will be reviewed by the project PM and PD and submitted to the World Bank for their review. The SEO will be assisted by the DDIS in this process.

The MRD SEO, assisted by DDIS, will monitor that the required mitigation measures of the ESMP and other applicable documents are considered and implemented by the civil works contractor and/or other responsible agency. During the road sub-project preparation phase, compliance monitoring activities will focus on ensuring effective ESMP implementation – i.e. ensuring that all mitigation measures described (as in Table 7) are being adhered to.

The SEO will also monitor grievance redress, implementation of land acquisition activities as described in the RF, ensuring adequate scoping for Indigenous Peoples in the project roads – and preparation of required documents if needed – and the implementation of the SEP consultation and disclosure activities.

Monitoring and evaluation of the social impacts should at least measure the following:

- Land Acquisition impacts and ensuring those affected by land acquisition have at least maintained their pre-project standard of living, as well as other related monitor indicators described in the RF/RPs;
- Impacts and benefit sharing with Indigenous Peoples if applicable as per the IPPF/IPP;
- Number of women working on road construction jobs and other Project non-construction jobs;
- Number of trainings provided to women and vulnerable groups, and the impacts of these trainings (i.e. whether knowledge on a topic was enhanced, on HIV/AIDS for example);
- Efficacy of the grievance redress mechanism (for the community and for workers);
- Efficacy of road safety measures;
- Incidence of GBV and whether community members feel grievance redress methods are appropriate;
- Age of workers and that all workers have contracts in place with adequate pay that is at least the minimum wage;
- Other monitoring indicators as may be described in the ESMP or other related project documents.

Meanwhile, monitoring of environmental impacts should focus on ensuring that all environmental mitigation measures are implemented as per the ESMP.
Data should be gender-disaggregated as much as possible. The ESMP will need to define how and when monitoring indicators will be measured. Monthly reports on monitoring should be provided by MRD SEO with the support of DDIS. A sample monitoring checklist is provided in Annex 6.

### Table 12: Proposed Monitoring Measures

<table>
<thead>
<tr>
<th>Parameter to be Monitored</th>
<th>Location</th>
<th>Means of Monitoring</th>
<th>Schedule/ Frequency</th>
<th>Responsible Agency for Monitoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>Completion of detailed design in accordance with ESMF, RF, IPPF and SEP requirements, including the preparation of required site-specific ESMPs, updating of the SEP, and RPs and IPPs as needed</td>
<td>Phnom Penh</td>
<td>Review of detailed design documentation</td>
<td>Prior to approval of detailed design</td>
<td>MRD SEO</td>
</tr>
<tr>
<td>Implementation of all mitigation measures specified in the ESMP (based on guidance of those specific in the ESMF Table 7)</td>
<td>All project roads</td>
<td>This will need to be defined in the ESMP but is expected to be conducted by conducting site visits to check contractor’s facilities, environmental management practices, reviewing worker’s contracts arrangements, conducting focus groups with women workers, conducting focus groups in the community to inquire about contractor-community relations, etc.</td>
<td>This will need to be defined in the ESMPs but some measures are expected to be conducted prior to the start of works (such as UXO assessment, establishment of GRM), while others will be throughout the construction period</td>
<td>MRD SEO and DDIS</td>
</tr>
<tr>
<td>Implementation of the SEP</td>
<td>All project roads</td>
<td>As defined in the SEP</td>
<td>As defined in the SEP</td>
<td>MRD SEO and DDIS</td>
</tr>
<tr>
<td>Implementation of all mitigation measures specified in other project documents that may be required, such as RPs and IPPs</td>
<td>As required in specific project roads</td>
<td>As defined in RPs or IPPs</td>
<td>As defined in RPs or IPPs</td>
<td>MRD SEO and DDIS</td>
</tr>
</tbody>
</table>

### Table 13: Example of Monitoring in Environment and Social Management Plan (also see Annex 6)

<table>
<thead>
<tr>
<th>Monitoring Plan</th>
<th>Mitigation Measure being Monitored</th>
<th>Location</th>
<th>When</th>
<th>Who</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example: Watering of roads 2x per day to minimize dust</td>
<td>Province / District / Village/ PK (Road Section)</td>
<td>Monthly – X Month</td>
<td>MRD SEO and DDIS</td>
<td></td>
</tr>
</tbody>
</table>
8 BUDGET

ESMF implementation cost will include the development of the specific site-specific environment and social instruments, including staff costs, travel, consultation workshops, translation and trainings. The total indicative cost reviewed by the World Bank and MRD is estimated at 341,000 USD (Table 12) plus the costs of specific mitigation measures in the ESMP, RP and IPP (if applicable). Funds will be sourced by a combination of IDA and counterpart financing, from the project management component. This budget is indicative only and should be further refined during the preparation of site-specific ESMPs.

Table 12. Estimated Budget for the ESMF

<table>
<thead>
<tr>
<th>Item</th>
<th>Estimated Cost (to be updated in the ESMP)</th>
</tr>
</thead>
<tbody>
<tr>
<td>International Consultants (DDIS) on E&amp;S to:</td>
<td></td>
</tr>
<tr>
<td>• Prepare site-specific ESMPs, updating of the SEP, required RPs and IPPs (if applicable)</td>
<td></td>
</tr>
<tr>
<td>• Ongoing monitoring of E&amp;S documents, including assisting SEO to provide regular reports (Additional budget for DDIS will be required to undertake the design and other aspects of their work)</td>
<td>USD 150,000</td>
</tr>
<tr>
<td>Training for the SEO on (but may be expanded):</td>
<td></td>
</tr>
<tr>
<td>• Implementing the ESMP;</td>
<td></td>
</tr>
<tr>
<td>• Monitoring E&amp;S compliance, including reporting;</td>
<td></td>
</tr>
<tr>
<td>• Gender-Based Violence, including how to conduct awareness raising on this topic;</td>
<td>USD 40,000</td>
</tr>
<tr>
<td>• Violence Against Children, including how to conduct awareness raising on this topic;</td>
<td></td>
</tr>
<tr>
<td>• HIV/AIDS awareness, including how to conduct awareness raising on this topic;</td>
<td></td>
</tr>
<tr>
<td>• Occupational Health &amp; Safety, including how to monitor and enforce this aspect;</td>
<td></td>
</tr>
<tr>
<td>• Labor Management Procedures, including how to monitor and enforce this aspect;</td>
<td></td>
</tr>
<tr>
<td>• Grievance Redress, including how to oversee and implement the GRM;</td>
<td></td>
</tr>
<tr>
<td>• Road Safety, including how to conduct awareness raising on this topic;</td>
<td></td>
</tr>
<tr>
<td>• Indigenous Peoples, including screening for IPs.</td>
<td></td>
</tr>
<tr>
<td>Budget for SEO office to conduct travel to provinces to conduct monitoring, training activities, etc.</td>
<td>USD 30,000</td>
</tr>
<tr>
<td>Translation of E&amp;S documents, printing and/or materials for consultations or trainings</td>
<td>USD 20,000</td>
</tr>
<tr>
<td>National consultation in Phnom Penh and additional local consultations throughout the project</td>
<td>USD 20,000</td>
</tr>
<tr>
<td>National Consultant (TBD if needed)</td>
<td>USD 30,000</td>
</tr>
<tr>
<td>Construction-phase mitigation measures of ESMP</td>
<td>To be calculated in ESMP</td>
</tr>
<tr>
<td>Budget for land acquisition</td>
<td>To be calculated in RP (if applicable)</td>
</tr>
<tr>
<td>Budget for mitigation measures for Indigenous Peoples</td>
<td>To be calculated in IPP (if applicable)</td>
</tr>
<tr>
<td>Description</td>
<td>Amount</td>
</tr>
<tr>
<td>----------------------------------------------------------------------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>Budget to implement Grievance Redress Mechanism, including associated</td>
<td>USD 20,000</td>
</tr>
<tr>
<td>trainings and any additional staff that may be required</td>
<td></td>
</tr>
<tr>
<td>Contingency (10%)</td>
<td>USD 31,000</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>USD 341,000 + costs of mitigation measures in ESMP, RP and IPP to be estimated</strong></td>
</tr>
</tbody>
</table>
ANNEX 1 – Environment and Social Baseline of Project Provinces

KRATIE PROVINCE

Environment – Kratie is a province located in the northeast of Cambodia. The province encompasses an area of 11,094 square km with coordinates of 12°29’ N and 106°1’ E. Kratie borders the provinces of Stung Treng to the north, Mondulkiri to the east, Kampong Thom and Kampong Cham to the west, and Tboung Khum and Viet Nam to the south. The province is subdivided into five districts and one city, Chhloung, Preaek Prasab, Sambour, Snuol, Chitr Borie, and Krong Kratie. The provincial capital is Kratie located in Kratie District. The Mekong River bisects the province from north to south resulting in narrow floodplains. Most of the province is covered in dense forests, though some are more open and generally consist of deciduous trees that lose their leaves during the dry season. The province also consists of undulating uplands and lowlands. Land use patterns in the upland area of Kratie province consists of forest, grazing, shrub and farming land. Due to economic development pressures, the use and control of the forests have significantly changed. Forest lands have been converted into plantations and rice paddies by farmers. Agriculture in Kratie, while not as abundant as in other provinces, continues to grow and produces maize, cassava, sesame, sweet potato, sugarcane and soya beans, among others. There are two protected areas in Kratie province: Keo Seima Wildlife Sanctuary and Snoul Wildlife Sanctuary. The Keo Seima Wildlife Sanctuary encompasses over 298,160 ha, although more than half is within Mondulkiri province. Adjacent to the Keo Seima Wildlife Sanctuary is the Snoul Wildlife Sanctuary. The Snoul Wildlife Sanctuary in Kratie encompasses 61,943 ha.

Climate and Extreme Weather – Kratie province follows a monsoonal climate, with a cool season from November to March, a hot season from March to May, and a rainy season from May to October. Temperatures may range from 22°C to 36°C annually. The province’s climate has three seasons: a cool season from November to March (22°C – 28°C), a hot season from March to May (28°C – 36°C), and a rainy season from May to October (24°C – 32°C, with humidity up to 90%). The annual flow of the Mekong River in Kratie province from 1985 to 2009 has been determined to be 401 cubic kilometers. The Mekong River may overflow its riverbanks by as much as 4 meters (m) during the rainy season, resulting in frequent and prolonged flooding. The peak of the flood is during September where the monthly discharge averages in excess of 36,000 cumecs (cubic metres per second). High flood years in Kratie have included 1961, 1978, and 2000. However, the Mekong floods at Kratie have been declining for the past two decades, and in 2012, flood volumes were almost 40% below the normal rate. Kratie is increasingly experiencing severe drought, which has affected rice production and other agricultural crops. Notable drought years have included 1977, 2004, and 2008.

Social – The population of Kratie province is approximately 320,000 people, or over 2% of the total population of Cambodia. The province’s population is split nearly evenly between males and females. Approximately 70% of residents live along the Mekong River and the remaining 30% live in mountainous areas. The majority of the population are Khmer, the largest ethnic group in Cambodia. There is a significant Vietnamese minority living in Kratie. There are also indigenous groups, including Bunong, Kouy, Mil, Khonh, Kraol and Steang. The majority of Kratie’s residents are subsistent farmers or fishers. Around three-quarters (78%) of the population are engaged in agriculture, both for livestock


(i.e. poultry, swine and cattle) and crop production. Crops include cassava, maize, sesame, sweet potato, sugarcane and soy beans, among others. Tobacco is one of the major products of Kratie, representing almost twenty percent of Cambodia's crop. Around 20,000 ha are dedicated to rubber plantations where the latex is exported to countries such as Viet Nam, Japan, and Korea. Kratie’s proximity to both Phnom Penh and Viet Nam provides efficient access and opportunities for trade between both growth poles. Other key industries include a growing tourism sector – particularly linked to the endangered Mekong Dolphin – and natural attractions, contributing over USD 3 million per year. There is potential for hydro-electric power and mineral resources.

KAMPONG CHAM PROVINCE

Environment – Kampong Cham is located in the central lowlands of Cambodia and is bordered by Kratie to the north-east, Prey Veng to the south, Kampong Chhnang to the west and Kampong Thom to the northwest as well as Viet Nam to the east. The province covers an area of 4,549 square km with coordinates 11°59’ N and 105°27’ E. Kampong Cham is subdivided into 10 districts: Batheay, Chamkar Leu, Cheung Prey, Kampong Siem, Kang Meas, Kaoh Soutin, Prey Chhor, Srei Santhor, Stueng Tra, and Krong Kampong Cham, with Kampong Cham serving as the provincial capital. The majority of the province consists of lowlands with the Mekong River flowing through the province. Agriculture and industrial crops consist of 413,035 ha of land, while forest area represents 300,000 ha, flooded land 312,860 ha, plain land 270,000 ha, and red soil 97,000 ha. There are currently no protected areas in Kampong Cham province.

Climate and Extreme Weather – Kampong Cham’s climate is governed by monsoons. The average temperature is around 27°C with a minimum temperature of about 16°C. December and January are the coolest months during the year. The province’s three seasons are: the cool season from November to March (17°C–27°C), hot season from March to May (28°C – 36°C), rainy season from May to October (25°C – 35°C, with humidity up to 90%). Kampong Cham is regularly hit by flash flooding and has endured severe flooding and drought incidents in the recent past. Overall, the province suffers more from droughts than floods. However, in 2014, Kampong Cham suffered the second highest death rate in Cambodia because of flooding that began in July and lasted until the end of August. Landslides are also a common occurrence in Kampong Cham and have contributed to infrastructure damage, especially roads.

Social – Kampong Cham’s total population is approximately 1 million people since being split into two provinces (Kampong Cham and Tboung Khmum). Much like the majority of Cambodia, Kampong Cham’s major ethnic group are Khmer as well as ethnic minorities such as Vietnamese, Chinese, and Cham groups, but there are no Indigenous Groups in the province. Kampong Cham’s strategic location, open policies and trading activities has transformed the province into the transportation hub for Cambodia, Thailand and Viet Nam. Transportation access to the province includes a comprehensive road network, railway, and riverboats. Generally, people make their living from rubber and cashew nut plantations, fishing, and farming. Potential investment opportunities include more value adding agro-industry, such as rice plantation, cassava (tapioca), sugar cane, durian, and palm fruit. There is also potential for tourism because of the province’s accessibility and historical, cultural attractions, as well as natural scenery.

29 http://pdf.usaid.gov/pdf_docs/Pnadin800.pdf
TBOUNG KHUM PROVINCE

General – Tboung Khmum is located on the central lowlands of the Mekong River. The province covers an area of 4,928 square km, with coordinates of 11°59’ N and 105°27’ E. Tboung Khmum borders Kampong Cham province to the west, Kratie province to the north, Prey Veng province to the south, and Viet Nam to the east. The province is divided into six districts and one city, Dambae, Krouch Chhmar, Memot (where some Indigenous Stieng Groups are found), Ou Reang Ov, Ponhea Kraek, Tboung Khmum, Krong Suong and its capital and largest city, Suong. Tboung Khmum used to be part of Kampong Cham province, until December 31st, 2013 when a Royal Decree was signed by King Norodom Sihamoni to split the province in two. Due to the province’s recent establishment, very little provincially aggregated data is available.

PROTECTED AREAS

There are Protected Areas dispersed across the three provinces with the greater concentration in Kratie Province (4), followed by Tboung Khmum (1), with no PAs in Kampong Cham province as of 2019. These form a small portion of the 66 Protected Areas in the country.

<table>
<thead>
<tr>
<th>Name</th>
<th>Size (Ha)</th>
<th>Province</th>
<th>District</th>
<th>Category</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ponhea Kraek Multiple Use Area</td>
<td>199</td>
<td>Tboung Khmum</td>
<td>Memot</td>
<td>Multiple Use Management Area</td>
<td>Sub_decree_No_87__09.05.2016</td>
</tr>
<tr>
<td>Snuol Wildlife Sanctuary</td>
<td>75,000</td>
<td>Kratie</td>
<td>Snoul</td>
<td>Wildlife Sanctuary</td>
<td>Royal_Decree_on Protected Areas 01.11.1993</td>
</tr>
<tr>
<td>Sor Sor Sdom Tao Multiple Use Area</td>
<td>839</td>
<td>Kratie</td>
<td>Sambour</td>
<td>Multiple Use Management Area</td>
<td>Sub_decree_no_201_28.11.2017</td>
</tr>
</tbody>
</table>

Source: https://data.opendevelopmentcambodia.net/dataset/e6083924-df52-4249-a044-9dfcde3e7245/resource/ae81c331-e6c7-47a4-b6b2-b7d71a2fa1a1/download/npas.jpeg
In addition to the PAs, international conservation organisations (including IUCN/WWF/WCS/ UN-GEF/ Birdlife and others) have identified 47 Key Biodiversity Areas (KBA) throughout Cambodia, with parts of some areas in the target provinces (Kratie (6), Tboung Khmum (1) and Kampong Cham (1)).

Key Biodiversity Areas (KBA) Identified by Conservation NGOs

<table>
<thead>
<tr>
<th>#</th>
<th>SiteID</th>
<th>Province</th>
<th>National Name</th>
<th>International Name</th>
<th>Total KBA Area (ha)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>16674</td>
<td>Kratie</td>
<td>Mekong River from Kratie to Lao PDR</td>
<td>Mekong River from Kratie to Lao PDR</td>
<td>83,501</td>
</tr>
<tr>
<td>2</td>
<td>16675</td>
<td>Kratie</td>
<td>Lomphat</td>
<td>Lomphat</td>
<td>306,397</td>
</tr>
<tr>
<td>3</td>
<td>16677</td>
<td>Kratie</td>
<td>Mondulkiri - Kratie Lowlands</td>
<td>Mondulkiri - Kratie Lowlands</td>
<td>383,233</td>
</tr>
<tr>
<td>4</td>
<td>16678</td>
<td>Kratie</td>
<td>Snoul / Keo Sema / O Reang</td>
<td>Snoul / Keo Sema / O Reang</td>
<td>257,843</td>
</tr>
<tr>
<td>5</td>
<td>23304</td>
<td>Kratie</td>
<td>Central Cambodia Lowlands</td>
<td>Central Cambodia Lowlands</td>
<td>69,000</td>
</tr>
<tr>
<td>6</td>
<td>31502</td>
<td>Kratie &amp; Tboung Khmum</td>
<td>Prek Chhlong</td>
<td>Prek Chhlong</td>
<td>18,000</td>
</tr>
<tr>
<td>7</td>
<td>16668</td>
<td>Kampong Cham</td>
<td>Stung Sen / Santuk / Baray</td>
<td>Stung Sen / Santuk / Baray</td>
<td>109,081</td>
</tr>
</tbody>
</table>

Source: http://www.keybiodiversityareas.org/site/mapsearch

There are also some **Community Protected Areas** in Kratie Province. One in Snoul covers 2,250 ha and four recently approved areas (2019) in Sambour district, which cumulatively cover 4,969 ha.
POVERTY DATA
Available data for the project provinces indicates that in the three provinces there are approximately 82,600 households which can be considered as poor, with 368,211 people.

<table>
<thead>
<tr>
<th>Provinces</th>
<th># of Districts (including urban municipalities) in province</th>
<th>Poor Households</th>
<th>Range of District Levels of Poverty (lowest vs highest)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>% of Poor Households</td>
<td># of Poor Households</td>
</tr>
<tr>
<td>Kampong Cham</td>
<td>10</td>
<td>13%</td>
<td>35,651</td>
</tr>
<tr>
<td>Kratie</td>
<td>6</td>
<td>17%</td>
<td>17,398</td>
</tr>
<tr>
<td>Tboung Khmum</td>
<td>7</td>
<td>14%</td>
<td>29,551</td>
</tr>
</tbody>
</table>

Source: MoP IDPoor data 2018

RISK OF UXOs
Government data suggests that the risk of UXO is significantly lower in Kampong Cham compared to the other two project provinces.

<table>
<thead>
<tr>
<th>Province</th>
<th>Total # Communes /Sangkats</th>
<th>Communes Reporting the Presence of UXOs</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kampong Cham</td>
<td>109</td>
<td>9</td>
<td>8%</td>
</tr>
<tr>
<td>Kratie</td>
<td>47</td>
<td>34</td>
<td>72%</td>
</tr>
<tr>
<td>Tboung Khmum</td>
<td>64</td>
<td>36</td>
<td>56%</td>
</tr>
</tbody>
</table>

Source: RGC Commune Database 2018

Location of bombs dropped in Cambodia by the American military during the Vietnam War
**GENDER-BASED VIOLENCE**
As the project’s gender assessment highlights, GBV in Cambodia remains widespread. As can be seen, a significant number of villages (~50%) in the target provinces reported incidence of GBVs in the preceding year.

<table>
<thead>
<tr>
<th>Province</th>
<th>Total # of Villages</th>
<th>Villages Reporting Incidence in Domestic Violence (CDB 2018)</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kampong Cham</td>
<td>916</td>
<td>377</td>
<td>41%</td>
</tr>
<tr>
<td>Kratie</td>
<td>258</td>
<td>154</td>
<td>60%</td>
</tr>
<tr>
<td>Tboung Khmum</td>
<td>873</td>
<td>411</td>
<td>47%</td>
</tr>
</tbody>
</table>

*Source: Commune Database 2018*

**PRESENCE OF HIV/AIDS**
Of the three project provinces, Kampong Cham reportedly has the highest number of families living with HIV/AIDS. All three provinces have considerable amounts of people with HIV/AIDS.

<table>
<thead>
<tr>
<th>Province</th>
<th>Total # of Villages</th>
<th>Villages Reporting HHs family member living with HIV/AIDS</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kampong Cham</td>
<td>916</td>
<td>340</td>
<td>37%</td>
</tr>
<tr>
<td>Kratie</td>
<td>258</td>
<td>66</td>
<td>26%</td>
</tr>
<tr>
<td>Tboung Khmum</td>
<td>873</td>
<td>215</td>
<td>25%</td>
</tr>
</tbody>
</table>

*Source: Commune Database 2018*

**TRAFFIC DEATHS**
Roughly a tenth of all villages across the three target provinces reported a traffic-related death in the preceding year. Traffic accidents are one of the leading sources of death tolls in the country, and the biggest victims are young males riding motorbikes.

<table>
<thead>
<tr>
<th>Province</th>
<th>Total # of Villages</th>
<th>Villages Reporting Traffic Related Deaths in 2017 (CDB 2018)</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kampong Cham</td>
<td>916</td>
<td>101</td>
<td>11%</td>
</tr>
<tr>
<td>Kratie</td>
<td>258</td>
<td>29</td>
<td>11%</td>
</tr>
<tr>
<td>Tboung Khmum</td>
<td>873</td>
<td>71</td>
<td>8%</td>
</tr>
</tbody>
</table>

*Source: Commune Database 2018*
ANNEX 2 – Ineligible/Negative Criteria List

To avoid adverse impacts on the environment and people, the following road sections would be excluded from Component 2 CRCIP financing:

- New roads;
- Road sections requiring significant widening;
- Road requiring full EIA according to national legislation;
- Road sections requiring the physical relocation and/or demolition of residential structures of households that affect more than 50 households;
- Road sections where Indigenous Peoples are found and project impacts are not acceptable to IPs, even with proposed mitigation measures, and/or IPs do not give their Consent, based on FPIC, to the project;
- Road sections that cause serious damage or loss to cultural property, including sites having archaeological (prehistoric), paleontological, historical, religious, cultural and unique natural values;
- Road sections that go through Protected Areas or other biodiversity conservation areas, and/or that would have significant negative impacts on flora or fauna or the degradation of natural resources or habitats.
ANNEX 3 – Environment & Social Screening and Scoping

This form is to be used by the MRD SEO and DDIS to screen potential environmental and social impacts of a proposed road section, to determine the level of risk (high, substantial, moderate or low), which World Bank standards are relevant, and which E&S instrument(s) needs to be prepared.

<table>
<thead>
<tr>
<th>Road Section:</th>
<th>Province/ District/ Village/ PK</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
<th>Action Required</th>
<th>World Bank ESS (ex.)</th>
<th>E&amp;S Document Required (example)</th>
<th>Level of Risk31</th>
</tr>
</thead>
<tbody>
<tr>
<td>Will the works require any households to move structures (include, houses, small shops, rice bins etc.) back from the road and/or to cut them?</td>
<td>Yes</td>
<td>No</td>
<td>TBD</td>
<td>If yes, need to complete Land Acquisition Screening Form (see RF) and follow guidelines in the RF</td>
<td>ESS5</td>
</tr>
<tr>
<td>Will the works require the removal of trees (fruit or other trees)?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>ESS1 and 5</td>
</tr>
<tr>
<td>Are there indigenous people living in the area?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>ESS7</td>
</tr>
<tr>
<td>Are the works, located in or near a cultural/heritage area? Or located near graves, temples or other sacred sites?</td>
<td></td>
<td></td>
<td></td>
<td>Check against Ineligible/ Negative list</td>
<td>ESS8</td>
</tr>
<tr>
<td>Are the works, located near or in a protected area (or a buffer zone of a protected area)?</td>
<td></td>
<td></td>
<td></td>
<td>Check against Ineligible/ Negative list</td>
<td>ESS6</td>
</tr>
<tr>
<td>Are there endangered flora or fauna species in the area?</td>
<td></td>
<td></td>
<td></td>
<td>Check against Ineligible/ Negative list</td>
<td>ESS1 and 6</td>
</tr>
<tr>
<td>Will the works require new borrow pits or quarries to be opened up?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>ESS1</td>
</tr>
</tbody>
</table>

31 High, Substantial, Moderate or Low
<table>
<thead>
<tr>
<th>Question</th>
<th>ESS1</th>
<th>ESMP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Will the works be located near a river, stream or waterway?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Will the works result in increases in, or changes to the type of, traffic using the road?</td>
<td>ESS1 and 4</td>
<td>ESMP</td>
</tr>
<tr>
<td>Will any of the works require the use of toxic chemicals, herbicides, and/or explosives?</td>
<td>ESS1 and 3</td>
<td>ESMP</td>
</tr>
<tr>
<td>Are there likely to be UXOs in the area?</td>
<td>ESS1</td>
<td>ESMP</td>
</tr>
<tr>
<td>Will the works increase noise levels in the community (due to vehicles, works, etc.)?</td>
<td>ESS1</td>
<td>ESMP</td>
</tr>
<tr>
<td>Would works required setting up a worker’s camp? Otherwise, where are workers expected to live?</td>
<td>ESS4</td>
<td>ESMP</td>
</tr>
<tr>
<td>Are works likely to cause significant negative impacts to air and/or water quality?</td>
<td>ESS3</td>
<td>ESMP</td>
</tr>
<tr>
<td>Would any public facilities, such as schools, hospitals or pagodas be negatively affected by construction?</td>
<td>ESS 4</td>
<td>ESMP</td>
</tr>
<tr>
<td>Is an influx of workers, from outside the community, expected? Would workers be Cambodian or foreigners? Would workers be expected to use health services of the community? Would they create pressures on existing community services (water, electricity, health, recreation, others?)</td>
<td>ESS 2 and 4</td>
<td>ESMP</td>
</tr>
<tr>
<td>Is there a risk that children could be hired for project works?</td>
<td>ESS 2</td>
<td>ESMP</td>
</tr>
<tr>
<td>Is there a risk that HIV/AIDS and other sexually transmitted diseases may increase as a result of project works?</td>
<td>ESS 4</td>
<td>ESMP</td>
</tr>
<tr>
<td>Is there a risk that GBV and/or VAC may increase as a result of project works?</td>
<td>ESS 4</td>
<td>ESMP, Gender Action Plan</td>
</tr>
<tr>
<td>Is there a risk that traffic accidents and death may increase as a result of the project?</td>
<td>ESS 4</td>
<td>ESMP, Road Safety Plan</td>
</tr>
<tr>
<td>Is there a risk that women and other vulnerable groups may not benefit and/or be more adversely impacted by the project?</td>
<td>ESS 4, 5, 7</td>
<td>ESMP, SEP and RP and IPP if applicable</td>
</tr>
<tr>
<td>Is there a risk that women may be underpaid when compared to men when working on the project construction?</td>
<td>ESS 2</td>
<td>ESMP</td>
</tr>
<tr>
<td>What is the likely number of construction workers needed?</td>
<td>ESS 1, 2, 4</td>
<td>ESMP</td>
</tr>
<tr>
<td>Is there a possibility of employment in project works for the local community? Of these, how many jobs would be expected for women?</td>
<td>ESS 2</td>
<td>ESMP</td>
</tr>
<tr>
<td>Will skilled workers be available in local areas and/or other areas in Cambodia? Will international workers be needed?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Other information that may be relevant about the road section:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
ANNEX 4 – Chance Find Procedures

Since Component 2 of the CRCIP is based on repair and rehabilitation, it is not expected to yield archaeological, paleontological or cultural findings of any significance because infrastructure works will occur in the existing road alignment and ROW. However, there remains a possibility for (as yet undiscovered) sites of local cultural significance (i.e. sacred sites, cemeteries) and archaeological sites to exist with sub-project areas.

MRD and the DDIS will ensure that the bidding and contract documentation for civil works contractors will include a clause on chance find procedures and includes the following measures:

a) Stop construction activities in the area of the chance find;
b) Delineate the discovered site or area;
c) Secure the site to prevent any damage or loss of removable objects;
d) Notify the supervisory Engineer who, in turn, will notify the responsible local authorities;
e) Responsible local authorities would conduct a preliminary evaluation of the findings to be performed by archaeologists who will assess the significance and importance of the findings according to various criteria, including aesthetic, historic, scientific or research, social and economic values;
f) Decisions on how to handle the finding shall be taken by the responsible authorities which could result in changes in layout, conservation, preservation, restoration and salvage;
g) Implementation for the management of the finding communicated in writing; and
h) Construction work could resume only after permission is given from the responsible local authority concerning safeguard of the heritage.
ANNEX 5 – Outline for Environment and Social Management Plan (ESMP)

An ESMP consists of a set of mitigation, monitoring, and institutional measures to be taken during implementation and operation of a project to eliminate adverse environmental and social risks and impacts, offset them, or reduce them to acceptable levels. The ESMP also includes the measures and actions needed to implement these measures.

Site-specific ESMPs will be needed for all roads financed under Component 2 of the CRCIP. Some of the road sections may be covered by the same ESMP, for instance if the roads are adjacent and similar. The ESMPs will be prepared by MRD with the assistance of DDIS Consultants.

The ESMP will consist of:

a) Brief Project description
b) Overview of the Project location, including socioeconomic and environmental baseline information
c) Legislative Framework (RGC laws and regulations, WB ESF and Gap Analysis)
d) Identifying all anticipated adverse environmental and social impacts, including those involving indigenous people or involuntary resettlement (and making relevant links to RPs and IPPs), and any relevant direct, indirect or cumulative impact;
e) Describing in detail each mitigation measure, including the type of impact to which it relates to, including Labor Management Procedures, Occupational Health and Safety Procedures, Community Health and Safety Plan, Child Labor Prevention Plan, Labor Influx Plan, Road Safety Plan, GBV Plan and other plans that may be necessary (cultural heritage, biodiversity management, etc.)
f) Monitoring objectives and the type of monitoring, with linkages to the impacts assessed, including a description of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements and monitoring and reporting procedures;
g) Stakeholder Engagement, aligned with the project’s SEP, and summary of consultations conducted on the ESMP;
h) Description of the Grievance Redress Mechanism, including a specific Labor-GRM for workers;
i) Description of institutional arrangements, identifying which party is responsible for carrying out the mitigation and monitoring measures (i.e. for operation, supervision, enforcement, monitoring, staff training, etc.), capacity assessment of the Borrower (MRD) and a training plan for the MRD SEO;
j) Implementation Schedule and Cost Estimates, showing coordination with overall project implementation plans, costs and sources of funds.

Sample Table for ESMP

<table>
<thead>
<tr>
<th>POTENTIAL NEGATIVE IMPACT</th>
<th>ENVIRONMENTAL AND SOCIAL MITIGATION MEASURES</th>
<th>LOCATION</th>
<th>ESTIMATED MITIGATION COSTS</th>
<th>EXECUTING AGENCY</th>
<th>SUPERVISING / MONITORING AGENCY</th>
</tr>
</thead>
<tbody>
<tr>
<td>DETAILED DESIGN/ PRE-CONSTRUCTION MOBILISATION STAGE</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CONSTRUCTION STAGE</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>POTENTIAL NEGATIVE IMPACT</td>
<td>ENVIRONMENTAL AND SOCIAL MITIGATION MEASURES</td>
<td>LOCATION</td>
<td>ESTIMATED MITIGATION COSTS</td>
<td>EXECUTING AGENCY</td>
<td>SUPERVISING / MONITORING AGENCY</td>
</tr>
<tr>
<td>---------------------------</td>
<td>--------------------------------------------</td>
<td>----------</td>
<td>---------------------------</td>
<td>-----------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**OPERATION AND MAINTENANCE STAGE**

|                                          |                                            |          |                           |                 |                               |
|                                          |                                            |          |                           |                 |                               |
### ANNEX 6 – Sample Monitoring Checklist

**PROJECT ROAD:**

**LOCATION:**

**DATE:**

**CONTRACTOR:**

**PREPARED BY:**

**SUPERVISION:**

**CONSULTANT**

<table>
<thead>
<tr>
<th>Inspection Participants: (insert names and positions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESMP Items</td>
</tr>
<tr>
<td>------------</td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

**Mitigation & Management Measures: Construction Phase**

*Mitigation measure from ESMP*

<table>
<thead>
<tr>
<th>Mitigation &amp; Management Measures: Operation and Maintenance Phase</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

**Compliant, Minor Non-Compliance, Significant Non-Compliance**

Status: (R) Resolved Issues, (O) Ongoing Issues
ANNEX 7 – Environmental and Social Codes of Practice for Construction Works

Generic contract clauses are provided to assist with environmental and social management works. These clauses are general and should be modified as needed. These clauses are intended to be included as requirements in the works contract and shall remain in force throughout the contract period.

Clause on ESMP
The Contractor is required to implement this ESMP. The Contractor is responsible for the implementation of construction and rehabilitation activities for the sites and for implementing the impact mitigation measures in the construction phase. The Contractor’s approach shall be detailed in the Contractor’s Management Plan.

The Contractor shall include a suitably qualified and experienced Environmental, Occupational Health and Safety Officer (and other staff or consultants as necessary) to be specifically responsible for preparation and regular update and supervision of the ESMP. The Environmental, Occupational Health and Safety Officer is responsible for the daily supervision and monitoring of the Contractors implementation of the Plan and compliance with the Project ESMP for the duration of the contract. The Contractor’s approach to comply with the ESMP shall be approved by MRD and DDIS prior to the Contractor’s mobilization to the site.

The Contractor will be required to report on the implementation status of the ESMP to MRD. The damages due to the violation of the stipulations by the Contractor shall be compensated and/or restored by the Contractor at his or her own expense. Performance will be monitored by MRD and will be enforced by withholding of payments (refer to relevant clause in the bid documents).

Other Standard Clauses
Permits and Approvals
The contractor shall be responsible for ensuring that he or she has all relevant legal approvals and permits required to commence works.

Site Security
The contractor shall be responsible for maintaining security over the construction site including the protection of stored materials and equipment. In the event of severe weather, the contractor shall secure the construction site and associated equipment in such a manner as to protect the site and adjacent areas from consequential damages. This includes the management of onsite, construction materials, construction and sanitary wastes, additional strengthening of erosion control and soil stabilization systems and other conditions resulting from contractor activities which may increase the potential for damages.

Discovery of Antiquities and Cultural Heritage
If, during the execution of the activities contained in this contract, any material is discovered onsite which may be considered of historical or cultural interest, such as evidence of prior settlements, native or historical activities, evidence of any existence on a site which may be of cultural significance, all work shall stop and the supervising contracting officer shall be notified immediately and the Chance Find Procedures followed. The area in which the material was discovered shall be secured, cordoned off, marked, and the evidence preserved for examination by the local archaeological or cultural authority. No item believed to be an artefact must be removed or disturbed by any of the workers. Work may resume, without penalty of prejudice to the contractor upon permission from the contracting officer with any restrictions offered to protect the site.
**Worker Occupational Health and Safety**

The contractor shall ensure that all workers operate within a safe environment. Sanitation facilities shall be provided for all site workers. All sanitary wastes generated as a result of project activities shall be managed in a manner approved by the contracting officer and the local authority responsible for public health. The contractor shall ensure that there are basic medical facilities on site and that there are staff trained in basic first aid. Workers must be provided with the necessary protective gear as per their specific tasks such as hard hats, overalls, gloves, goggles, boots, etc. The contractor shall provide the contracting officer with an occupational health and safety plan for approval prior to the commencement of site activities.

The contractor must ensure that all workers operate within a safe environment. All relevant Labor and Occupational Health and Safety regulations must be adhered to ensure worker safety. Sanitary facilities must be provided for all workers on site. Appropriate posting of information within the site must be done to inform workers of key rules and regulations to follow.

**Noise Control**

The contractor shall control noise emissions generated as a result of contracting activities to the extent possible. In the case of site locations where noise disturbance will be a concern, the contractor shall ensure that the equipment is in good working order with manufacturer supplied noise suppression (mufflers etc.) systems functioning and in good repair.

Where noise management is a concern, the contractor shall make reasonable efforts to schedule activities during normal working hours (between 7 am and 5 pm). Where noise is likely to pose a risk to the surrounding community either by normal works or working outside of normal working hours or on weekends, the contractor shall inform the contracting officer and shall develop a public notification and noise management plan for approval by the contracting officer.

**Use and Management of Hazardous Materials, fuels, solvents and petroleum products**

The use of any hazardous materials including pesticides, oils, fuels and petroleum products shall conform to the proper use recommendations of the product. Waste hazardous materials and their containers shall be disposed of in a manner approved by the contracting officer in accordance with State and/or national laws and the Project ESMP. A site management plan will be developed by the contractor if the operation involves the use of these materials to include estimated quantities to be consumed in the process, storage plans, spill control plans, and waste disposal practices to be followed. Any plans required shall be approved by the contracting officer.

Elements of the hazardous materials management shall include:

- Contractor must provide temporary storage on site of all hazardous or toxic substances in safe containers labeled with details of composition, properties and handling information;
- Hazardous substances shall be placed in a leak-proof container to prevent spillage and leaching; and
- Wastes shall be transported and disposed of in a manner outlined in the ESMP, and cleared by the CIU Safeguards Team compliant with national laws and policies and the ESMP.

**Use and Management of Pesticides**

Any use of pesticides shall be approved by the contracting officer and shall conform to the manufacturers’ recommendations for use and application. Any person using pesticides shall demonstrate that they have read and understood these requirements and are capable of complying with the usage recommendations to the satisfaction of the contracting officer. All pesticides to be used shall conform to the list of acceptable pesticides that are not banned by the relevant local authority.
If termite treatment is to be utilized, ensure appropriate chemical management measures are implemented to prevent contamination of surrounding areas, and use only licensed and registered pest control professionals with training and knowledge of proper application methods and techniques.

**Use of Explosives**
No explosives shall be used on the Project.

**Site Stabilization and Erosion Control**
The Contractor shall implement measures at the site of operations to manage soil erosion through minimization of excavated area and time of exposure of excavated areas, preservation of existing ground cover to the extent possible, provision of approved ground cover and the use of traps and filtration systems. Where excavations are made, contractor shall implement appropriate stabilizing techniques to prevent cave-in or landslide. Measures shall be approved by the contracting officer.

The contractor must ensure that appropriate erosion control measures such as silt fences are installed. Proper site drainage must be implemented. Any drain clogged by construction material or sediment must be unclogged as soon as possible to prevent overflow and flooding. The use of retaining structures and planting with deep rooted grasses to retain soil during and after works must be considered. The use of bio-engineering methods must be considered as a measure to reduce erosion and land slippage. All slopes and excavated areas must be monitored for movement.

The contractor will establish appropriate erosion and sediment control measures such as hay bales, sedimentation basins, and / or silt fences and traps to prevent sediment from moving off site and causing excessive turbidity in nearby streams, rivers and wetlands. Construction vehicles and machinery will be washed only in designated areas where runoff will not pollute natural surface water bodies.

**Air Quality**
The Contractor shall comply with the Project ESMP requirements for dust management.

**Traffic Management**
In the event that construction activities should result in the disruption of area transportation services, including temporary loss of roadways, blockages due to deliveries and site related activities, the contractor shall provide the contracting officer with a traffic management plan including a description of the anticipated service disruptions, community information plan, and traffic control strategy to be implemented so as to minimize the impact to the surrounding community. This plan shall consider time of day for planned disruptions, and shall include consideration for alternative access routes, access to essential services such as medical, disaster evacuation, and other critical services. The plan shall be approved by the contracting officer.

Elements of the traffic management plan to be developed and implemented by contractor shall include:
- Alternative routes will be identified in the instance of extended road works or road blockages;
- Public notification of all disturbance to their normal routes;
- Signage, barriers and traffic diversions must be clearly visible, and the public warned of all potential hazards;
- Provision for safe passages and crossings for all pedestrians where construction traffic interferes with their normal route;
- Active traffic management by trained and visible staff at the site or along roadways as required to ensure safe and convenient passage for the vehicular and pedestrian public; and
• Adjustment of working hours to local traffic patterns, e.g. avoiding major transport activities during rush hours or times of livestock movement.

**Water Quality**
The Contractor shall comply with the Project ESMP requirements for water quality. Under no circumstances shall the contractor permit the collection of standing water as a consequence of contractor activities to ensure that it does not create breeding grounds for any pests such as mosquitoes.

**Management of Solid Wastes and Construction Debris**
The contractor shall provide a solid waste management plan that conforms to the national solid waste management policies and regulations and the Project EESMP for approval by MRD (see Annex 5). The site waste management plan shall include a description of waste handling procedures including collection, storage and disposal through the national waste management system. There will be no open burning of waste material and the contractor shall endeavor to recycle wastes as appropriate. Under no circumstances shall the contractor allow construction wastes to accumulate so as to cause a nuisance or health risk due to the propagation of pests and disease vectors.

**Management of Workers**
The Contractor will prepare a specific Code of Conduct (see Annex 10 & 11) to describe the expected behaviors of their project worker in relation to the local communities and their social sensitivities. This is to avoid creating demand for illegal sex work, avoid Gender-Based Violence and Violence Against Children, manage alcohol consumption and avoid the use of illegal substances, and abide by cultural and social norms of the host community. The Contractor is to ensure no children (persons under the age of 18) are hired to work in the project.

The Contractor is to ensure that all overseas project staff undergo a training on the Staff Code of Conduct. Gender based violence and HIV/AIDS and communicable disease awareness raising and resources shall also be provided to all workers. MRD shall provide to the Contractor a list of approved service providers, which shall include recognized NGOs and others for conducting this training.

The Contractor is to stipulate the conditions under which visitors may attend the workers’ accommodation, including curfews. The Contractor shall ensure that basic social/collective rest and recreation spaces and activities within the workers accommodation to help minimize the impact that the workers would have on the leisure and recreational facilities of the nearby communities. The Contractor must comply with the Labor Management Procedures (Annex 8).

As per guidelines in the ESMP, the Contractor must ensure that Worker’s Camps are located at least 500m from nearby communities and schools (see Annex 12).
ANNEX 8 – Labor Management Procedures

**Instructions:** Site- Specific ESMPs will update this information.

Labor Management Procedures (LMP) are mandated by WB ESS2 to identify the main labor requirements and risks associated with a project and to determine the resources necessary to address project labor issues. The LMP is a living document to be reviewed and updated throughout development and implementation of the project. The LMP applies to all project workers, irrespective of contracts being full-time, part-time, temporary or casual.

**USE OF LABOR IN THE PROJECT**

The World Bank ESS2 defines four categories of project workers:

- **Direct workers** - people employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project.
- **Contracted workers** - people employed or engaged through third parties to perform work related to core functions of the project, regardless of location. These could be either international or national workers.
- **Primary supply workers** - people employed or engaged by the Borrower’s primary suppliers (primary supply workers).
- **Community workers** - people employed or engaged in providing community labor, generally voluntarily. There will be no community workers engaged on the Project.
- **Civil Servant** - those employed directly by the Government.

Component 2 of the CRCIP is expected to have the following type of workers:

<table>
<thead>
<tr>
<th>Category of worker</th>
<th>Estimated Number of Project Workers</th>
<th>Characteristics of Project Workers</th>
<th>Timing of Labor Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Civil servant</td>
<td>20</td>
<td>Workers at MRD in Phnom Penh, the Department of Rural Development in the three project provinces, District level staff in the three provinces. May also include staff from MEF/GDR and other line ministries.</td>
<td>Throughout the whole project cycle</td>
</tr>
<tr>
<td>Direct Workers</td>
<td>5-10</td>
<td>DDIS E&amp;S Specialist, DDIS design engineers as well as DDIS supervisors on site and other DDIS staff. It is likely that DDIS staff will mostly be international.</td>
<td>Throughout the whole project cycle</td>
</tr>
</tbody>
</table>
**Direct and Contracted worker**

250 (for all roads), of which approximately 200 unskilled and of these 30 female
Contractor team engaged to build road section. Contractor may sub-contract staff to work in construction, both skilled and unskilled staff. Contractor will be encouraged to hire locally and/or in Cambodia. Contractor will need unskilled workers and they will be encouraged to hire from the community (to avoid having migrant workers), including that 15% of unskilled workers are women.

**Construction and maintenance**

**Supply workers**

TBD
Those working in companies/factories supplying materials for construction, in particular raw materials.

**Construction and potentially maintenance**

**Direct workers**

TBD
Civil society, NGO or consultant staff may be hired to deliver training activities such as HIV/AIDs or GBV, or conduct additional assessments, ideally Cambodian and/or Cambodia-based

**Construction and potentially maintenance**

The project will ensure that no workers of any type is under 18 years.

**ASSESSMENT OF KEY POTENTIAL LABOR RISKS**

The project will hire a range of workers for the overall delivery of the project. Construction workers are deemed to be the highest labor risk, both due to the informal nature of their work (usually short-term contracts) and their presence in the community, which can heighten risks of GBV and VAC.

<table>
<thead>
<tr>
<th>Project Activity</th>
<th>Key Labor Risks</th>
</tr>
</thead>
</table>
| General project administration and implementation (hiring of consultants, monitoring and reporting, financial management, audits, E&S management, project coordination) | • Road travel to provinces (OHS)  
• Sedentary work (OHS)  
• Air travel (OHS)  
• Presence of foreign workers |
| Design of project roads, including consultation activities and conducting surveys (if needed) | • Road travel to provinces (OHS)  
• Sedentary work (OHS)  
• GBV and VAC when designers and/or project consultations close to communities  
• Presence of foreign workers |
| Construction works/ rehabilitation of project roads, including procuring materials for road works, as well as potentially project maintenance | • Operating heavy machinery (OHS)  
• Traffic hazards (OHS)  
• Accidents or emergencies (OHS)  
• Risks of workplace accidents, particularly when operating construction equipment, when working at height on building construction, and when handling heavy equipment and materials |
| Delivering trainings for community | • GBV and VAC to workers and community  
• Spread of sexually-transmitted diseases |

**BRIEF OVERVIEW OF THE LABOR LEGISLATION: TERMS AND CONDITIONS**

Cambodia has national legislation that outlines worker’s rights. The Labor Law (1997) remains the key document governing the regulatory framework for labor in Cambodia.

The **1997 Labor Law** defines non-discrimination in employment and in wages. It establishes a minimum wage level, which may vary among regions. Working hours are limited to 8 hours per day, 6 days a week. There are strong regulatory provisions against discrimination in the work place, enhancing from a legal point of view fair treatment, non-discrimination and equal opportunity, special protection and assistance to vulnerable workers. A whole chapter in the Law is dedicated to health and safety in the workplace. The Law also covers those who work for subcontractors.

Child labor remains a noticeable gap in the legal framework despite many years of participation in related international programs. The Labor Law defines 12 years old as the minimum working age for children, though 12-15 year olds are meant to only engage in certain light jobs, but this is not always closely monitored. The Prakas on the Prohibition of Hazardous Child Labor (2004) allow hazardous work for well-trained children above 16, provided it is not night work. The ESMF details the relevant legislation and a gap analysis with the World Bank ESF.

**OVERVIEW OF THE LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY**


**RESPONSIBLE STAFF**

These following individuals/agencies are expected to work in the different aspects of Component 2 of the CRCIP.

**Engagement and Management of Contractors/Subcontractors.** The Ministry of Rural Development is responsible for contractor engagement and compliance with contract conditions. The MRD will address all LMP aspects as part of procurement for works and consultancy/technical assistance.
activities. MRD (PD, PM, SEO and others as relevant) will be responsible for overseeing all aspects of implementation of the project, including compliance and contractor induction.

Meanwhile the Contractor is responsible for management of subcontractors in accordance with contract specific Labor Management Plans (LMP).

**Labor and Working Conditions.** Contractors will keep records in accordance with specifications set out in this LMP. MRD may at any time require records to ensure that labor conditions are met. MRD will review records against actuals, at a minimum on a monthly basis, and can require immediate remedial actions if warranted. A summary of issues and remedial actions will be included in quarterly reports to the World Bank.

**Training of Workers.** Contractors are required to, at all times, have a qualified safety officer on board. If training is required, this will be the contractor’s responsibility. The safety officer will provide instructions to contractor staff. The contractor will be obligated to make staff available for any mandatory trainings required by MRD, as specified by the contract.

**Addressing Worker Grievances.** The Contractors will be required to implement a Grievance Redress Mechanism (GRM) for workers which responds to the minimum requirements in this LMP. The MRD’s SEO will review records on a monthly basis. MRD will keep abreast of GRM complaints, resolutions and reflect in quarterly reports to the World Bank.

**Occupational, Health and Safety.** Contractors must designate a minimum of one safety representative to ensure day-to-day compliance with specified safety measures and records of any incidents. Minor incidents and near misses should be reported to MRD on a monthly basis; serious incidents should be reported immediately. Minor incidents should be reflected in the quarterly reports to the World Bank, and major issues should be flagged to the World Bank immediately.

MRD and all workers under Component 2 of the CRCIP will:
- Comply with Cambodia legislation, WB’s ESS2 requirements and other applicable requirements which relate to OHS hazards (see Annex 9: OHS Guidelines);
- Enable active participation in OHS risks elimination through promotion of appropriate skills, knowledge and attitudes towards hazards;
- Continually improving the OHS management system and performance;
- Communicate this policy statement to all persons working on the project with emphasis on individual OHS responsibilities; and
- Make this policy statement available to all interested parties.

**Contractor’s Safety Officer(s)** will be responsible for:
- Identification of potential hazards to project workers, particularly those that may be life threatening;
- Provision of preventative and protective measures, including modification, substitution, or elimination of hazardous conditions or substances;
- Training of project workers and maintenance of training records;
- Documentation and reporting of incidents;
- Emergency prevention and preparedness and response arrangements to emergency situations; and
- Remedies for adverse impacts such as occupational injuries, deaths, disability and disease.

The **contractor(s)** will be required to:
- Develop and implement procedures to establish and maintain a safe working environment, including that workplaces, machinery, equipment and processes under their control are safe and without risk to health;
- Actively collaborate and consult with project workers in promoting understanding and methods for implementation of OHS requirements;
- Provide OHS training to all employees involved in works or site supervision;
- Provide laminated signs of relevant safe working procedures in a visible area on work sites, in English and local language as required;
- Provide PPE as suitable to the task and hazards of each worker, without cost to the worker;
- Put in place processes for project workers to report work situations that they believe are not safe or healthy and to remove themselves from situations they have reasonable justification to believe are unsafe;
- Confirm appropriate measures are in place for working in communities with known risk of conflict / violence;
- Ensure availability of first aid boxes in all work locations;
- Provide employees with access to toilets and potable drinking water; and
- Properly dispose of solid waste at designated permitted disposal/landfill sites.

Further to enforcing the compliance of environmental and social management, contractors will be responsible and liable for the safety of site equipment, laborers and daily workers attending to the construction site and safety of citizens for each subproject site, as mandatory measures.

POLICIES AND PROCEDURES
MRD will incorporate standardized environmental and social clauses in the tender documentation and contract documents in order for potential bidders to be aware of environmental and social performance requirements that shall be expected from them, are able to reflect that in their bids, and required to implement the clauses for the duration of the contract. MRD will enforce compliance by contractors with these clauses.

As a core contractual requirement, the contractor is required to ensure all documentation related to environmental and social management, including the LMP, is available for inspection at any time by the MRD. The contractual arrangements with each project worker must be clearly defined. All environmental and social requirements will be included in the bidding documents and contracts.

All workers must be aware and sign the Manager’s Code of Conduct (Annex 10) and/or the Individual Code of Conduct (Annex 11), as applicable.

Occupational Health and Safety (OHS)
OHS strategy will include specific measures to ensure the safety of workers travelling to remote sites, including (1) project cars to be driven by professional drivers only; (2) compulsory helmet use for drivers and passengers on project motorcycles at all times, and on private motorcycles when used for project-related tasks; (3) travel by motorcycle for project-related purposes to be in daylight hours only; and (4) measures to monitor, anticipate and avoid potential security risks while travelling, including liaison with local police and authorities and encouraging project workers to share any concerns they may have.

Project workers in remote areas will receive health and safety training including prevention of infection through contaminated food and/or water and/or through vector-borne diseases and avoidance of snakebites and insect stings. Site-specific risks will be assessed as part of the ESMP which will include plans for emergency evacuation and identification of emergency health facilities. If
necessary, stocks of snakebite antivenom will be maintained at project sites, or availability otherwise ensured.

UXO risks will be assessed for all sites with the assistance of Cambodia Mines Action Centre / Cambodia Mines Action Authority and appropriate risk mitigation measures adopted.

The Health and Safety specifications will include the following provisions:

- Ensuring workplace health and safety standards in full compliance with Cambodian law, at a minimum, and including (1) basic safety awareness training to be provided to all persons as a pre-condition for presence at an active construction site; (2) all vehicle drivers to have appropriate licenses, and all construction equipment operators to be trained including in safety procedures; (3) Safe management of the area around operating equipment (e.g. turning circle of excavators), including stationing a flag-person where necessary; (4) all workers on construction sites to be equipped with hard helmets, safety boots and protective gloves; (5) secure scaffolding and fixed ladders to be provided for work above ground level; (6) First aid equipment and facilities to be provided in accordance with the Labour Law; (8) at least one supervisory staff trained in safety procedures to be present at all times when construction work is in progress; and (9) adequate provision of hygiene facilities, resting areas etc.

- All workplace health and safety incidents to be properly recorded in a register which will be shared with the supervising engineer. The register should include (1) time and place of incident; (2) type of incident; (3) type of injury or other impact occurring, and number of workers affected; and (4) actions taken (first aid, evacuation etc.).

- All workers to be covered by insurance against occupational hazards.

- All work sites to have a health and safety plan including identification of potential hazards and actions to be taken in case of emergency, including location of accident and emergency facilities.

- Any on-site accommodation to be safe and hygienic, including provision of an adequate supply of potable water, washing facilities, sanitation, accommodation and cooking facilities. Location and layout of site camps to be agreed with construction supervisors and risk assessment conducted.

- Workers residing at site accommodation to receive training in preventing prevention of infection through contaminated food and / or water and or through vector-borne diseases; and in avoidance of sexually transmitted diseases.

- Fair and non-discriminatory employment practices. Where contractors hire workers from the beneficiary community, disadvantaged and vulnerable community members are to have equal access to opportunities. Where large numbers of community members are employed, childcare facilities to be provided.

- Employment of children under 18 is prohibited.

- Under no circumstances will contractors, suppliers or sub-contractors engage forced labor.

- Construction materials manufactured in Cambodia be procured only from suppliers able to certify that no forced labour (including debt bondage labour) or child labour (except as permitted by the Labour Law) has been used in production of the materials.

- All employees to be aware of their rights under the Labour Law, including the right to organize;

- All employees to be informed of their rights to submit a grievance through the Project Worker Grievance Mechanism.

Additional guidelines on OHS can be found in Annex 9.
Age of Employment
For this project, the minimum age will be 18 years. This rule will apply for both national and international workers. Workers will be required to provide proof of their identity and age before commencing any works on site.

Terms and Conditions and Equal Opportunities
All terms and conditions as outlined in the World Bank Environmental and Social Framework (ESF) ESS2, paragraphs 10 to 15 apply to contracted workers. In addition,

- In line with national law, the maximum working hours are limited to 8 hours per day, 6 days a week.
- Employers shall guarantee that the workers shall have at least one resting day per week. The employers shall also make arrangements for the employees to take vacation according to law during Khmer New Year, Pchum Ben and any other holidays prescribed by laws and regulations.
- Employment opportunities will be available to all. This includes equal pay for equal work, regardless whether the person performing the work is male or female.
- The wages paid by the employers to the workers shall not be lower than the local Cambodian minimum wage.
- Provisions of the Labor Law must be followed, including maternity leave for females if applicable.

The labor contract shall be provided to workers writing and shall have the following provisions:

a) The term of the labor contract;
b) Work content;
c) Labor protection and working conditions;
d) Remuneration for labor;
e) Labor discipline;
f) Conditions for termination of the labor contract;
g) Responsibility for breach of labor contract;
h) Individual Staff Code of Conduct;
i) Grievance Redress Mechanism.

Grievance Mechanism
There will be a specific Grievance Redress Mechanism (GRM) for project workers as per the process outlined below. This considers culturally appropriate ways of handling the concerns of direct and contracted workers. Processes for documenting complaints and concerns have been specified, including time commitments to resolve issues.

In addition, this GRM should be communicated to all relevant stakeholders (such as workers and the community) as part of project engagement. Special communications will be held with the vulnerable groups identified at each location.

All project workers will be informed of the Grievance Mechanism process as part of their contract and induction package.

The process for the Worker GRM is as follows:

- The first step is that the Aggrieved Person/Party may report their grievance in person, by phone, text message, mail or email (including anonymously if required) to the Contractor as the initial focal point for information and raising grievances. For complaints that were
satisfactorily resolved by the Aggrieved Person/Party or Contractor, the incident and resultant resolution will be logged and reported to the MRD SEO.

- As a second step, where the Aggrieved Person/Party is not satisfied, the Contractor will refer the aggrieved party to the MRD SEO. Grievances may also be referred or reported to the MRD Management if deemed suitable. The MRD SEO endeavors to address and resolve the complaint and inform the Aggrieved Person/Party in two weeks or less. For complaints that were satisfactorily resolved by the MRD SEO, the incident and resultant resolution will be logged by the MRD SEO. Where the complaint has not been resolved, the MRD SEO will refer to the Project Manager/Director for further action or resolution.

- As a third step, if the matter remains unresolved, or the Aggrieved Person/Party is not satisfied with the outcome, the MRD PM/PD should refer the matter to the CRCIP Project Steering Committee for a resolution, which shall aim to resolve the grievance in three weeks or less. The MRD SEO will log details of issue and resultant resolution status.

Up until the third stage there will be no fees for the lodgement of grievances. However, if the complaint remains unresolved or the complainant is dissatisfied with the outcome proposed by the Project Steering Committee, the Aggrieved Person may refer the matter to the appropriate legal or judicial authority, at the complainant’s own expense. A decision of the Court will be final.

Each grievance record should be allocated a unique number reflecting year and sequence of received complaint (for example 2020-01, 2020-02 etc.). Complaint records (letter, email, record of conversation) should be stored together, electronically or in hard copy. The MRD SEO will be responsible for undertaking a regular (at least monthly) review of all grievances to analyze and respond to any common issues arising. The MRD SEO is also responsible for oversight of the GRM.

**CONTRACTOR MANAGEMENT**

The tendering process for contractors will require that contractors can demonstrate their labor management and OHS standards, which will be a factor in the assessment processes.

Contractual provisions will require that contractors:

- Monitor, keep records and report on terms and conditions related to labor management;
- Provide workers with evidence of all payments made, including benefits and any valid deductions;
- Keep records regarding labor conditions and workers engaged under the Project, including contracts, registry of induction of workers including Code of Conduct, hours worked, remuneration and deductions (including overtime);
- Record safety incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, etc.);
- Report evidence that no child labor is involved;
- Training/induction dates, number of trainees, and topics;
- Details of any worker grievances including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken. Grievances listed should include those received since the preceding report and those that were unresolved at the time of that report;
- Sign the Manager’s Code of Conduct (Annex 10) and/or the Individual Code of Conduct (Annex 11), as applicable.
Monitoring and performance management of contractors will be the responsibility of MRD and DDIS. MRD/DDIS will be responsible for oversight of labor management provisions as well as contract supervision.

**PRIMARY SUPPLY CHAIN WORKERS**
The Contractor will be responsible for conducting due diligence on the primary supply workers (those providing key materials for road construction, in particular raw materials), to ensure there is no indentured/forced or child labor (as per the Labor Law).

In conducting due diligence, the contractor (or contractor’s staff) should:

- Inform the provider, that the Contractor will not engage a provider who has forced or child laborers;
- When possible, visit the company/factory, and conduct interviews with key personnel about their working conditions, as well as informal random interviews with workers;
- Conduct secondary due diligence, by asking information from others who may be familiar with the provider, to make sure there are no reported instances of forced or child labor;
- If necessary, and when possible, engage the Ministry of Labor to conduct checks on supplier to ensure no child labor or forced labor;
- Keep records of the information and include in reporting to MRD.

**CAPACITY BUILDING**
While the provisions outlined in this LMP are in most respects consistent with the requirements of the Labour Law 1997, with only limited additional provisions (for example, the Worker Grievance Redress Mechanism) to meet the requirements of ESS2, the LMP considerably exceeds actual practice in labor management in Cambodia, particularly in the Cambodian construction industry. Therefore, to ensure that project partner agencies, contractors and suppliers, and particularly local construction contractors, can meet these obligations, the project will develop and deliver trainings and simple awareness raising materials. This will be the responsibility of DDIS.

Key project personnel who will require training include:

- Human resources staff or administration staff responsible for recruitment of direct project workers in MRD;
- Procurement staff in MRD;
- MRD SEO;
- Provincial Rural Development staff;
- Management Focal Points in each project partner agency;
- Staff, consultants and consultants’ staff acting as contract supervisors and responsible for monitoring compliance with the policy;
- Commune and village leaders.

DDIS and MRD will develop and deliver a short training course for contractors and / or contractors site managers, explaining the obligations of the contractor as set out in the Health and Safety specifications. Supervising engineers are also to attend these courses. Courses will be delivered by DDIS and MRD SEO.

MRD/DDIS will also prepare a simple booklet, in Khmer language and with easy-to-understand illustrations, explaining the requirements of the LMP as applicable to contracted workers in the project. The booklet will include details of the Worker Grievance Redress Mechanism. This booklet will be disseminated to all project direct workers.
ANNEX 9 – OHS Guidelines

The objective of this guideline is to provide guidance on the:
- Key principles involved in ensuring the health and safety of workers is protected;
- Preparation of Health and Safety plans


1. Principles

Employers must take all reasonably practicable steps to protect the health and safety of workers and provide and maintain a safe and healthy working environment. The following key principles are relevant to maintaining worker health and safety:

1.1 Identification and assessment of hazards

Each employer must establish and maintain effective methods for:
- Systematically identifying existing and potential hazards to employees;
- Systematically identifying, at the earliest practicable time, new hazards to employees;
- Regularly assessing the extent to which a hazard poses a risk to employees.

1.2 Management of identified hazards

Each employer must apply prevention and control measures to control hazards which are identified and assessed as posing a threat to the safety, health or welfare of employees, and where practicable, the hazard shall be eliminated. The following preventive and protective measures must be implemented in order of priority:
- Eliminating the hazard by removing the activity from the work process;
- Controlling the hazard at its source through engineering controls;
- Minimizing the hazard through design of safe work systems;
- Providing appropriate personal protective equipment (PPE).

The application of prevention and control measures to occupational hazards should be based on comprehensive job safety analyses (JSA). The results of these analyses should be prioritized as part of an action plan based on the likelihood and severity of the consequence of exposure to the identified hazards.

1.3 Training and supervision

Each employer must take all reasonably practicable steps to provide to employees (in appropriate languages) the necessary information, instruction, training and supervision to protect each employee’s health and to manage emergencies that might reasonably be expected to arise in the course of work. Training and supervision includes the correct use of PPE and providing employees with appropriate incentives to use PPE.

1.4 General duty of employees

Each employee shall:
- Take all reasonable care to protect their own and fellow workers health and safety at the workplace and, as appropriate, other persons in the vicinity of the workplace;
- Use PPE and other safety equipment supplied as required; and

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[32](www.ifc.org/ehsguidelines)
• Not use PPE or other safety equipment for any purpose not directly related to the work for which it is provided.

1.5 **Protective clothing and equipment**

Each employer shall:
• Provide, maintain and make accessible to employees the PPE necessary to avoid injury and damage to their health;
• Take all reasonably practicable steps to ensure that employees use that PPE in the circumstances for which it is provided; and
• Make provision at the workplace for PPE to be cleaned and securely stored without risk of damage when not required.

2. **Design**

Effective management of health and safety issues requires the inclusion of health and safety considerations during design processes in an organized, hierarchical manner that includes the following steps:
• Identifying project health and safety hazards and associated risks as early as possible in the project cycle including the incorporation of health and safety considerations into the worksite selection process and construction methodologies;
• Involving health and safety professionals who have the experience, competence, and training necessary to assess and manage health and safety risks;
• Understanding the likelihood and magnitude of health and safety risks, based on:
  o The nature of the project activities, such as whether the project will involve hazardous materials or processes;
  o The potential consequences to workers if hazards are not adequately managed;
• Designing and implementing risk management strategies with the objective of reducing the risk to human health;
• Prioritising strategies that eliminate the cause of the hazard at its source by selecting less hazardous materials or processes that avoid the need for health and safety controls;
• When impact avoidance is not feasible, incorporating engineering and management controls to reduce or minimize the possibility and magnitude of undesired consequences;
• Preparing workers and nearby communities to respond to accidents, including providing technical resources to effectively and safely control such events, in particular relating to traffic;
• Improving health and safety performance through a combination of ongoing monitoring of facility performance and effective accountability.

3. **Implementation**

3.1 **Documentation**

A Health and Safety Plan must be prepared and approved prior to any works commencing on site. The H&S Plan must demonstrate the Contractor’s understanding of how to manage safety and a commitment to providing a workplace that enables all work activities to be carried out safely. The H&S Plan must detail reasonably practicable measures to eliminate or minimise risks to the health, safety and welfare of workers, contractors, visitors, and anyone else who may be affected by the operations. The H&S Plan must be prepared in accordance with the World Bank’s EH&S Guidelines and the relevant country health and safety legislation.
3.2 Training and Awareness

Provisions should be made to provide health and safety orientation training to all new employees to ensure they are apprised of the basic site rules of work at/on the site and of personal protection and preventing injury to fellow employees. Training should consist of basic hazard awareness, site-specific hazards, safe work practices, and emergency procedures for fire, evacuation, and natural disaster, as appropriate. Training should also include HIV/AIDS awareness training.

Visitors are not permitted to access to areas where hazardous conditions or substances may be present, unless appropriately inducted.

3.3 Personal Protective Equipment (PPE)

Personal Protective Equipment (PPE) provides additional protection to workers exposed to workplace hazards in conjunction with other facility controls and safety systems.

PPE is considered to be a last resort that is above and beyond the other facility controls and provides the worker with an extra level of personal protection. The table below presents general examples of occupational hazards and types of PPE available for different purposes. Recommended measures for use of PPE in the workplace include:

- Active use of PPE if alternative technologies, work plans or procedures cannot eliminate, or sufficiently reduce, a hazard or exposure;
- Identification and provision of appropriate PPE that offers adequate protection to the worker, co-workers, and occasional visitors, without incurring unnecessary inconvenience to the individual;
- Proper maintenance of PPE, including cleaning when dirty and replacement when damaged or worn out. Proper use of PPE should be part of the recurrent training programs for Employees;
- Selection of PPE should be based on the hazard and risk ranking described earlier in this section, and selected according to criteria on performance and testing established.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Workplace Hazards</th>
<th>Suggested PPE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Eye and face protection</td>
<td>Flying particles, molten metal, liquid chemicals, gases or vapors, light radiation.</td>
<td>Safety Glasses with side-shields, protective shades, etc.</td>
</tr>
<tr>
<td>Head protection</td>
<td>Falling objects, inadequate height clearance, and overhead power cords.</td>
<td>Plastic Helmets with top and side impact protection.</td>
</tr>
<tr>
<td>Hearing protection</td>
<td>Noise, ultra-sound.</td>
<td>Hearing protectors (ear plugs or ear muffs).</td>
</tr>
<tr>
<td>Foot protection</td>
<td>Falling or rolling objects, pointed objects. Corrosive or hot liquids.</td>
<td>Safety shoes and boots for protection against moving &amp; falling objects, liquids and chemicals.</td>
</tr>
<tr>
<td>Hand protection</td>
<td>Hazardous materials, cuts or lacerations, vibrations, extreme temperatures.</td>
<td>Gloves made of rubber or synthetic materials (Neoprene), leather, steel, insulating materials, etc.</td>
</tr>
<tr>
<td>Respiratory protection</td>
<td>Dust, fogs, fumes, mists, gases, smokes, vapors.</td>
<td>Facemasks with appropriate filters for dust removal and air purification (chemicals, mists,</td>
</tr>
<tr>
<td>Hazard</td>
<td>Protection Required</td>
<td></td>
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<tr>
<td>-------------------</td>
<td>--------------------------------------------------------------------------------------</td>
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<tr>
<td>Vapors and gases</td>
<td>Single or multi-gas personal monitors, if available.</td>
<td></td>
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<tr>
<td>Oxygen deficiency</td>
<td>Portable or supplied air (fixed lines). On-site rescue equipment.</td>
<td></td>
</tr>
<tr>
<td>Body/leg protection</td>
<td>Extreme temperatures, hazardous materials, biological agents, cutting and laceration.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Insulating clothing, body suits, aprons etc. of appropriate materials.</td>
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</tbody>
</table>

4. Monitoring

Occupational health and safety monitoring programs should verify the effectiveness of prevention and control strategies. The selected indicators should be representative of the most significant occupational, health, and safety hazards, and the implementation of prevention and control strategies. The occupational health and safety monitoring program should include:

- **Safety inspection, testing and calibration**: This should include regular inspection and testing of all safety features and hazard control measures focusing on engineering and personal protective features, work procedures, places of work, installations, equipment, and tools used. The inspection should verify that issued PPE continues to provide adequate protection and is being worn as required.

- **Surveillance of the working environment**: Employers should document compliance using an appropriate combination of portable and stationary sampling and monitoring instruments. Monitoring and analyses should be conducted according to internationally recognized methods and standards.

- **Surveillance of workers health**: When extraordinary protective measures are required (for example, against hazardous compounds), workers should be provided appropriate and relevant health surveillance prior to first exposure, and at regular intervals thereafter.

- **Training**: Training activities for employees and visitors should be adequately monitored and documented (curriculum, duration, and participants). Emergency exercises, including fire drills, should be documented adequately.

- **Accidents and Diseases monitoring**: The employer should establish procedures and systems for reporting and recording:
  - Occupational accidents and diseases
  - Dangerous occurrences and incidents

These systems should enable workers to report immediately to their immediate supervisor any situation they believe presents a serious danger to life or health. Each month, the contractor shall supply data on trainings delivered, safety incidents prevented and any accidents to the Client’s Consulting Engineer for reporting to the MRD. These data are to also include incidents related to any sub-contractors working directly, or indirectly, for the Contractor.

The MRD and DDIS shall be notified of any incident in accordance with the standards below:
All Class 1 and Class 2 health and safety incidents must be formally investigated and reported to the MRD and DDIS through an investigation report. This report shall be based on a sufficient level of investigation by the Contractor so that all the essential factors are recorded. Lessons learnt must be identified and communicated promptly. All findings must have substantive documentation. As a minimum the investigation report must include:

- Date and location of incident;
- Summary of events;
- Immediate cause of incident;
- Underlying cause of incident;
- Root cause of incident;
- Immediate action taken;
- Human factors;
- Outcome of incident, e.g. severity of harm caused, injury, damage;
- Corrective actions with clearly defined timelines and people responsible for implementation;
- Recommendations for further improvement.

<table>
<thead>
<tr>
<th>Incident Severity Class</th>
<th>Incident Classification</th>
<th>Notification timeframe</th>
</tr>
</thead>
<tbody>
<tr>
<td>Class 1</td>
<td>Fatality</td>
<td>As soon as possible</td>
</tr>
<tr>
<td></td>
<td>Notifiable Injury, Illness or Incident</td>
<td>As soon as possible</td>
</tr>
<tr>
<td>Class 2</td>
<td>Lost Time Injury</td>
<td>As soon as practicable but within 48 hours</td>
</tr>
<tr>
<td></td>
<td>Medical Treatment</td>
<td>Within 72 hours</td>
</tr>
</tbody>
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ANNEX 10 – Manager’s Code of Conduct

Instructions: This Code of Conduct should be included in bidding documents for the civil works contractor(s) and in their contracts once hired. This Code of Conduct should also be included in bidding documents, and the contracts, of DDIS. This Code of Conduct is to be signed by the main party (head or manager) in the Contractor/DDIS.

Manager’s Code of Conduct

The contractor/DDIS is committed to ensuring that the project is implemented in such a way which minimizes any negative impacts on the local environment, communities, and its workers. This will be done by respecting the environmental, social, health and safety (ESHS) standards, and ensuring appropriate occupational health and safety (OHS) standards are met. The contractor/DDIS is also committed to creating and maintaining an environment where children under the age of 18 will be protected, and where sexual abuse and sexual harassment have no place. Improper actions towards children, Violence Against Children (VAC), sexual abuse/harassment, and/or acts of Gender Based Violence (GBV) will not be tolerated by any employee, sub-contractors, supplier, associate, or representative of the company.

Staff at all levels have a responsibility to uphold the contractor’s/DDIS’ commitment. Contractors/DDIS need to support and promote the implementation of the Code of Conduct. To that end, staff must adhere to this Code of Conduct and also to sign the Individual Code of Conduct. This commits them to supporting the implementation of the Contractor’s Environmental and Social Management Plan, the OHS Management Plan, and developing systems that facilitate the implementation of the GBV Action Plan.

Staff, in particular Managers, need to maintain a safe workplace, as well as a GBV-free environment at the workplace and in the local community. Their responsibilities to achieve this include but are not limited to:

Implementation

a. To ensure maximum effectiveness of the Code of Conduct:
   (i) Prominently displaying the Code of Conduct in clear view at workers’ camps, offices, and in public areas of the workspace. Examples of areas include waiting, rest and lobby areas of sites, canteen areas and health clinics.
   (ii) Ensuring all posted and distributed copies of the Code of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.

b. Verbally and in writing explain the Code of Conduct to all staff, including in an initial training session.

c. Ensure that:
   (i) All staff sign the ‘Individual Code of Conduct’, including acknowledgment that they have read and agree with the Code of Conduct.
   (ii) Staff lists and signed copies of the Individual Code of Conduct are provided to the OHS Manager and the MRD SEO.
   (iii) Participate in training and ensure that staff also participate as outlined below.
   (iv) Put in place a mechanism for staff to:
      - report concerns on ESHS or OHS compliance; and,
- confidentially report GBV incidents through the Grievance Redress Mechanism (GRM)

(v) Staff are encouraged to report suspected or actual ESHS, OHS, GBV, VAC issues, emphasizing the staff’s responsibility in compliance with applicable laws and to the best of your abilities, prevent perpetrators of sexual exploitation and abuse from being hired, re-hired or deployed. Use background and criminal reference checks for all employees nor ordinarily resident in the country where the works are taking place.

d. Ensure that when engaging in partnership, sub-contractor, supplier or similar agreements, these agreements:

(i) Incorporate the ESHS, OHS, GBV, VAC Codes of Conduct as an attachment.

(ii) Include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers, to comply with the Individual Codes of Conduct.

(iii) Expressly state that the failure of those entities or individuals, as appropriate, to ensure compliance with the ESHS and OHS standards, take preventive measures against GBV and VAC, to investigate allegations thereof, or to take corrective actions when GBV or VAC has occurred, shall not only constitute grounds for sanctions and penalties in accordance with the Individual Codes of Conduct but also termination of agreements to work on or supply the project.

e. Provide support and resources to the E&S team to create and disseminate staff training and awareness-raising strategy on GBV, VAC and other issues highlighted in the ESMP.

f. Ensure that any GBV or VAC complaint warranting Police action is reported to the Police, the client and the World Bank immediately.

g. Report and act in accordance with the agreed response protocol any suspected or actual acts of GBV or VAC.

h. Ensure that any major ESHS or OHS incidents are reported to the client and the supervision engineer immediately, non-major issues in accordance with the agreed reporting protocol.

i. Ensure that children under the age of 18 are not present at the construction site or engaged in any hazardous activities.

**Training**

j. The managers are responsible to:

(i) Ensure that the OHS Management Plan is implemented, with suitable training required for all staff, including sub-contractors and suppliers; and,

(ii) Ensure that staff have a suitable understanding of the ESMP and are trained as appropriate to implement the Contractor’s ESMP requirements.

k. All managers are required to attend an induction manager training course prior to commencing work on site to ensure that they are familiar with their roles and responsibilities in upholding the GBV and VAC elements of these Codes of Conduct. This training will be separate from the induction training course required of all employees and will provide managers with the necessary understanding and technical support needed to begin to develop the GBV Action Plan for addressing GBV issues.

l. Managers are required to attend and assist with the project facilitated monthly training courses for all employees.
m. Ensure that time is provided during work hours and that staff prior to commencing work on site attend the mandatory project facilitated induction training on:

(i) OHS and ESHS, and,

(ii) GBV and VAC.

n. During civil works, ensure that staff attend ongoing OHS and ESHS training, as well as the monthly mandatory refresher training course required of all employees on GBV.

Response

o. Managers will be required to take appropriate actions to address any ESHS or OHS incidents.

p. Regarding GBV:

(i) Maintain the confidentiality of all employees who report or (allegedly) perpetrate incidences of GBV (unless a breach of confidentiality is required to protect persons or property from serious harm or where required by law).

(ii) If a manager develops concerns or suspicions regarding any form of GBV by one of his/her direct reports, or by an employee working for another contractor on the same work site, s/he is required to report the case using the GRM.

(iii) Once a sanction has been determined by the GRM, the relevant manager(s) is/are expected to be personally responsible for ensuring that the measure is effectively enforced, within a maximum timeframe of 14 days from the date on which the decision to sanction was made by the GRM.

(iv) If a Manager has a conflict of interest due to personal or familial relationships with the survivor and/or perpetrator, he/she must notify the Company and the GRM. The Company will be required to appoint another manager without a conflict of interest to respond to complaints.

(v) Ensure that any GBV issue warranting Police action is reported to the Police, the client and the World Bank immediately.

q. Managers failing address ESHS or OHS incidents or failing to report or comply with the GBV provisions may be subject to disciplinary measures, to be determined and enacted by the Company. Those measures may include:

(i) Informal warning;

(ii) Formal warning;

(iii) Additional Training;

(iv) Loss of up to one week’s salary;

(v) Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months;

(vi) Termination of employment.

r. Ultimately, failure to effectively respond to ESHS, OHS, VAC and GBV cases on the work site by the company’s managers may provide grounds for legal actions by authorities.

I do hereby acknowledge that I have read the Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS,
VAC and GBV requirements. I understand that any action inconsistent with this Code of Conduct or failure to act mandated by this Code of Conduct may result in disciplinary action.

Signature: __________________________
Printed Name: __________________________
Title: __________________________
Date: __________________________
ANNEX 11 – Individual Code of Conduct

**Instructions:** This Code of Conduct should be included in bidding documents for the civil works contractor(s) and in their contracts once hired. This Code of Conduct should also be included in bidding documents, and the contracts, of DDIS. This Code of Conduct is to be signed by all contractor and DDIS staff, including managers, working on Component 2 of the CRCIP.

I, ______________________________, acknowledge that adhering to environmental, social, health and safety (ESHS) standards, following the project’s occupational health and safety (OHS) requirements, and preventing Violence Against Children (VAC) and Gender Based Violence (GBV) is important.

The Contractor/DDIS considers that failure to follow ESHS and OHS standards, or to partake in activities constituting VAC or GBV—be it on the work site, the work site surroundings, at workers’ camps, or the surrounding communities—constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution by the Police of those who commit GBV or VAC may be pursued if appropriate.

I agree that while working on the project I will:

a. Consent to a background check in any place I have worked for more than six months.

b. Attend and actively partake in training courses related to ESHS, OHS, VAC and GBV as requested by my employer.

c. Will wear my personal protective equipment (PPE) at all times when at the work site or engaged in project related activities.

d. Take all practical steps to implement the environmental and social management plan (ESMP).

e. Implement the OHS Management Plan.

f. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can impair faculties at all times.

g. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.

h. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.

i. Not sexually exploit or abuse project beneficiaries and members of the surrounding communities.

j. Not engage in sexual harassment of work personnel and staff —for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature is prohibited: i.e. looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; in some instances, giving personal gifts.

k. Not engage in sexual favors —for instance, making promises of favorable treatment (i.e. promotion), threats of unfavorable treatment (i.e. loss of job) or payments in kind or in cash, dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.

l. Not use prostitution in any form at any time.
m. Not participate in sexual contact or activity with children under the age of 18—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.

n. Unless there is the full consent\textsuperscript{33} by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex (including prostitution). Such sexual activity is considered “non-consensual” within the scope of this Code.

o. Consider reporting through the GRM or to my manager any suspected or actual GBV by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

With respect to children under the age of 18:

p. Bring to the attention of my manager the presence of any children on the construction site or engaged in hazardous activities.

q. Wherever possible, ensure that another adult is present when working in the proximity of children.

r. Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.

s. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography (see also “Use of children’s images for work related purposes” below).

t. Refrain from physical punishment or discipline of children.

u. No hiring of children for any CRCIP project activity (no persons under the age of 18).

v. Comply with all relevant local legislation, including labor laws in relation to child labor and World Bank’s safeguard policies on child labor and minimum age.

w. Take appropriate caution when photographing or filming children (see x-\textsuperscript{bb} below). Photos or films of children should generally not be taken in Component 2 of the CRCIP, except in instances showing the benefits or impacts of road works, such as impacts to schools or school safety trainings.

Use of children’s images for work related purposes

When photographing or filming a child for work related purposes, I must:

x. Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.

y. Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.

\textsuperscript{33} Consent is defined as the informed choice underlying an individual’s free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.
z. Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.

aa. Ensure images are honest representations of the context and the facts.

bb. Ensure file labels do not reveal identifying information about a child when sending images electronically.

Sanctions
I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

cc. Informal warning;

dd. Formal warning;

ee. Additional Training;

ff. Loss of up to one week’s salary;

gg. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months;

hh. Termination of employment;

ii. Report to the Police if warranted.

I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met. That I will adhere to the occupational health and safety management plan. That I will avoid actions or behaviors that could be construed as VAC or GBV. Any such actions will be a breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, VAC and GBV issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: ________________________

Printed Name: ________________________

Title: ________________________

Date: ________________________
ANNEX 12 – Guidelines for Worker’s Camps

If relevant, these guidelines will help the contractor when setting up worker’s camps.

GENERAL

The Workers Camp Management Plan will be compliant with the specific prescriptions of the ESMP.

WORKER RECRUITMENT

The Contractor is required to minimise the number of skilled workers that are recruited from overseas. No unskilled labour will be sourced from overseas. Local communities should be prioritized for unskilled labor, including a target of 15% female unskilled workers. The Contractor will maximise the number of skilled and unskilled workers that are recruited from the communities along the project site. The Contractor will be required to provide justification for any skilled workers recruited from overseas and explain why this position cannot be filled locally in Cambodia.

WORKERS CAMP FACILITIES

All facilities in the Workers Camp must be compliant with the stipulations of the ESMP. The camp shall be provided with the following minimum facilities:

- Eating space and dormitories as required shall be constructed of suitable materials to provide a safe healthy environment for the workforce and which facilitate regular cleaning and the provision of ventilation and illumination.

- At least one water closet toilet, one urinal and one shower per 10 personnel engaged either permanently or temporarily on the project. Separate toilet and wash facilities shall be provided for male and female employees, including ensuring that toilets are available close to working sites/road sections where women are working.

- A sick bay and first aid station.

- Sewage collection facilities to allow for the treatment of black and grey wastewater discharge from toilets, wash rooms, showers, kitchens, laundry and the like. The management of all camp wastewater water shall be as prescribed in the ESMP.

- All camp facilities shall be maintained in a safe clean and or appropriate condition throughout the construction period.

- Throughout the period of the contract the employer, the engineer, or their representatives shall have uninterrupted access to and from the camp for the purpose of carrying out routine inspections of all buildings, facilities or installations of whatever nature to ensure compliance with this specification.

WORKERS CAMP OPERATIONS

- The Contractor will be required to provide adequate provisions for the workers for the duration of the project so as not to be a burden on the food or water security of the surrounding communities. The Contractor will strive to hire local labor to provide cleaning and food services.

- All wastewater, solid waste, freshwater usage, noise levels, handling and storage of hazardous materials shall be as prescribed in the ESMP.
MANAGEMENT OF OFF DUTY WORKERS

- The Contractor will prepare and ensure all staff sign and adhere to the Individual Code of Conduct to describe the expected behaviours of their project worker in relation to the local communities and their social sensitivities.

- The Contractor is to ensure that all overseas project staff, not already living in Cambodia, undergo a cultural familiarisation session as part of their induction training. The purpose of this induction will be to introduce the project staff to the cultural sensitivities of the local communities and the expected behaviours of the staff in their interactions with these communities.

- The Contractor is to stipulate the conditions under which visitors may attend the workers’ camp. Strict visiting hours should be enforced and all visitors will be required to sign in and out of the workers’ camp. No overnight visitors will be allowed.

- The Contractor shall ensure that basic social/collective rest spaces are provided equipped with seating within the Workers Camp to help minimise the impact that the workers would have on the leisure and recreational facilities of the nearby communities. Provisions should also be made to provide the workers with an active recreation space within the camp.

WORKERS CAMP MANAGEMENT PLAN

A Workers’ Camp Management Plan shall be submitted by the Contractor to MRD. The Workers’ Camp Management Plan shall describe how this document and the ESMP shall be implemented in the following:

- Recruitment strategy
- Accommodation
- Canteen and dining areas
- Ablutions
- Water supply
- Wastewater management system
- Proposed power supply
- Code of Conduct for Workers
- Recreational/leisure facilities for workers
- Visitors to the Workers Camp
- Interactions with the local communities
## ANNEX 13 – GBV Stakeholders in Project Provinces

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<th>Tboung Khoum</th>
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<td>PDOWA</td>
<td>CWWW (province and district) PDOWA Vice governor SW-GBV</td>
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<td>Men’s awareness</td>
<td>WCCC, CCWC, Police Provincial, district Focal point</td>
<td>MHC: Health – MSM program</td>
<td>WCCC CCWC Police Provincial, district Focal point</td>
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<td><strong>3. Response: Essential Services</strong></td>
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<td><strong>Health</strong></td>
<td>DoH</td>
<td>PSOD: SRHR</td>
<td>DoH, DPOWA</td>
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<td>FHI: reproductive health</td>
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<td>RACH: SRHR</td>
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<td>PFD: Community health</td>
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<td>ADHOC: Access to justice for women</td>
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<td><strong>Justice, Policing</strong></td>
<td>Provincial Police, JPA/JPO, DPOWA</td>
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<td>ADHOC: access to justice for women</td>
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<td>Provincial prosecutor</td>
<td>LAC: Legal advice</td>
<td>CPU: Legal support</td>
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<td>LSCW: trafficking and paralegal</td>
<td>CHAPDAY: Child protection</td>
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<td>ADHOC: access to justice for women</td>
<td>DAi: Child protection</td>
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<td>CNCW: CEDEW implementation</td>
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<td>PM’s Volunteer Lawyers</td>
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<td><strong>Shelter/safe house/ OSSC</strong></td>
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<td>HAGAR: Shelter</td>
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<td>WCCC, DPOWA, Provincial prosecutor</td>
<td>CPU: Legal support</td>
<td>AFESIP: Shelter</td>
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<td>LAC: legal support -GBV</td>
<td>HAGAR: Shelter</td>
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<td>LSCW: Trafficking paralegal</td>
<td>Provincial Red Cross: emergency respond</td>
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