



វេទិកាសេដ្ឋកិច្ចសង្គមស្របច្បាប់ កម្ពុជា
The NGO Forum on Cambodia

ធ្វើការរួមគ្នាដើម្បីការវិវឌ្ឍស្របច្បាប់
Working Together for Positive Change

The Assessment Of CSO/NGOs' Comments Incorporated Into The National Strategic Development Plan (NSDP) 2014-2018

September 2015

Coordinated by the Development Policy Project,
Development Issues Program, The NGO Forum on Cambodia (NGOF)

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Based on the submitted comments and finalized NSDP, NGOF through Development Issues Program has conducted and finalized an assessment of the CSO/NGOs' comments into the NSDP 2014-2018 to find out to what extent the comments were incorporated into NSDP.

Very thankful to Diakonia, Kepa, Oxfam, NPA organizations for providing any fund support to Development Issues Program in order to running this project.

Phnom Penh, Date: 09 September 2015

Development Issues Programme,
The NGO Forum On Cambodia

EXECUTIVE SUMMARY

In recent years, Cambodia has experienced significant developments not only in political and security but also in economic and social aspects. Such environments of political stability, peace, and safety are the prerequisites for Cambodia to make use of its socio-economic potentials (RGC, 2015). The Royal Government of Cambodia (RGC) has undergone the experiences of the formulation of five 5-Year national development plans including, (1) the first Socio-Economic Development Plan (SEDP I) 1996-2000, (2) Socio-Economic Development Plan Phase II 2001-2005 (SEDP II), (3) National Strategic Development Plan 2006-2010, (4) National Strategic Development Plan Update 2009-2013, and (5) National Strategic Development Plan (NSDP) 2014-2018. In the development of Cambodia, CSO/NGOs have contributed their work a lot to the Royal Government of Cambodia. As can be seen in Cambodia, the civil society organizations have an important role to play in setting priorities and shaping policies such as national development policy and development policy and program implementation. Moreover, the effective implementation of the NSDP will be successes not only for the implementation of all sectors in Cambodia but also in the sharing work of the civil society organizations. Hence, “the assessment of CSO/NGOs’ Comments incorporated into the National Strategic Development Plan (NSDP) 2014-2018” was conducted. This document is important because it serves as a reference for all civil society organizations that have contributed to discussions about the NSDP, and will turn into a shape for future debates.

This assessment is aimed to find out to what extent the CSO/NGOs’ comments/inputs on the draft of the National Strategic Development Plan (NSDP) 2014-2018 were incorporated into the final version of the NSDP 2014-2018. The methodology of this assessment is to make the assessment based on the final version of NSDP2014-2018 comparing to the CSO/NGOs comments/inputs on the NSDP 2014-2018 draft. The NSDP 2014-2018 draft refers to the version released by the Ministry of Planning in December 2013 and was submitted by sector CSO/NGOs to Line Ministries/Agencies and Development Partners in January 2014. It included comments from around ten CSO/NGOs and the NGO Forum on Cambodia and was coordinated by the Development Policy Project of the NGO Forum.

Results of the assessment show that, in total, the earlier said about ten CSO/NGOs representatives have provided 140 comments into the draft of the NSDP 2014-2018. However, only approximately 34% (48 comments) of them were authoritatively incorporated in the final version of the NSDP 2014-2018 while about 66% (92 comments) was not officially incorporated into it. Nonetheless, although a small percentage of the NGO/CSOs’ comments was included in the final version of the NSDP 2014-2018, their comments could be a constructive pathway to the Ministry of Planning. This is on the ground that their comments were offered based on their respective sector and/or field of work.

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1. Introduction

In recent years, Cambodia has experienced significant developments not only in political and security but also in economic and social aspects. Such environments of political stability, peace, and safety are the prerequisites for Cambodia to make use of its socio-economic potentials (RGC, 2015).

The Royal Government of Cambodia (RGC) has undergone the experiences of the formulation of five 5-Year national development plans including, (1) the first Socio-Economic Development Plan (SEDP I) 1996-2000, (2) Socio-Economic Development Plan Phase II 2001-2005 (SEDP II), (3) National Strategic Development Plan 2006-2010, (4) National Strategic Development Plan Update 2009-2013, and (5) National Strategic Development Plan (NSDP¹) 2014-2018.

The Royal Government of Cambodia's National Strategic Development Plan 2014-2018 (NSDP) is the key document that will help shape the country's development until 2018. While Cambodia has achieved high rates of economic growth and poverty has been reduced, challenges remain. These include agriculture domain, good government area, environment industry, education.etc.. The importance of these issues is compounded by joining ASEAN in 2015. Membership may provide opportunities for Cambodia, but also put the economy under competitive pressure, and serve as a challenge to existing institutions.

The NSDP plays a very crucial in economy and social sectors and the plan indicators in the NSDP have been utilization to all sectors for their 5-years plan implementation. The GDP² growth rate in the economy has been a signed of country development. Thus, the Cambodian economy has been fully depending on four sectors such as agriculture, Forestry and Fishery, industry, and services. These sectors have been contributing to the growth of Cambodian's GDP annually (MEF, 2015).

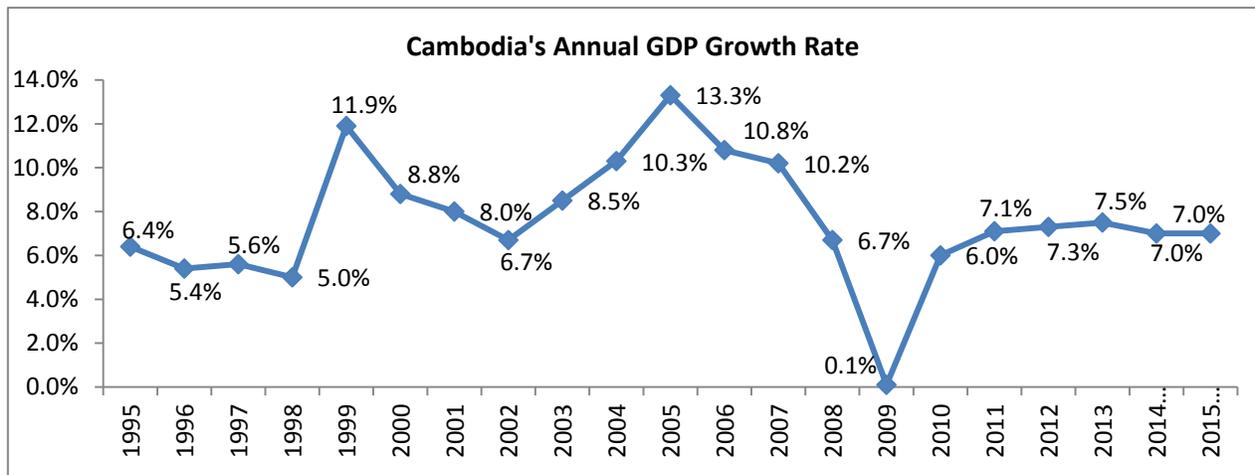
Figure 1 shows the Cambodian's annual GDP growth rates from 1995 to 2015. It illustrates that the percentage of GDP growth rate was steadily decreased about 1.4% between 1995 and 1998 and this figure was increasing by 11.9% in 1999. Additionally, there have been gradually fallen in the Cambodian's annual GDP growth rate by 6.7% in 2002 while this figure continues to boosting to over 13.3% in 2005. Interestingly, in 2009, there had been a gradually went down in the percentage of Cambodian's annual GDP growth rate by 0.1% because the economic outlook in the very short-term faced two important down side risks. Firstly, the uncertainties about the severity and duration of the global financial crisis and the on-going economic recession in developed economies, as well as the potential impact of the swine flu epidemic on the tourism sector (RGC, 2015). The second risk was a very slow pace of economic recovery in developed economies. Even though, the projection of this GDP growth rate is, it having been remained steadily until 2015 by 7% (Figure 1).

As addressed by the Royal Government of Cambodia, "*The Royal Government's strategic motto is "Poverty reduction through high economic growth over the long term by ensuring environmental sustainability and social equity"*" (RGC 2015). As can be seen in Figure 2, a percentage of poverty rates had been gradually fallen since 2007 until 2015 with the figure of 47% and 15.9% respectively. Economic growth is emphasized as a prerequisite to poverty reduction. Nevertheless, the RGC stated, "*the position of human development and poverty reduction within the overall economic policy framework determines the type of growth and the equity priorities pursued*" (RGC 2015). Hence, the NSDP plays a significant role in the poverty alleviation and country development based on the implementation of strategic development plan by each sector (See Figure 2).

¹ Source: RGC (2015), National Strategic Development Plan. NSDP has been operationalized from the Rectangular Strategy, a political platform of the ruling party, to implement the socio-economic development agenda.

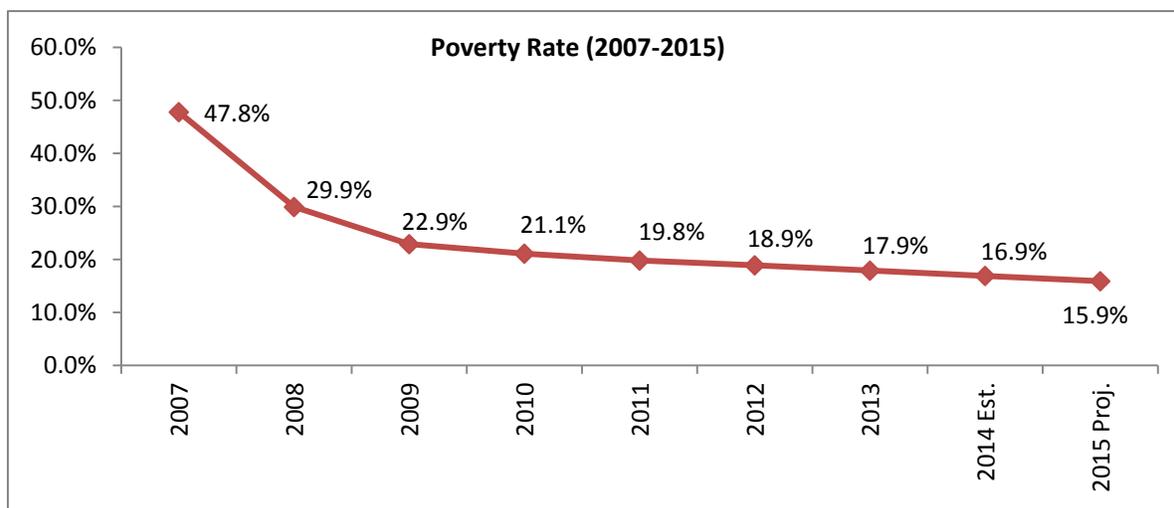
² Gross Domestic Product

Figure 1: Cambodia's annual GDP³ growth rate from 1995-2015



Source: World Bank (2014)

Figure 2: Poverty rate⁴ from 2007-2015



Source: ADB (2014)

In Cambodia, civil society organizations have an important role to play in setting priorities and shaping policies such as national development policy and development policy and program implementation. Moreover, the effective implementation of the NSDP will be successes not only for the implementation of all sectors in Cambodia but also in the sharing work of the civil society organizations. It is clearly seen that all civil society organizations have set up their roles, goal, visions, purposes and missions to shape the Royal Government of Cambodia rectangular strategy. Thus, their work are closely relation to people across a range of issues, uniquely placed to understand the problems that Cambodians encountered, monitoring outcomes, and making changes where necessary will be important to build on the success identified above in the NSDP. Hence, the RGC has been opened for any strategic comment on the NSDP 2014-2018 since 2014. The draft report of NSDP has been produced by Ministry of Planning. It is noticed

³ Source: Clear Skies Cambodia Economic Update (World Bank, 2014)

⁴ Source: ADB (2014), Cambodia Country Poverty Analysis from 2007-2012 & RGC (2015), National Strategic Development Plan (2014-2018): Cambodia at a Glance from 2013-2015.

that the comments, which were provided by CSO/NGOs usually, were not fully incorporated into the final report of NSDP. However, the debate about policy in Cambodia, and some of the challenges that lie ahead still should be advocated when there is a next NSDP plan.

Hence, “the assessment of CSO/NGOs’ Comments incorporated into the National Strategic Development Plan (NSDP) 2014-2018” was conducted. This document is important because it serves as a reference for all civil society organizations that have contributed to discussions about the NSDP, and will turn into a shape for future debates. NGO Forum gratefully acknowledges the CSO/NGOs that have spent time reviewing the NSDP and checking it against their original submission. Without their dedication, this task would not have been completed. This assessment coordinated by the Development Policy Project at Development Issues Program, NGO Forum On Cambodia (NGOF).

2. Objective

This assessment is aimed to find out to what extent the CSO/NGOs comments/inputs on the draft National Strategic Development Plan (NSDP) 2014-2018 were incorporated into the final version of Strategic Development Plan (NSDP) 2014-2018.

3. Methodology

The NGO Forum’s Development Policy Project makes the assessment based on the final version of NSDP2014-2018 comparing to the CSO/NGOs comments/inputs on the draft of NSDP2014-2018.

The CSO/NGOs’ comments/inputs on the draft of NSDP 2014-2018 refer to the comments submitted by sector CSO/NGOs to Line Ministries/Agencies and Development Partners in January 2014, which was coordinated by the Development Policy Project of NGO Forum.

The draft of NSDP 2014-2018 refers to the version, which was released by the Ministry of Planning in December 2013. There were about ten CSO/NGOs representatives and NGO Forum has provided comments on the draft of NSDP 2014-2018.

The assessment was conducted on some parts of NSDP 2014-2018 such as legal and judicial reform, good governance and access to information and public financial reform program. Moreover, management of revenues from extractive industry (oil, gas and mining), education; improving education, science and technology and technical training, rural development, disability, agriculture, land reform, development of hydropower dams and the energy sector is also included in this assessment. Additionally, sustainable management of natural resources, environment, and sector key policy priorities and actions to implement the prioritized policies, partnership in development; and last monitoring and evaluation were assessed.

4. Results of CSOs/NGOs' Comments

The assessment of the CSO/NGOs' comments and inputs on the draft comments of NSDP 2014-2018 was conducted in 2014. It compares comments of CSO/NGOs in different sectors and the extent to which they were incorporated into the final report of NSDP 2014-2018. Finally, the assessment found that the CSO/NGOs' comments were less accepted following the careful, extensive review of the final version of the NSDP 2014-2018.

All CSO/NGOs' comments on the NSDP 2014-2018 provide some useful ideas on the disparities of various sectors such as legal and judicial reform, good governance and access to information, public financial reform program, management of revenues from extractive industry (Oil, Gas, and Mining), education, improving education, science technology and technical training, rural development, disability, agriculture, land reform, development of Hydropower Dams and the energy sector, sustainable development of natural resources, environmental sustainability and climate change, partnership and development, monitoring and evaluation, and general comments (on key policy priorities and actions to implement the prioritized policies).

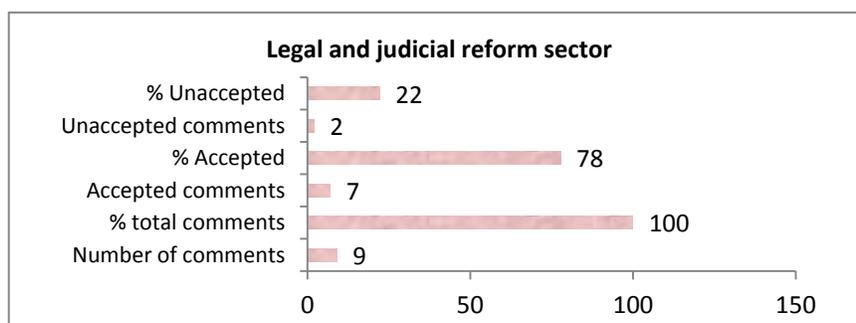
4.1 Legal and Judicial Reform

Cambodian Human Rights Action Committee (CHRAC) has provided about nine comments on the legal and judicial reform in the first draft of the NSDP since 2014. After the release of the final version of NSDP 2014-2018, the comments were re-checked by CHRAC, which was coordinated by the Development Policy Project at NGO Forum on Cambodia.

The part of the comments on Legal and Judicial Reform is illustrated in the Figure 3 below. Approximately 78% of the comments in this part were officially accepted/ incorporated into the final report of the NSDP 2014-2018, whereas 22% was not included in it. CHRAC has observed that *RGC still has a strong commitment to strengthen the professionalism, independence, impartiality and rule of law in Cambodia and three laws on Judiciary adopted by the national assembly which consisted of only the ruling party without the consultation with Civil Society Organizations. Moreover, there is no clear plan on how to enhance the professional capacity of judicial officers. However, RGC has set up the administrative unit in all levels of courts as stated under the article 10 and article 32 of the current Law on the Organization of the Court which was adopted by the national assembly on May 2014.*

According to CHRAC's observation and concerns of NGOs, *"the courts in Cambodia do not have sufficient human resources, funding and infrastructure There is no clear direction on law dissemination and the provision of training for judicial officials and the public as set in the NSDP (2014-2018)". "CHRAC recognizes the importance of dissemination of law to the general public, but CHRAC would also encourage the RGC to include program that raises awareness of the ideals relating to anti-corruption, transparency, and independences within the judiciary". "There is no clear plan regarding the provision of funding for legal representatives to the Bar Association of Cambodia (BACK) for the poor (CHRAC, 2015). Importantly, in the point of "Appropriate ADR measures talking into account political and economic power inequality between litigant parties" (NSDP, 2014-2018), CHRAC observed that RGC has commitment to continue ADR measure".(see appendix)*

Figure 3: The percentage of comments on legal and judicial reform by CHRAC, 2015



4.2 Good Governance and Access to information

The previous comments provided by Advocacy and Policy institute (API) into the draft report of NSDP (2014-2018) were a hundred percent incorporated into the final report of NSDP (2014-2015). The final comments authorized from the last version of NSDP are noted below:

“Access to Information Law shall be a one the key outputs of the legal instrument, frameworks and measures necessary for fighting against corruption.”

“The Minister of Ministry of Information, assigned by government, should regular open consultations with journalists, CSOs and relevant stakeholders during draft law on Access to Information to ensure the law is following the international standard that at least comply with nine principles (1) Maximum disclosure (2) Obligation to publish (3) Promotion of open Government (4) Clear and narrow exemptions (5) Easy process to access information (6) Control request costs (7) Open meetings of public bodies (8) Laws consistent with maximum disclosure and (9) Protect whistleblower. It should be one of the output indicators.”

“Government actors at all levels must take steps to develop a culture of openness. They should work to disseminate information proactively and respond promptly to requests for information. The Royal Government of Cambodia with inclusion of the NGO Access to Information Working Group is convened to formulate strategies, procedures and mechanisms to enable effective implementation of the Access to Information Law once it is enacted shall be activity milestone actions of the JMIs.”

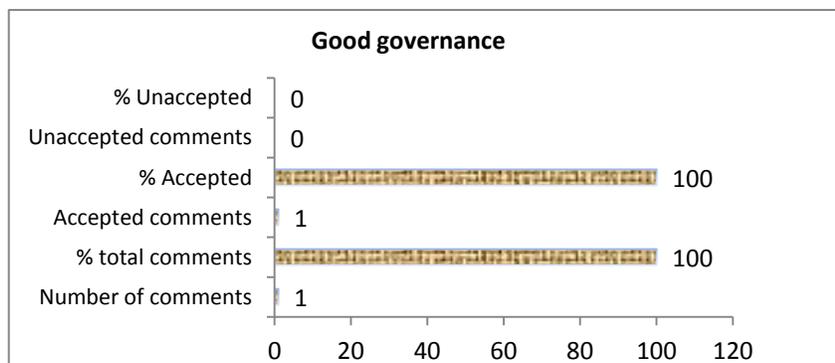
“Recommendations to the donors:

- Development partners should keep access to information on the Government’s agenda and should offer the technical assistance necessary for the passage of strong legislation to ensure the law is following the international standard.*
- Allocate resources to promote people’s awareness of their right to access to public information and support the mechanisms to enable effective implementation of the Access to Information Law once it is enacted to endorse this in order to broaden transparency and accountability.*

Encourage their partners to focus and integrate access to public information concepts/ principles into their projects/programs as a cross-cutting issue.” (See the appendix)

Hence, the government of Cambodia successfully accepted this comment. The percentage of comment on good governance and access to information is listed in Figure 4.

Figure 4: The percentage of comment on good governance and access to information by API, 2015



4.3 Public Financial Reform Program

This reform agenda will inevitably face challenges from those adversely affected by the improvements planned in governance, accountability, and transparency of the PFM system. Hence, in the NSDP 2014-2018 report, around 67% of the CSO/NGOs' comments which were provided by NGO Forum On Cambodia (NGOF), were authorized into the final NSDP (2014-2018). However, approximately 33% of these comments were not incorporated. The percentage of the comments on public and financial reform is displayed in Figure 5. The original texts of the public financial reform program were shown and comments on them from CSO/NGOs are illustrated below:

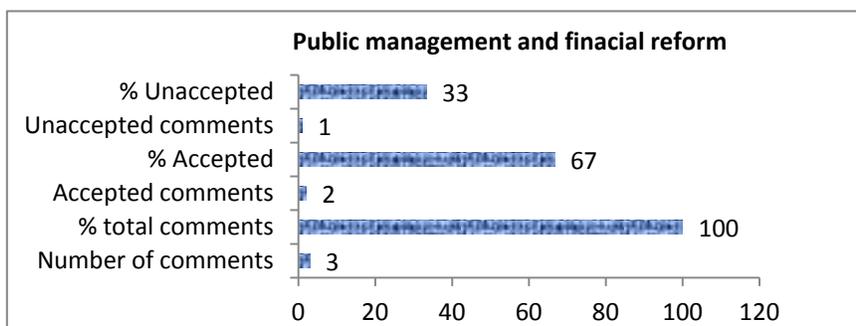
“3.36- Transparency in public finance management should be clearly highlighted as an end goal along with budget-policy linkages and accountability for performance and public service delivery in the NSDP 2014-2018. It should also be seen as a means to help achieve the targeted revenue increase of 0.5% of GDP per year and improve efficiency in the budget process”. “The focus on the PFMRP phase IV should be on the accountability and transparency. The NSDP should define the need for the RGC institutions and agencies to publish their financial plan and implementation in their public domain regularly. MEF should also be required to produce and publish simplified budget related documents to allow the public to understand national budget matters.”

This comment was shown in section 3.40. (page 92), NSDP 2014-2018, states that *“Promote effectiveness, transparency and accountability in expenditure allocation, from the stages of preparation to implementation, monitoring and auditing of the outcomes, in budget the implementation.”*

“4.39, The NSDP 2014-2018 should add transparency in continuing to implement the PFMRP which aims at improving the efficiency and effectiveness of Cambodia’s public financial management system. Thus in this point, ‘Enhancing transparency of national budget by producing and publishing all budget related documents in the public domain,’ should be added.”

This comment was shown in section 3.67. (page 102) *As an effort to promote transparency of the budget formulation process, the MOP has prepared a preliminary/indicative projection of recurrent expenditure allocation for RGC institutions for the NSDP 2014-2018. The indicative projections are presented in Table 3.4. (Please see all comments in the attached appendix)*

Figure 5: The percentage of comments on public management and financial reform by NGOF, 2015

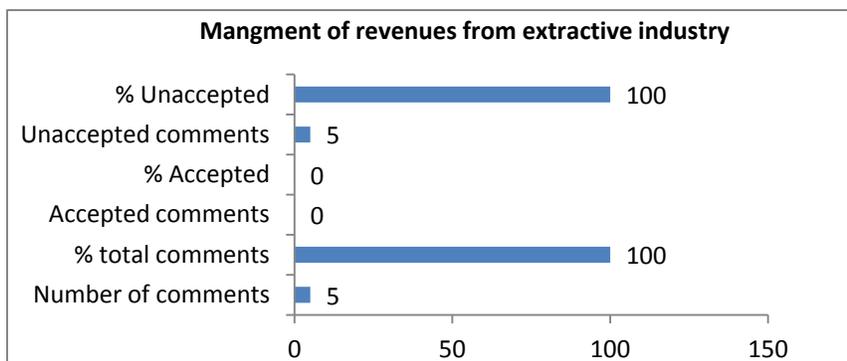


4.4 Management of Revenues from Extractive Industry (Oil, Gas and Mining)

Building transparency and accountability in Cambodia will be critical in unlocking resources for local-driven development and directing extractive revenues into productive investments in infrastructure, business enabling environment, and human capital. As the global demand for energy and raw materials continues to grow over the next several decades, sustainable development in resource-rich Cambodia will depend on their ability to leverage the extractive industry to jumpstart development rather than simply the primary source of revenue. Given that the mismanagement of governments as providers of public services, effective management of these resources can help bridge this gap and strengthen public

confidence in the government’s ability to provide accountable and transparent governance. In the draft of NSDP (2014-2018), this sector was commented by Cambodians for Resource Revenue Transparency (CRRT) and by comparing the previous comments to the final report of NSDP. The analysis of percentage of these comments is shown in Figure 6 and a hundred percent of these comments were not officially accepted and incorporated into the final NSDP report (2014-2018) with the total comments of five in this sector. (Please see all comments in the attached appendix)

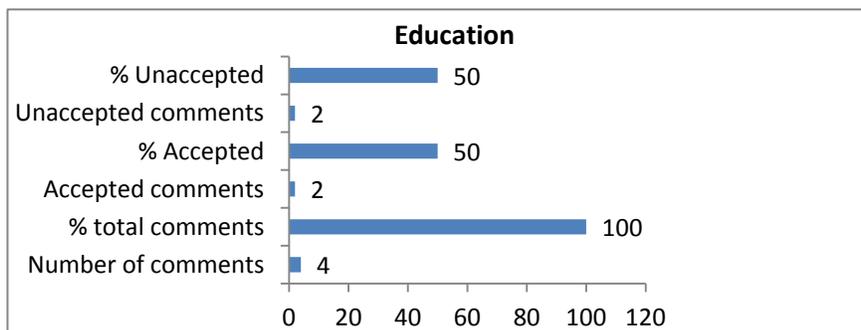
Figure 6: The percentage of comments on the management of revenues from extractive industry (Oil, Gas and Mining) by Cambodians for Resource Revenue Transparency (CRRT), 2015



4.5 Education

Education sector was commented by NGOs Education Partnership (NEP) with the total four comments. Figure 7, approximately 50% or two of its comments has/have been incorporated into the final report of NSDP (2014-2018) , while at least 50% or two has/have not been fully accepted because its original comments focused on ensuring the effective implementation of the Education Strategic Plan (ESP) . By contrast, the final version of the NSDP 2014-2018 only focused on the preparation stage. The original text from the final NSDP is *“Further improving education policies and strategies, especially by ensuring effective implementation of the Education Strategic Plan (2014 – 2018) and monitored through an updated and accurate Education Management Information System (EMIS), Master Plan on ITC in Education, and Policy on Research &Development in Education to inform policy,”*. In policy 1 their comments were mostly accepted, except one on more intention so that all school levels are child friendly and inclusive schools which had been mentioned in MoEYS’s policies. Refer to the comment *“Policy 3: Initiate developing a national framework to put in place mechanisms to assess student achievement, improving learning outcomes of children in primary school which will require many more primary teachers with greater qualifications.”* This comment was officially not incorporated into the final report of NSDP (2014-2018). The percentage of comments on education is shown in Figure 6. (Please see all comments in the attached appendix)

Figure 7: The percentage of comments on Education by NGOs Education Partnership (NEP), 2015



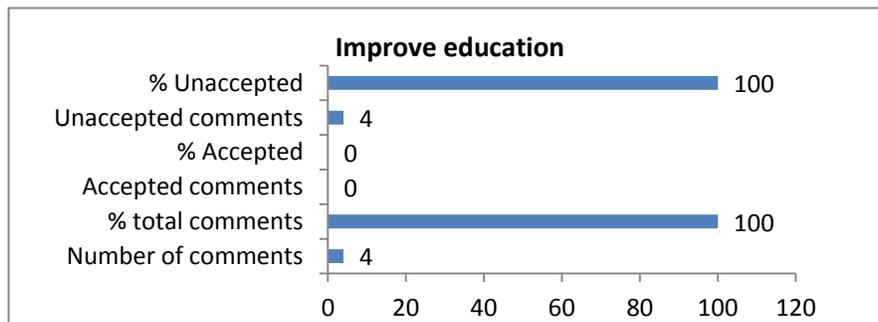
4.6 Improving Education, Science and Technology and Technical Training

The sub-sector of the improving education, science and technology and technical training was commented by ActionAid Cambodia. From the previous draft report of the NSDP (2014-2018), there were four comments that provided by ActionAid Cambodia. As can be seen in the Figure 8, a hundred percent of all comments was officially incorporated by the Royal Government of Cambodia into the final version of NSDP 2014-2018. The original texts written in the final version of NSDP (2014-2018) are displayed below:

“Planned actions to implement the prioritized policies should include: Improving teacher professionalism through Awareness raising on the sub-degree on teacher code of ethics, Conducting regular reflection meetings on teacher code of ethics with teachers, community people, local authorities and education officials of DOE and POE, Trainings on children’s rights and human rights for teachers, head of teachers and School Support Committees, Strengthening teacher’s skills on teaching methodologies – Child Friendly Program, and Conducting study visits for teachers to model schools having strong management and leadership skills.” There is no clear statement regarding teacher professionalism and teacher skills on teaching methodologies as well as study visits for teachers to model schools.

“Improving participation in oversight of schools and education system through Strengthening the role and responsibilities of SSC as stated in the guideline on the Establishment and Functioning of SSC, Conducting regular reflection meetings/dialogues on quality education in local levels among community people, children and youths, SSC, local authorities and education officials of DOE and POE, Conducting bi-annual debates where parents, SSCs, teachers, children and youths, local authorities and education official at local levels ask each other questions on the role they play, and Encouraging discussions on the quality of education in the media (radio, TV talk-show).” The comment from ActionAid Cambodia is school principal, PoE & DoE officials are to be trained to advise schools but here is no engagement from SSC and community with POE & DOE to meet/dialogue and debate on their roles to make education a quality one for their generation. (Please see all comments in the attached appendix)

Figure 8: The percentage of comments on improving Education, Science and Technology and Technical Training ActionAid Cambodia, 2015

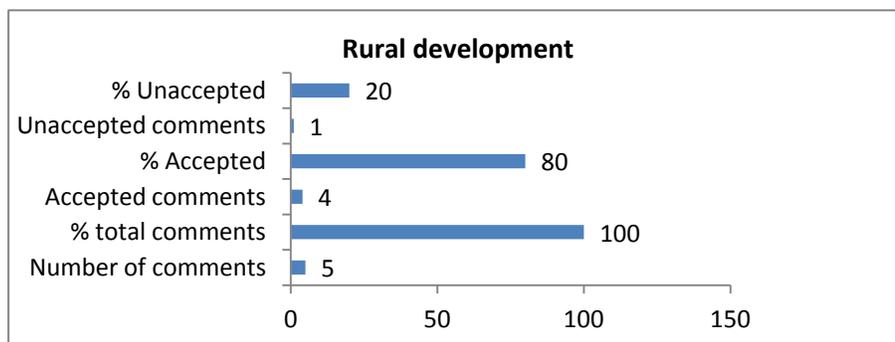


4.7 Rural Development

Rural development sector has been commented by Life With Dignity (LWD) since NSDP 2014-2018 was drafted in 2014. Ultimately, it has totally provided five comments. However, they have not been accepted by the government at all. Figure 9 below depicted that approximately 80% or four out of the comments have been incorporated into the final report of NSDP (2014-2018) with 20% or one of these comments not having been incorporated. Refer to the comments in the final report of NSDP 2014-2018, it is addressed that *"Monitoring results should be shared with local authorities through facilitated interface/feedback meetings. Monitoring results and action plans should be publicized, integrated in work plans of schools, health centers, Commune Investment Plans and shared at District Integration Workshops". "This comment was not reported in the final report of NSDP (2014-2018)"*.

Authorized comment by the Royal Government of Cambodia that "NSDP 2014-2018 have to continue strengthen and monitoring in promoting community hygiene sensitization and WASH in School curriculum including public awareness." It has been officially in the Page 143 of the NSDP says` Improvement of accessibility to safe-drinking water (from multiple sources) and sanitation in rural communities residing in water-scarce areas, as well as water for irrigation. In this regard, innovations in sanitation at localized environments need encouragement, preferably with participation from communities (CLTS). This text reflects our submission to the NSDP". (See the comment in the appendix). The percentage of comments on rural development is indicated in Figure 9.

Figure 9: The percentage of comments on rural development by Life With Dignity, 2015

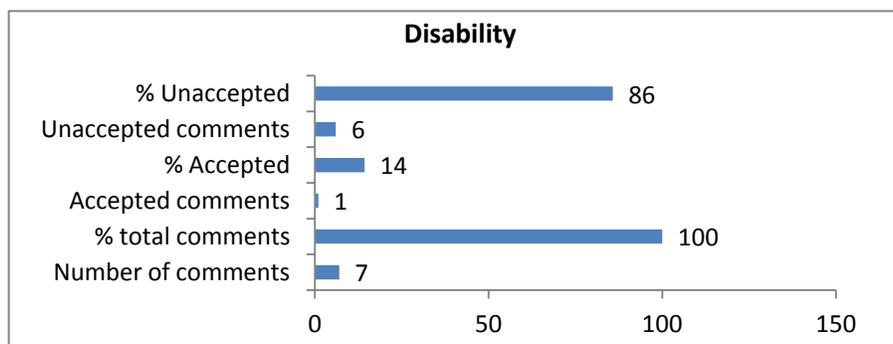


4.8 Disability

Disability sub-sector was commented by the Cambodian Disabled People’s Organization (CDPO) with the total comments of seven. However, respect to the Royal Government of Cambodia that has authorized comments in 2015, the vast majority of the comments was not accepted by the Government. These comments have been written in the final report of NSDP that “Disability is not included in this Section of the document as a cross-cutting issue. If disability could be included as a cross-cutting issue in the introduction, the needs and rights of persons with disabilities would be covered in all Policy Priorities for the Fifth Legislature.” And “In particular for persons with disabilities” were not incorporated into the final draft of NSDP (2014-2018); and “Disability is also cross-cutting issue of equal importance to gender and a Section on disability equity could be included in the document. ” (More comments please see the attached all comments in the appendix)

To illustrate into the percentage of unincorporated comments please see Figure 10 and about 86% of these comments was legitimately unaccepted by the Royal Government of Cambodia. In contrast, approximately 14% of disability comment part was authoritatively accepted and this comment was officially noted in the final report of NSDP that “Law on protection and promotion the rights of persons with disabilities is not mentioned. As disability is a cross-cutting issue, this law could be included as priority law as persons with disabilities are among the poorest and most vulnerable groups in society.” (Please see all attached comments in the appendix)

Figure 10: The percentage of comments on disability by Cambodian Disabled People’s Organization (CDPO), 2015



4.9 Agriculture

Agriculture plays an important role in Cambodian economy. Hence, most of the comments by ActionAid Cambodia are mostly related to promote sustainable agriculture. Some illustration comments which were drawn from the final report of NSDP are written that:

“4.50/promotion of agricultural sectoris to promote sustainable agriculture approaches drawn from traditional and scientific knowledge to improve the yield rate, and diversify activities into high value crops, livestock, and aquaculture which mostly benefit local food security and export. Meanwhile, the effort will be further promoted agriculture commercialization by ensuring smallholder farmers are fairly benefited for their smallholder products.” The final draft did not explain the government’s approach to sustainable agriculture. We proposed that its approach draw on traditional and scientific knowledge to improve the yield rate. But final NSDP emphasizes new technologies and modernization and did not focus on small landholders.

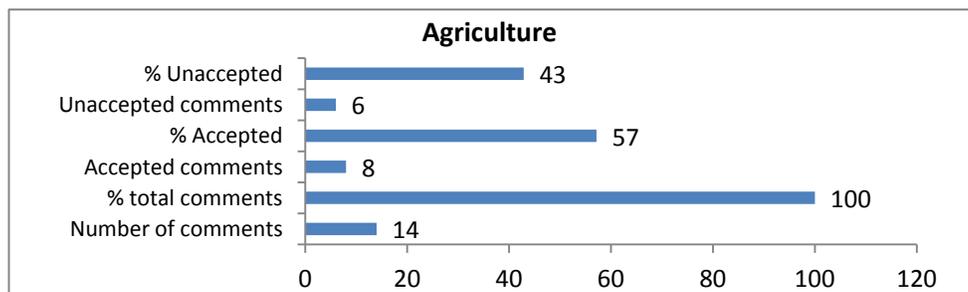
“4.52.....further investing in irrigation which favor smallholder farmers and rationalizing of water use; improving collection and storage facilities at local and national levels; and preparing and improving.....contract farming which benefit smallholder farmers...” The changes in agriculture were stated as a general target, but the focus wasn’t on smallholder farmers. In addition there was not enough detail about irrigation at the local and national level, and did not explain how contract farming was to benefit to smallholder farmers.

“.....production expansion, exports, farmer preference and resilience to climate change; strengthening the environment to..... promoting the use of agricultural machinery which more benefits smallholder farmers, particularly women.” The aim of expanding production, and increasing exports didn’t state about the preference of farmers or include resilience to climate change. In addition our concern about promoting machinery that might benefit smallholder farmers, particularly women benefit was not included.

“RGC should develop and promote vegetable security strategy to diversify source of food dietary, stable income and reduced vegetable import.” The suggestion that the strategy be undertaken to reduce vegetable imports was not included. (More comments please see all attached comments in the appendix)

Figure 11 given below, about 57% of CSO/NGOs comments were accepted by the government and approximately out of 43% of these comments were not incorporated into the final of NSDP.

Figure 11: The percentage of comments on agriculture by ActionAid Cambodia, 2015



4.10 Land reform

Land reform part officially received 16 comments from NGO Forum On Cambodia (NGOF). An official incorporation of its comments into the final version of NSDP 2014-2018 was about 28% while approximately 72% was not accepted (Figure 12). The original texts from the NSDP are described below:

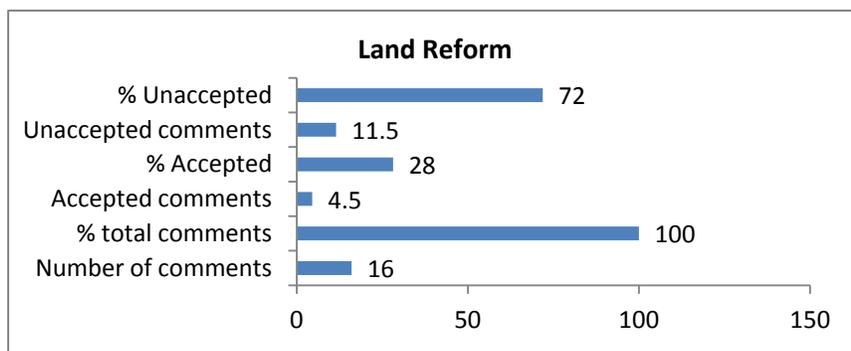
“This Section does not specify how Cambodia’s land distribution policy will be decided. The Draft NSDP fails to mention NGOF’s suggestion that clear land mapping is the action that needs to be taken, to ensure the RGC plans do not have an adversarial effect on people’s tenure and rights.” This comment was not incorporated into the final version of NSDP.

“While this point indirectly acknowledges the necessity of supporting smallholders, CSOs highlighted the current inadequacies of, and dangers of relying on, Directive 01. For example, it legalizes the occupation of land as “unclear status”, and does not avoid land grabbing. The existing Directive 01 must be strengthened and improved before it can be relied upon.” The comment from NGFO is measuring land and giving land titles to the people within the framework of the implementation of the “Old Policy-New Action”, related to the 3 types of state lands: forest concessions, economic land concessions, and confiscated land. (4.63, page 131).

“This text is not clear on how land registration and dispute resolution can be accelerated. While CSOs agrees that the SLR process should be accelerated, RGC must first ensure land is transparently demarcated, including the land of indigenous people. RGC has not accounted for whether or not it has the capacity to do this. It is also important that the RGC allow land registration and recognition of informal settlements.” The comment from NGOF is speeding up of all types of land registration (to reach at least 6 to 7 million parcels throughout the country) and accelerating land dispute resolution to achieve the target plans of land registration accordingly 52% by 2014, 57% by 2015 and 70% by 2018. (4.63, page 131).

“Instead of focusing on “dispute free” areas, individual and communal land titling should be prioritized in areas prone to disputes. The Ministry of Land Management Urban Planning and Construction recently committed to providing communal land titles to 10 indigenous communities per year. This should be included in the NSDP.” The comment from NGOF is continuing registering land titles for indigenous communities.(4.63, page 131). (See all comments in the appendix)

Figure 12: The percentage of comments on land reform by NGOF, 2015



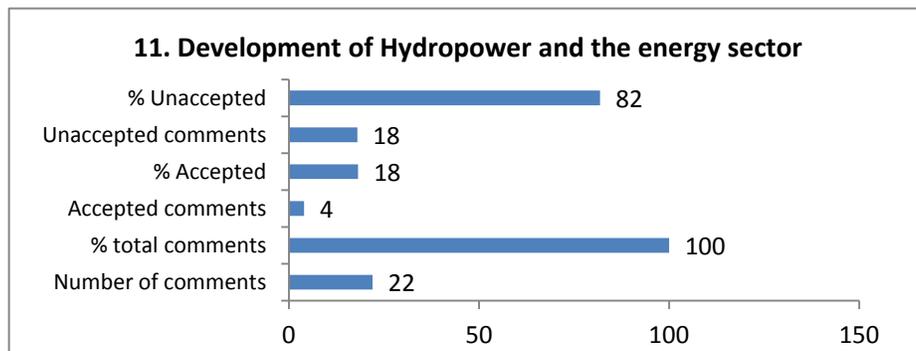
4.11 Development of Hydropower dams and the energy sector

This part was commented by the Environment Program of NGO Forum on Cambodia. In the development of hydropower and the energy sector, there were about 18% of CSO/NGOs comments that the government has been considered to include into the final report of NSDP (2014-2018) (Figure 13). The accepted comments which are given by the original text from the final report of NSDP are quoted below:

*“Should include Affected Community in Government-Private Sector Forum”. This comment was incorporated into to the final draft of NSDP (2014-2018) and the commenter would like to say thanks to government for the improvement of the NSDP 2014-2018 and this comment was originated withdrawn from (paragraph 4.45, page 122, point 5: strengthening **Cambodia Development Cooperation Forum...consultative meeting between government and NGOs, and Bilateral consultation mechanisms...platform to dialogue between government and all its stakeholders...to discuss development***

issues in the country). It is a win-win solution to call for sustainable development in Cambodia. However, we as CSOs have found that there is still limitation of dialogue between **Affected Community-Government-Private Sector** on development project in Cambodia. We still strongly recommend government to consider **Affected Community-Government-Private Sector Forum Mechanism** to apply in the government agenda for discussing to resolve the outstanding problems in the private sector while **CSOs/NGOs** play role as the observers. For example, LS2 dam development in Stung Treng and/or Chhay Areng Dam in Koh kong, without the 3 parties (Affected community, government, and private sector) forum mechanism, there are still have many problems which are the barriers for the project development process in Cambodia. This could affect to either the national and private benefit. Therefore, considering **Affected Community-Government-Private Sector Forum Mechanism** is very important to ensure the effectiveness and efficiency of private investment and to achieve social justice and sustainable and equitable socio-economic development in Cambodia”. (More comments please see all attached comments in the appendix)

Figure 13: The percentage of comments on Development of Hydropower dams and the energy sector by Environment Program, NGOF, 2015



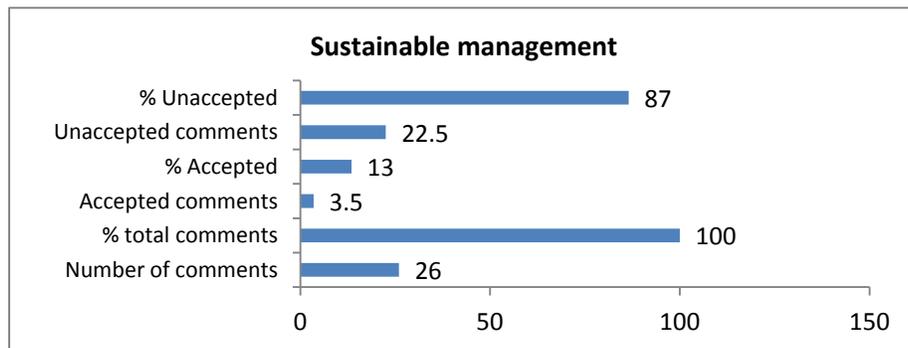
4.12 Sustainable management of natural resources

Land and Livelihood Program, NGO Forum On Cambodia (NGOF) provided total four comments on the sustainable management of natural resources, and all the comments were incorporated into the final report of NSDP (2014-2018).

The original text from the final NSDP report is “NGOF recommended encouraging stakeholders’ attentions to the development of eco-tourism projects within the CFs of CPAs with potential to contribute to increased employment of local communities through tourism services. NGOF also recommended drawing donor attentions to improving communities’ capacity and promote ownership of local communities in sustainable management and effective community forestry through capacity building and awareness raising. While Environmental Impact Assessments are important, it is disappointing to see NGOF’s abovementioned suggestions have not been included in the Draft NSDP”. “This comment was not incorporated into the final version of NSDP (2014-2018)”.

“The RGC should establish a transparent land-use planning system from the local to national level under cooperation with local communities. It was envisioned this could be done through a community based forest management strategic action plan. This was not included in the draft NSDP. Zoning demarcation process should be accelerated”. “This comment was incorporated in to the final version of NSDP; it shows that Develop land use planning that allows for holistic planning across sectors, jurisdictions and local government borders (Land Use Policy and Spatial Planning)”.

Figure 14: The percentage of comments on Sustainable management of natural resources by NGOF, 2015



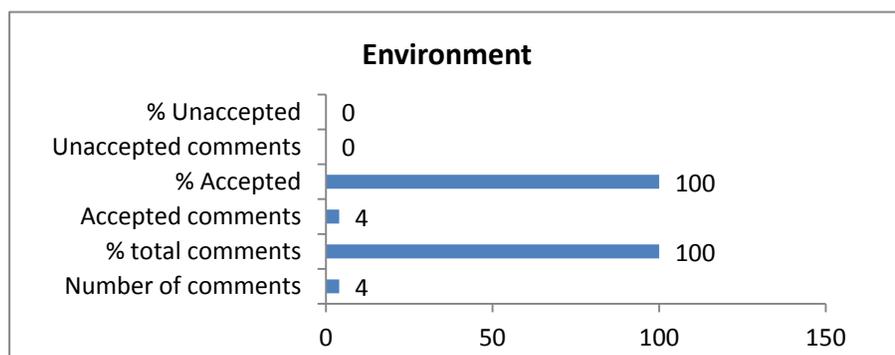
4.13. Environment

This part was also commented by NGO Forum on Cambodia. As can be seen in Figure 15 and a hundred percent of these comments were publicly incorporated into the final version of NSDP (2014- 2018). Original texts from the final version of NSDP 2014-2018 are listed below:

“Government and relevant ministries/ agencies stop acquiring land in protected areas for land concession. The Ministry of Environment and the Ministry of Agriculture, Forestry and Fisheries should effectively preserve the forest remaining from economic land concession; especially encourage all companies to grow trees in degraded areas or in areas where reforestation is needed to maintain environmental equilibrium and ecology. The government should continue and expedite adoption and recognition of community natural protected areas.” “This comment was accepted to put into the final version of NSDP and the comments from them are”:

*“CSOs request to Royal Government of Cambodia (RGC) and shown **highly commitment with political wills to fully implement** of Cambodia Climate Change Strategy Plan (CCCSP) 2014-2023, National Policy on Green Growth and National Strategic Plan on Green Development 2013-2030. Their comment is climate change legislation: MoE now in the process to develop NAP, CCFF, and may be climate change law etc. It also reforms their existing NCCC into NCSD. (More detail please sees all attached comments in the appendix).*

Figure 15: The percentage of comments on Sustainable management of natural resources by NGOF, 2015



4.14 Sector Key Policy Priorities & Actions to Implement the Prioritized Policies

As stated in the Rectangular Strategy Phase II, the Royal Government reaffirms its commitment to continuing to establish and strengthen partnership with national and external stakeholders in the development processes of the country (RGC, 2015). In this part, some comments were provided by CSO/NGOs, and the original texts (in the final report of NSDP) of their comments are shown below:

“Agencies (included parliamentary, NGO/CSO, private sector) to implement its potential role and work, cooperate and collaborate in a more closely manner at both national and sub-national levels.” The suggested change was not incorporated.

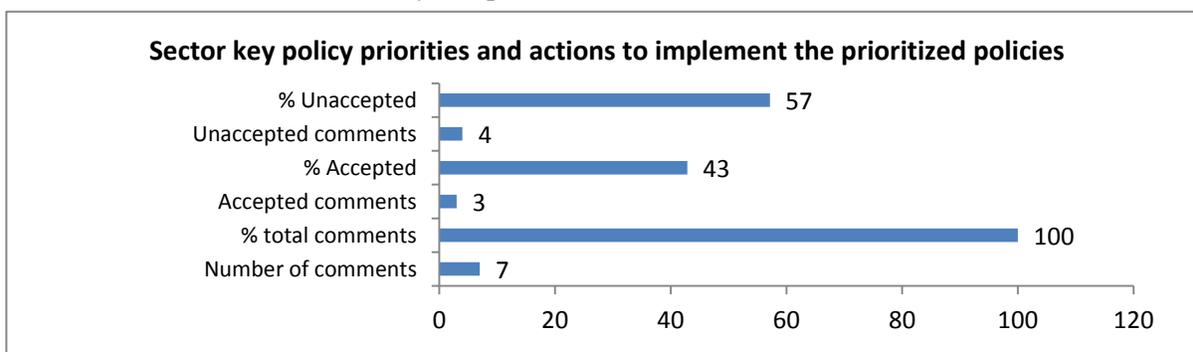
“A lot of attention will be paid on building irrigation system as priority to support farmers, the local transportation system to facilitate logistics and investment in power, to ensure a reasonable availability of electricity at price of the electrical power for family, business and industry consumption.” It was not incorporated in to the final NSDP report.

“Develop, establish and disseminate user feedback and recourse mechanisms. Encourage and foster the concerned authorities at national, sub-national and local level to practice the obligation in a prompt, quality, and effective manner after receiving feedback/report.” There is slight change compared to the previous version but the suggested change from CSOs was not incorporated.

“Attract foreign investments in all chain that bring value added to the existed value chain of farmers.” There was a slight change with the numbering but comments from CSOs were not addressed.

In a part of sector key policy priorities and actions to implement the prioritized policies, approximately 43% of comments were incorporated into the final report of NSDP and about 50% of it was not incorporated (Figure 16). This part was commented by Cooperation Committee for Cambodia (CCC).

Figure 16: The percentage of comments on Sector Key Policy Priorities & Actions to Implement the Prioritized Policies by Cooperation Committee for Cambodia (CCC), 2015



4.15 Partnership in Development

The development of partnership part was commented by The NGO Forum on Cambodia and Cooperation Committee for Cambodia. Their comments were computerized in the percentage and at least 20% of their comments were accepted into the final of NSDP 2014-2018. However, approximately 80% of their comments were not incorporated (Figure 17). Hence, the NGOF comments in the partnership in development part were less incorporated into the final version of NSDP (2014-2018). The original texts withdraw from the final NSDP 2014-2018 report is seen below:

“Regarding the mutual solutions between traditional and non-traditional development partners, the tied aid from non-traditional development partners and the conditions imposed by the traditional development partners should be in careful consideration among development actors where beneficiary group could mostly benefit the real aid out of the gross aid.” This concern about aid from traditional and nontraditional partner is noted in the NSDP.

“Not limited to climate change, human trafficking and migration, the global challenges could be listed more so that we could cope with its negative impacts on time in Cambodia.” These problems are not discussed in this section of the NSDP”.

“A statement should be added about Joint Monitoring Indicators (JMIs). Smart indicators at national and sub-national levels should be established to monitor the development results and the JMIs report should be widely disclosed to the public.” This was not included in the final version of NSDP (2014-2018).

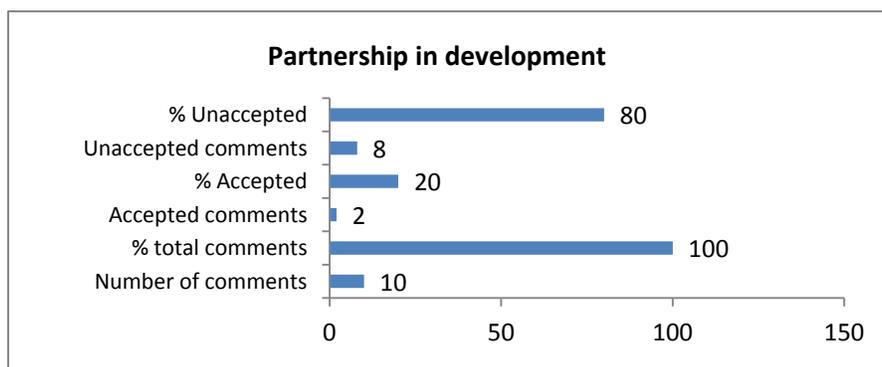
“The development effectiveness approach should be elaborated more specifically that development actors apply accordingly to respective sectors.” was not included in the final version of NSDP (2014-2018).

“A paragraph is suggested for the TWG mechanism. TWG mechanism will continue to provide the technical dialogue among the Royal Government, development partners, and CSOs. The TWGs’ performance and structure will be monitored and reviewed to ensure that the inclusive partnership among the stakeholders is based on the strengthened country ownership and accountability for development results.” There is a concern about the role of TWG’s on page 209 of the final version of the NSDP, although it is not included in the section, Partnership in Development

“The ‘Guideline on the Role and Functioning of the TWGs’ should be re-visited for its relevance to the update arrangement, where an enabling environment guideline on roles of each development actors could be included to encourage effective and efficient participation”. It was suggested that a review of the TWG’s be undertaken but the document failed to detail the role of each development actor.

“Partnership between the private sector and CSOs should be strengthened to rightly enforce the corporate social responsibilities for the benefits of the private sector and local communities prevented from the negative impacts of socio-economic aspects and environmental aspects.” This was not included in the final version. (More comments please see all attached comments in the appendix)

Figure 17: The percentage of comments on Partnership in Development by NGO Forum on Cambodia and Cooperation Committee for Cambodia, 2015



4.16 Monitoring and Evaluation

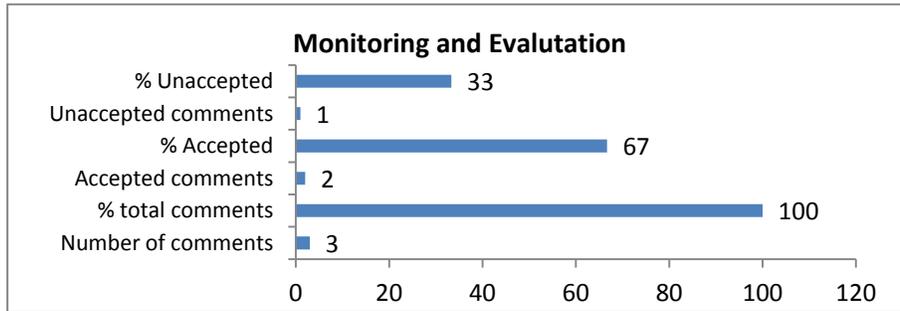
This part was provided comments by NGO Forum on Cambodia (NGOF). In the reviewing of NGOF comments into the final report of NSDP 2014-2018, it shows that 67% of the comments in the monitoring and evaluation which is part of the NSDP (2014-2018). These comments were very constructive since they will be key ideas to put into action. However, the analytical data from NGOF officially indicates that about 33% of their comments were not put into account into the final version of NSDP (2014-2018) (Figure 18). The original texts from the final version of NSDP and their comments are described below:

“Balancing the input, output, outcome and impact indicators should be further improved in the NSDP 2014-2018. This would allow concerned stakeholders, especially the National Assembly, be able to better track the short-term and medium-term changes in the development efforts of the RGC against the targets stated in the plan.” It was included in the final draft of the NSDP”.

“The NSDP 2014-2018 should include additional measurable and timely assessable monitoring indicators set on a yearly basis in order to enable concerned stakeholders to be able to monitor the progress against the implementation.” These comments were included in the final draft of the NSDP”.

“In addition, NGOs believe that it would be more useful for the Ministry of Planning to consider including a policy matrix in the NSDP 2014-2018 to explicitly present, in a concentrated format, the progress of the policy implementation at the national level giving a clear framework in poverty reduction. This is because the current NSDP Update contains a significant number of policy commitments in several areas.” A policy matrix was not included in the final draft of the NSDP”.

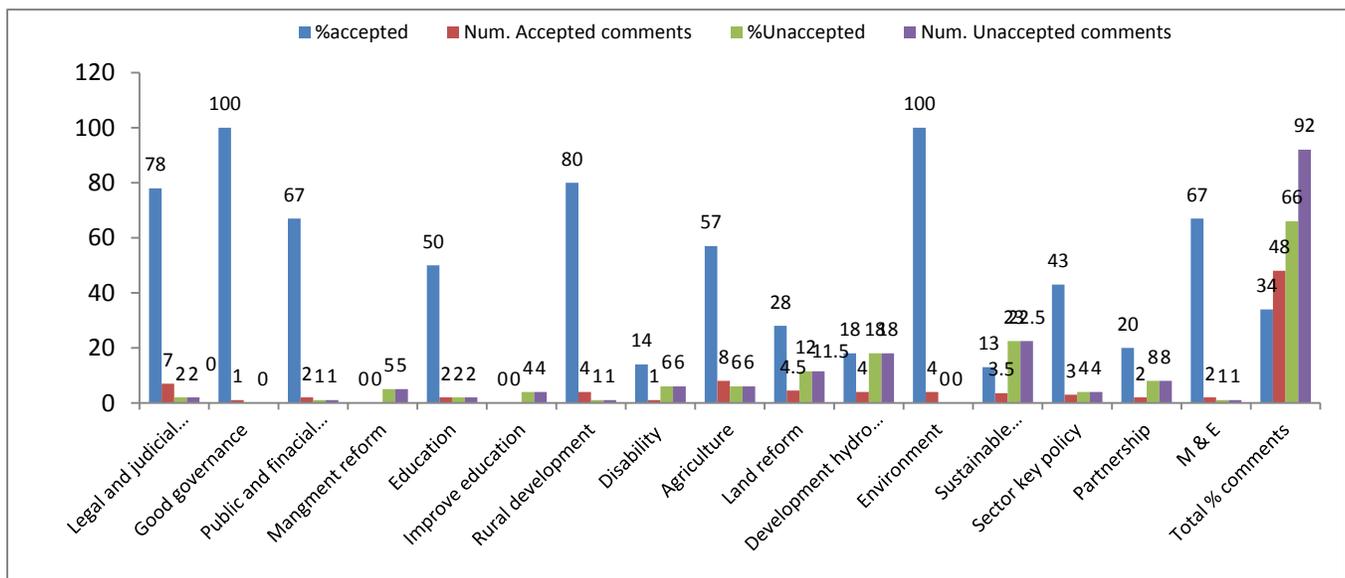
Figure 18: The percentage of comments on Partnership in Development by NGOF, 2015



V. CONCLUSION

To sum up, constructive comments from CSO/NGOs on NSDP (2014-2018) to the Ministry of Planning could be a pathway for the government frontline. Most of civil society organizations have a good or very close relationship with people and know a lot about the grassroots issues happening to vulnerable and poor people. They also could provide good, relevant recommendations to the government to consider if they are useful, to be included in the NSDP 2014-2018. Aligning with this perspective, results of the assessment suggests that, in total, the earlier said about ten CSO/NGOs have provided 140 comments on into the draft of the NSDP 2014-2018. However, only approximately 34% (48 comments) of them were authoritatively incorporated in the final version of the NSDP 2014-2018 while about 66% (92 comments) was not officially incorporated into it (Figure 19). Nonetheless, although a small percentage of the NGO/CSOs’ comments was included in the final version of the NSDP 2014-2018, their comments could be a constructive pathway to the Ministry of Planning. This is on the grounds that their comments were offered based on their respective sector and/or field of work.

Figure 19: The percentage of comments incorporated into NSDP by sectors, 2015



REFERENCES

ADB (2014), Cambodia Country Poverty Analysis from 2007-2012, p.4, Phillipine

RGC (2015), National Strategic Development Plan (2014-2018): “Cambodia at a Glance”, p.vi, Cambodia.

RGC (2014), the compiled CSO/NGOs comments on draft NSDP2014-2018 (16 sectors) submitted to LM/LA and DPs in January 2014. Cambodia.

RGC (2015), the final draft on National Strategic Development Plan (2014-2018) issued by 17 July, 2014, Cambodia

RGC (2015), Partnership in development:”Key policy priorities and actions: 2009-2013”, Cambodia, http://www.cdc-crdp.gov.kh/cdc/twg/fifteenth/fifteenth_partnership.htm, retrieved by 31 August 2015.

Ministry of Economy and Finance (2015), Budget in Brief, Cambodia.

World Bank (2014), Clear Skies “Cambodia Economic Updated” selected issues: making the most of the Cambodian rice sector and creating opportunities for firm: Finding from the investment climate assessment, Cambodia.

APPENDIXS

1. Legal and Judicial Reform

No	CSO/NGO Comments and inputs on draft NSDP 2014-2018	CSO/NGO Assessment Final version of the NSDP 2014-2018
1	While CSO acknowledges the effort of RGC to develop the necessary framework to the implementation and enforcement of the framework is severely lacking CSO would recommend the RGC to acknowledge and set concrete measure to address the implementation and enforcement of the abovementioned strategies and measures	CHRAC has observed that RGC still has a strong commitment to strengthen the professionalism, independence, impartiality and rule of law in Cambodia.
2	<p>(1)RGC should set specific timeline commitment to adopt in first or second year of fifth legislature and implement the 3 laws to the judiciary</p> <p>(2) RGC should specify what is meant by ‘professional capacity’ and ‘responsibility’. CHRAC suggest specific capacity and responsibility indicator should be included, such as independence, professional accountability and other measures.</p> <p>(3) RGC should set court administration to specifically include court documentation, publication of judgments, case management, anti-corruption measures</p> <p>(4) RGC should have appropriate resources to assist the courts such as appropriate level of funding, infrastructure (internet, computers etc) and human resources.</p> <p>(5) CHRAC recognizes the importance of dissemination of law to the general public, but CHRAC would also encourage the RGC to include program that raises awareness of the ideals relating to anti-corruption, transparency, and independences within the judiciary.</p>	<p>(1) The 3 laws on Judiciary adopted by national assembly in which consisted only ruling party without the consultation with Civil Society Organizations.</p> <p>(2) There is no clear plan on how to enhance of the professional capacity of judicial officers.</p> <p>(3) RGC has set up the administrative unit in all level of courts as stated under the article 10 and article 32 of The current Law on The organization of The Court which was adopted by national assembly on May 2014.</p> <p>(4) According to observation and the concerns of NGOs, the courts in Cambodia don’t have sufficient human resources, funding and infrastructure.</p> <p>(5) There is no clear direction on law dissemination and the provision of training provision to judicial officials and to the public.</p>

	<p>(6) BAKC report increase in (legal aid) funding from 200 million riels to 300 riels, this is a welcome increase, but CHRAC encourages the BAKC to be more transparent and accountable about how the funding is spent. CHRAC also contents that more funding need to be directed to NGOs offering legal aid services around Cambodia. RGC should provide the good facilitation of budget to BAKC.</p> <p>(7) Appropriate ADR measures talking into account political and economic power inequality between litigant parties.</p>	<p>(6) There is no clear plan regarding the provision of funding for legal representatives to the Bar Association of Cambodia (BACK) for the poor.</p> <p>(7) CHRAC observed that RGC has commitment to continue ADR measure.</p>
3	<p>These are not specific actions to achieve the above goal but rather a series of goals and objectives. CHRAC believe the RGC needs to provide specific action plans in the NSDP to achieve the legal and judicial reform goals as set out in [4.16]. These can then be effectively monitored and evaluated later on.</p>	

* Paragraph/section refers to paragraph/section in draft NSDP 2014-2018.

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2. Good Governance and Access to information

N°	CSO/NGO Comments and Inputs on Draft NSDP 2014-2018	CSO/NGO Assessment: Final Version of NSDP Update 2014-2018
1	<p>Recommendations to the government:</p> <p>Access to Information Law shall be a one the key outputs of the legal instrument, frameworks and measures necessary for fighting against corruption.</p> <p>The Minister of Ministry of Information, assigned by government, should regular open consultations with journalists, CSOs and relevant stakeholders during draft law on Access to Information to ensure the law is following the international standard that at least comply with nine principles (1) Maximum disclosure (2) Obligation to publish (3) Promotion of open Government (4) Clear and narrow exemptions (5) Easy process to access information (6) Control request costs (7) Open meetings of public bodies (8) Laws consistent with maximum disclosure and (9) Protect whistleblower. It should be one of the output indicators.</p> <p>Government actors at all levels must take steps to develop a culture of openness. They should work to disseminate information proactively and respond promptly to requests for information. The Royal Government of Cambodia with inclusion of the NGO Access to Information Working Group is convened to formulate strategies, procedures and mechanisms to enable effective implementation of the Access to Information Law once it is enacted shall be activity milestone actions of the JMIs.</p> <p>Recommendations to the donors:</p> <ul style="list-style-type: none"> • Development partners should keep access to information on the Government’s agenda and should offer the technical assistance necessary for the passage of strong legislation to ensure the law is following the international standard. • Allocate resources to promote people’s awareness of their right to access to public information and support the mechanisms to enable effective implementation of the Access to Information Law once it is enacted to endorse this in order to broaden transparency and accountability. • Encourage their partners to focus and integrate access to public information concepts/ principles into their projects/programs as a cross-cutting issue. 	Overall, yes.

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3. Public Financial Reform Program

No	CSO/NGO Comments and Inputs on Draft NSDP 2014-2018 ⁵	Final Version of NSDP as approved by the Council of Ministers 2014-2018
1	<p>3.36- Transparency in public finance management should be clearly highlighted as an end goal along with budget-policy linkages and accountability for performance and public service delivery in the NSDP 2014-2018. It should also be seen as a means to help achieve the targeted revenue increase of 0.5% of GDP per year and improve efficiency in the budget process.</p> <p>- The focus on the PFMRP phase IV should be on the accountability and transparency. The NSDP should define the need for the RGC institutions and agencies to publish their financial plan and implementation in their public domain regularly. MEF should also be required to produce and publish simplified budget related documents to allow the public to understand national budget matters.</p>	<p>3.40. (page 92) NSDP 2014-2018, states that “Promote effectiveness, transparency and accountability in expenditure allocation, from the stages of preparation to implementation, monitoring and auditing of the outcomes, in budget the implementation.”</p>
2	<p>4.39</p> <p>-The NSDP 2014-2018 should add transparency in continuing to implement the PFMRP which aims at improving the efficiency and effectiveness of Cambodia’s public financial management system. Thus in this point, ‘Enhancing transparency of national budget by producing and publishing all budget related documents in the public domain,’ should be added.</p>	<p>3.67. (page 102) As an effort to promote transparency of the budget formulation process, the MOP has prepared a preliminary/indicative projection of recurrent expenditure allocation for RGC institutions for the NSDP 2014-2018. The indicative projections are presented in Table 3.4.</p>
3	<p>4.41-NSDP 2014-2018 should specify the requirement to ensure the transparency in order to support the achievement of objective 25 of PFMRP by publishing all national budget related documents such as draft annual budget laws. Those documents must be</p>	

⁵ It’s based on the compiled CSO/NGOs comments on draft NSDP2014-2018 (16 sectors) submitted to LM/LA and DPs in January 2014.

	<p>comprehensive and up-to-date with the details of revenues and expenditures in all sectors.</p> <p>-Transparency is observed to be well legislated in relevant legal provisions for sub-national administration. Sub-objective 25.4 on improving transparency stated only number of documents to be published, mostly at national level. Transparency at the ministerial level needs to be improved as well. To improve transparency practice at national and ministerial level, Article 84 on disclosing financial and accounting reports in the Law on Public Finance System should be operationalized in provision of relevant legislation, circular and guidelines on budget formulation and implementation.</p>	
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* (sector) are among the compiled CSO/NGOs comments on draft NSDP2014-2018 (16 sectors) submitted to LM/LA and DPs in January 2014.

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4. Management of Revenues from Extractive Industry (Oil, Gas and Mining)

No	CSO/NGO Comments and Inputs on Draft NSDP 2014-2018 ⁶	CSO/NGO Assessment: Final Version of NSDP Update 2014-2018
1	<p>Continue formulating law on petroleum taxation and mining taxation.</p> <p>Engage the public and CSOs in the development of policies, laws, regulations and regulatory frameworks in oil, gas, and mining sector.</p> <p>Increase the disclosure of information to the public on oil gas and mining revenue collection through TOFE in a timely, regular, disaggregate and comprehensive manner.</p> <p>Study the establishment of a Petroleum Fund in anticipation of oil revenue from 2016 onwards.</p>	<p>4.38 CRRT’s comments, suggestions and inputs were not incorporated into the final version of NSDP Update 2014-2018.</p>

⁶ It’s based on the compiled CSO/NGOs comments on draft NSDP2014-2018 (16 sectors) submitted to LM/LA and DPs in January 2014.

	Consider membership to Extractive Industries Transparency Initiative (EITI) at the most appropriate time.	
2	4.127 Ensuring a fair share of state revenue-inflows through multi-layered revenues such as royalties, production sharing and income tax, to increase the financial capacity of the government, and to deliver public services and invest in key infrastructures, social services, and human resources development.	4.127 Maximizing revenue-inflows through multi-layered revenues such as royalties, production sharing and income tax, to increase the financial capacity of the government. CRRT's comments, suggestions and inputs were not incorporated into the final version of NSDP Update 2014-2018.
3	4.127 Developing policy, laws, regulations and regulatory framework for the petroleum sector to ensure an efficient, transparent, sustainable and participatory management of oil and gas.	4.127 Developing laws, regulations and regulatory framework for the petroleum sector to ensure an efficient management of oil and gas. CRRT's comments, suggestions and inputs were not incorporated into the final version of NSDP Update 2014-2018.
4	<p>Request to add</p> <p>Developing policy for the mining sector to ensure an efficient, transparent, accountable and participatory management of mineral resources.</p> <p>Amending and updating the law on mineral resource management and exploration to reflect current situation and changes in the mining sector.</p> <p>Engaging the public and CSOs in the development of policies, laws, regulations and regulatory frameworks in the oil, gas and mining sector and in monitoring their implementation.</p> <p>Disclosing information to the public in a timely, regular and comprehensive manner</p>	CRRT's comments, suggestions and inputs were not incorporated into the final version of NSDP Update 2014-2018.

	concerning oil gas and mining development, including but not limited to contracts and licenses with extractive industries companies in full or part, areas, location and size of operations, social impact and spending, and environmental risk mitigation plan.	
5	Promoting research and development focused on oil gas and mining issues.	4.127 Promoting research and development focused on oil and gas issues. CRRT's comments, suggestions and inputs were not incorporated into the final version of NSDP Update 2014-2018.

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5. Education

No	CSO/NGO Comments and Inputs on Draft NSDP 2014-2018 ⁷	CSO/NGO Assessment: Final Version of NSDP Update 2014-2018
1	Further improving education policies and strategies, especially by ensuring effective implementation of the Education Strategic Plan (2014 – 2018) and monitored through an updated and accurate Education Management Information System (EMIS), Master Plan on ITC in Education, and Policy on Research & Development in Education to inform policy,	Our comments were not fully accepted because our original comment was focused on ensuring effective implementation of the ESP, but the final version is only focused on the preparation stage.
2	Policy 1: Ensuring equitable access for all to education services All children have access to child friendly and inclusive preschool, primary school and lower secondary school facilities and opportunities to continue learning. For children who do not access formal education alternatives will be provided. To achieve all these, MOEYS needs to build more schools and provision of qualified and trained teachers.	In policy 1 our comments were mostly accepted, except one on more intention so that all school levels are child friendly and inclusive schools which had been mentioned in MoEYS's policies.

⁷ It's based on the compiled CSO/NGOs comments on draft NSDP2014-2018 (16 sectors) submitted to LM/LA and DPs in January 2014.

	<ul style="list-style-type: none"> • Ensure all children enrolling in grade 1 have at least one year of pre-primary education. • Increase the number of children and youth that have access to all education levels with a focused attention on equity and access for the most disadvantaged areas and groups of children. • Increase opportunities for children to complete lower and upper-secondary education with a good knowledge and reasoning and logic skills, who can further build on these skills (and knowledge) through technical training, higher education and other means. 	
3	<p>Policy 2: Enhancing the quality and relevance of learning All children and youth have a relevant and quality learning experience, enabling them to contribute effectively to the growth of the nation. Children and youth will learn to think analytically and critically, and will have a good grounding in mathematics, sciences, foreign languages and social and life-skills.</p> <p>To achieve this policy objective, MOEYS will carry-out the policy objectives as follows:</p> <ul style="list-style-type: none"> • Undertake a curriculum reform of the general and technical education in line with the international best practices • Revise the teacher training curriculum in line with the revised curriculum and undertake in-service teachers training • Ensure effective implementation of instructional-hours with adequate provision of qualified and trained teachers at all levels as well as textbooks and learning materials • Systematically monitor the student learning achievements by conducting national assessments at grades 3, 6 and 8 and prepare for participation in the regional and international assessment programs. 	Most of our comments in policy 2 were accepted.
4	<p>Policy 3: Initiate developing a national framework to put in place mechanisms to assess student achievement. Improving learning outcomes of children in primary school which will require many more primary teachers with greater qualifications.</p> <p>Aim for a national primary pupil teacher ratio of 40:1 on the current 2012/13 figures. Cambodia would need an extra 9500 primary teachers. To attract and retain qualified, motivated primary teachers, government should increase the basic wage of primary teachers to equal lower secondary teachers and creating enabling environment for female teachers to teach in rural areas. Higher basic wages must be accompanied by a large reduction in lost teaching hours.</p>	Our comments were not in the final draft

<p>The government should prioritize education as being in greater need of extra investment by the government ahead of other issues such as health, infrastructure, national defense and the environment.</p> <p>Define and ensure effective monitoring of the implementation of instructional hours, strengthen regular classroom testing, finalize and publish the results of the learning assessment in Grade 3, with a view to expanding to Grades 6 and 8 and to prepare for regional and international assessments. Improve the quality and relevance of the curriculum content by reviewing curricula and textbooks.</p> <p>There should be a focus on getting boys and girls to enroll in grade 1 at age 6. In 2011/12, 31.5% of children beginning grade 1 were older than 6. For every year over the age of 6 that a child begins primary school, they are 1.5 times more likely to have dropped out by grade 5 than a comparable child who began school aged 6. Starting primary school late also causes children, especially female to drop out of lower secondary school because they are already 15 or 16.</p> <p>Greater effort is required to promote enrolment and retention of girls in educational institutions at all levels and areas of education including secondary school. One such measure would be to offer a greater amount of scholarships to women. Access to education need also be improved by, for instance, building dormitories to accommodate female students attending from far-flung areas.</p>	
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6. Improving Education, Science and Technology and Technical Training

No	CSO/NGO Comments	CSO/NGO Assessment: Final Version of NSDP Update 2014-2018
1.	<p>Planned actions to implement the prioritized policies should include: Improving teacher professionalism through Awareness raising on the sub-degree on teacher code of ethics, Conducting regular reflection meetings on teacher code of ethics with teachers, community people, local authorities and education officials of DOE and POE, Trainings on children’s rights and human rights for teachers, head of teachers and School Support Committees, Strengthening teacher’s skills on teaching methodologies – Child Friendly Program, and Conducting study visits for teachers to model schools having strong management and leadership skills.</p> <p>Improving accountability and transparency of budget and expenditure through Strengthening the capacity of School Management Committees and School Support Committees on financial management and auditing, Strengthening the implementation of the guideline on the Establishment and Functioning of Primary and Lower Secondary School Support Committees, Conducting regular reflection meetings with SMC, SSC, education officials of DOE and POE to present school Program-Based Budget (PB) – income and expenditure, Developing school improvement plan through engaging all relevant stakeholders in the school catchment areas especially SSCs and community and teacher unions, Integrating activities in the school improvement plans into the Commune Investment Plan (CIP) to get budget allocation and quality monitoring from Commune Education for All Commissions (CEFAC), Establishing an audit system engaging teachers representatives from teacher unions, SSCs, SMCs and CSOs to track school budget and expenditure.</p> <p>Improving participation in oversight of schools and education system through Strengthening the role and responsibilities of SSC as stated in the guideline on the Establishment and Functioning of SSC, Conducting regular reflection meetings/dialogues on quality education in local levels among community people, children and youths, SSC, local authorities and education officials of DOE and POE, Conducting bi-annual debates where parents, SSCs, teachers, children and youths, local authorities and education official at local levels ask each other questions on the role they play, and Encouraging discussions on the quality of education in the media (radio, TV talk-show).</p>	<p>There is no clear statement regarding teacher professionalism and teacher skills on teaching methodologies as well as study visits for teachers to model schools.</p> <p>It does not state who the financial management and capacity building is for.</p> <p>School principal, PoE & DoE officials are to be trained to advise schools but here is no engagement from SSC and community with POE & DOE to meet/dialogue and debate on their roles to make education a quality one for their generation.</p>

<p>Addressing the shortage of qualified teachers through Encouraging the engagements from all relevant stakeholders in the education congress at provincial and national levels to ensure issues relating to quality of teachers and equitable distribution of teachers are raised, Conducting national dialogues on teacher salary and their standard of living which affecting quality teaching with community people, SSCs, local authorities, teacher unions, NGOs, INGOs, and development partners, and Following the UNESCO's Recommendation Concerning on the Status of Teacher.</p>	<p>Teacher salary/status is not mentioned in NSDP. To improve teacher motivation to increase their teaching capacity, salary and living standard needs to be strongly encouraged.</p>
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* Paragraph/section refers to paragraph/section in draft NSDP 2014-2018.

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7. Rural Development

No	CSO/NGO Comments	CSO/NGO Assessment: Final Version of NSDP Update 2014-2018
	<p>Specification on the areas of cooperation could be listed. For instance, the cooperation of NGOs in their engagement on M&E and technical support.</p> <p>NGOs should closely cooperate with MRD to learn and share best practices of water and Sanitation projects.</p>	<p>Yes, the text on page 144 of the NSDP, Establish a national M&E System on rural water supply and sanitation, reflects our submission.</p> <p>Yes the text on page 143 of the NSDP, Continue to cooperate with NGOs and development partners, reflects our submission</p>
	<p>Monitoring results should be shared with local authorities through facilitated interface/feedback meetings</p> <p>Monitoring results and action plans should be publicized, integrated in work plans of schools, health centers, Commune Investment Plans and shared at District Integration Workshops.</p>	<p>No</p>

	The important way is to strengthen understanding, trust, constructive engagement between state and non-state actors	Yes the text page 39 of the NSDP Promote rural economic growth through integrated rural development with participation from both national and international communities, reflects our submission
	NSDP 2014-2018 have to continue strengthen and monitoring in promoting community hygiene sensitization and WASH in School curriculum including public awareness.	Page 143 of the NSDP says` Improvement of accessibility to safe-drinking water (from multiple sources) and sanitation in rural communities residing in water-scarce areas, as well as water for irrigation. In this regard, innovations in sanitation at localized environments need encouragement, preferably with participation from communities (CLTS). This text reflects our submission to the NSDP

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8. Disability

	CSO/NGO Comments	CSO/NGO Assessment: Final Version of NSDP Update 2014-2018
1	Disability is not included in this Section of the document as a cross-cutting issue. If disability could be included as a cross-cutting issue in the introduction, the needs and rights of persons with disabilities would be covered in all Policy Priorities for the Fifth Legislature.	Our comments were not included in the final draft
2	Law on protection and promotion the rights of persons with disabilities is not mentioned. As disability is a cross-cutting issue, this law could be included as priority law as persons with disabilities are among the poorest and most vulnerable groups in society.	Yes Section 4.182 in section 4 mentions upholding the policies on disability. P.192
3	Implement the <i>Convention on the rights of persons with disabilities</i> and <i>Incheon Strategy</i> . Persons with disabilities to be engaged fully in society must have the capacity to contribute significantly to the national economy.	Our comments were not included in the final draft
4	Disability is also cross-cutting issue of equal importance to gender and a Section on disability equity could be included in the document.	Our comments were not included in the final draft

5	‘With specific attention on women and children’ and persons with disabilities	Our comments were not included in the final draft
6	<ul style="list-style-type: none"> • Accessibility to education for students with disabilities through the provision of suitable physical infrastructure, assistive devices and personal assistant. Teacher aides to be trained in disability. • Teacher training to be conducted in addressing the needs of student with special needs in mainstream classrooms. Development of integrated and/ or inclusive curriculum 	Our comments were not included in the final draft
7	<ul style="list-style-type: none"> • In particular for persons with disabilities 	Our comments were not included in the final draft

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9. Agriculture

	CSO/NGO Comments	CSO/NGO Assessment: Final Version of NSDP Update 2014-2018
1	4.50/promotion of agricultural sectoris to promote sustainable agriculture approaches drawn from traditional and scientific knowledge to improve the yield rate, and diversify activities into high value crops, livestock, and aquaculture which mostly benefit local food security and export. Meanwhile, the effort will be further promoted agriculture commercialization by ensuring smallholder farmers are fairly benefited for their smallholder products.	1. The final draft did not explain the government’s approach to sustainable agriculture. We proposed that its approach draw on traditional and scientific knowledge to improve the yield rate. But final NSDP emphasizes new technologies and modernization and did not focus on small landholders
2	4.52.....further investing in irrigation which favor smallholder farmers and rationalizing of water use; improving collection and storage facilities at local and national levels; and preparing and improving.....contract farming which benefit smallholder farmers...	<p>The changes in agriculture were stated as a general target, but the focus wasn’t on smallholder farmers. In addition there was not enough detail about irrigation at the local and national level, and did not explain how contract farming was to benefit to smallholder farmers</p> <p>2. The aim of expanding production, and increasing exports</p>

	<p>.....production expansion, exports, farmer preference and resilience to climate change; strengthening the environment to..... promoting the use of agricultural machinery which more benefits smallholder farmers, particularly women.</p> <p>....Enhanced local and national processes capacity....</p>	<p>didn't state about the preference of farmers or include resilience to climate change. In addition our concern about promoting machinery that might benefit smallholder farmers, particularly women benefit was not included</p> <p>3 This point was not explained in detail</p>
3	<p>1. RGC should develop and promote vegetable security strategy to diversify source of food dietary, stable income and reduced vegetable import.</p> <p>2. RGC should develop and promote smallholder agriculture support framework to ensure that smallholder farmers are included and fairly benefit from food value chain.</p>	<p>The suggestion that the strategy be undertaken to reduce vegetable imports was not included</p> <p>That was a general statement but lacked detail</p>
3technology transfer at all levels, particularly community level	The phrase 'particularly community level' was omitted
	RGC should further develop and promote small scale irrigation infrastructure which favor smallholder farmers, especially women headed household.	There was a lack of detail regarding irrigation infrastructure.
	Enhancing introduction of good quality seeds and support participatory seed production and community seed bank	There was a lack of detail about participatory seed production and the development of community seed banks
	Improving soil fertility through integrated nutrient management, assessing and classifying land for crop zoning....	These comments were included in the final draft.
	RGC should develop Good Agriculture Practices (GAP) guide book and promote it nationwide to ensure.....	These comments about the Good Agriculture Practices (GAP) guide book are encouraging, but funds should be made available to ensure that the book is distributed nationwide.
	Strengthening integrated pest management program (IPM) and promote climate resilient sustainable agriculture (CRSA)	This statement is welcome but there is a lack of detail, about the approaches that will be used.
4	4.53/Strengthening agricultural system and services Creating Agricultural Centers at the commune level and ensure that enough and skilled extension workers, women extension workers are in place.	There is a lack of detail, about how the increase in skilled extension workers will be achieved
	4.53/Strengthening agricultural system and services Local agriculture structure should work closely with NGOs/CSOs and other actors in the area	Details about linkages with NGOs/CSOs and other actors was not included

	and provide technical support RCG should allocate enough budget for local state extension services	In addition information about budget allocation for local extension services was not included.
5	4.53/Establishing and strengthening farmer cooperative RGC should organize regular agriculture value chain platform at various level RGU should establish and support smallholder farmers and ensure they receive benefit from cooperative.	The final draft of the NSDP did not detail how the government wanted to support improvements to agricultural value chain.
6	4.53/Agricultural Research and Development RGC should prioritize decentralize research through promoting participatory agriculture research and development	The document didn't explain how to prioritize decentralized research through promoting participatory agricultural research and development.

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10. Land reform

Paragraph/Section* (Chapter IV: Key Policy Priorities and Actions 2014-2018)	CSO/NGO Comments and Inputs on Draft NSDP 2014-2018 ⁸	Final Version of NSDP as approved by the Council of Ministers 2014-2018
Distribution of land	<p>This Section does not specify how Cambodia's land distribution policy will be decided. The Draft NSDP fails to mention NGO's suggestion that clear land mapping is the action that needs to be taken, to ensure the RGC plans do not have an adversarial effect on people's tenure and rights.</p> <p>While this point indirectly acknowledges the necessity of supporting smallholders, CSOs highlighted the current inadequacies of, and dangers of relying on, Directive 01. For</p>	<p>No</p> <p>Measuring land and giving land titles to the people within the framework of the implementation of the "Old Policy-New Action", related to the 3 types of</p>

⁸ It's based on the compiled CSO/NGOs comments on draft NSDP2014-2018 (16 sectors) submitted to LM/LA and DPs in January 2014.

	<p>example, it legalizes the occupation of land as “unclear status”, and does not avoid land grabbing. The existing Directive 01 must be strengthened and improved before it can be relied upon.</p>	<p>state lands: forest concessions, economic land concessions, and confiscated land. (4.63, page 131)</p>
<p>4.70</p> <p>4.71 B Land Administration, bullet point 3</p>	<p>This text is not clear on how land registration and dispute resolution can be accelerated. While CSOs agrees that the SLR process should be accelerated, RGC must first ensure land is transparently demarcated, including the land of indigenous people. RGC has not accounted for whether or not it has the capacity to do this. It is also important that the RGC allow land registration and recognition of informal settlements.</p> <p>Instead of focusing on “dispute free” areas, individual and communal land titling should be prioritized in areas prone to disputes. The Ministry of Land Management Urban Planning and Construction recently committed to providing communal land titles to 10 indigenous communities per year. This should be included in the NSDP.</p> <p>This text does not specify whether the land titles registered for Indigenous Communities will be communal land titles. Sub-decree 083 on procedures of registration of land of indigenous communities should be amended and the procedure should be simplified to allow an accelerated CLT process. Indigenous communities whose lands are most threatened by Economic Land- or Mining Concessions and other development activities should be prioritized for CLT.</p> <p>A legal mechanism should also be developed to allow for Indigenous People to cancel or return their private land titles that were granted under No 01 BorBor Directive on Measures to Strengthen and Foster Effectiveness of ELC Management. These people should then be able to receive a communal land title, without the imposition of financial penalty.</p> <p>Interim protection should also be granted to Indigenous communities seeking communal land titles.</p>	<p>Speeding up of all types of land registration(to reach at least 6 to 7 million parcels throughout the country) and accelerating land dispute resolution to achieve the target plans of land registration accordingly 52% by 2014, 57% by 2015 and 70% by 2018. (4.63, page 131).</p> <p>Continue registering land titles for indigenous communities.(4.63, page 131)</p> <p>No</p> <p>No</p>
<p>Bullet point 9</p>		

4.71 B Land Administration Bullet point 12	This is not clear on who the statistics and data will be shared with. The RGC has not mentioned CSO’s suggestion that all relevant documents should be shared with stakeholders in advance, and allowing more time for consultations.	No
B. 4.71. Land Administration 4.70, 4.	CSO is satisfied to know its recommendation that the RGC continue developing additional laws and policies has been taken into account. However, CSO continues to recommend laws related to housing issues, strengthening land management and land distribution be developed as well as a law on the re-classification of land, as these were not apparent in the Draft NSDP.	Continue to adopt the National Housing Policy in order to resolve housing problems for poor people so they can live in safety, welfare, and in dignity. (4.63, page 132)
3. Promotion of Agricultural Sector 4.50	CSO recommended that more awareness be raised about good practices in organic cultivation of agricultural products, as well as ensuring marketing opportunities for these products and fair market prices. CSO also recommended that more support should be given to smallholders in increasing the productivity of their land, in order to sustain national food security. In this regard, the focus should be on smallholder support instead of focusing on large scale land acquisition.	no
Section 4.71, Land Management and Urban Planning	<p>Taking inspiration from the Philippines, RGC could create an act which mandates local governments to integrate disaster and climate change risks in local land use plans and development plans.</p> <p>Additionally, RGC should continue to carry out the Circular N°. 3 Resolution on temporary settlements relating to land illegally occupied in the capital, as well as urban areas throughout Cambodia. Circular 03 was not mentioned in the draft NSDP and should be implemented country-wide across Cambodia to promote good cooperation with local authorities</p> <p>RGC should also implement a National Urban Forum in Cambodia.</p> <p>CSO also recommended that future exclusions be avoided. The NSDP made no reference to this. A provision on future</p>	No, but it was stated it “Continue to adopt the National Housing Policy in order to resolve housing problems for poor people so they can live in safety, welfare, and in dignity”. (4.63, page 132)

	<p>exclusions should be included in the NSDP because overlaps with land disputes during the adjudication process should be addressed according to the current legal framework, rather than resulting in withheld land titles.</p>	
<p>Environmental Sustainability 4.43, 2.</p> <p>Disaster Management 4.93</p> <p>Section 4.85 Management of natural resources and climate change</p>	<p>The Royal Government of Cambodia should implement more climate change and disaster management measures. At the local level, governments could incorporate climate change and disaster risks into local plans for land use, via a Climate Change Act and a Disaster Risk Reduction and Management Act. The Disaster Risk Reduction and Management Act should also state that for instance not less than 5% of regular (local) sources shall be set aside to support disaster risk management activities.</p> <p>It would also be beneficial to establish a national greenhouse gas inventory.</p> <p>These measures would prove useful for both the RGC and the public by facilitating monitoring and reporting about the adverse impacts of climate change on land, social and economic development in Cambodia.</p> <p>RGC should develop a NAMA (National AMA), in addition to conducting a National greenhouse gas inventory and Greenhouse gas inventory for Phnom Penh and other major municipalities including Battambang , Siem Reap and Sihanoukville.</p>	

* (sector) are among the compiled CSO/NGOs comments on draft NSDP2014-2018 (16 sectors) submitted to LM/LA and DPs in January 2014.

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11. Development of Hydropower dams and the energy sector

Paragraph/Section* (Chapter IV: Key Policy Priorities and Actions 2014-2018)	CSO/NGO Comments and Inputs on Draft NSDP 2014-2018 ⁹	Final Version of NSDP as approved by the Council of Ministers 2014-2018
4.49 (Page 16, point 3)	Should include Affected Community in Government-Private Sector Forum	Thanks to government for the improvement of the NSDP 2014-2018 (paragraph 4.45, page 122, point 5: strengthening Cambodia Development Cooperation Forum...consultative meeting between government and NGOs, and Bilateral consultation mechanisms...platform to dialogue between government and all its stakeholders...to discuss development issues in the country). It is really the win-win solution to call for sustainable development in Cambodia. However, we as CSOs have found that there is still limitation of dialogue between <i>Affected Community-Government-Private Sector</i> on development project in Cambodia. We still strongly recommend government to consider <i>Affected Community-Government-Private Sector Forum Mechanism</i> to apply in the government agenda for discussing to resolve the outstanding problems in the private sector while CSOs/NGOs play role as the observers. For example, LS2 dam development in Stung Treng and/or Chhay Areng Dam in Koh kong, without the 3 parties (Affected community, government, and private sector) forum mechanism, there are still have many problems which are the barriers for the project development process in Cambodia. This could affect to either the national and private benefit. Therefore, considering <i>Affected Community-Government-Private Sector Forum Mechanism</i> is very important to ensure the

⁹ It's based on the compiled CSO/NGOs comments on draft NSDP2014-2018 (16 sectors) submitted to LM/LA and DPs in January 2014.

		effectiveness and efficiency of private investment and to achieve social justice and sustainable and equitable socio-economic development in Cambodia.
4.37 (Page 16, point 2 and point 3)	Should mention the regulatory frameworks for further improvement and included hydropower sector investment regulatory framework.	No
4.65 (Page 22)	Should consider developing <u>a transboundary regulation with the Mekong Riparian countries to protect those deep pools as hydropower dam development in the upper Mekong River</u> which could bring sediment to fill the pools of the biodiversity in the river.	No. We still strongly recommend government to consider developing a <u>transboundary regulation with the Mekong Riparian countries to protect those deep pools as hydropower dam development in the upper Mekong River</u>
4.78 (Page 28, point 3)	Should develop the “Natural Resource Protection Guideline specifically on the Development of Hydropower in the Kingdom of Cambodia and in the Lower Mekong River” under the cooperation with especially Cambodian National Mekong Committee (CNMC), MoWRAM, MoE, and MoME.	No
4.81 (Page 29)	Should develop “EIA Guideline on the Development of Hydropower in the Kingdom of Cambodia and in the Lower Mekong River”	In paragraph 4.85, page 138 related to develop guideline for EIA in the sector of tourism and infrastructure, we still recommend government to consider develop “EIA guideline on the development of hydropower in Cambodia and in the Lower Mekong River”.
4.87 (Page 30)	Should include hydropower sector into Green Growth activities. It is to ensure whether this kind of development has met with the Green Growth principles.	No
4.93 (Page 32)	Should also include the effective EWS tools on open hydropower dam gate inside country and the neighboring countries such as Vietnam.	In paragraph 4.96, page 141-142 related to the role of the National Committee for Disaster Management (NCDM) in the five major components was showed a strong commitment of the government to improve ways of getting and distributing information related to EWS, risk reduction, and effective emergency response at the national, sub national and local community level. However, related to hydropower issue in the Mekong region on EWS, it seems Cambodia National Mekong

		Committee (CNMC)/MoWRAM plays important on this. Therefore, we would strongly recommend CNMC/MoWRAM and NCDM to build more cooperation and partnership with each other to play these roles effectively and respond quickly to the affected communities.
4.104 (Page 41, point 3)	Should open space for dam affected communities to get all projects' documents and join the decision making process on hydropower dam particularly in the Environmental Impact Assessment (EIA) process and Procedure Notification Prior Consultation and Agreement (PNPCA) process. It is a requirement that EIA must be completed before any agreement has been made.	No
4.107 (Page 42)	Should specific which laws will be enacted: 1. PNPCA should be transformed to the trans-boundary law on the involvement of relevant stakeholders in the decision making on the Mekong Water Usage. 2. Should cooperate with MRC to push out and adopt the trans-boundary EIA laws/regulations as soon as possible with the other MRC countries including Lao, Thailand, and Vietnam as it is really important to protect the food security of the Mekong Citizens and can forbid the countries who make use of Mekong without fair on benefit sharing to the riparian countries, especially the poor (men and women) and venerable people living depend on Mekong and Tonle Sap Fishery. 3. Should transform 1995 Mekong Agreement to the trans-boundary law to ensure the transparency and accountability of the project development in the Mekong River	No. The government of Cambodia did not set this law happen yet.
4.110 (Page 43)	Should consider including hydropower sector in this sub-decree development.	No
4.116 (Page 45)	Should conduct the workshop or forum to make the communities living along the Mekong River and CSOs/NGOs <u>MRC Strategic Plan, IWRM-based Basin Development Strategy, Basin Development Plan, Fisheries, Irrigated Agriculture, Sustainable hydropower, Flood Management, Drought Management</u> working	Thanks to the government that pushed some important workshops, (..... <u>MRC Strategic Plan, IWRM-based Basin Development Strategy, Basin Development Plan, Fisheries, Irrigated Agriculture, Sustainable hydropower, Flood Management,</u>

	on the Mekong issue understand about the, <i>Climate Change, Mekong Integrated Water Resources Management, Information and Knowledge Management and Integrated Capacity Building</i> as they are the affected people.	<i>Drought Management</i> working on the Mekong issue understand about the, <i>Climate Change, Mekong Integrated Water Resources Management, Information and Knowledge Management and Integrated Capacity Building.....)</i>
4.125 (Page 47)	<ul style="list-style-type: none"> • Should have the country energy plan (energy development sources and consuming) a long with NSDP period. • Should develop the “Guideline on the efficient use of Hydropower electricity in the Kingdom of Cambodia and in the Lower Mekong River” under the cooperation with especially Cambodian National Mekong Committee (CNMC), MoWRAM, MoE, and MoME in order to ensure the minimal impact on the environment and to respond on the climate change adaptation and mitigation. 	No
4.127 (Page 47)	Should also include developing <u>Hydropower regulatory framework</u> .	No
4.127(Page 48)	Should improve management efficacy in <u>Hydropower sector</u>	No
4.127 (Page 48)	Should also include managing and monitoring the implementation of <u>Hydropower sector</u>	No
4.144 (Page 54)	Should address clearly about which laws to enforce and develop for example the investment law on Hydropower sector	No
4.148 (Page 56)	<ul style="list-style-type: none"> • Should develop water management system in Angkor Heritage Areas to protect and evacuate flood. • Should consider about the study on the impact of hydropower in the Mekong Mainstream and its tributaries which could bring negative impact to the Angkor Temple. 	No
4.152 (Page 58, Point 4)	Should include the statistics of Cambodian workers on hydropower issue.	No
4.152 (Page 58, Point 5)	Should include skills and professional training related to hydropower issue	No
4.170 (Page 68)	Should consider about the workers from outside countries such as hydropower workers from China, Vietnam, etc in reducing morbidity and mortality of main communicable diseases.	No
4.203 (Page 86)	Should consider about the <u>Gender Youth and Child and Hydropower</u> as one part of Green Growth sector.	No

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12. Sustainable management of natural resources

Paragraph/Section* (Chapter IV: Key Policy Priorities and Actions 2014-2018)	CSO/NGO Comments and Inputs on Draft NSDP 2014-2018 ¹⁰	Final Version of NSDP as approved by the Council of Ministers 2014-2018
Paragraph/Section* (Chapter IV: Key Policy Priorities and Actions 2014-2018)	CSO/NGO Comments	
4.77	by ensuring:(1) green cover, <u>natural forest protection</u> and wildlife conservation;	No
4.79	Continue formalizing titles to the indigenous peoples and permit them access to NTFP and <u>support NTFP value chain development</u>	Continue formalizing titles to the indigenous peoples and permit them access to NTFP (4.71, page 135)
4.79	Ensure environmental protection and conservation of <u>natural forest resources</u>	4.71, page 135 (EN version)
4.79	Add point: [Review on the National Forest Program]	
4.79	Add Point: [Review on the definition of “Forest” by consultation with relevant stakeholders.	
4.79	Add point: [Demarcation and classification of forest land based on updated forest cover map, forest functions and its potential use]	
4.79	Add point: [Promote the implementation of Reducing Emission from Deforestation and Forest Degradation (REDD+) by ensuring that rights of Indigenous community and forest dependent community are respected]	
4.79	Add point: [Ensure that the development of National REDD+ strategy involves with all relevant stakeholders at all levels]	
4.79	Develop sustainable financing systems <u>in coordination with others lines Ministries</u>	
4.79	Add point: [Develop national REDD+ strategy, national social and environmental safeguards for REDD+ and climate change by	

¹⁰ It's based on the compiled CSO/NGOs comments on draft NSDP2014-2018 (16 sectors) submitted to LM/LA and DPs in January 2014.

	considering the existing policies and international standard on safeguards and UNFCCC guidelines on safeguards]	
4.82	Add point: [Ensure that the EIA process is transparency and involved all stakeholders in all the processes]	
4.87	Add point: [Improve knowledge and information of natural stocks and flows of ecosystem services. The returns on investment in natural capital are considerable, but not always counted. Mapping, valuation and measurement of Natural Capital – and understanding the value it represents to different Sections of society – are crucial contributions for better decision-making for development and social equity that can be supported by all stakeholders.]	
4.87	Add point: [Include Natural Capital management in measuring progress towards green growth. Natural Capital concepts need recognition within the National Green Growth Strategy and integration into Cambodia’s Rectangular Strategy. Indicators for measuring investments in Natural Capital and the state of its quality are needed. Producing ‘environmental-economic accounts’ alongside the national accounts, allows natural resources and ecosystems to be considered capital, and the ecosystem services contribution to the economy and people’s human wellbeing measured, in the same way as we account for economic and financial resources]	
4.87	Add point: [Create innovative financing and policy mechanisms to reward maintaining Natural Capital and support sustainable production and consumption. Policy reform to institute increased incentives for natural capital conservation and sustainable use, including environmental tax reform and removal of perverse incentives that encourage unsustainable use of natural resources.]	
4.88	Add point: [Mapping areas of key natural capital, and valuing biodiversity and ecosystem services through a consultative process will help improve measurement and valuation of natural capital in	

	the protected area to make decision with balance of “conservation” and “development”]	
4.88	Add point: [Adopt and implementation of the National Strategic Plan on Protected Area]	
4.88	Add point: [Promote and strengthen the capacity of local community living in/surround the protected to protect, and manage and improve their livelihoods from the natural resources]	No
IV B. 4.80 IV B. 4.82	NGOF recommended encouraging stakeholders’ attentions to the development of eco-tourism projects within the CFs of CPAs with potential to contribute to increased employment of local communities through tourism services. NGOF also recommended drawing donor attentions to improving communities’ capacity and promote ownership of local communities in sustainable management and effective community forestry through capacity building and awareness raising. While Environmental Impact Assessments are important, it is disappointing to see NGOF’s abovementioned suggestions have not been included in the Draft NSDP.	No
	NGOF raised the issue of the importance of differentiating between natural forests and plantations in the definition of ‘forest’. The Draft NSDP does not mention this.	No
IV A. 4.78 IV B. 4.79 IV B. 4.80 IV B. 4.85	The new policies and regulations are consulted with the public for awareness-raising purposes, as well as establish a program to promote and accelerate effective community forestry through capacity building and awareness-raising on law and policies and other relevant international agreements. The Draft NSDP has not detailed how such information-sharing will be practically implemented.	No, but raise training in sub-national level
IV A. 4.78, 4. IV B. 4.79	National social and environmental safeguards for climate change should be developed by considering the existing policies and international standards and agreements on safeguards. NGOF’s	

IV B. 4.80	idea of adding climate change issues to the school curriculum was not included in the Draft NSDP. The RGC report fails to mention REDD+.	
	A rigid monitoring system for existing ELCs be enforced, that the information such as numbers, names and locations of all granted ELCs be made publicly available, and that the granting of ELCs should be permanently banned. The RGC does not mention Economic Land Concessions at all within the Sustainable Management of Natural Resources Section in the Draft NSDP.	No
IV A. 4.78 (1) IV B. 4.79 IV B. 4.85	The RGC should establish a transparent land-use planning system from the local to national level under cooperation with local communities. It was envisioned this could be done through a community based forest management strategic action plan. This was not included in the draft NSDP. Zoning demarcation process should be accelerated.	Develop land use planning that allows for holistic planning across sectors, jurisdictions and local government borders (Land Use Policy and Spatial Planning).
IV. B. 4.80.	The government should strengthen forest law enforcement and develop and effective mechanism to sustainably and effectively protect natural forest. RGC does not appear to have taken this suggestion on board. The draft sub-decree on Prey Long should be adopted and enforced as soon as possible. The Draft NSDP does not mention this.	

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13. Environmental sustainability and Climate Change

Paragraph/Section* (Chapter IV: Key Policy Priorities and Actions 2014-2018)	CSO/NGO Comments and Inputs on Draft NSDP 2014-2018 ¹¹	Final Version of NSDP as approved by the Council of Ministers 2014-2018 (English Version)
4.43/1	Government and relevant ministries/ agencies stop acquiring land in protected areas for land concession. The Ministry of Environment and the Ministry of Agriculture, Forestry and Fisheries should effectively preserve the forest remaining from economic land concession; especially encourage all companies to grow trees in degraded areas or in areas where reforestation is needed to maintain environmental equilibrium and ecology. The government should continue and expedite adoption and recognition of community natural protected areas.	<p>- EIA Draft law is almost finalized with fully engaging by community representatives, CSOs/NGOs, DPs since 2010.</p> <p>- The Environmental Code under coordinate by legal working group (CCD/MoE and Vishnus Law Group). All stakeholders including DPs, CSOs/NGOs and ministries officers and communities plan to invite to inception workshop on environmental code by August 2015.</p> <p>4.58 MAFF will put following plans and prioritized actions for the agro-industry sector in the next 5 years:</p> <ul style="list-style-type: none"> - Establish information systems on processing agricultural products. - Provide technical support to rural areas. - Enforce laws for economic land concession companies. <p>4.62 Further ensuring transparent and efficient management, conservation and use of land and natural resources to ensure the sustainability of the environment and socio-economic development, prevention of illegal forest encroachments and enforcement of strict measures against those who illegally grab state land or keep land idle for speculative purposes, intensification of drive for confiscation of economic land concessions in case of violation of contract agreement or regulations, and</p>

¹¹ It's based on the compiled CSO/NGOs comments on draft NSDP2014-2018 (16 sectors) submitted to LM/LA and DPs in January 2014.

		<p>cessation of granting new economic land concessions</p> <p>Draft and adopt the National Policy on Land and Properties Valuation System and related legal policy documents</p> <p>4.63 Cancelled from economic land concessions (ELCs) due to nonoperation/ non-production.</p> <p>4.70 To achieve this objective, the Royal Government will implement a comprehensive and cross cutting approach, aimed at improving the effectiveness and equity in the exploitation of natural resources accordingly to National Forest Program 2010-2029, Strategic Planning Framework for Fisheries Sector 2010-2019 and the “Declaration on the National Policy for Fisheries Sector; strengthening the implementation of “Law on the Environmental Protection and the Management of Natural Resources”, “Law on Protected Natural Areas” and “Guideline on the Development of Coastal Areas in the Kingdom of Cambodia”.</p> <p>4.71-4.73: Forestry reform: Forestry Administration (FA) has prepared an action plan to implement the National Forest Program effectively</p>
4.43/2	<p>CSOs request to Royal Government of Cambodia (RGC) shown highly commitment with political wills to fully implement of Cambodia Climate Change Strategy Plan (CCCSP) 2014-2023, National Policy on Green Growth and National Strategic Plan on Green Development 2013-2030.</p> <p>CSOs request to RGC prepare the climate change legal</p>	<p>Climate change legislation: MoE now in the process to develop NAP, CCFF, and may be climate change law etc. It also reform their existing NCCC into NCSD.</p> <p>4.86-4.94 RGC is strongly committed to full implementation of Cambodia Climate Change</p>

	<p>frameworks with include updating institutional arrangement, financing management and mainstreaming climate change across sectors.</p>	<p>Strategic Plan 2014-2023", "National Policy on Green Development" and the "National Strategic Plan on Green Development 2013-2030.</p> <p>4.40 Ministry of Environment (MOE) will continue to take a comprehensive development approach toward environmental management in Cambodia, through:</p> <ol style="list-style-type: none"> 1. Sustainable management of natural resources. 2. Intensifying efforts to reduce the impact of climate change by strengthening the adaptation capacity and resiliency to climate change, particularly by implementing the "Cambodia Climate Change Strategic Plan 2014-2023", "National Policy on Green Development" and the "National Strategic Plan on Green Development 2013-2030". 3. Continuing to strengthen technical and institutional capacity to promote the mainstreaming of climate change responses into the policies, laws and plans at national and sub-national levels. 4. Continuing to introduce measures to control environment and ecosystems. <p>4.41-4.48 There are several mechanisms to show the finance management and potential sources of funds for RGC.. Continuing to strengthen partnership in development with all stakeholders in order to mobilize financial resources from all sources</p> <p>4.70 Stepping up cooperation with relevant development stakeholders under the framework of the</p>
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		<p>“National Policy on Green Development” and the “National Strategic Plan on Green Development 2013-2030” through the development of regulatory frameworks and mechanisms for carbon trading, strengthening the capability, preparation and implementation of climate change adaptation measures, assessment... environmental financing mechanisms including payment for environmental services and environmental fund, strengthening the management of protected natural areas including protection of biodiversity, rain forests, and wetland areas; and environment and ecosystem monitoring and control mechanism at both national and sub-national levels.</p> <p>4.83 Ministry of Environment (MOE) will</p> <ul style="list-style-type: none"> - Implement the Cambodia Climate Change Strategic Plan 2014-2023. - Adopt Green Growth and low carbon development strategies, which are key to sustainable economic development. - Strengthen the management of protected areas to eliminate illegal exploitation of natural resources, and curb illegal land and forest clearings. - Evaluate environmental impacts of any development projects proposed. - Maintain a high quality environment: it should be chemical-free; by monitoring and inspecting polluting sources and monitoring water, soil and air - Adapt to climate change and mitigation measures for reduction of greenhouse gas emissions. - Strengthen the implementation of bio-safety and biotechnology activities. - Strengthen environmental education and
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		<p>dissemination of environmental information</p> <p>4.84 MOE will Prepare the climate change legal framework which will include updating institutional arrangement, financing arrangements, and mainstreaming of climate change across sectors.</p>
4.43/4	<p>RGC should continuing a strengthen effective, accountable, and transparent enforcement of laws, Royal Decrees, sub-decrees, Prakas, and guidelines related to environment, natural resources, forest, land, and mines.</p>	<p>4.62 During the Fifth Legislature, RGC will intensify land reforms, focusing on strengthening the management, organization, utilization and distribution of lands that will contribute to reducing poverty, ensuring food security, protecting the environment and natural resources, and socio-economic development, within a market framework. RGC will focus on the following priorities:</p> <ol style="list-style-type: none"> 1. Further promoting the formulation of a comprehensive land policy entitled “White Paper on Land”. 2. Promoting the preparation of Law on Land Management and Urbanization and Law on Agricultural Land. 3. Accelerating land registration and issuance of land titles including for state lands, private lands and indigenous community lands through regular land registration process and further implementing the “Old Policy-New Action” policy giving priority to land titling in dispute-free areas in order to guarantee security of title and ensure confidence in land ownership. Further promoting the establishment of the database of land management and land Use <p>4.62 Prepare Policy on Public and Private Partnership (PPP)</p> <p>4.84: There are several law, registrations and sub</p>

		degree plan to accomplish by MoE such as Law on the Management of Environmental Pollution, Law on Environmental Impact Assessment, Law on Green Growth, Law on Biodiversity. Law on Chemicals Management, Law on Ratification on Minamata Convention on Mercury, Sub-decree on the Establishment of Funds for Natural Protected Areas, Sub-decree on the environmental impact assessment, Sub-decree on Social Funds.
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14. Sector Key Policy Priorities & Actions to Implement the Prioritized Policies

No	CSO/NGO Comments and Inputs on Draft NSDP 2014-2018 ¹²	CSO/NGO Assessment: Final Version of NSDP 2014-2018
1	Agencies (included parliamentary, NGO/CSO, private sector) to implement its potential role and work, cooperate and collaborate in a more closely manner at both national and sub-national levels.	The suggested change was not incorporated.
2	Develop, establish and disseminate user feedback and recourse mechanisms. Encourage and foster the concerned authorities at national, sub-national and local level to practice the obligation in a prompt, quality, and effective manner after receiving feedback/report.	There is slight change compared to the previous version but the suggested change from CSOs was not incorporated.
3	Add 1 more point 5. Develop mechanism for the arrangement of link among national, sub-national and local level to deal with any issues raised by local-sub-national in a prompt, quality, and effective manner.	The suggested change was not incorporated.
4	A lot of attention will be paid on building irrigation system as priority to support farmers,	The suggested change was not incorporated.

¹² It's based on the compiled CSO/NGOs comments on draft NSDP2014-2018 (16 sectors) submitted to LM/LA and DPs in January 2014.

	the local transportation system to facilitate logistics and investment in power, to ensure a reasonable availability of electricity at price of the electrical power for family, business and industry consumption.	
5	<p>Add 3 more points</p> <ul style="list-style-type: none"> • Allocate national budget for CSOs to work more on social protection and local economic development • Develop minimum pricing policy on farmer products, small scale farmer protection and development • Development projects designed with consideration for the rights of and potential benefits for the most vulnerable members of the community including the oldest and youngest, indigenous people and other ethnic minorities, those who are disabled and the LGBT community. 	There are some changes with the numbering but the suggested points from CSOs were not included.
6	Enforce laws for economic land concession companies and cooperate social response	The suggested comment was not incorporated.
7	Attract foreign investments in all chain that bring value added to the existed value chain of farmers.	There was a slight change with the numbering but comment from CSOs were not addressed.

15. Partnership in Development (yet to be approved 3.6.2015)

No	CSO/NGO Comments	CSO/NGO Assessment: Final Version of NSDP Update 2014-2018
1	<p>Regarding the mutual solutions between traditional and non-traditional development partners, the tied aid from non-traditional development partners and the conditions imposed by the traditional development partners should be in careful consideration among development actors where beneficiary group could mostly benefit the real aid out of the gross aid.</p> <p>Not limited to climate change, human trafficking and migration, the global challenges could be listed more so that we could cope with its negative impacts on time in Cambodia.</p>	<p>This concern about aid from traditional and nontraditional partner is noted in the NSDP</p> <p>These problems are not discussed in this section of the NSDP</p>
2	A statement should be added about Joint Monitoring Indicators (JMIs). Smart indicators at national and sub-national levels should be established to monitor the development results and the JMIs report should be widely disclosed to the public.	This was not included in the final version

	The development effectiveness approach should be elaborated more specifically that development actors apply accordingly to respective sectors.	This was not included in the final version
3	<p>A statement should be added about the ODA database because it is the one of the helpful system used to support planning and budgeting functions as well as to promote coordinated activities implemented by development partners at national and sub-national level.</p> <p>The most accurate and consistent data should be enhanced or initiated with transparent release of information to the public with ease and without bureaucratic barriers, especially the breakdown information between operational budget and for-result budget while we are working on priority policies according to the result framework.</p>	<p>This was not included in the final version</p> <p>This was not included in the final version</p>
4	<p>A paragraph is suggested for consulting with CSOs to develop civil society Enabling Environment Policy in accordance with recommendations from CSO Enabling Environment Report 2013, to allow CSOs to fully participate in supporting the government in all aspects of the NSDP 2014-2018 and its monitoring process.</p> <p>A paragraph is suggested for the TWG mechanism. TWG mechanism will continue to provide the technical dialogue among the Royal Government, development partners, and CSOs. The TWGs' performance and structure will be monitored and reviewed to ensure that the inclusive partnership among the stakeholders is based on the strengthened country ownership and accountability for development results.</p> <p>The 'Guideline on the Role and Functioning of the TWGs' should be re-visited for its relevance to the update arrangement where an enabling environment guideline on roles of each development actors could be included to encourage effective and efficient participation.</p>	<p>This was not included in the final version</p> <p>There is a concern about the role of TWG's on page 209 of the final version of the NSDP, although it is not included in the section, Partnership in Development</p> <p>It was suggested that a review of the TWG's be undertaken but the document failed to detail the role of each development actor.</p>
5	<p>Partnership between the private sector and CSOs should be strengthened to rightly enforce the corporate social responsibilities for the benefits of the private sector and local communities prevented from the negative impacts of socio-economic aspects and environmental aspects.</p> <p>The partnership will develop and support the initiatives of social enterprise projects.</p>	This was not included in the final version

6	As per its missing, Government-Development Partner Coordination Committee (GDCC) should be inserted back along with other forum.	This was not included in the final version
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* Paragraph/Section refers to paragraph/Section in draft NSDP 2014-2018.

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16. Monitoring and Evaluation

No	CSO/NGO Comments	
1	Balancing the input, output, outcome and impact indicators should be further improved in the NSDP 2014-2018. This would allow concerned stakeholders, especially the National Assembly, be able to better track the short-term and medium-term changes in the development efforts of the RGC against the targets stated in the plan.	Yes this was included in the final draft of the NSDP
2	The NSDP 2014-2018 should include additional measurable and timely assessable monitoring indicators set on a yearly basis in order to enable concerned stakeholders to be able to monitor the progress against the implementation.	Yes these changes were included in the final draft of the NSDP
3	In addition, NGOs believe that it would be more useful for the Ministry of Planning to consider including a policy matrix in the NSDP 2014-2018 to explicitly present, in a concentrated format, the progress of the policy implementation at the national level giving a clear framework in poverty reduction. This is because the current NSDP Update contains a significant number of policy commitments in several areas.	A policy matrix was not included in the final draft of the NSDP

* Paragraph/section refers to paragraph/section in draft NSDP 2014-2018.

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