

**Rapid Assessment of the Incorporation of NGO Comments on
the first draft National Strategic Development Plan (NSDP) Update
2009-2013**

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Rapid Assessment on NGO Inputs to and Comments on the First Draft of NSDP Update 2009-2013

This assessment is aimed to find out to what extent the NGO inputs to and comments on first draft National Strategic Development Plan (NSDP) Update 2009-2013 were incorporated into the final version of NSDP Update.

- The NGO inputs to the first draft NSDP Update refer to inputs submitted by sectoral NGOs/Groups to Line Ministries/Agencies (LMs/LAs) during July 2009 and were compiled by the NGO Forum¹ at that time (July 2009).
- The NGO comments on the first NSDP Update refer to comments submitted by sectoral NGOs/Groups to LMs/LAs during January 2010 and were consolidated by the NGO Forum in February 2010.
- The first draft NSDP Update refers to a version which was released by Ministry of Planning (MoP) on 17 December 2009, while the final version of NSDP Update is referred to the one endorsed by the National Assembly and released on 07 July 2010. This final version was officially launched by the MoP at the Intercontinental Hotel.
- Therefore, the methodology of this assessment is through **rapidly authenticating NGO inputs into and comments on the first draft NSDP Update** with those relevant sections in the **final version of NSDP Update. This authentication purpose is to figure out how many inputs and comments provided by NGOs were incorporated or considered incorporated into the final version of NSDP Update.**
- Inputs from Health and Education sectors provided by NGOs working in these areas were discussed and included in the development of both Ministries' plans from the beginning. The NGO inputs on these two sectors were mostly incorporated into the two Ministries plans (Health and education strategic plans). As for the case of health sector, MEDiCAM and its health sector NGO members inputs were excluded from this rapid assessment as it's hardly possible to verify the health sector inputs provided by NGOs into the final version of NSDP Update. This is due to the fact that their comments or inputs were provided on Health Strategic Plan of Ministry of Health while health sector inputs into the NSDP Update were made by MoH afterward and no second round of comments were made by health NGOs. In the case of education sector, NGOs working on education sector gave its second round of comments on the first draft NSDP Update then in this case, rapid assessment on education NGO comments on education section could be conducted.

It should be noted that it is possible that some comments/suggestions have been included in the NSDP Update but in such a different wording that the assessment team has not been able to identify it as such. Therefore, it is crucial to emphasize that the assessment below should only be treated as a "rapid assessment" and not as an "in-depth analysis". As not all sector NGO comments sent to line ministries/agencies of the Royal Government received responses or feedback, this assessment will validate both the first round of inputs to the first draft NSDP Update and second round of comments to the final version of NSDP Update. Any changes of wordings or concept from the first draft to the final draft which match to the recommendations made by sector NGOs, they are considered as accepted by the line ministries/agencies of the Royal Government. Those that are not mentioned or changed in the two versions and not matched or responded to NGO comments, they are considered as not accepted. This verification is made to prevent a one side claimed assessment of the comments and ensure that this is acceptable method to all given the lack of confirmation from some government line ministries/agencies on those sector NGO comments.

¹ This work is mainly coordinated by Development Policy Project of the NGO Forum which works to represent the cross-sector NGOs in the Technical Working Group on Planning and Poverty Reduction chaired by Ministry of Planning with support from development partners.

This rapid assessment on sector NGO comments was made initially by NGO Forum staffs and was verified by all sector NGOs who provided their inputs and comments on the NSDP Update 2009-2013 from July 2010 till February 2011. Furthermore, it should be noted here that the process of NGOs providing inputs and comments in the formulation of the current NSDP Update 2009-2013 was also constrained by lack of established working relationship with some relevant line ministries and agencies of the Royal Government as well as lack of openness from them to comments or inputs from NGOs. This was explained by the mechanism which was used in preparation of the plan, which is through Technical Working Groups (19) and designated working groups established in line ministries/agencies. Among 19 TWGs, only 14 TWGs have NGO representation during the formulation process and only 3 TWGs had their dedicated agenda to discussion on inputs or comments on their draft section for NSDP Update. NGOs believe that with improved space for wider participation of other NGOs and civil society organizations such as academic institutions, associations, community based organizations, and other groups like commune council members in the formulation of the future plans will make these plans more inclusive and reflective to the needs of the poor and vulnerable groups.

Overview of number of NGO Comments and incorporation in NSDP Update 2009-2013

No	Sector	Number of Inputs into/comments on the first draft NSDP Update	Number of inputs/comments incorporated in the final version NSDP Update
1	NSDP Situation Analysis, Monitoring Framework, and Costing	7	2
2	Public Financial Reform and Budget Allocation	6	2
3	Inclusion of the National Audit Authority's Achievement, Challenges, Strategic Plan	2	0
4	Land Reform	44	17 ²
5	Forestry Reform	21	4 ³
6	Agriculture Sector	17	4
7	Fisheries	18	2
8	Mining and its Environmental Impact	55	7 ⁴
9	Good Governance/ Anti-Corruption	20	4 ⁵
10	Decentralization & De-concentration	8	1
11	Access to Information	2	0
12	Child Right	11	0
13	Inclusion of Disability	36	6
14	Education sector	5	2
15	Aid Effectiveness	5	0
16	Hydropower Development and Energy Sector	44	2
17	Environment Protection, Conservation and Climate Change	60	6
18	Inclusion Disaster Risk Reduction	13	6
Total		374	65

² There was one repeated comment; of which it was the same to input provided during the input collection stage.

³ There was one repeated comment; of which it was the same to input provided during the input collection stage.

⁴ There was one repeated comment; of which it was the same to input provided during the input collection stage.

⁵ There was one repeated comment; of which it was the same to input provided during the input collection stage.

NSDP Situation Analysis, Monitoring Framework, and Costing

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
1	<p><i><u>Making a more detailed analysis of the needs of the poor and vulnerable groups in our society.</u></i> The current NSDP has a good poverty analysis at the aggregate level but the NSDP Update would benefit from using the available disaggregated data and make it more focused on the poorest and most vulnerable groups in our society. Making the challenges faced by these groups, their needs and their aspirations visible enables developing an efficient strategy for national development with the main goal of poverty reduction.</p>	<p>The suggested comment was not included.</p>
2	<p><i><u>Including additional input and output indicators in the monitoring framework</u></i> that currently consists of 43 indicators. Additional input-output indicators would make the monitoring framework more balanced and better able to track short-term changes in the poverty reduction efforts of the Royal Government and its development partners.</p>	<p>The suggested inputs were included as following:</p> <p>Para. 586..... It is critical to ensure that the core monitoring indicators/targets for NSDP Update 2009-2013 meet two important criteria: i) that each proposed indicator/target is readily available or can be collected within acceptable time frame, ii) an RGC institution has been identified and has agreed to monitor and evaluate progress on the indicator/target. A Sub-Group of the TWG-PPR was established to develop a potential list of core monitoring indicators for NSDP Update 2009-2013 building on the work that has been done.</p> <p><i>However, as stated in para. 587 that ... because of time constraints the Sub-Group was unable to complete the task. Therefore, for the time being, the "core monitoring indicators/targets of NSDP 2006-2010" have been left unchanged (Table 24)..... However, it's supposed to complete this task before work on the first overall assessment of progress on the implementation of NSDP Update 2009-2013 is carried out in early 2011.</i></p>

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
3	<p><u>Adjusting the format of table 4.3 with in the Mid Term Review on “NSDP allocations by sector”.</u> In order to enable monitoring on the alignment of development resources with the priorities outlined in the NSDP, <u>NGOs request that table 4.3 follows the same format as the National Budget Law (by line ministry and institution).</u></p>	<p>The suggested comment was not included. <i>Para. 583 elaborated that for the NSDP Update 2009-2013, the allocation of recurrent expenditure by ministry/agency within the framework of the Medium-Term Expenditure is presented in Table 14 in Chapter III. Allocation of capital expenditure and the costs of special measures to mitigate the adverse effects of the global financial crisis and the economic downturn on the real economy and the vulnerable and the poor by sector are presented in Table 26.</i></p>
4	<p><u>Including a policy matrix to show the progress the Royal Government is making at the policy level.</u> The NSDP contains a significant number of policy commitments in several areas that deserve to be reported upon regularly in structured manner.</p>	<p>The suggested comment was not included.</p>
5	<p><u>Revising the costing of NSDP implementation as announced in the circular.</u> The costing of the full NSDP should be accompanied by an assessment of the likely resources and a prioritization of pipe-line projects.</p>	<p>The suggested comment was included, but not achieved as its attempt. <i>Para. 565, to collect information, through a bottom up process, on the cost of public investment requirements to implement RGC’s prioritised policies for the Fourth Legislature (on-going development programmes... as well as planned high priority pipeline projects), the Ministry of Planning had asked each line ministry/agency to provide information on their Public Investment Requirements for 2009-2013. Unfortunately, this bottom up approach cannot be applied as not many ministries/agencies were able to provide the information that is needed. The Royal Government will further strengthen and refine the planning and resource allocation processes and the capacity of RGC institutions will be strengthened to ensure that the data required for development planning and public investment resources allocation purposes is readily available.</i></p>

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
6	A meeting of the Technical Working Group Planning and Poverty Reduction should be called by the Ministry of Planning to discuss the issue of civil society participation in the drafting process of the NSDP Update together with participants from all Line Ministries/Agencies, Development Partners and Civil Society Organisations that participate in the Technical Working Group. In our view, the mandate and broad membership of the TWG-PPR makes it the most appropriate mechanism to discuss this among all relevant stakeholders.	Suggested comment was not included.
7	For sectoral consultations to happen, it is necessary that all Government chairs of the TWGs meet to discuss the current draft. This process needs to be fully supported by the co-facilitators from the development partner side.	Suggested comment was not included.

Public Financial Reform and Budget Allocation

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
1	<p>i) On paragraph 566 of the NSDP Update NGO Forum welcomes the significant attention⁶ that is given in the current draft of the NSDP Update on the need to further improve linking Government planning and budgeting (financed by domestic and development partner resources). Whereas paragraph 566 rightly emphasizes the role of the Task Force⁷ we would like to request to MEF and other institutions in the Task Force to provide an elaboration on when the taskforce expects to finalize its tasks as outlined in paragraph 566 in the next version of the NSDP Update 2009-2013.</p>	This suggested addition was not included.
2	<p>ii) On paragraph 552 of the NSDP Update Related to the linking of planning and budgeting, it is observed that there is an absence of a capital costing by ministries of the NSDP Update 2009-2013. Although a costing of the NSDP Update was announced in Government's Circular on the Preparation of the NSDP Update (page 6, annex II, B5), the current draft of the NSDP Update mentions in paragraph 552 (page 173) that "<i>not many ministries/agencies were able to provide the information that is needed...</i>". The NGO Forum on Cambodia would like to request to the Ministry of Planning and the Ministry of Economy and Finance that the next version of the NSDP Update includes:</p> <ul style="list-style-type: none"> • An elaboration of what the Royal Government, supported by its development partners, can do to ensure that "<i>the data required for development planning and public investment resources with relevance to development priorities for poverty reduction are readily available in the costing chapter of the NSDP Update</i>". • A reference that the costing refers to both recurrent and capital budgets of the line ministries in order to ensure consistency between the NSDP Update, the National Budget, and the PIP. 	<p>These suggestion and comments were not included.</p> <p>It just unclearly stated that "<i>The Royal Government will further strengthen and refine the planning and resource allocation processes and the capacity of RGC institutions will be strengthened to ensure that the data required for development planning and public investment resources allocation purposes is readily available.</i>"</p>

⁶ See especially paragraphs 302, 315, 382, 551, 566 of the draft NSDP Update (2009-2013). In the NSDP Mid Term Review of 2008 (para 1.10) this issue was also clearly recognized as a challenge.

⁷ Consisting of the Ministry of Economy and Finance, Council for the Development of Cambodia, the Supreme National Economic Council and chaired by the Ministry of Planning

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
4 5 6	<p>iii) On Table 14 of the NSDP Update</p> <p>Finally we would like to express our genuine appreciation for the increased amount of budget information included in the NSDP Update (Table 14 '<i>Indicative recurrent budget expenditure by ministry / agency 2008-2013</i>'). Concerning the table we would like to make the following suggestions for your consideration:</p> <ol style="list-style-type: none"> 1. The estimated expenditures in 2009 should be replaced with actual expenditure in the next and final version of the NSDP Update; 2. Replace the estimates for 2010 budget allocations by actual allocations in the 2010 Budget Law; 3. On the actual allocations included in table 14 of the draft NSDP Update 2009-2013: <ul style="list-style-type: none"> • Add the missing four institutions under the category of "General Administration": Royal Palace, National Assembly, Senate and Constitutional Council. • Although we welcome the decrease in General Administration budgets and the fact that the Ministry of Justice is excluded from this decrease; the National Audit Authority should be considered to be excluded from this overall decrease in allocations for General Administration given its important role in further contributing to improving Cambodia's good governance through external audit on all public institutions (and the relative small size of its budget). • Compared to sectors that are of crucially important for continued poverty reduction and economic growth, allocations to national defense and security budgets are high. We propose that the level of these increases is reduced and that these reductions are allocated to the Ministry of Agriculture, Fishery and Forestry, Ministry of Rural and Development, and Ministry of Water Resource and Methodology. Although these three ministries receive some priority in the proposed allocations, these need to be further increased given the small size of their budgets and the large need for development of the rural areas (91% of poor live in rural areas and 70% of Cambodian people are employed in agriculture). 	<ol style="list-style-type: none"> 1. Finally, as suggested the estimated expenditure in 2009 was replaced with actual expenditure in the final version of the NSDP Update. 2. This suggested addition was not included. 3. Comments were partly included, please see below explanation. <ul style="list-style-type: none"> • The four missing institutions under "General Administration" were <i>not</i> included. • Budget allocation for the National Audit Authority was excluded from the overall decrease in allocations for General Administration. And as a result, the budget allocation for the NAA was increased for 2009-2013. • Level of increase in budget allocations to National Defence and Security were reduced; and in turn, level of increase in the MAFF, MoRD, MoWRAM was increased.

Inclusion of the National Audit Authority's Achievement, Challenges, Strategic Plan

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
1	In chapter two of the first draft NSDP update 2009-2013 on achievements and challenges of implementation in NSDP 2006-2010, the National Audit Authority could highlight the publication of the 2006 Audit Report in October 2009.	The suggested addition was not included.
2	In chapter four of this draft on key policy priorities and actions, a number of priorities from the 2007-2011 Strategic Development Plan could be included while reference is made to the full plan for more details.	The suggested addition was not included.

Land Reform

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
1	<ul style="list-style-type: none"> <i>We kindly request to add an integrated approach by which all fundamental components of the land administration, management and distribution reform programme are functional. This includes a consistent and complete legal and policy framework that adequately addresses the issue of state land identification; co-operation between relevant line Ministries and lower levels of government; registration and subsequent registration of land titles; and a functioning dispute resolution mechanism. A number of fundamental areas are not functioning effectively, including: state land identification and demarcation, refusal to issue land titling of some urban and rural areas for reason of "master plans development".</i> 	<p>Comment was partly included because the following statements are mentioned:</p> <p>In par. 404: The Royal Government's land reform programme is focused on measures to strengthen land management, land distribution and land use to ensure the security of land ownership, to eradicate illegal land holding, and to prevent concentration of unused land in few hands.</p>
2	<ul style="list-style-type: none"> <i>Should expedite and increase effectiveness of implementation of land registration and issuing land titles by providing information and sufficient time for registration at provinces because of the low level of subsequent registration of land title; the backlog of undistributed titles to people.</i> 	<p>Comment was partly included in the area of land registration because in para. 411 point four described that "Expedite the registration of state land (public state land and private state land) and private land (individual private land and co-owned building) through the procedures being in force (systematic and sporadic) in a transparent and efficient manner and with the participation of all concerned governmental and non-governmental parties particularly female family heads."</p>

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
3	<ul style="list-style-type: none"> <i>Should strengthen an effective out-of-court land conflict resolution mechanism based on the basis of justice and equality between conflict parties (by studying and investigating information at conflict sites), including aligning existing out-of-court land conflict resolution and effective conflict resolutions through courts because there are a lot of unsettled conflicts pending at the Cadastral Commission. The Commission's land conflict resolutions and activities are still limited in settling cases. Furthermore, many cases submitted to the Commission are not resolved through the procedures state in the relevant Sub-degree, Prakas, and guidelines. In addition, the jurisdiction and effectiveness of the National Authority for Land Dispute Resolution (NARLD) remains unclear. The court system is applied to untitled land conflicts and civil society's involvement in decision making process is limited.</i> 	<p>The comments are partly included as in the Para 406 mentioned that:</p> <p>The Royal Government will continue to resolve land conflicts by using legal mechanisms to ensure justice coupled with the out-of-court conflict settlement mechanism. The Royal Government attaches priority to granting land ownership rights to poor households and vulnerable groups for housing, farming and small businesses.</p>
4	<p><i>Should share results and related experiences in land conflict resolutions publicly made thus far by the Cadastral Commission.</i></p>	<p>Comment was included as par. 113 and 114 elaborated more detailed information on the conflict resolutions if compared to MTR in 2008 of NSDP 2006-2010.</p>
5	<p><i>Should enhance equality husband and wife in land titling.</i></p>	<p>Comment was not included. There is no section mentioned about this.</p>
6	<p><i>Should continue implementation of increased transparency and fairness in allocation of social land concessions to poor people and in developing appropriate infrastructure.</i></p>	<p>Comment was included because para.410 point 5 stated that "collaborate with the institution involved in providing social land concession in promoting partnership between smallholder farmers.....for people living in those localities."</p>

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
7	<p><i>Should strengthen the capacity of commune/Sangkat councils in implementing the Sub-decree on land use with local (commune level) participation in order to contribute to enforce the principle of land resource management and to develop a more effective social land concession project. This framework must include mechanisms which prioritize coordination and harmonization of identification and planning stages between responsible government authorities and with local communities living within, or using lands identified as potential social land concession areas in order to avoid any effects.</i></p>	<p>Comment was included as par. 411 point ten mentioned that "Development a land management planning system including a master plan or national, regional and provincial land management plans and sub-national land use plans (commune/sangkat and city/district/khan) with participation of all concerned sectors and parties including civil society organizations and other stakeholders in particular female family heads and disable people (if any) in order to support the decentralisation and deconcentration of land management, land development planning, well-defined identification of land use areas..."</p>
8	<ul style="list-style-type: none"> Should enhance public consultations with communities planned economic land concession areas in order to avoid impacts of development projects on communities and to gain satisfaction from all stakeholders. 	<p>Comment was included because in par. 408 of number (3) stated that "to mitigate risks of conflict of interest between the indigenous people and the appropriation of economic land concession in order to protect the best interest of the country and with participatory approach"</p>
9	<ul style="list-style-type: none"> Should share information on social and environmental impact assessment of areas planned for economic and social land concessions with participation from civil society and with transparent, in particular after consultations with communities or civil society. 	<p>Comment was included in para. 411 point one mentioned that "further develop the policy and legal and regulatory framework pertaining to the enforcement of land law and other related legislation with transparency and participation of governmental and non-governmental stakeholders and by ensuring that the rights and interest of woman and disabled are protected in an equitable and fair manner..."</p>
10	<ul style="list-style-type: none"> Should increase transparency and accountability in the process of systematic and sporadic land titling and payment for services of title transfer in order to ensure that the payment is compliant with regulations. 	<p>Comment was included as it reflected in the para. 410 point 3 that "Expedite land management planning at all levels and state land mapping for all cities/districts/khans in accordance with the transparent, participatory, consensual principle and by respecting the hierarchy, order, and the transparent, equitable, sustainable and effective procedures...."</p>

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
11	<ul style="list-style-type: none"> Should pay more attention to on-site development policies, creation of new villages, and resettlement in the National Strategic Development Plan Update 2009-2013: these issues are concerns of poor people in urban areas as well as in areas with development projects and of civil society. Many reports raise concerns over the increasing number of people forced to resettle and condemn the current violent and inhumane means during eviction⁸. 	The comment was not included.
12	<ul style="list-style-type: none"> Should review on the national housing policies with consultations with civil society in order to ensure that all citizens have equal rights in having proper housing, in particular urban poor communities. 	The comment was not included.
13	<ul style="list-style-type: none"> Should expedite the drafting of Expropriation Law in order to identify and to ensure compliance with the principle of proper and fair compensation for property owners, which is enshrined in the Cambodian Constitution and Land Law. 	The comment was not included.
14	<ul style="list-style-type: none"> Development of city or urban master plans should be carried out with involvement of communities in the area as well as civil society organizations in the respective communities to ensure their ownership rights. 	Comment was included as stated in para. 411 point 9 that "Development a land management planning system ...with the participation of all concerned parties including civil society organization..."

⁸ Amnesty International, *Rights Razed: Forced Evictions in Cambodia*, February 2008; HRTF "Human Rights Day Urgent Action Appeal: 280 families threatened with forced eviction in Phnom Penh need your help!", Housing Rights Task Force, September 2007; HRTF "Joint Statement on the forced eviction of 132 families in Sangkat Chrouy Changva, Phnom Penh" Housing Rights Task Force, 3rd November 2007; FIDH 2008 "Forced Evictions in Cambodia: Time to End Impunity" International Federation for Human Rights, 19th February 2008.

⁸ Leased to Shukaku Inc. who share offices with Pheapimex and whose owner is Senator Lao Meng Khim.

⁸ Article 15 of the Land Law states that lakes are State public land because they have a "natural origin" and serve a public purpose.

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
15	<p>Control and Prevention of Illegal Encroachment of State Land</p> <ul style="list-style-type: none"> • <i>Should speed up the demarcation and registration of state land, and prioritize building the capacity of the registration mechanisms and responsible provincial and district level agencies to ending illegal acquisition.</i> In fact, opportunists who always grab land in all forms, including illegal use of rights over economic land concessions, which affects legal land occupation rights of poor people in both urban and rural areas as stipulated under the 2001 Land Law. Unfortunately, lack of transparency and access to a state land use map has encouraged opportunists to use the Sub-decrees on reclassification of private State land for interest of a small group like what is happening today. 	Comment was included as para. 406 and 407 mentioned.
16	<ul style="list-style-type: none"> • <i>the development of the Spatial Planning Policy Land should includes the following:</i> <ol style="list-style-type: none"> a) A review of institutional responsibilities for registration of all types of state land, the scope and implementation of Article 18 of the Land Law 2001, and the institutional roles in the administration of state land; b) Strategies for Inter-Ministerial harmonization and cooperation for all processes, specifically harmonizing identification and classification of state land with coexisting mapping processes through participation with civil society. 	Comment (a) and (b) was partly included because in para 411 point 4 stated that "Expedite the registration of state land... in a transparent and efficient manner and with participation of all concerned governmental and non- governmental parties particularly female family heads...".

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
17	<ul style="list-style-type: none"> Should improve legal framework of the law on transferring immovable state property because the methodology or process of converting public state asset or possession into private state asset or possession allowing for sale, leasing, or concession to investment firms to develop has affected and depleted the public interests. Eventually, there are interventions by parliamentarians, which assure both citizen rights and State public interests, or historic archeological sites, or people's memorial locations in areas where property is found. This pushes vulnerable people to fall into poverty, which transforms into a significant burden for the Royal Government. This deviates from the Royal Government's policy on poverty reduction. 	Comment was not included.
18	<p>So far, land registration has done more primarily in rural areas than in urban areas (3/4 in rural and 1/4 in urban) which most of the land are rice paddy fields and belong to farmers, so this does not consume much time to tackle conflict arising during the registration processes.</p> <p>We would suggest speeding up land registration in urban areas as fast as in rural areas in the yearly plans of the MLMUPC so that the land conflict which is a hot issue in the society can minimize and at the same time, allow people to use their land for production activities for both daily survival and poverty reduction.</p>	Comment was not included.
19	In the process of developing master plan or land use maps of the city, district and commune, the government shall arrange more consultation with local communities as well as engage them in the formulating process of the master plan of the city, khan, and in drafting all legal and regulatory frameworks, then publicize all relevant information to guarantee transparency, clear division of task and fruitful impact on land use.	Comment was included. (the same to comment number 14 and only one is counted)

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
20	<ul style="list-style-type: none"> • So far, there are some cases of social land concession distribution which had been done without thoroughly examining land space at the ground. This lack of attention and concerted effort caused overlapping granting between land granted to some private companies through economic land concession and actual land already occupied by local people. The overlapping granting undeniably results in land conflict, force eviction and many cases, unfair compensation. • So far, some social land concession had been largely distributed to the people but not done alongside with the provision of suitable even basic social and economic infrastructures such as road, school, information access, health care, market, clean water, electricity and link to outside economic areas. • Basing on the previous lesson learned, socioeconomic infrastructure should be done before moving people to live in the social land concession areas. <p>Comparing the number of the poor in the country and the abundance of land availability, the government still enables to distribute more land to the poor as well as smallholder farmers. There also should have a balance between economic and social land concession.</p>	<p>Comment was not included.</p> <p>In para 411 point 11 stated that based on the availability of national budget, the MLMUC will distribute lands for social purpose to 10, 000 landless poor families by 2013 pursuant to RGC's Circular on Social Land Concession Distribution Plan.</p>

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21	<ul style="list-style-type: none"> • Based on observation, economic land concession was granted over the maximum size permitted by the land law 2001, had no effective monitoring measurement, and clear penalty, for example: confiscating unused land. • Areas of granting economic land concession is generally identified on the map without examine on the actual area on the ground which sometimes overlapping on community's areas or some other private company's concession. • Before granting economic land concession, the adequate consultation should be conducted with the local communities because this can affect community livelihoods. • There are some cases that a number of economic land concessions were granted to a single individual which are found to oppose the merit of the land law. Please re-check all these cases and manage coherent procedure and regulation to take back any unused or idle land. • Land speculation is going on without any effective policy response, so the powerful rich and rich acquire more and more land without the moral of paying tax. • So far, economic land concession was granted without conducting the environmental and social impact assessment and also without consultation with the local communities. • Please arrange public consultation basing on the environmental impact assessment study with local people and related stakeholders when the government plans to grant economic land concession. 	<p>Comment was included as para. 408 point number (3) stated that "to mitigate risks of conflict of interest between the indigenous people and the appropriation of economic land concession in order to protect the best interest of the country and with participatory approach"; <i>but do not stated clearly on how to involve the local people in this process.</i></p>
22	<ul style="list-style-type: none"> • Suggested to amend the second phrase "Land reform is crucial for the increase and allocation of social land concessions and for family's agricultural farm by providing land title to people especially the farmers to enhance agricultural productivity and diversification." 	<p>Comment was included. Please see para. 404.</p>
23	<ul style="list-style-type: none"> • Explain in detail the word "Diversification" 	<p>Comment was not included.</p>

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24	<ul style="list-style-type: none"> • Suggest listing down the actual number of land plots/ land size which is going to be registered in each year. 	<p>Comment was included because in the para. 411 point 4 stated that " out of a total of 6-7 private land plots to be registered, for each province, the annual targets of the registration for 2010 and 2013 will be 32 percent and 38 respectively and the annual target of land registration for indigenous people's communities will be 2/5 of the land plots of all officially recognised indigenous people's communities".</p>
25	<p>Suggested conducting the adequate consultation and including the Civil Society's representatives in the process of drafting legal and regulatory frameworks.</p>	<p>Comment was included. Please para. 411 point 1.</p>
26	<ul style="list-style-type: none"> • Suggested to explain the phrase " Single Window to ensure transparency" • Suggested to identify clearly about the "Accord Priority", whom will be the accorded parties? 	<p>Comment was not included.</p>
27	<ul style="list-style-type: none"> • Suggested to adding sentence " ---and eliminate illegal land holding. The Royal Government will take effective measurement to protect the indigenous' land by not granting the economic land concession in areas where the indigenous people settled. The Royal Government will continue to resolve land conflicts by using existing mechanisms in place such as (Cadastral Commission and National Authority for Land Dispute Resolution) to ensure adequate resolution and ensure justice coupled with the in-and-out-of-court mechanism. The Royal Government is speeding up and attaches priority for granting land ownership rights to poor households and vulnerable groups such as housing, farming and small businesses. 	<p>Comment was not included.</p>
28	<ul style="list-style-type: none"> • Suggest adding phrase in the first sentence "... in order to prevent improper land use and land conversion with participation from all relevant parties. The royal government" 	<p>Comment was not included.</p>

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29	<p>Suggested to add sentence and phrase in the first and second bullet points such as:</p> <ul style="list-style-type: none"> • Speed up and continue the registration of ownership and other rights on all immovable properties----- this process should be in accordance with the principle of good governance, transparency, centralization and decentralization, gender equity to develop a culture of land registration and to improving the land registration system. 	Comment was not included.
30	<ul style="list-style-type: none"> • "Speed up the process of planning for all scales and levels of land management and mapping state land in all towns and districts complying with the principles of transparency, participation from all relevant parties, accordance,---" <p>Conduct land distribution and use for social land concession and public with transparency, equity, octal stability, food security, and the investment opportunity in accordance with land variety and natural advantage and in response to citizens' requirements in general; and in particular, the requirements of poor people, disabled veterans, families of sacrificed soldiers, and families of armed forces in duties in the front line of the battle field; through social land concession program. Developing of City's Master plan shall be conducted with the participation from community and civil society to guarantee the ownership in each area.</p>	Comment was not included.
31	<ul style="list-style-type: none"> • Suggest adding sentence in the 3rd bullet point "...efficiency of State immovable properties management and have to disclose all related documents to the public regularly, timely and reliably manner in order to ensure transparency and accountability. 	Comment was not included.
32	<ul style="list-style-type: none"> • Suggest adding sentence in the fourth bullet point "...by insuring that the legal rights and benefits of female and indigenous group are properly protected." 	Comment was not included.
33	<ul style="list-style-type: none"> • In the 5th bullet point, what does Land Evaluation System base on? 	Comment was not included
34	<ul style="list-style-type: none"> • Suggest adding phrase in the 5th bullet point "...in form of participatory approach from CSOs and related stakeholder, transparency..." 	Comment was not included

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35	<ul style="list-style-type: none"> Please give an explanation on the word "up-to date land information" 	Comment was not included
36	<ul style="list-style-type: none"> Suggest adding phrase in the 6th bullet point "Strengthen the subsequent registration both in urban and rural area and precede the up-to date land information..." 	Comment was not included
37	<ul style="list-style-type: none"> Suggest changing phrase in the 7th bullet point "... (LIS) able to provide reliable information for people customers and to be a basis for designing national geographic database..." 	Comment was not included
38	<ul style="list-style-type: none"> Suggest specific date when geometric system will be established as mentioning in the 8th bullet point, for example: the geometric system is committed to be created in 2012. 	Comment was not included
39	<ul style="list-style-type: none"> Suggested adding phrase in the 10th bullet point "...unused land, cadastral definition, and compensation) by independent agencies and the creation of legal framework concerning the management of professional assessment on the price of immovable properties. 	Comment was not included
40	<ul style="list-style-type: none"> Suggested adding phrase in the 12th bullet point "- Precede both in and out court solving land dispute through..." 	Comment was not included
41	<ul style="list-style-type: none"> In the 16th bullet point shows that only a small number of families who will receive the social land concession until 2013 (only 10,000 families). We suggested that a number of the families who will be granted social land concession should increase to 25,000 families instead. 	Comment was not included
42	<ul style="list-style-type: none"> Suggested adding sentence in bullet points "...to social issue solution and national defense by creating mechanism to ensure transparency, accountability and equity to the poor, and demand for the attention to Social Land concession for poor people especially at rural area and develop basic infrastructure also. 	Comment was not included
43	<ul style="list-style-type: none"> Suggest editing the 17th bullet point as below: re-checking all ELCs which have been granted so far, especially those that were not complied by the article of land law, for example; the size of granting is larger than the defined size stated in the land law. Granting ELCs will be only done through legal framework, basing on in-depth study on environmental impact assessment and participatory consultation with all stakeholders. 	Comment was not included
44	<ul style="list-style-type: none"> Suggest adding one more bullet point as below: encourage people to increase agriculture production in order to improve farmer their livelihoods. 	Comment was not included

Forestry Reform

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
1	We would like to suggest the government to state agreement of percentage of forest to be retained only for natural forest not include the industrial plantations. We think that plantation is not forest. CMDG indicators need to be reformulated to state agreements on the % of natural forest to be retained. It can be less than 60% but for natural forest only. Natural forest is essential to the environmental stability of Cambodia. As most Cambodians depend on natural resources, instability in the environment will lead to great negative impacts of all Cambodians.	Comment was not included.
2	We would like to suggest the government to clarify the definition and scope of " private forest ". There needs to be clarification on whether there is overlap between private forest and other land uses.	Comment was not included.
3	We would like to suggest the government to have clear land use planning and decision making prior to the use of land and forest areas for industrial development (which includes economic land concessions, mining concessions, tourism concessions, large scale hydro electricity dams...). State Land Mapping with proper process, transparency and disclosure is required before issuance of industrial concessions.	Comment was included as the para. 407 stated that " <i>To ensure land use efficiency, the Royal Government will speed up the preparation of Land Use Map to enable orderly allocation of land for agriculture, industry, tourism, rural, urban, residential and reserved areas in order to prevent improper land use and land conversion. The Royal Government will review and regularly monitor the economic land concessions to ensure that they conform to the agreed upon priorities and to make them active as well as to avoid unproductive holding of land.</i> "
4	We would like to suggest the government not to use natural forest for National Economic Development. We recognize that National Economic Development is really vital for our country as the government have done. However, forest in Cambodia should not be used for "National Economic Development". Forests are for the livelihoods of local communities. There are other more effective ways to build national economic development – such as carbon payments, tourism, improvements in governance and effective tax collection. Even small sized and well managed mining or petroleum extraction would be better.	Comment was not included. <i>Anyway, in the section of Forestry Reform of Chapter IV, there is no paragraph mentioned on the use of natural forest.</i>
5	We would like to suggest the government to firstly prioritize to Community land use prior to any industrial concessions are issued	Comment was not included.

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
	(this includes mining concessions).	
6	We would like to suggest the government to input the meaning of NGOs and community statement to NFP. Because the National Forest Programme has been developed by technical groups rather than starting with community consultations it has been developed in an inappropriate manner. It will not lead to the stated objective. Community and NGO's have already provided statements to the NFP on this topic. Please see attached statements from communities and NGO's for recommendations.	Comment was not included as there is section describing this suggestion.
7	We would like to suggest the government to stop issuing new industrial concessions until there must be a proper and effective review of all industrial Concessions (which includes mining concessions). Any concessions with negative impacts on environment or social values need to be cancelled. Indigenous peoples land must also be allocated to indigenous communities before land is issued to industrial concessions or other land uses.	Comment was included because in para 408 point number (3) was stated that "to mitigate risks of conflict of interest between the indigenous people and the appropriation of economic land concession in order to protect the best interest of the country and with participatory approach."
8	We would like to suggest the government to check and solve the Community complaints related to forestry that have been lodged with government must be addressed and legally resolved as a matter of urgency. This is essential to the credibility of any forest and land management plans in Cambodia.	Comment was not included.
9	We would like to suggest the government to clearly and independently review of the effectiveness of community forestry in the current situation. Some community forestry are difficult to implement their own activities because the nearby economic land concession. The main problem is that the actual practice of ELCs and mining concessions are inappropriate and mostly break the law. Under the conditions, the land that is not covered by community forestry is often destroyed or taken as land concessions. Community forestry is ineffective under these conditions or under the conditions where only small areas of disparate areas are accepted as community forestry.	Comment was included as it's stated in para. 421 that <i>"the Royal Government's forestry policy is to ensure sustainable forestry management and the use of forests to improve the livelihoods of people living in rural areas and to contribute to economic growth. Besides banning logging for the present, the Royal Government has established protected and biodiversity conservation forest areas, undertaken reforestation, formed forestry communities, taken up proper boundary demarcation and strict measures to prevent, reduce and eradicate illegal encroachments and occupation of forest land by private individuals."</i>
10	It is acceptable to have timber harvesting for domestic use in natural forests - but that must be well managed. While there have been improvements here is still significant anarchic logging and there is still involvement of some government staff in this.	Comment was not included as there is no section mentioned.

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
11	The sub-decree to allow there to be “tree planting” on State Public Land is of great concern when coupled with the fact that the definition has not been clarified. If the sub-decree allows industrial plantations on state public land then it is a serious concern and against the vision of forest held by civil society. It needs to be clarified that industrial plantations cannot be established on State Public Land.	Comment was not included.
12	We would like to suggest the government to have clear plan for the expansion of forest conservation for carbon retention and sequestration in all provinces of Cambodia and to carefully view the Reduced Emissions from Deforestation and Degradation (REDD) project in Oddar Meanchey. Even it is positive in Oddar Meanchey, it is obvious that there is still massive conversion of forests to industrial concessions in other areas of Cambodia and this is likely to affect the environmental stability and food security of Cambodia.	Comment was not included as there is no section mentioned such what comment suggested.
13	We would like to request the government to publicly disclose the forest cutting plan or forest management plan for the whole Cambodia.	Comment was not included.
14	We would like to suggest the government to state agreement of percentage of forest to be retained only for <i>natural forest</i> not include the industrial plantations. We think that plantation is not forest. CMDG indicators need to be reformulated to state agreements on the % of natural forest to be retained. It can be less than 60% but for natural forest only. Natural forest is essential to the environmental stability of Cambodia. As most Cambodians depend on natural resources, instability in the environment will lead to great negative impacts of all Cambodians.	Comment was not included. (This comment was the same to number 1)
15	There is another challenges that FA have faced, there was some government authorities have involved in illegal forest logging in Cambodia which this is the most critical challenge that lead to unsuccessful sustainable forest management in Cambodia.	This was just a comment.
16	We would like to request the government to state about the willingness to implement the National Forest Programme in NSDP update 2009-2013.	Comment was not included as there was no section mentioned about RGC’s willingness to implement NFP.
17	We would like to suggest the government to clearly and independently review of the effectiveness of community forestry in the current situation. Some community forestry are difficult to	Comment was included. (The same to the comment number 9)

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
	implement their own activities because the nearby economic land concession. The main problem is that the actual practice of ELCs and mining concessions are inappropriate and mostly break the law. Under the conditions, the land that is not covered by community forestry is often destroyed or taken as land concessions. Community forestry is ineffective under these conditions or under the conditions where only small areas of disparate areas are accepted as community forestry.	
18	We would like to request the government to clearly define " Commercial Forest Plantation ". Does the " Commercial Forest Plantation " refer to plantation such as Economic Land Concession?	Comment was not included as there was no section mentioned the definition of this phrase.
19	In the paragraph 416 stated that the government already postpone the Forest Concession, but in the paragraph 418 stated that the government will continue to monitor forest concessions. So, does it mean that the government reactivates for the forest concession? How do the civil society organization involve in the process of forest concession monitoring? How many CSOs will the government selected for this process?	These were just questions.
20	We would like to suggest the government to check and solve the Community complaints related to forestry that have been lodged with government must be addressed and legally resolved as a matter of urgency. This is essential to the credibility of any forest and land management plans in Cambodia.	Comment was not included.
21	We would like to suggest the government to have clear plan for the expansion of forest conservation for carbon retention and sequestration in all provinces of Cambodia and to carefully view the Reduced Emissions from Deforestation and Degradation (REDD).	Comment was not included as it's the same to comment number 12.

Agriculture Sector

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
1	<ul style="list-style-type: none"> Poverty reduction and growth statistics by urban/rural/province breakdowns needed (note this is done in the country statistics and poverty indicator charts) Results in rural poverty reduction through increased productivity will be achieved through investments in supporting sectors as well as ensuring that efforts at productivity enhancement emphasize environmental sustainability, participatory design and gender equity. 	These were just comments.
2	NSDP recommends a 60% allocation to agriculture, but this is not reflected in the annual budget process; if the RGC truly "attaches the highest priority to pursue this goal," it will commit to adequately funding the agricultural sector in the annual budget.	These were just comments
3	Include women as a needy/under-served group	This was just comment.
4	Extension should be decentralized, demand-driven and participatory, involving farmers in all stages of research and intervention design and implementation.	Comment was included as para.399 stated that "...This will be achieved through an integrated approach including increased proper use of improved agricultural inputs, agricultural extension, <u>research and development, construction and maintenance of the rural infrastructure</u> , especially irrigation network, expansion of rural credit and microfinance, agricultural market development, organisation of farmer communities and better management of agricultural land..."
5	<p>Where irrigation is too costly or infeasible to implement, other strategies such as water catchment and rainwater storage should be used in combination with sound water management practices (which should be employed regardless of irrigation technologies)</p> <p>Other types of financial services for the poor such as savings-led micro-finance and micro-insurance should be considered, especially for farmers that are ineligible for credit where these services do exist; creating of rural banks and credit institutions designed to meet farming needs.</p>	Comment was not included.

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
6	We assume “improve agro-industry for post-harvest processing” implies value added, or more specifically improving mills in Cambodia so that rice does not have to be exported to be husked/refined and can be distributed directly from mill/processor to consumer; if not, then this should be added.	Comment was not included.
7	2.85: need to develop agricultural investments that address women’s needs equitably. To speed up the development of national legal framework on agricultural and food products standards, mainly for normal products, good agricultural practices products, organic agriculture, and Protected Geographical Indication products. Lack of legal framework and national standard on agricultural and food products lead to importation of low quality or event harmful products to the country to compete with our farmers’ products. Furthermore, it is an obstacle in the promotion of export of Cambodian agricultural products to developed countries. These two phenomena make our agriculture undeveloped.	Comment was not included.
Comments on the first draft NSDP Update		
8	<ul style="list-style-type: none"> • Poverty reduction and growth statistics by urban/rural/province breakdowns needed (note this is done in the country statistics and poverty indicator charts) • Results in rural poverty reduction through increased productivity will be achieved through investments in supporting sectors as well as ensuring that efforts at productivity enhancement emphasize environmental sustainability, participatory design and gender equity. 	<p>Comment was included in section of Cambodia at a glance table.</p> <p>Just comment, not suggestion or recommendation.</p>
9	Program # III: “Strengthen institution, legal framework and human resources development.” Special attention and priority should be given towards the development of human resources in rural areas. A new program should also be considered and added to MAFF’s objectives, which would focus on improving and strengthening agricultural research and extension systems.	Comment was not included.

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
10	<p>For the improvement, law on agricultural pesticide management and agricultural land.</p> <p>The draft pesticide law should be released to the public, along with a series of public consultations and priority should be given towards the finalization of the law.</p> <p>MAFF should give opportunities to stakeholder involving during process, consultation and implementation.</p>	Comment was included.
11	<p>Another challenge that the RGC should seek to address is the widespread usage of illegal chemical pesticides, which are often imported illegally from Vietnam and Thailand. The government should seek to reduce the usage of illegal chemical pesticides by ensuring all pesticides have proper labeling, farmers are educated on the risks involved with illegal pesticide use and by controlling borders and the importation of pesticides into the country. The RGC in return should encourage the use of sustainable organic pesticides and fertilizers. Another key challenge that remains is groundwater contamination and topsoil depletion from the usage of illegal pesticides and wrong fertilizer.</p>	Comment was not included.
12	<p>The RCG should develop an irrigation infrastructure master plan that is based on the prioritization of drought areas and based on the need of family farms. The government should encourage small-scale irrigation systems that are based on reduced water-volume irrigation technologies, in order to help ensure the water sustainability in the country.</p>	Comments were not included as there is no section mentioned irrigation infrastructure master plan.
13	<p>As one of the main goals of the RGC's enhancement of the agriculture sector is to accelerate poverty reduction, we encourage the government to encourage sustainable agricultural practices and improving long-term food security for Cambodia, which encourages diverse and decentralized systems of family farms rather than corporate agro-industries.</p>	This is just encouragement, no suggestion and recommendation.
14	<p>3 activities that suggested into the Ministry of Agriculture Forestry and Fishery strategies there are:</p> <ol style="list-style-type: none"> 1. Support and strengthen farmers agriculture inputs provider association (seed prevention, organic manure, post harvest) 	Comments were included as there is a sentence mention in para. 401 that " <i>Foster the strengthening and development of Farmer Organisations and Agricultural Communities.</i> "

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
	<p>2. Support and strengthen farmer's cooperative on credit service and rice mill and storage.</p> <p>3. Strengthen rural youth capacity to become a agriculture entrepreneur</p>	
15	In number VI, should be change the word of new technology to innovation (skill, approach, process) for focused within word to introduce chemical inputs and GMOs.	Comment was not included
16	Domestic and Foreign investor should consider to the environmental protection.	Comment was not included
17	Should create the mechanism to implementation during the climate change and how to adapt and mitigate its impacts in the agricultural sector, such as seeking sustainable agricultural practices and encouraging drought-tolerant crop species. The budget and grant for climate change adaptation should be prioritized for building irrigation system.	Comment was not included in the agriculture section but in the section of Environmental Protection and Conservation and Climate Change that " <i>Promote the implementation and update the National Action Programme on "climate change adaptation."</i>

Fisheries

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
1	Fisheries stats are not harmonized with data from the SPF	Comment was not included.
2	What does the RGC mean by "sustainable access" for whom? What mechanisms are proposed for assuring this?	Comment was not included.
3	Needs to be clear on what definition of <i>sustainable</i> is being used; <i>resilient</i> is perhaps better as it deals with the necessity of coping with change, especially when dealing with fisheries and Climate Change, how will Cambodian fisheries and fisher respond to CC?	Comment was not included.
4	471,000 as stated in the FiA 10 year SPF	Comment was included as stated in Para. 119.
5	Change to 469 as in SPF	Comment was included as stated in Para. 414.
6	Change to 434 as in SPF	Comment was not included.
7	<p>There needs to be a more cross-sectoral inclusion of the impacts of Climate Change including a detailed outlining of the strategies that the RGC is planning in order to deal with the impacts especially on fishing livelihoods in the Tonle sap, Mekong River and potential impacts on coastal fishing communities from sea level rise, saltwater intrusion;</p> <p>Lack of effective enforcement, lack of empowered community fisheries to stop illegal fishing</p> <p>There needs clear recognition by both the RGC and Provincial Cantonement counterparts on the profound alterations to Mekong Fisheries from hydropower development in both tributary dams and from proposed mainstream hydro developments. There is no mention on how the RGC plans to deal with these possible impacts to millions of fisher livelihoods.</p>	Comment was not included.
8	Should include a specific mention for the conservation and management of aquatic biodiversity and the importance of fisheries and aquatic products to health and well being of millions of Cambodians and how this is impacted by the multiple and cross-scale impacts of Climate Change and other landscape scale alterations.	Comment was not included.
9	Does not correspond to previous numbers or with the SPF stats. (pg. 34 p. 114); how will the RGC develop and promote conservation/preservation of fish stocks and at the same time	Comment was not included.

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	develop fishing livelihoods and new markets; this is very difficult task, especially with poor state capacity.	
10	There is a need to develop the marketing/transport infrastructure in order to better bring quality fish products to both domestic and export markets.	Comment was not included.
11	There needs to be full re-evaluation of the fishing lot scale and its impacts on the poverty of Tonle Sap fishing communities; the lot system should be made fully transparent and leasee made fully accountable for maintaining AND improving ecosystem and fish stock health; portions of the revenues from fishing lots should be targeted for Fisheries Administration budget	Comment was not included.
12	There needs to be a full social and economic evaluation of "eco-tourism" in Cambodia. There is no guarantee that "if you "build it they will come", areas such as Kratie/Sambour may be already overdeveloped with low #s of tourists recorded. Ecotourism, a bottom up initiative must be guided by sound economic planning with consideration for potential positive and negative impacts on fisher livelihoods.	Comment was not included.
13	Aquaculture development capacity is poor in Cambodia. The FiA must develop linkages with Asian regional organizations such as SeafDec, NACA, AIT and others to develop the sustainable aquaculture capacity; Proper and well implemented broodstock (genetics) programs for aquaculture will reduce impacts of aquaculture on wild stocks; Cambodia should take creative steps to develop sustainable aquaculture such as rice-fish systems, Integrated agri-aquaculture systems, Culture-based fisheries and have a well supported aquaculture and marketing unit in FiA with close links to private sector investor, so FiA should support and facilitate private sector aquaculture investment while at the same time developing the capacity to integrate aquaculture into the Community fisheries program.	Comment was not included.
14	These are all very lofty goals which will require strong financial and legislative support and powers given to the FiA to implement its 10 yr. SPF.	Comment was not included.
15	All <i>actions</i> of implementation of fisheries development, management or conservation should be harmonized 1) with the 10 year SPF and 2) cross-sectoral with all relevant ministries and line agencies (LAs) including a full recognition of the potential impacts	Comment was not included

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
	of climate change on the hydro-ecology of the fisheries of Cambodia and the resulting potential impacts on the rural poor who directly depend on fish and other aquatic resources for food and income.	
16	There is no clear strategic statement on how the RGC will maintain a sustainable fishery for the benefits of the poor fishers; those families and communities most vulnerable, most dependent on fisheries resources for their existence.	Comment was not included
17	There is a need for the clear definition of fishers' rights in terms of access and benefits sharing from Cambodian waters including Fishing Lots in the Tonle / Bassac system.	Comment was not included.
18	There are no clear directions on how FiA intends to improve the role of women in marketing or increase their involvement in the Community Fisheries Program; space should be provided by FiA for more participation by women in both the Community Fishery and in the FiA itself including future management and research positions.	Comment was not included.

Mining and its Environmental Impact

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
	Inputs	
1	<p>Article # 2.28: Partnership in Development.</p> <p>RGC will continue to actively involve concerned sections of civil society in all appropriate aspects of RGC's planning, legislation development and decision making. The involvement of civil society in public consultation enables them to deliver meaningful contribution/inputs to RGC for taking Cambodia's forward.</p>	Comment was not included.
2	<p>- The EIA Department of MOE is suggested to create the platform where the representatives from NGO National Level Extractive Industry Social Environmental Network (EISEI network) wish to engage with the platform. The Representatives of EISEI network can share their evidence and opinions on environmental breaches made by companies. Such a mechanism will be cost effective and will contribute to increase linkages between state and citizens.</p>	Comment was not included.
3	<p>Article # 2.65: Offshore oil and gas fields are common asset of all Cambodians, now and in the future...</p> <ul style="list-style-type: none"> • We kindly suggest that: <ul style="list-style-type: none"> - The RGC will develop and implement a national policy for social and environmental responsibility in the extractive industries sector" 	Comment was not included.
4	<ul style="list-style-type: none"> - The RGC will establish independent public agency (by inter-ministries: MIME, MoE and Ministry of Health) with the mandate, resources and expertise to continuously oversee all aspects of the award of rights including the monitoring of health and socio-cultural impacts. Additionally, monitors under the supervision of Protected Area/Forestry (PA/F) authorities 	Comment was not included.

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
5	<p>should monitor all exploration activities within PA/F.</p> <ul style="list-style-type: none"> - All responsible government agencies enforce a moratorium on the granting of exploration and extraction licenses in indigenous areas until indigenous communal land titling is completed. 	<p>Comment was not included.</p>
6	<ul style="list-style-type: none"> - The RGC will develop in-country human resources and human resource development plan on extractive industries. This could ensure to have adequate human resource in this EI sector. 	<p>This comment was included as in para. 472 stated that "Promoting human resource development and institutional strengthening to improve management efficiency of oil and gas resources for economic development and improvement in livelihoods of Cambodian people."</p>
7	<ul style="list-style-type: none"> - The development of oil and gas in Cambodia is documented but public dissemination is non-existent. Information on concession will be made available on the responsible ministry's websites, including contracts, agreements, policy and legislation. Additionally, the RGC will develop policies and legislation with public consultation. 	<p>Comment was not included.</p>
8	<p>Article # 2.66: Information and communication technology.</p> <ul style="list-style-type: none"> • We kindly suggest that: <ul style="list-style-type: none"> - The RGC will develop provisions which will enable civil society groups and the wider public to have full access to information relating to the extractive industries sector. For instance, disclosure information on the concession and contracts granted to mining companies, payments as well as the progress made to the industry development. 	<p>This comment was not included. However, para. 368 stated that "The Royal Government is committed to efficient, transparent, and accountable management of the revenues from mineral, oil and gas exploitation."</p>
9	<ul style="list-style-type: none"> - The RGC, Ministry of Information, particularly Radio National Kampuchea establishes and broadcasts programme on mineral exploration and extraction. 	<p>This comment was not included as there is no session mentioned in the final version of NSDP Update.</p>
	<p>Article # 2.68: Strengthen the private sector and attracting investments.</p>	

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
10	<ul style="list-style-type: none"> - There needs to be a reform in the policies and legislation which is accountable and transparent to be able to attract corporate socially responsible businesses. 	Comment was not included.
11	<p>Article # 2.69: RGC's Trade Integration Strategy points out to some of the new challenges such as the "competitiveness paradigm". The ability of Cambodian...</p> <ul style="list-style-type: none"> • We kindly suggest: <ul style="list-style-type: none"> - The "new applications for concessions that overlap Protected Area and Forest (PA/F) will be reviewed by the technical agency responsible for management, e.g., MoE/Administration of Nature Conservation and Protection and MAFF/FA, plus any other relevant stakeholders, as required by Article 10 of Environmental Protection Law and Article 4 and 35 of the Forestry Law". 	<p>This comment was not included. But in para. 425, bullet point 3 stated that <i>"Continue to monitor forest concessions to ensure that they comply with international standards by seeking external technical and financial assistance and through active and appropriate participation of civil society in monitoring."</i></p>
12	<ul style="list-style-type: none"> - The RGC, especially the Environmental Impact Assessment (EIA) department of Ministry of Environment will revise environmental impact assessment (EIA) guidelines which employ multiple stakeholder participation and meaningfully fulfil their objectives. 	This comment was not included.
13	<ul style="list-style-type: none"> - The RGC, especially MIME will compile all mineral resource deposit data and develop a national mineral resource management strategy before offering extraction rights to ensure sustainable use. This will mitigate negative social and environmental impacts. 	This comment was not included.
14	<ul style="list-style-type: none"> - There needs to have cooperation and supports from provincial authorities to monitor mineral exploration and extraction implemented by mining companies at the local areas for better management. 	This comment was not included.
Comments on the first draft NSDP Update 2009-2013		
15	In addition to other ministries and other concerned parties, the EIA Department of MOE also make an official effort to collaborate with	Comment was not included.

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
	NGOs and private citizens who wish to participate in the environmental planning process. This could entail the creation of a platform to solicit comments and input from communities and representatives of NGOs such as the Extractive Industry Social and Environmental Impact (EISEI) network who can share their observations and evidence on environmental impacts associated with projects under review by the MOE. Such a mechanism would be cost effective and would contribute to increased public participation and linkages between the state and its citizens.	
16	The MOE cooperate with MIME, MWRM and MAFF to mandate water quality testing in areas potentially affected by the expansion of all industries, including construction, extractive, hydropower and manufacturing. This cooperation would lead to increased communication between ministries and could prevent serious impacts to biodiversity, fisheries, agriculture and drinking water.	Comment was not included.
17	The MOE establish and promulgate comprehensive minimum standards and parameters for water quality testing. These parameters could include heavy metals, industrial solvents, chemical fertilizers, dissolved oxygen, biological oxygen demand, etc.	Comment was not included.
18	All master plans on water resources management should be made publically available at a reasonable cost by MWRM. Rivers and watersheds (e.g. Srepok, Sekong, Voeun Sai) likely to be affected by extractive and hydropower industries in Ratanakiri, Mondulkiri and Stung Treng provinces should be studied and the results made publically available at a reasonable cost.	Comment was not included.
19 20	<p>Paragraph 158: Offshore oil and gas fields are common asset of all Cambodians, now and in the future...</p> <ul style="list-style-type: none"> • We kindly suggest that: <ul style="list-style-type: none"> ➢ The RGC will develop and implement a national policy for social and environmental responsibility in the extractive industries sector. ➢ The RGC will establish an independent public agency (by inter-ministries: MIME, MOE and Ministry of Health) 	<p>This comment was not included.</p> <p>Comment was not included.</p>

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
21	<p>with the mandate, resources and expertise to continuously, and comprehensively, oversee all aspects of the award of rights including the monitoring of health and socio-cultural impacts. Additionally, monitors under the supervision of Protected Area/Forestry (PA/F) authorities should monitor all exploration activities within PA/F.</p> <p>➤ All responsible government agencies enforce a moratorium on the granting of exploration and extraction licenses in indigenous areas until indigenous communal land titling is completed.</p>	Comment was not included.
22	<p>➤ All responsible government agencies enforce a moratorium on the granting of exploration and extraction licenses in forested and biologically sensitive areas until demarcated boundaries are reviewed and drawn to protect these valuable remnants of Cambodia's original ecosystems.</p>	Comment was not included.
23	<p>➤ The RGC will develop in-country human resources and human resource development plan on extractive industries. This could ensure the development of adequate human resource for the EI sector.</p>	Comment was included. The same to above.
24	<p>➤ The development of the extractive industry (including oil, gas and mineral exploration) in Cambodia is documented but public dissemination is non-existent. Information on concessions will be made available on the responsible ministry's websites, including contracts, agreements, policy and legislation. Additionally, the RGC will develop policies and legislation outlining specific requirements and procedures for public consultation.</p>	Comment was not included. This same to above comment.
25	<p>➤ The RGC will develop provisions which will enable civil society groups and the wider public to have full access</p>	Comment was not included.

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
26	<p>to information relating to the extractive industries sector. For instance, disclosure information on the concession, contracts granted to mining companies, payments and SEIA's as well as the progress made to the industry development.</p> <ul style="list-style-type: none"> ➤ The RGC, Ministry of Information, particularly Radio National Kampuchea establishes and broadcasts programme on mineral exploration and extraction. 	<p>Comment was included as recently there were some TVK broadcasting of Equity Programme on Extractive Industry and Mining Extraction.</p>
27	<ul style="list-style-type: none"> ➤ The RGC will continue to actively involve civil society in all appropriate aspects of RGC's planning and decision making. The involvement of civil society in public consultation enables them to deliver meaningful contribution/inputs to RGC for taking Cambodia's forward. 	<p>Comment was included as para. 373 stated that "<i>The Royal Government has scored many achievements in strengthening partnership with all development stakeholders, including the development partner community, the private sector and the civil society based on basic principles and global commitments to assure ownership of the Royal Government in leading the national development process.</i>"</p>
28	<p>Paragraph 158, Bullet point #1: Get maximum revenues to the state through.... MEF has done considerable advance thinking to examine all available options. Besides, RGC is examining the Extractive Industry Transparency Initiatives (EITI).....</p> <ul style="list-style-type: none"> • We kindly suggest: <ul style="list-style-type: none"> ➤ The inclusion of safeguards for human rights and other social protection be included in the above text including the reflection on how the revenue generated from exploration activities will contribute to poverty alleviation and equitable development or all Cambodians. 	<p>Comment was not included.</p>
	<p>Paragraph 158, Bullet point # 2: Set up mechanisms and bodies to guide this sector and monitor operations...</p>	

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29	<ul style="list-style-type: none"> • We kindly suggest: <ul style="list-style-type: none"> ➢ The RGC will establish independent public agency (by inter-ministries: MIME, MOE and Ministry of Health) with the mandate, resources and expertise to continuously monitors under the supervision of Protected Area/Forestry (PA/F) authorities should monitor all exploration activities within PA/F and other biologically sensitive areas important for ecological services and local livelihoods. <p>The EIA Department of MOE also collaborate with NGOs and private citizens who wish to participate in the environmental planning process. This could entail the creation of a platform to solicit comments and input from representatives of NGOs such as the Extractive Industry Social and Environmental Impact (EISEI) network who can share their observations and evidence on environmental impacts associated with projects under review by the MOE. Such a mechanism would be cost effective and would contribute to increased public participation and linkages between the state and its citizens.</p>	Comment was not included.
30	<p>Paragraph 161, last sentence: The Royal Government of Cambodia has pursued an export-led, pro-poor growth strategy focused on diversifying and broadening the economic base and...</p> <ul style="list-style-type: none"> • We kindly suggest: <ul style="list-style-type: none"> ➢ There needs to be a reform in the policies and legislation to be accountable and transparent in order to attract socially responsible corporations, businesses and investment. 	Comment was not included.
31	<p>Paragraph 162: The Government-Private Sector Forum...Also the management of mineral ore resources...</p> <ul style="list-style-type: none"> • We kindly suggest: <ul style="list-style-type: none"> ➢ This forum should be used to attract socially and environmentally responsible businesses and to initiate policy and legislative reform in regard to extractive industry accountability and transparency. 	Comment was not included.

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
	Paragraph 181 : Oil, Gas and Mineral Exploration	
32	<ul style="list-style-type: none"> • We kindly suggest: <ul style="list-style-type: none"> ➢ Any new applications for oil, gas or mineral concessions that overlap Protected Area and Forest (PA/F) will be reviewed by the technical agency responsible for management, e.g., MOE/Administration of Nature Conservation and Protection and MAFF/FA, plus any other relevant stakeholders, as required by Article 10 of Environmental Protection Law and Article 4 and 35 of the Forestry Law. 	This comment was not included. This comment is same to the comment number 11. But in para. 425, bullet point 3 stated that <i>"Continue to monitor forest concessions to ensure that they comply with international standards by seeking external technical and financial assistance and through active and appropriate participation of civil society in monitoring."</i>
33	<ul style="list-style-type: none"> ➢ The RGC, especially the Environmental Impact Assessment (EIA) department of Ministry of Environment will revise EIA guidelines to require multiple stakeholder participation and the meaningful fulfilment of their objectives. 	Comment was not included.
34	<ul style="list-style-type: none"> ➢ Review and revise current laws and legislations pertaining to the oil, gas and mineral extraction sector to adequately reflect international standards of the industry to ensure social and environmental safeguards and standards in the sector; including best practices for occupational health, safety and environmental protection, ISO, biodiversity conservation and sustainable natural resource management. 	Comment was not included.
35	<ul style="list-style-type: none"> ➢ The RGC, especially MIME will compile all mineral resource deposit data and develop a national mineral resource management strategy before offering extraction rights to ensure sustainable use. This will mitigate negative social and environmental impacts. 	Comment was not included.
36	<ul style="list-style-type: none"> ➢ The RGC focus on developing capacity for cooperation and support from provincial authorities to monitor mineral exploration and extraction implemented by mining companies at the local level for better law enforcement 	Comment was not included.

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	and management.	
37	<p>Paragraph 421, items i – iv:</p> <ul style="list-style-type: none"> • We kindly suggest: <ul style="list-style-type: none"> ➢ Strengthening enforcement of environmental regulations in order to ensure that an appropriate EIA or SEIA is completed before project commencement. This entails strengthening MOE review times to ensure adequate analysis, ensuring the public right to comment and monitoring implementation of approved mitigation measures; 	<p>Comment was included as Para. 428 stated that “In the area of <i>environmental impact assessment</i>, the MOE will, in collaboration with concerned ministries and agencies, ensure sustainable use of natural resources and socioeconomic development by conducting environmental impact assessments prior to the implementation of development projects by:”</p>
38	<ul style="list-style-type: none"> ➢ Formulate and enforce comprehensive and consistent national air, water and noise pollution standards; 	<p>Comment was not included.</p>
39	<ul style="list-style-type: none"> ➢ Collaborate with other ministries (i.e. MIME, MWRM, MAFF etc.) to produce a comprehensive and universally accepted management plan for existing conservation and important forested areas that forbids development that is not compatible with the preservation and conservation of cultural and natural resources; as reflected in the current National Forestry Programme. 	<p>Comment was not included.</p>
40	<p>Paragraph 423: In the area of <i>environmental impact assessment</i>, the MOE will ensure sustainable use of natural resources and economic sustainability of the sector by conducting environmental impact assessments before development projects are implemented by:</p> <ul style="list-style-type: none"> • We kindly suggest: <ul style="list-style-type: none"> ➢ That the implementation of EIAs and SEIAs be enforced as stated above and made public for review. All laws contradicting the above statement such as the Law on Mineral Extraction are amended to reflect the NSDP and existing regulations of the MOE. 	<p>Comment was included and taken into action as recently practices of MoE that the EIA reports have sent to NGO Forum and other network of NGO Forum for comments. However, during this period, there is no amendment of Law on Mineral Extraction.</p>

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41	<p>Paragraph 423, bullet points 1-3,</p> <ul style="list-style-type: none"> • We kindly suggest: <ul style="list-style-type: none"> ➢ Involve civil society (i.e. private citizens, NGOs, etc.) and government (i.e. ministries, universities, etc.) in MOE's efforts to strengthen technical capacity, to prepare and edit legislation and policy, and to monitor environmental management plans. With many citizens, organizations and government entities concerned about Cambodia's environment, the MOE could leverage the experience and expertise of many entities active at all levels of Cambodian government and society to achieve these goals. 	Comment was not included.
42	<p>Paragraph 424, bullet points 1-7,</p> <ul style="list-style-type: none"> • We kindly suggest: <ul style="list-style-type: none"> ➢ Involve existing national level experts and engage international entities in MOE's efforts to strengthen pollution control measures. Strengthen enforcement of existing regulations to obligate government and private sector entities responsible for air, groundwater, noise, and surface water pollution to work with the MOE to create innovative solutions that can be used to solve and/or mitigate existing and future problems. Finally, MOE should make public all standards and prescribed mitigation measures relating to any pollution control measures adopted by the ministry. 	Comment was not included.
43	<p>Paragraph 425, bullet points 3 and 7 (data management, strengthen management and conservation.</p> <ul style="list-style-type: none"> • We kindly suggest: <ul style="list-style-type: none"> ➢ The MOE should construct an official, public, national level database for protected and non-protected areas containing maps, land use data, and final versions of EIAs approved 	This comment was not included.

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44	<p>by the agency;</p> <ul style="list-style-type: none"> ➤ The MOE should strengthen the management and conservation of wetlands, biosphere reservations, coastal zones, etc. through establishing a consistent and enforceable set of acceptable land uses for such places. Acceptable land uses should exclude logging, extractive industry or development that exceeds the carrying capacity of the existing ecosystem. 	This comment was not included.
45	<p>Paragraph 426</p> <ul style="list-style-type: none"> • We kindly suggest: <ul style="list-style-type: none"> ➤ As a means to reach communities, the MOE should include concerned civil society groups in its education and information campaigns. This would also provide valuable opportunities to exchange information and promote dialogue between government, communities and civil society. 	Comment was not include.
46	<p>Paragraph 450: In the programme area, draft and enact regulations and built partnership with the private sector to promote sector participation.</p> <ul style="list-style-type: none"> • We kindly suggest: <ul style="list-style-type: none"> ➤ All responsible government agencies enforce a moratorium on the granting of exploration and extraction licenses in indigenous areas until indigenous communal land titling is completed. 	Comment was not included.
47	<ul style="list-style-type: none"> ➤ The RGC provide MIME, MOE, FA and Ministry of Health with the mandate, resources and expertise to continuously oversee all aspects of the award of rights including the monitoring of health and socio-cultural impacts. 	Comment was not included.

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
48 49	<p>Paragraph 452, bullet points 1-2 :</p> <ul style="list-style-type: none"> • We kindly suggest: <ul style="list-style-type: none"> ➢ MIME should include information on significant adverse environmental impacts from mining in its campaign to raise awareness about safe water and sanitation; ➢ When selecting 5 areas to integrate environmental management into sanitation schemes, MIME should select 5 municipalities containing areas where MIME has given mining exploration licenses. This provides MIME with an opportunity to engage communities and to provide mitigation for any potential water quality issues associated with existing or future mining activity. 	<p>This comment was not included.</p> <p>This comment was not included.</p>
50 51 52	<p>Paragraph 457: The Royal Government of Cambodia considers oil and gas resources as a unique potential to ensure energy security.....</p> <ul style="list-style-type: none"> • We kindly suggest: <ul style="list-style-type: none"> ➢ The RGC investigate alternative sources of energy which are more environmentally sustainable and socially equitable to further secure Cambodia's energy needs. ➢ The RGC develop policies and legislation with public consultation. ➢ The RGC seek cooperation and support from provincial authorities to monitor mineral exploration and extraction implemented by mining companies at the local level for better management. 	<p>This comment was not included.</p> <p>This comment was not included.</p> <p>This comment was not included.</p>
53	<p>Paragraph 458: The RGC encourage the use of efficient energy with minimal impacts on the environment.</p> <ul style="list-style-type: none"> • We kindly suggest: <ul style="list-style-type: none"> ➢ The RGC develop and implement a national policy for social and environmental responsibility in the extractive 	<p>This comment was not included.</p>

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
54	<p>industries sector.</p> <ul style="list-style-type: none"> ➤ The RGC, especially the Environmental Impact Assessment (EIA) department of Ministry of Environment, revise environmental impact assessment (EIA) guidelines to require multiple stakeholder participation and the meaningful fulfilment of their objectives 	<p>Comment was not included. (This comment was the same to above one)</p>
55	<ul style="list-style-type: none"> ➤ The RGC, especially MIME compile all mineral resource deposit data and develop, and make public, a national mineral resource management strategy before offering extraction rights to ensure sustainable use. This will mitigate negative social and environmental impacts. 	<p>Comment was not included.</p>

Good Governance/ Anti-Corruption

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
Inputs into the first draft NSDP Update		
1	We would like to request that the Government maintains the anti-corruption law is based on international best practices and that it should be passed as early as at the beginning of the new term of the Government	Comment was partly included as the law was passed and practices recently. However, it was not sure if the law is complied with the international standard.
2	We would like to see also in the NSDP update 2009-2013 that actions taken by the Government against corruption be conducted and reported out on a regular basis, with data available and accessible to the public	Comment was partly included as law was enforced but maybe not regular basis.
3	It would be more effective if the complaint box mechanism can be expanded and that they can be set up at every Government office and a regular update is provided to the public on the number of the complaints received, how they are handled, and how many of them have been addressed and what could be good lessons learn...	Comment was not included.
4	<ul style="list-style-type: none"> ▪ Public education/awareness raising should be fully mainstreamed into the public domain and should be of a broader scope and with many different tools 	Comment was not included.
5	<ul style="list-style-type: none"> ▪ As for prevention, we would like to request that specific forms and measures be identified and incorporated into the strategy update 	This comment was not included.

6	<p>NGOs appreciate the progress and achievement made by the Royal Government of Cambodia as stated in the MTR, but would like to see that they are substantiated with clear references and/or the scope being expanded in the NSDP update. The following is a few extract from the MTR with suggestions from the NGOs:</p> <p>1) <i>An office for Receipt of Complaints functions at the Council of Ministers with the aim of enhancing public participation in the supply and receipt of corruption-related information</i></p> <ul style="list-style-type: none"> • Here, NGOs would like to request the Government/ACU provides the details on how the Office for Receipt of Complaints works with clear references to those that have been addressed and those were not addressed and why. We would like to request also that in the NSDP Update the complaint mechanism be expanded to every government office and a system be set up to provide a regular update to the public on its progress of work. 	
7	<p>2) <i>In addition, disciplinary actions have been taken on civil servants, and customs, police and judicial officers reported to have indulged in corrupt practices</i></p> <ul style="list-style-type: none"> • Here NGOs would like to request that the NSDP Update provides clear references to different categories of actions taken against different groups of people for different acts of corruption, and that all the information be updated systematically right from the beginning to the end <p>3) <i>Campaigns have been launched to provide information to and educate the public and disseminate knowledge on all aspects of corruption including causes, effects, and consequences</i></p>	<p>This comment was not included. However, there some points mentioned in para. 338 that <i>to implement RGC's priority policies, MONASRI will focus on "...Strengthening inspection and complaints handling unit</i> in order to fight against corruption, abuse of power and misconduct, aiming at ensure the enforcement of laws and the reduction of corruption, abuse of power, and misconduct. This assignment has been focusing on three key priorities of MONASRI, viz. inspection, monitoring of law enforcement, and complaint handling... "</p> <p>Comment was not included.</p>
8	<ul style="list-style-type: none"> • As for campaigns, we would like to request that the NSDP Update elaborates the types and the aims of campaigns to be implemented, the target groups of the campaigns, and that implementers should be different stakeholders from both the state and non-state sector, since anti-corruption is a coordinated approach that requires a wide participation to be successful <p>4) <i>Meanwhile, the already existing legal framework and institutional mechanisms are being invoked to reduce and prevent corruption</i></p> <ul style="list-style-type: none"> • Prevention is an extremely important tool to address corruption. The stronger and/or the more effective the prevention is the less enforcement/legal actions are needed. Therefore we would like to strongly request that the NSDP Update clearly mandates the establishment and enforcement of preventive mechanisms. This 	<p>This comment was not included.</p>

9	<p><i>Good public governance, at the core of RS, needs above all equitable and fair public participation in all matters...</i></p> <ul style="list-style-type: none"> ▪ Since the Government is on the way of implementing a project called Demand for Good Governance (DFGG) with funding support from the World Bank, and since anti-corruption is correlative as part of the Good Governance that forms the core of the RS, we would like to request that NSDP Update officially links the two areas so that in the implementation, possible constraints and or disregard particularly against anti-corruption can be avoided and hence paves the way to success. 	This comment was not included as there is no section in NSDP Update mentioned about the linkage between the demand for Good Governance (DFGG) project with anti-corruption.
10	<p><i>It is however, important to note that eradicating corrupt policies [practices] is a long-term and challenging endeavor that requires adequate means including appropriate institutional framework, and enhanced human and financial resources</i></p> <ul style="list-style-type: none"> ▪ NGOs fully agree with this and therefore would like to request that the NSDP Update gives a priority to the development the Anti-Corruption Law Implementation Plan so that by the time the Anti-Corruption Law is passed, at least some of the basic needs can be addressed and be in place, and in the meantime, resources could be spared to address other pressing needs. 	This comment was not included.
11	<p><i>An Access to Information Framework has been adopted to facilitate easier public access to government records and data</i></p> <ul style="list-style-type: none"> ▪ Since the document has been only drafted by the Ministry of National Assembly Senate Relation and Inspection and has never been approved by the Council of Ministers to become a legal document to be used as the guidelines for developing an FOI Law, we would like to strongly request that the NSDP Update 2009-2013 includes a clear mandate and timeframe for the development of In addition, the FOI legislation should include strategies, procedures and mechanisms enabling effective implementation of the Rights Access to Information Law once it is enacted. 	This comment was not included.
Comment on the first draft NSDP Update		

12	We would like to see also in the NSDP update 2009-2013 that actions taken by the Government against corruption be conducted and reported out on a regular basis, with data available and accessible to the public.	Comment was not included.
13	Public education/awareness raising should be fully mainstreamed into the public domain and should be of a broader scope and with many different tools.	Comment was not included.
14	In addition , we would like to request that, for public education, it should be clearly stated that all stakeholders, both state and non-state actors should be engaged. The awareness should be included the dialogue for the implementing. The suggested paragraph should be modified as following: <i>Preventative Measures:</i> The Royal Government will continue to raise awareness about all aspects of corruption, including its causes, impacts and consequences to encourage public participant <i>through dialogue and provide opportunities to all</i> stakeholders, both state and non-state actors such as NGOs, private sectors <i>actively involved</i> in preventing and fighting corruption. Concrete measure will pursue to encourage all levels of government officials to adhere to dignity, morality, professionalism and responsibility in fulfilling their duties.	Comment was not included.
15	<ul style="list-style-type: none"> > For this bullet we strongly suggest to remove the following sentence: <i>However, this should be done in a credible and responsible manner by respecting the rights, honor and dignity of people involved while protecting national security and public order.</i> 	Comment was not included.
16	We would like, under (A - 321), NSDP should add one more bullet (Bullet No. 5) to disclose <i>“all establishment/creation sub-degrees/policies to support for implementing the ACL that will allow Civil Society and Stakeholders to involve in the whole draft process”</i> .	This comment was not included.

17	<p>In the update of the first draft NSDP Update 2009 – 2013 is unclear about the type of complaints that ACU will handle and the type of complaints that MoNASRI will handle. To avoid confusion, the document should specify if these are different types of complaints or not. If they are not different complaints, the document needs to provide greater clarity on the roles of ACU and MoNASRI in relation to corruption complaints handling.</p>	This comment was not included.
18	<p>The draft NSDP Update 2009 – 2013 should provide the details on how the Office for Receipt of Complaints works with clear references to those that have been addressed and those were not addressed and why. We would like to request also that in the NSDP Update the complaint mechanism be expanded to every government office and a system be set up to provide a regular update to the public on its progress of work.</p>	This comment was not included.
19	<p>Moreover, the NSDP Update should provides clear references to different categories of actions taken against different groups of people for different acts of corruption, and that all the information be updated systematically right from the beginning to the end process.</p>	This comment was not included.
20	<p>Prevention is an extremely important tool to address corruption. The stronger and/or the more effective the prevention is the less enforcement/legal actions are needed. Therefore we would like to strongly request that the NSDP Update clearly mandates the establishment and enforcement of preventive mechanisms. This could start with the mapping of corruption vulnerability and/or assessment of integrity risks in the administrative system and then set up mechanisms to address and enforce them</p>	This comment was not included.

Decentralization & De-concentration

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
Inputs into the first draft NSDP Update		
1	<ul style="list-style-type: none"> Section 2.08 should comment on the degree of alignment between the Strategic Framework for Decentralization & Deconcentration and the National Strategic Development Plan, as well as specify who is responsible for information regarding the progress of D&D reforms. D&D reforms continue to be couched in general terms, without specific targets. 	This comment was not included.
2	<ul style="list-style-type: none"> Technical Working Group for Decentralization & Deconcentration: a member of civil society should be identified and included in deliberations and decisions. Civil society should consult and identify a competent individual capable of understanding and discussing technical issues, who would then be responsible for reporting to CSO's. 	This comment was not included.
3	<ul style="list-style-type: none"> Technical Facilitation Committee: a member of civil society should be identified and included in <i>deliberations and decisions</i>. Civil society should consult and identify a competent individual capable of understanding and discussing technical issues, who would then be responsible for reporting to CSO's. 	Comment was not included.
4	<ul style="list-style-type: none"> Technical Facilitation Committee: a member of civil society should be identified and included in <i>implementation</i> of policies at the provincial and district levels. Civil society should consult and identify a competent individual capable of understanding and discussing technical issues, who would then be responsible for reporting to CSO's. 	Comment was not included.
5	<ul style="list-style-type: none"> Decentralized financial management: commune council budget accounting should follow the national government's management system in form and reporting. Budgeting systems should adapt to allow flexibility in planning, implementing, and reporting commune spending. 	Comment was not included as there was no policy statement stated in the final version of NSDP Update.

6	<ul style="list-style-type: none"> Showing budget allocation figures to commune-sangkat fund (CSF) is a good indication of government commitment to D&D reform; however, annual figures on budget implementation for CSF should be included as an input indicator for D&D. Both figures should be reflected in the Annual Progress Report of NSDP Update and figures in percentage should be clearly specified whether percentage of total budget expenditure or recurrent or capital expenditure. 	Comment was not included.
7	<ul style="list-style-type: none"> Both budget allocation and implementation for CSF should also be mentioned separately from municipality and provincial budget in the annual national budget law and budget settlement law. 	Comment was not included.
8	<ul style="list-style-type: none"> Civil society relies on the assistance of ministries to have access to, understanding of, and participation in, the drafting of Cambodian decentralization reforms. CSO's strongly urges all levels of government to include representatives of civil society in their TWG meetings. 	<p>Comment was included as para.387 stated that "<i>The Royal Government considers civil society organizations (CSOs) as an important development partner in the national development processes. The Royal Government will continue to encourage civil society organizations..... and in the promotion of democracy and human rights, and encourage their responsible participation in monitoring the implementation of national development strategies and policies.</i>"</p>

Access to Information

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
Comments on the first draft NSDP Update		
1	Access to information is sine qua non to promote transparency and public participation. It strengthens the connection and builds the trust and confidence between the government and citizens as soon as they get sufficient information. CSOs would like to strongly request that the NSDP Update 2009-2013 includes the law on access to information as a prioritized policy for the fourth legislature to protect the freedom to seek to obtain and disseminate information.	This comment was not included.
2	Since the Access to Information policy framework has been only drafted by the Ministry of National Assembly Senate Relation and Inspection and has never been approved by the Council of Ministers to become a legal document to be used as the guidelines for developing an Access to Information Law, we would like to strongly request that the NSDP Update 2009-2013 includes a clear mandate and timeframe for the development of the Access to Information legislation. In addition, the NSDP update should be included strategies, procedures and mechanisms enabling effective implementation of the Access to Information Law once it is enacted.	This comment was not included.

Child Right

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
Comments on the first draft NSDP Update		
1	We would like to propose to the council of legal and judicial reform, Ministry of Justice and relevant ministries integrate another draft law which is draft Law on Juvenile Justice into the development of the action plans to implement the prioritized policies of the Royal Government of Cambodia for the 4 th legislature of the National Assembly.	This comment was not included.
2	Propose for the integration of the preparation or establishment of the Juvenile Justice System.	This comment was not included.
3	Propose for indicating the number of school, teachers, enrollment rate, percentage of National budget allocated for the MoEYS from the previous years.	This comment was not included.
4	Propose for linking of policy in eliminating child labor, especially elimination of the Worst Forms of Child Labor that the Government has set up in 2015.	This comment was not included.
5	Propose for controlling on improving of the quality of education and take action against teachers who asked for money from students and committed violence in class, which affected the government education plan in continuing the improvement of education quality.	This comment was not included.
6	Propose for the amendment to the Law on Education or integrate into Educational Plan to ensure that children in prison get access to education.	This comment was not included.
7	Propose for mainstreaming of child rights, especially rights to education into educational policy and real practice. And propose to the government to increase teachers' salary as well as giving them the salary on time.	This comment was not included.
8	Propose to integrate all legal measure to the private hospitals that are operating and that caused people's life injurious and that they did not apply the code of ethnic.	This comment was not included.

9	<p>Propose:</p> <ul style="list-style-type: none"> - Raise awareness of the equal right of girls to secondary and higher education, and increase access by providing financial assistance and addressing cultural roots of discrimination. - Assure safety of girls in going to and from school. - Promote the benefits of education for girls in terms of improved earning, marital and parenting skills. 	This comment was not included.
10	Propose for the integration of the concepts and implementation of the international laws such as CEDAW and UN Convention on the Rights of the Child.	This comment was not included.
11	Propose for reducing cultural taboos against sex education by promoting its safety and health benefits, while assuring parents that providing appropriate information and education in this area does not encourage children to experiment sexually.	This comment was not included.

Inclusion of Disability

In the session of Creation of Social Safety Nets of NSDP Update para.516 stated that “ *To continue to implement social safety policies, the Royal Government of the Fourth Legislature will: give priority to improve working conditions for workers and employees, enforcement of Social Security Law, implementation of the principle of benefit and pension scheme for people with disabilities and their dependents; ensure protection of those covered by the Labour Law; and make available to all employees insurance coverage against workplace accidents. The Royal Government will continue to strengthen support to disabled people and families of veterans who sacrificed their lives for the nation. Furthermore, the Royal Government will continue to support retired civil servants and veterans through implementing a comprehensive pension system under the National Social Security Fund. In this context, the government will work towards promulgation of a “Law on the Comprehensive Social Security Regime for common People” and a “Sub-decree on the Establishment of National Social Security Fund for Veterans”.*” Moreover, in para 521 page 165 stated that “**priority 3: Strengthen and Expand Welfare and Rehabilitation Services for Disabled People**”. This has reflected the RGC’s commitment to improve the welfare of the disable people in the policy paper.

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
Inputs into the first draft NSDP Update		
1	In 2.04 consider inclusion of disability as follows: <ul style="list-style-type: none"> o Persons with disabilities and their families are among the most vulnerable population in Cambodia and are the most likely to be affected by the Global Economic Crisis. 	This comment was included as stated in para. 514 that <i>“During the Third Legislature, the Royal Government succeeded in rescuing, and providing support to a large number of vagrants, vulnerable women and children, people with disabilities, victims of human trafficking, and victim families of natural disasters. These people have been provided with training and jobs to survive on their own.”</i>
2	In 2.05 on <u>Poverty</u> , include in the first paragraph, 2 nd sentence: ...social marginalization, such as disability as a major cause of poverty.	This comment was not included.
3	In 2.34 on <u>Rural Development and Deconcentration and Decentralisation processes</u> include after the 2nd sentence: According to MOP (CSES 2004), persons with disabilities constitute 5% of the rural population belonging to the most vulnerable.	This comment was not included.

4	<p>In 2.56 on <u>Education</u>, include the following:</p> <ul style="list-style-type: none"> o In 2008, the Policy for Education of Children with disabilities was adopted, and a master plan developed. However, implementation of the policy needs further enforcement to ensure identification and enrolment of all children with disabilities. 	<p>This comment was included as stated in para 530 bullet number one that “Ensuring equal access to education service by building schools as close as possible to the residences, reducing the number of incomplete primary schools, increasing operational budgets to schools, increasing the supply of teachers, providing scholarships to poor students and building dormitories for students, especially girls. Access will also be expanded for children in early childhood education, as well as those with disabilities and those from minority groups. Ensuring community/private engagement in this process is crucial for long-term success”.</p>
5	<p>In 2.59 on <u>Health</u>, include the following: Medical and physical rehabilitation schemes have been introduced to every provincial hospital. However, particular attention will be paid to ensure access to improved health services for persons with disabilities by removing physical, financial and social barriers as well as including disability in all capacity building.</p>	<p>This comment was not included.</p>
6	<p>In 2.65 on <u>Gender Equity</u>, consider a paragraph on disability inclusion: <u>Disability Inclusion</u>: Disability is both a cause and consequence of poverty. In Cambodia at least 4% (CSES 2004) of the population has a disability. They are disproportionately higher represented among the poorest caused by significant barriers to participation in social, cultural, political and economic life and in accessing services. To redress this, the RGC signed \the UN Convention on the Rights of Persons with Disabilities (2007), passed the Law for the Protection and the Promotion of the Rights of Persons with Disabilities (2009) and is about to adopt the National Plan of Action for Persons with Disabilities Including Landmine/ERW Survivors. Therefore, as stipulated in this new policy framework, disability should be addressed as a cross-cutting issue. Priority should be paid to include disability in the key pillars of the Rectangular Strategy, i.e. good governance, ensuring social safety nets, improving health services, enhancing quality of education, fostering gender equity, improving productivity and diversifying agriculture sector.</p>	<p>This comment was not included.</p>

7	<p>Priority Goals and Targets (Chapter 3 of the current NSDP)</p> <p>To redress the absence of disability inclusion in this chapter, we suggest inclusion of a sentence in <u>3.13</u> relating to the importance of consulting with persons with disabilities in the development of sectoral plans and targets ensuring disability inclusiveness and gender equity.</p>	This comment was not included.
8	<p>Key strategies and actions (Chapter 4 of the current NSDP)</p> <p>To redress the absence of disability inclusion in this chapter, we make the following recommendations for the updated NSDP:</p> <ul style="list-style-type: none"> • In 4.05 on <u>Poverty</u>, consider inclusion of disability as follows: <ul style="list-style-type: none"> ○ Factor poverty reduction, gender equity and disability inclusion concerns in all activities. 	This comment was not included.
9	<ul style="list-style-type: none"> • In 4.17 on <u>Decentralization and Deconcentration</u>, consider inclusion of disability as follows: <ul style="list-style-type: none"> ○ Grass root level development can best proceed by identification and prioritisation of needs at the local level in consultation with marginalized groups, including persons with disabilities, including them in the commune decision making processes as well as implementing the Cambodian Community-Based Rehabilitation Guidelines. 	This comment was not included.
10	<ul style="list-style-type: none"> • In 4.54 on <u>Rural Development</u>, consider inclusion of disability as follows: <ul style="list-style-type: none"> ○ Improve and increase sustainable access and use of safe drinking water and sanitation, particularly in rural communities in water scarce areas, including the accessibility needs of persons with disabilities. 	This comment was not included.

11	<ul style="list-style-type: none"> • In 4.81 on <u>Social Safety Nets</u>, consider inclusion of disability in sentence 3: <ul style="list-style-type: none"> ○ In other sectors as well, a systematic policy is being followed to create more jobs especially for young people entering the labour market and indeed for all Cambodians, including persons with poor employment prospects, such as persons with disabilities through various measures: 	<p>This comment was included as para. 516 stated that "<i>To continue to implement social safety policies, the Royal Government of the Fourth Legislature will: give priority to improve working conditions for workers and employees, enforcement of Social Security Law, implementation of the principle of benefit and pension scheme for people with disabilities and their dependents; ensure protection of those covered by the Labour Law; and make available to all employees insurance coverage against workplace accidents. The Royal Government will continue to strengthen support to disabled people and families of veterans who sacrificed their lives for the nation.</i>"</p>
12	<ul style="list-style-type: none"> • In 4.81 on <u>Employment Creation and better working conditions</u>, consider inclusion of disability at the end of paragraph 1: <ul style="list-style-type: none"> ○ Priority strategies and actions to be taken include: the adoption and enforcement of important legislation, including the Law on the Protection and Promotion of the Rights of Persons with Disabilities; 	<p>This comment was included as the current action of the Law on the Protection and Promotion of the Rights of Person with disabilities are being implemented.</p>
13	<ul style="list-style-type: none"> • In 4.88 on priorities of <u>Education</u>, consider inclusion of disability as follows: <ul style="list-style-type: none"> ○ Ensuring easy and equitable access to education, especially to the poor, girls, ethnic minorities, disabled and disadvantaged children, 	<p>This comment was included. It's almost the same to comment number 3 above.</p>
14	<ul style="list-style-type: none"> • In 4.89 on goals for <u>Education</u>, consider inclusion of disability in the first sentence as follows: <ul style="list-style-type: none"> ○ ...still severe gaps relating to the very poor, children with disabilities and people in remote areas availing of all the facilities. 	<p>This comment was not included.</p>

15	<ul style="list-style-type: none"> • In 4.91 on key strategies for <u>Education</u>, consider inclusion of disability as follows: <ul style="list-style-type: none"> ◦ Enforce the implementation of the Policy on Education of Children with Disabilities 	<p>This comment was included as para. 530 530 bullet number one that <i>“Ensuring equal access to education service by building schools as close as possible to the residences, reducing the number of incomplete primary schools, increasing operational budgets to schools, increasing the supply of teachers, providing scholarships to poor students and building dormitories for students, especially girls. Access will also be expanded for children in early childhood education, as well as <u>those with disabilities and those from minority groups</u>. Ensuring community/private engagement in this process is crucial for long-term success”.</i></p>
16	<ul style="list-style-type: none"> • In 4.94 on <u>Health</u>, consider inclusion of disability as follows: <ul style="list-style-type: none"> ◦ Ensure services provided under Equity Funds are accessible for and cover the needs of persons with disabilities 	<p>This comment was not included.</p>
17	<ul style="list-style-type: none"> • In 4.95 under strategies for <u>Health</u>, consider inclusion of disability as follows: <ul style="list-style-type: none"> ◦ Develop appropriate measures to ensure access to improved health services and prevention programs (e.g. HIV/AIDS) for persons with disabilities, i.e. removal of physical, financial and social barriers, and development of disability related capacities of health professionals. 	<p>This comment was not included.</p>
18	<ul style="list-style-type: none"> • In 4.97 consider inclusion of disability as follows: <ul style="list-style-type: none"> ◦ Particular attention needs to be paid to women facing multiple discriminations, such as women with disabilities and women from ethnic minority groups. 	<p>This comment was not included.</p>
	<p>Costs, Resources and Programming (Chapter 5 of the current NSDP)</p> <p>If changes are to be implemented it is necessary to allocate sufficient resources. Therefore, it is recommended to include the following phrase in the update NSDP.</p> <ul style="list-style-type: none"> • Allocate resources (financial and human resources) for actions which raise awareness on disability inclusion; and enable implementation and monitoring of the new Disability Law and the National Plan of Action for Persons with Disabilities including Landmine/ERW Survivors. 	<p>This comment was not included.</p>

19	<p>Monitoring and Evaluation (Chapter 6 of the current NSDP) The invisibility of disability in the current NSDP as well as the absence of disability inclusiveness in the JMIs is a major obstacle to monitoring progress of whether activities are resulting in positive outcomes and benefits for persons with disabilities. The MOP through NIS and MOEYS already are collecting data with reference to disability and could provide those statistics. Therefore, we suggest that data on disability as a cross-cutting issue be included within the Joint Monitoring Indicators in the updated NSDP, following the good practice developed from gender mainstreaming. In addition we suggest that Disabled People’s Organizations be included in all monitoring exercises and priority setting as well as in capacity building initiatives.</p>	This comment was not included as chapter 6 does not mention any sentences related to the comment.
Comments on the first draft NSDP Update		
20	<p>The long-term development objective of the Royal Government’s decentralization and de-concentration reform program is to achieve broad-based and sustainable development and delivery of quality public services to meet the needs of citizen and poverty reduction by focusing on <u>vulnerable groups, indigenous minorities, disabled people, women and children</u>. The Royal Government believes that establishing and promoting democratic development at ... goals: (i) to strengthen and expand local democracy; and (ii) to promote local development and to reduce poverty.</p>	This comment was not included.
21	<p>Ensure accessibility for persons with disabilities (PPRPD)</p>	This comment was not included.
22	<p>The MoSAVY, also provides services to homeless and destitute people, emergency relief to people effected by natural and other disasters, victims of sex trafficking and inter-country human trafficking, protecting the four basic rights of children, <u>promoting and protection the rights of persons with disabilities, promoting family values, and caring for orphan infants, orphan children disabled children and children with HIV/AIDS.</u></p>	This comment was not included.

23	<p>The priority policies in the ESP 2006-2010 are focused on three areas: (i) ensuring equitable access to education; (ii) improving quality and efficiency of the education services; and (iii) strengthening institutional development and capacity building for decentralization. However, it is recognized that there are still gaps that require more intensive efforts to implement the strategies successfully, especially those related to Early Childhood Education, reducing repetition and drop out rates, facility development and higher education in particular for <u>students from poor families students with disabilities and from remote areas</u>. Table 2 shows the latest data for the education sector.</p>	This comment was not included.
24	<p>To implement RGC's priority policies, the Ministry of Information will:</p> <ul style="list-style-type: none"> • Expand coverage and improve <u>the quality, accessibility and effectiveness of the national media to provide services to 95 percent of the population including deaf and blind people across the country</u>, to the region and other continents, including North America. 	This comment was not included.
25	<p>To implement RGC's priority policies, the Ministry of Labour and Vocational Training (MLVT) will take actions to:</p> <p>iv. Expand technical and vocation training, in particular in rural areas, by:</p> <ul style="list-style-type: none"> • <u>Ensure gender and disability equity in access to technical and vocational training opportunities.</u> 	This comment was not included.
26	<p>In the Fourth Legislature, the Royal Government will continue to implement the <i>Education Strategic Plan</i>, putting emphasis on ensuring that all Cambodian children and youth should have equal opportunity for access to basic education, both formal and informal, without discrimination <u>on grounds of race, skin colour, gender, disability, languages, religion, political affiliations of parents, place of birth and social status</u>. Equally, the implementation of the Strategic Plan is linked to imparting a culture of peace, respect for human rights and dignity, respect for the principles of freedom, democracy and justice, and instilling a culture against violence, drug use, child and women trafficking and social discrimination.</p>	This comment was not included.

27	<p>The Royal Government recognizes that healthy people constitute the key basis for human resource development and sustainable socio-economic progress. The Royal Government has placed emphasis on enhancing the general well-being of <u>all citizens, particularly the poor, disabled, women and children.</u></p>	This comment was not included.
28	<p>The implementation of priority policies for health sector over the next five years will be guided by the strategic framework outlined in the Health Strategic Plan 2008-2015 (HSP2), RGC’s policy on public services delivery, the policy framework for decentralization and de-concentration, and national budget strategic framework. The strategic priorities for the health sector fall into two broad interrelated areas that the Ministry of Health and all stakeholders will pay particular attention to. The building blocks of the HSP2 strategic framework are the following three main health programs of the MoH:</p> <ul style="list-style-type: none"> i. Reproductive, Maternal, New Born and Child Health. ii. Communicable Diseases. <u>iii. Non communicable Diseases and other health problems such as related to physical, mental, intellectual, speech, hearing and visual impairments.</u> 	This comment was not included.
29	<p>In each of these three program areas the MoH will focus on implementing the following five cross-cutting health strategies that include both “supply-side” and “demand side” measures:</p> <ul style="list-style-type: none"> i. Health Service Delivery: Actions will be taken to: <ul style="list-style-type: none"> <input type="checkbox"/> Expand coverage of the Minimum Packages of Activity (MPA) and the Complimentary Packages of Activity (CPA) based on Health Coverage Plan with a focus on meeting client needs. <ul style="list-style-type: none"> • <u>Strengthen health Service delivery support systems in an integrated manner, including persons with disabilities (PWDs).</u> • <u>Target public health services provision and public health interventions according to needs of the public including persons with disabilities.</u> • Develop and apply consistent standards of quality across the entire health sector (public, private and non-profit). • Develop contracting models as part of a comprehensive approach to health services delivery. 	This comment was not included.

30	<p>iv. Health Information System: Actions will be taken to:</p> <p>☐ Increase the availability of accurate, timely, and complete health data of high quality from public and private sources, together with enhanced coordination, and resources for the Health Information System (HIS).</p> <ul style="list-style-type: none"> • <u>Improve data sharing for the public especially the deaf and blind people, management, analysis, dissemination and use across all levels of the health system, including population and socio-demographic data.</u> • <u>Expand participation in the national HIS by the private sector including health and disability-related organizations, and facilitate data use for planning, resource allocation and management of human resources, infrastructure, and supplies.</u> 	This comment was not included.
31	<p>To implement the priority policies of the RGC for the health sector, the day-to-day activities of health managers and staff of the MoH at all levels will be guided by the following five working principles:</p> <p><u>i. Ensure social health protection, especially for the poor, vulnerable groups and persons with disabilities.</u></p>	This comment was not included.
32	<p>In the strategic area <u>Promotion of women’s participation including women with disabilities in decision making in the public and political sector</u>, the MOWA in cooperation with relevant stakeholders will take the following actions:</p> <ul style="list-style-type: none"> • Increase the number of active <u>women representatives including women with disabilities</u> in decision making in government institutions and at all sub national levels through lobbying of political parties and relevant institutions ... next national elections. • The promotion of <u>women’s participation including women with disabilities</u> in decision making in the public sector at all levels by pushing for the implementation of policies and procedures ... as well as other related skills for women leaders. 	This comment was not included.

33	<p>“Gender equality and the empowerment of women” is a development goal ... to promote gender equality within its mandate.</p> <p><i>i. <u>Gender mainstreaming including women with disabilities in national policies and the statistical system</u> <u>by focusing</u> mainly on gender mainstreaming ... and gender mainstreaming in the national statistical system.</i></p>	This comment was not included.
34	<p>The Indicator of Education Sector in the NSDP update (2009-2013) should be linked to disability issues already stated in the “Millennium Development Goals: Situation of persons with disabilities based on available global data”, which are as the following mentioned:</p> <p>Goal 2. Achieve universal primary education</p> <p>2.1 Net enrolment ratio of children with disabilities in primary education</p> <p>2.2 Proportion of pupils with disabilities starting grade 1 who reach the last grade in primary school</p> <p>2.3 Literacy rate of 15- to 24-year-olds with disabilities, women and men</p>	This comment was not included.

35	<p>The Indicator of Health Sector in the new NSDP (2009-2013) should be linked to disability issues already stated in the “Millennium Development Goals: Situation of persons with disabilities based on available global data”, which are as the following mentioned:</p> <p>Goal 4. Reduce child mortality</p> <ul style="list-style-type: none"> 4.1. Under-five mortality rate for all children with disabilities 4.2. Infant mortality rate for all infants born with disabilities 4.3. Proportion of one-year-old children with disabilities immunized against measles <p>Goal 5. Improve maternal health</p> <ul style="list-style-type: none"> 5.1. Maternal mortality rate for women with disabilities 5.2. Proportion of births among women with disabilities attended by skilled health personnel 5.3. Contraceptive prevalence rate among women with disabilities 5.4. Adolescent birth rate among young women with disabilities 5.5. Antenatal care coverage (at least one visit and at least four visits) for all women with disabilities who are pregnant 5.6. Unmet need for family planning among women with disabilities <p>Goal 6. Combat HIV/AIDS, malaria and other diseases</p> <ul style="list-style-type: none"> 6.1. HIV prevalence among pregnant women with disabilities aged 15 to 24 6.2. Contraceptive use at last high-risk behaviour among women and men with disabilities 6.3. Percentage of population with disabilities aged 15 to 24 with comprehensive correct knowledge of HIV/AIDS 6.4. Ratio of school attendance of orphans with disabilities to school attendance compared both with non-disabled orphans and non-orphans aged 10-14 6.5. Proportion of population with disabilities with advanced HIV infection with access to antiretroviral drugs 6.6. Incidence and death rates associated with malaria among individuals with disabilities compared with the non-disabled population 6.7. Proportion of children with disabilities under five sleeping under insecticide-treated bed nets compared with non-disabled children 6.8. Proportion of children with disabilities under five with fever who are treated with appropriate anti-malarial drugs 6.9. Incidence, prevalence and death rates associated with tuberculosis among individuals with disabilities compared with the non-disabled population 6.10. Proportion of tuberculosis cases among persons with disabilities detected and cured under directly observed treatment short course 	This comment was not included.
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36	<p>The Indicator of Industrial Growth and Employment Sector in the new NSDP (2009-2013) should be linked to disability issues already stated in the “Millennium Development Goals: Situation of persons with disabilities based on available global data”, which are as the following mentioned:</p> <p>Goal 1. Eradicate extreme poverty and hunger</p> <ul style="list-style-type: none"> • Proportion of population with disabilities below \$1 per day • Poverty gap ratio between persons with disabilities and non-disabled • Proportion of persons with disabilities within the poorest quintile in national consumption • Growth rate of GDP per person with disabilities employed • Employment-to-population ratio for persons with disabilities • Proportion of employed persons with disabilities living below \$1 per day • Proportion of own-account and contributing family workers with disability in total employment • Prevalence of underweight children with disability under five years of age • Proportion of population with disabilities below minimum level of dietary energy consumption 	This comment was not included.
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Education Sector

During the stage of collection inputs from Line Ministries/Agencies and other stakeholders for the first draft NSDP Update, the NEP and NGO working in Education Sector provided their inputs/comments on the Inputs of the Ministry of Education, Youth and Sport for the first draft NSDP Update 2009-2013. Therefore, this rapid assessment just focus on the second round of education sector's comments made by NEP and its members on the first draft NSDP Update released on 27 December 2009.

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
Comments on the first draft NSDP Update		
1	Government to provide learning materials and assist marginalized families by continuing to provide scholarship for their children	This comment was included as para. 533, bullet point 3 stated that "Improve student retention in schools through eliminating parental cost barriers such as informal school fees and increasing the number of scholarships for students from poor families, especially girls."
2	Increase teachers' salaries to a level that they can live on, then disciplinary action will be taken on teachers charging unofficial school fees	This comment was not included. However, there was policy statement mentioned in para. 533 stated that " <i>Policy 3: Enhance institutional development and capacity building of education officers for Decentralization:</i> Strengthen good governance at all levels including rationalising staff management on teachers' salaries, recruitment, promotion and replacement, preparing legislations on the use of budget resources in accordance with the budget allocation schedule, strengthening internal audit, administrative and financial inspection and monitoring mechanisms including improving accuracy and timeliness of statistical data."
3	Government is committed to recruit 5000 teachers annually	This comment was not included.
4	Will give incentives to teachers which include monetary, in kind, training and promotion to higher grades based on merit and measurable performance.	This comment was not included as there is no section mentioned on the suggested comment.

5	Increase operational budget to schools to meet the need of a school and simplify the requisition and reporting procedure.	This comment was included as para. 530 “ <i>To achieve the goals of the prioritised policies for the education sector, the MOEYS will take appropriate measures within the three policies of ESP that are aimed at: • Ensuring equal access to education service by building schools as close as possible to the residences, reducing the number of incomplete primary schools, increasing operational budgets to schools, increasing the supply of teachers,....”</i>
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Aid Effectiveness

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
Comments on the first draft NSDP Update		
1	<p><i>“The Royal Government is committed to implement “the Accra Agenda for Action” which represents the consensus at the third High Level Forum on Enhanced Effectiveness of Official Development Assistance (ODA) in order to strengthen national ownership and leadership, and partnership and transparency with all development partners as well as to enhance result-based management (.....)”</i></p> <p>Suggestion:</p> <ul style="list-style-type: none"> • The government should indicate his commitment and achievement that has been done to enable the National Assembly and citizens in the monitoring process of development cooperation mechanisms/ platforms and its accountability for development result. • Add in bracket (...): Its mutual accountability for the development result to the National Assembly and its citizens 	<p>These suggestions were not included.</p>
2	<p><i>“The Government-Development Partner Coordination Committee (GDCC) and Technical Working Group (TWG) mechanisms will continue to provide the principal modes of dialogue between the Royal Government and its development partners. Their performance and structure will be monitored and reviewed to ensure that the partnerships between the Royal Government and its development partners are based on strengthened <u>government ownership</u> and accountability for development results”.</i></p> <p><u>Comment</u></p> <ul style="list-style-type: none"> • GDCC and TWG mechanism will continue to provide the platforms for policy dialogue between the Royal Government, its development partners and CSOs. Their performance and structure will be monitored and reviewed to ensure that the partnership between the Royal Government, its development partners and CSOs are based to strengthen country ownership and accountability for development results. 	<p>This comment was not included.</p>

3	<p><i>‘Partnerships are meaningful when the TWGs are not only the forum for discussion on issues but also where measures to address these issues are agreed and implementation jointly monitored by <u>the Government and development partners</u> (...). The TWG mechanism will be strengthened to support the monitoring of the implementation of development cooperation activities in the sector or area that they support’</i></p> <p>Suggestion to add in (...):</p> <ul style="list-style-type: none"> • With the same status quo engagement of CSOs and NGOs in the 19 TWGs 	This comment was not included.
4	<p><i>“....The Cambodia ODA Database, which is the Royal Government's information platform on development cooperation activities, will be customized to support the work related to planning and budgeting.....”</i></p> <p>Suggestion to rephrase:</p> <ul style="list-style-type: none"> • The Cambodia ODA database will provide timely updated, accurate and adequate aid-financing projects through a customized, systematic and well-integrated link with PIP for planning and budgeting. 	This comment was not included.
5	<p><i>“The Royal Government appreciates the active participation in national development processes of civil society organizations that are genuinely willing to contribute in both financial and operational resources. The Government considers the resources and expertise brought in by CSOs as an important input in the policy processes to reach the desirable development results. The Royal Government will continue to ensure rigorous participation of CSOs in the dialogue mechanisms (...).”</i></p> <p>Suggestion:</p> <ul style="list-style-type: none"> • Add in the bracket (...): through the recognition of CSOs/NGOs as their legitimate stakeholders, well-informed date of related policy forums, publicly available updated development result information, proper time span for sending inputs/comments in each stage of policy and budging formulation, monitoring and execution, and space for public consultation. 	This comment was not included.

Hydropower Development and Energy Sector

No	NGO Inputs to and comments/suggestions on the zero and first draft NSDP Update	Final Version of NSDP Update 2009-2013
Inputs on the first draft NSDP Update		
1	<ul style="list-style-type: none"> Mention of status of Cambodia's Hydropower Master Plan commissioned by JICA would be beneficial to be included in the Mid-Term Review 	Comment was not included.
2	<ul style="list-style-type: none"> The Royal Government of Cambodia has made a commitment to encouraging "exploration and environmentally and socially acceptable development resources needed for supply to all sectors of the Cambodian economy," in its Power Sector Development Policy. This commitment is not listed in the Mid-Term Review and should be added. 	Comment was not included.
3	<ul style="list-style-type: none"> Reference should be made in the Mid-Term Review to the draft EIA Guidelines that have been produced by the Ministry of Environment in cooperation with the World Bank, along with explanation on the current status of these guidelines and how they can be strengthened in terms of the government's commitment towards good governance, especially in regards to transparency, public participation and accountability. Clear indicators and instructions should be mentioned on how to ensure meaningful, equitable and fair public participation. 	Comment was not included.
4	<ul style="list-style-type: none"> There is no mention on how the Royal Government of Cambodia has encouraged the investment of alternative energies which are environmentally and socially acceptable. 	Comment was not included.
5	<ul style="list-style-type: none"> The Mid-Term Review should list or provide reference to the current status of in-country projects being implemented so that the public knows the current status of energy development in Cambodia. 	Comment was not included.

6	<ul style="list-style-type: none"> Information on the challenges being faced in implementing the Rural Electrification Master Plan should be mentioned 	<p>Comment was incorporated as stated in para. 166.</p> <p>"Although significant progress has been made, the energy sector also faces many daunting challenges:</p> <ul style="list-style-type: none"> How to ensure efficiency and sustainability of production, supply, and proper maintenance of the power infrastructure across the whole country. How to lower the current high cost of electricity generation not only to support private sector development but also to make it available to the poor at affordable cost."
7	<ul style="list-style-type: none"> While the Mid-Term Review mentions the adaptation of the Law on Water Management, reference and information should also be given to Cambodia's commitment to ensuring the management and development of water resources according to integrated water resources management (IWRM) (Article 4 of 2007 Law on Water Resources Management). Evaluation on how Cambodia has applied IWRM in its hydropower development, especially in terms of participatory planning and stakeholder involvement, should be made in the Mid-Term Review. 	<p>Comment was not included.</p>
8	<ul style="list-style-type: none"> <i>Today, approximately 25% of all households have access to electricity (from all sources).</i> <p>Please provide reference to this number, so that it can be verified by the public. It would also be useful to know whether electricity costs have been reduced as well.</p>	<p>Comment was not included.</p>
9	<ul style="list-style-type: none"> The Mid-Term Review identifies constraints of environmental protection and management in terms of institutional and legal framework and weak coordination among concerned agencies and authorities, however, no solutions are provided as to how the RCG plan's to address these issues. 	<p>Comment was not included.</p>

<p>10</p> <p>11</p>	<ul style="list-style-type: none"> The Mid-Term Review states that hydropower development “will alter and adversely affect the entire eco-system in Cambodia and will have serious implications for its crops and fisheries.” Information should be provided on how the Royal Government of Cambodia will mitigate and compensate for these impacts, as much of Cambodia’s poor men and women, especially its ethnic minorities, who depend on the country’s natural resources, especially fisheries and agriculture land, as a source of livelihood and food security. Detailed information should be provided on which stakeholders are responsible for developing and implementing mitigation measures. Additional information should be provided on how these impacts will be incorporated and considered in Cambodia’s energy planning and its commitment to alleviate poverty. 	<p>Comment was included as para. 465. stated that “ The Royal Government will accord high priority to encourage the private sector to invest in energy infrastructure, including generation, transmission and distribution. The Royal Government will make further efforts to mitigate adverse effects on environment and society in the implementation of energy projects while safeguarding economic efficiency of each project. Attention will also be paid to capacity building and institutional reform in the Electricity Authority of Cambodia (EAC), Electricity Du Cambodge (EDC) and other relevant ministries and agencies to improve management efficiency and the quality of electricity supply.”</p> <p>This comment was not included.</p>
<p>12</p>	<ul style="list-style-type: none"> While the 43rd indicator states it would like to increase per capita use of electricity from 62 to 159 Kwh/year, no indicators are provided at how the electricity rate should increase nor does it provide an indicator as how the increased rate will be distributed among the population, especially those who do not currently have access to electricity in remote locations. 	<p>Comment was not included.</p>
<p>13</p>	<ul style="list-style-type: none"> An indicator should be provided on how the RGC will “encourage exploration and environmentally and socially acceptable development of energy resources,” so that the public can monitor the RGC’s progress on implementing this objective. 	<p>Comment was not included.</p>

14	<ul style="list-style-type: none"> The Mid-Term Review states that “RGC’s priority continues to be to provide and ensure access to fisheries resources for the poor to sustain their nutrition and for poverty reduction.” As this is a cross-cutting issue as mentioned in Section 2.45, future energy planning by the RGC should take into account the negative impacts hydropower development will have on Cambodia’s fisheries and Cambodia’s overall food security, as fisheries supply approximately 82% of Cambodia’s animal protein, and seek more environmentally friendly forms of energy production that do not threaten the countries fisheries and food security. Section 2.79 on health should clearly identify the challenges that hydropower development will bring in terms of food security, nutrition and increased water-borne disease. 	Comment was not included.
15	<ul style="list-style-type: none"> While we applaud the RGC’s “high priority to maximum and sustainable mobilization of revenues from all natural resources, especially oil and gas, to benefit all Cambodians,” we would like the Government to commit to the long-term sharing of benefits of hydropower dams with communities affected by these projects. We would recommend providing affected communities with a certain percentage of the project’s revenue based on each kilowatt of electricity produced, in order to help ensure that these communities also benefit from the development of dams. 	Comment was not included.

16	<ul style="list-style-type: none"> • Civil society would like to see the RGC give high priority on its Rural Electrification Master Plan and its commitment to developing energy that is “environmentally and socially acceptable.” In order to do this, we would like the RGC to kindly consider modernizing its energy plans, by encouraging and prioritizing decentralized energy generation through more environmentally and socially acceptable technologies, while also introducing policy changes that encourage decentralized generation. We recommend the following that RGC implement the following policy and regulatory initiatives: <ol style="list-style-type: none"> 1) Remove import duties on all decentralized generation technologies and equipment 2) Introduce customer financing programs to help all households, businesses, and communities finance the upfront capital costs of build-scale and industrial-scale generating technologies over a 5 to 10 year period 3) Open the market to decentralized generation by announcing specific policies pertaining to the leading technologies, and impose no cap on the amount of power each produce 4) Invite competitive bids for new decentralized generating capacity additions, by service territory and in low-risk increments of several megawatts, as different markets require 5) Give all power generators non-discriminatory access to local distribution grids and introduce interconnection standards that accommodate all producers 6) Provide investors and project developers with the stability and price signals they need by providing a transparent and explicit mechanism for tariff-setting and cost recovery. 7) Establish explicit and transparent step-by-step procedures for obtaining permits and public approval. 8) Make proof of community and land rights holder’ approval for project siting a prerequisite to licensing by the regulatory authority. 	<ol style="list-style-type: none"> 1) Comment was not included. 2) Comment was not included. 3) Comment was not included. 4) Comment was not included. 5) Comment was not included. 6) Comment was not included. 7) Comment was not included. 8) Comment was not included.
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17	<ul style="list-style-type: none"> A more modern energy approach will allow the country to produce energy in an efficient and sustainable manner while avoiding expensive, environmentally damaging, high-risk investments in old technologies such as hydropower dams and coal-fired plants, while also better meeting the energy needs of the people and country. 	
Comments on the first draft NSDP Update		
18	<p>In spite of significant progress made the fisheries sector still face many challenges:</p> <ul style="list-style-type: none"> We would like to kindly recommend that reference is given to the challenge of preventing and mitigating negative impacts on fisheries caused by hydropower development projects in Cambodia and the Mekong region. As fisheries supply approximately 82% of Cambodia's animal protein, hydropower in the Mekong River basin will also significantly impact Cambodia's food security. Special attention will need to be given in the future to ensure that Cambodia's energy development does not negatively impact Cambodia's fisheries in terms of catch and species. 	Comment was not included.

<p>19</p>	<p>According to the letter on December 27, 2009, from 3S (Sesan, Srepok, Sekong) River communities to the Cambodian National Mekong Committee (CNMC), communities sent a three-page report regarding poor water quality in the Sesan, Srepok and Sekong rivers. Communities are concerned that the bad water quality of these rivers may have been caused by the operation of hydropower dams upstream the rivers in Vietnam and the construction of the Lower Sesan 2 hydropower dam project in Stung Treng. Additionally, a 2009 Technical Brief (Issue No.12) by STRIVER confirmed the presence of cyanobacteria, algae toxin microcystin, thermo-tolerant coliform bacteria and E. Coli in the Sesan River in Cambodia. The poor water quality and its health-related impacts were linked to stagnant water in reservoirs located upstream in Vietnam.</p> <ul style="list-style-type: none"> We would like to kindly recommend that monitoring water quality for biodiversity conservation should include areas having abundant biodiversity, such as the Tonle Sap Lake, sites along the whole stretch of the Mekong River and along its 3S tributaries (Sesan, Srepok, Sekong rivers). The government and relevant stakeholders have to ensure the water quality of the rivers is acceptable for both biodiversity and people. Water quality monitoring should include both environmental and health related parameters. Additionally, we would like to request that the government should carry out an investigation into these reports and seek compensation and mitigation from Vietnam for the water-related illness and deaths suffered by Cambodians due to upstream hydropower development. 	<p>This comment was partly included, especially extended the coverage areas for monitoring water quality, as stated in para. 128. <i>"To monitor water quality for biodiversity conservation, every month the MOE takes water samples at 15 targeted locations: 4 targeted locations along the streams in Phnom Penh (Kien Svay, Chroy Changva, Phnom Penh Port, and Prek Pnov bridge); 2 targeted locations in Kandal Province (Stung Chroeu Prek Tnot and Takmao Ferry Port); one targeted location in Battambang Province; 2 targeted locations in Pursat Province; 2 targeted in Kampong Chhnang Province; one targeted location in Siemreap Province; 2 targeted locations in Kompong Thom Province, one targeted in Kompong Cham Province. The MOE also takes water samples at 4 targeted locations in Prah Sihanouk Province, 5 targeted locations in Koh Kong Province (including waters from the four sea tributaries), one targeted location in Kep Province, and is going to take water sample at one targeted location in Kampott Province."</i></p>
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20	<p>Attention should be brought to the erratic water fluctuation issues being suffered by communities on Sesan and Srepok rivers due to upstream hydropower development in Vietnam by Cambodia's Standing Committee on Coordination of Dams-Canal Along Border of Cambodia, Vietnam, Laos and Thailand.</p> <ul style="list-style-type: none"> We would like to kindly recommend that Cambodia should seek to ensure that Vietnam adheres to the past commitments it has given to Cambodia of building the Sesan 4a and Srepok 4a re-regulating reservoirs (made at the 12 January 2007 STAKEHOLDER MEETING ON ENVIRONMENTAL IMPACT ASSESSMENT (EIA) ON THE CAMBODIAN PART OF SREPOK RIVER DUE TO HYDROPOWER DEVELOPMENT IN VIETNAM Workshop), and improving water release notification systems (the 5 Solutions agreement). 	Comment was not included.
21	<ul style="list-style-type: none"> We would like to kindly suggest that the challenge of high water demand for energy development (hydropower and coal fired plants) and irrigation projects be added to the list of challenges, as these projects may cause future conflict of water resource usage and may lead to water shortages thus impacting the urban and rural public's demands for water. 	Comment was not included.
22	<ul style="list-style-type: none"> We would like to kindly suggest that information on the challenges being faced in implementing the Rural Electrification Master Plan should also be mentioned. 	Comment was not included.
23	<ul style="list-style-type: none"> We would like to kindly suggest that the Fishery Administration carry out research and public dialogue events on the subject of hydropower dams and fishery mitigation technologies. The Fisheries Administration should seek to ensure that proper mechanisms for the mitigation of fisheries impacts caused by hydropower dams is promoted and in cases where technologies do not exist to mitigation fishery impacts the Fisheries Administration carries out an awareness raising campaign for the public and government, in order to help informed decision-making processes. 	Comment was not included.

24	<ul style="list-style-type: none"> We would like to kindly recommend that the government (Forestry Administration) should ensure that no illegal logging occurs in protected areas during the clearing of forest for the reservoir sites of hydropower dams. This should be done through proper monitoring and strict enforcement of laws. Replantation of lost forests is also encouraged and any prior commitments made by hydropower companies to replant should also be adhered to. Moreover, as forest is an important area of wildlife habitat, we would like to recommend that the MoE help define a suitable mechanism to help protect and conserve endangered species and nearly extinct wildlife during the hydropower construction and operation period. 	Comment was not included. However, this illegal logging measure has been stated already in para. 425 by the RGC; but fail to elaborate the relation between forest protection and hydropower dam construction.
25	<p>The MOE will prepare legislation and documentary by: Preparing guidelines on prepare environmental impact assessment report</p> <ul style="list-style-type: none"> We would like to kindly recommend that the preparation of the EIA guidelines is done in consultation with civil society and includes detailed guidelines on how to determine when an IEIA vs. and EIA is needed for projects and detailed guidelines on how to carry out meaningful public participation processes in the EIA. 	Comment was not included.
26	<p>Original text: Accelerate implementation of green house gas emission projects</p> <ul style="list-style-type: none"> We would like to kindly recommend that the RGC should consider and approve electricity generation from energy sources that do not emit greenhouse gases (GHG) into the atmosphere. We would like to encourage the government to promote clean and modern technology power generation such as biogas, biomass, solar and wind turbines, while also avoiding the development of hydropower and coal fired power plants given their green-house gas emissions. 	This comment was not included.
27	<ul style="list-style-type: none"> We would also like to kindly recommend that the English language used in the NSDP is improved to state that the MoE will work to accelerate the implementation of greenhouse gas emission reduction projects. 	This comment was not included.

28	<ul style="list-style-type: none"> As most of the people living along rivers are dependent on water for fishing, transportation, daily household usage, etc., we would like to kindly recommend that the government prioritize in the national plan projects to improve access to safe water for the communities who have been negatively affected by hydropower dam development projects in both Vietnam and Cambodia. 	Comment was not included.
29	<ul style="list-style-type: none"> We would like to kindly recommend that MWRAM add a point to include the study and consideration of the Basin Development Plan Phase 2 into the country's development planning process, which includes stakeholder's participation. 	Comment was not included.
30	<ul style="list-style-type: none"> We would also like to kindly recommend that MWRAM increase the capacity of its staff and relevant ministries to understand the concept of Integrated-Water Resource Management (IWRM) and begin implementation of this principle into its work (as mentioned in the Water Law) 	Comment was not included.
31	<p>ii. Strengthen and encourage the implementation of Water Resources Management Law and other related provisions to monitor and prevent all rehabilitation and construction projects that might have adverse impact on water resources and eco-system.</p> <ul style="list-style-type: none"> As public participation is a key aspect to informed decision-making, we would like to kindly recommend the RGC include information on how it will ensure public participation in hydropower decision-making processes in order to prevent adverse impacts on water resources. Mention should also be given to Cambodia's committeemen to ensuring the management of development of water resources according to integrated water resources management (Article 4 of 2007 Law on Water Resources Management). Evaluation on how Cambodia has applied IWRM in its hydropower development, especially in terms of participatory planning and stakeholder involvement, should be made in its evaluation process. 	This comment was not included.
32	<ul style="list-style-type: none"> Ensure that development projects such as hydropower dams, coal fired plants, and irrigation projects undergo all necessary legal requirements, such as carrying out EIA laws, prior to providing licenses or permits for water use. 	This comment was not included.

33	<ul style="list-style-type: none"> We would to likely suggest that the Ministry of Industry, Mine and Energy (MIME) develop a new master plan, which incorporates rural and urban electrification plans and incorporates all energy technologies into one plan. This master plan should include government plans to promote private investment in sustainable alternative energy options (which are environmentally and socially acceptable), along with government plans including the Hydropower Master Plan prepared by JICA and the Rural Electrification Plan. 	This comment was not included.
34	<ul style="list-style-type: none"> The Royal Government of Cambodia has made a commitment to encouraging “exploration and environmentally and socially acceptable development resources needed for supply to all sectors of the Cambodian economy,” in its Power Sector Development Policy. We would suggest MIME to put this commitment into the NSDP Update 2009-20013. 	This comment was not included.

	<p>In order to reduce poverty and ensure harmony in the lives of people in the rural areas, the Royal Government will continue to attach priority to accelerate rural electrification, including the use of renewable energy.</p>	
35	<ul style="list-style-type: none"> • We would like to kindly recommend that the RGC gives high priority towards the development of decentralized renewable energy generation based on sustainable forms of energy as it works towards accelerating rural electrification. In order to do this, we would like the RGC to kindly consider encouraging and prioritizing decentralized energy generation through more environmentally and socially acceptable technologies, while also introducing policy changes that encourage decentralized generation. We recommend the following that RGC implement the following policy and regulatory initiatives: 	<p>This comment was not included.</p>
36	<ol style="list-style-type: none"> 1) Introduce customer financing programs to help all households, businesses, and communities finance the upfront capital costs of build-scale and industrial-scale generating technologies over a 5 to 10 year period 2) Open the market to decentralized generation by announcing specific policies pertaining to the leading technologies, and impose no cap on the amount of power each produce 3) Invite competitive bids for new decentralized generating capacity additions, by service territory and in low-risk increments of several megawatts, as different markets require 4) Give all power generators non-discriminatory access to local distribution grids and introduce interconnection standards that accommodate all producers 5) Provide investors and project developers with the stability and price signals they need by providing a transparent and explicit mechanism for tariff-setting and cost recovery. 	<p>Comments (1) to (7) were not included. These are the same to above during the inputs process of NSDP Update formulation.</p>

	<p>6) Establish explicit and transparent step-by-step procedures for obtaining permits and public approval.</p> <p>7) Make proof of community and land rights holder' approval for project siting a prerequisite to licensing by the regulatory authority.</p> <p>A more modern energy approach will allow the country to produce energy in an efficient and sustainable manner while avoiding expensive, environmentally damaging, high-risk investments in old technologies such as hydropower dams and coal-fired plants, while also better meeting the energy needs of the people and country.</p>	
37	<p>The Royal Government encourages the use of efficient energy with minimal impact on the environment.</p> <ul style="list-style-type: none"> We would like to kindly recommend that the RGC also should add information on how the RGC will mitigate and compensate for the impacts caused by energy projects ,as much of Cambodia's poor men and women, especially its ethnic minorities, who depend on the country's natural resources, especially fisheries and agriculture land, as a source of livelihood and food security. Detailed information should be provided on which stakeholders are responsible for developing and implementing mitigation measures. 	Comment was not included.

38	<p>iii. Developing policy, legal and regulatory framework for energy sector in order to ensure efficient management and resources utilisation for economic development and improvement in livelihoods of the Cambodian people.</p> <ul style="list-style-type: none"> In order to develop policy, legal and regulatory framework for the energy sector that improves the livelihoods of Cambodian people, we would like to kindly recommend that the RGC seek to develop legal framework on hydropower and also develop a benefit-sharing law, in order to ensure directly and indirectly affected communities are positively impacted from the development of hydropower dams. We would also like to encourage the government to commit to the implementation of international best practice standards, such as those outlined by the World Commission on Dams, in the planning, construction and operation phases of hydropower development. 	This comment was not included.
39	<p>Promote the use of local energy sources such as hydro power, natural gas and coal.</p> <ul style="list-style-type: none"> We would like to kindly recommend that the RGC also commit to promoting and <i>prioritizing</i> the use of sustainable renewable energies in order to meet the electricity needs of Cambodia. The government should also encourage updating its energy planning process to include the exploration of more sustainable modern energy sources, rather than environmentally and socially destructive hydro power and coal fired plants. 	Comment was not included.

40	<p>Make further efforts to mitigate adverse effects on environment and society in the implementation of energy projects while safeguarding economic efficiency of each project.</p> <ul style="list-style-type: none"> We would like to kindly recommend that the RGC also mention safeguarding the rights of local communities who will be adversely impacted by energy development, in order to work towards sustainable development. The Government should also commit to the long-term sharing of benefits of hydropower dams with communities affected by these projects. We would recommend providing affected communities with a certain percentage of the project's revenue based on each kilowatt of electricity produced, in order to help ensure that these communities also benefit from the development of dams. 	Comment was not included.
41 42	<p>I. Strengthening Private Sector and Attracting Investment B. Planned Actions to Implement the Prioritized Policies:</p> <ul style="list-style-type: none"> We would like to kindly suggest that the CDC include mention on how the Royal Government of Cambodia will encourage the investment of alternative energies which are both environmentally and socially acceptable. The NSDP Update 2009-2013 should list or provide reference to the current status of in-country projects being implemented so that the public knows the current status of energy development in Cambodia 	<p>This comment was not included.</p> <p>This comment was not included.</p>

43	<p>Women and children are the most vulnerable from the negative impacts of hydropower dam development. Hydropower dam development negatively impacts the ability of women in affected communities to access natural resources for supporting their livelihoods and food security needs, including access to fisheries agricultural products, plantation, water sanitation and health. The above issues and solutions should be integrated into the updated NSDP 2009-2013.</p> <ul style="list-style-type: none"> • We would like to kindly recommend that the government and relevant stakeholders integrate resolution mechanism and plans to reduce the challenges faced by women in communities affected by hydropower dam development into the update NSDP 2009-2013, in order to ensure the promotion of better living conditions for women in local communities. 	This comment was not included.
44	<ul style="list-style-type: none"> • We would like to strongly recommend to increase the involvement of women into the process of decision making for all kinds of development projects and community development. We would like to encourage all levels of government to consider and accept the concerns, suggestions and recommendations of women into the plans of the government. In addition, women in local communities should be encouraged and empowered to become active participants in decision-making through providing capacity building opportunities and more. 	This comment was not included.

Environment Protection, Conservation and Climate Change

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
1	<p>The protection of conservation areas is very important for Cambodia's sustainable development. In order to help ensure poverty alleviation in rural areas, the Royal Government of Cambodia should ensure the sufficient use of natural resources to meet the demands in the present, while protecting reserves for future needs.</p> <p>Rural livelihoods of local communities are dependent on the environment and natural resources, especially in areas of fisheries and Non Timber Forest Products (NTFPs). Environmental Impact Assessments (following EIA guidelines and other relevant laws of the RGC) are required for most development projects, in order to ensure environmental protection. To date, EIA reports for development projects are observed to be of low quality, lack adequate public participation and stakeholder consultation, have few mitigation measures to protect the environment, while also having vague environmental management plans with no benefit sharing with affected communities and lack monitoring to ensure commitments are followed. At the same time, the draft EIA guidelines have not yet been approved, while the EIA reports that do exist have been shared with civil society organizations with only a short period of time for review and providing comments. Affected communities have not yet been included in the consultation process.</p> <p>According to above comments, we would like to kindly suggest the following recommendations to the Ministry of Environment:</p> <ul style="list-style-type: none"> - Improve cooperation with relevant line ministries and civil society, in order to hold joint investigations and monitoring of development project's EMP, to implement existing laws and take action as needed. - Improve the draft EIA Guidelines by incorporating comments from civil society and relevant stakeholders, in order to help address some of the key concerns mentioned above. 	<p>These suggestions were not incorporated as there was no policy commitments stated in NSDP Update in relation to this suggested recommendations.</p>

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
2	<p>Although the Ministry of Environment has been implementing important programs to address environmental issues, we have observed that there are still many outstanding environmental issues in Cambodia, which have been caused by development projects: Tran boundary impacts (water quality, ecology of Sesan River and impacts to livelihoods) of Vietnam's Yali dam on Sesan communities in Cambodia; sand dredging;; coastal development; human health impacts of the paper factory in Sangkat Chak Angre; chemical pollution in the Mekong River and Tonle Sap Lake due to chemical and pesticide usage; mining impacts; lack of solid waste management and investment in the protected areas.</p> <p>While Cambodia needs development, the RGC should also take care to prioritize projects that contribute to sustainable development while avoiding high environmental risk projects. We would like to kindly recommend that the Ministry of Environment should prioritize the resolution of existing environmental issues, while also cooperating with relevant line ministries, civil society and communities, in order to begin addressing the above mentioned issues.</p>	This comment was not included.
3	<p>We would like to suggest that the government, especially the Ministry of Environment, provide information on how many EIAs have been submitted vs. how many EIAs have been reviewed by the MoE. We would also like to suggest that the MoE provide reference to where the public can view copies of the EIA reports and the environmental protection agreements which have been signed. Additionally, the MoE should ensure that all EIA reports being reviewed are open to public scrutiny, in order for stakeholders to review and provide comments, ensure accuracy of information, and help to ensure proper mitigation mechanisms for environmental protection.</p>	This comment was not included as there is committed statement mentioned in this NSDP Update.

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
4	<p>The volume of the solid waste has increased year by year. The data provided within the NSDP should be reviewed for accuracy, since the data does not fit with the recent study conducted by KOICA, as mentioned in Rasmei Kampuchea newspaper, which estimated that the volume of solid waste in Phnom Penh has reached 1,100 tons per day. (Rasmei Kampuchea, Year 17, No: 5084 Date: 27-28 Dec 2009). The amount of solid waste and garbage collected has increased more than 200 tons within 3 years, which has contributed to the development of more waste collection sites. These waste collection sites may have impacts on the health of communities living around the dump sites, along with impacts to water quality and may contribute to global warming through the emission of greenhouse gases (GHG).</p> <p>We would like to kindly suggest that the Ministry of Environment do the following:</p> <ul style="list-style-type: none"> - Solid waste management needs to be improved. Improve solid waste management by separating material (e.g glass, aluminum, and plastic, organic and paper) and require by law the recycling of waste from each household, buildings, factories, etc. 	This comment was not included.
5	<ul style="list-style-type: none"> - Take into account the risks of solid waste and lobby the Ministry of Education, Youth and Sport (MoEYS) to develop curriculum about waste management for educating students from primary school till high school in both public and private schools. 	This comment was not included.
6	<ul style="list-style-type: none"> - Develop a master plan for solid waste collection sites and carry out proper Environmental Impact Assessment's for each site. 	This comment was not included.
7	<ul style="list-style-type: none"> - Awareness raising on solid waste management should be integrated into the plans of the government and widely circulated through different methods, such as TV, radio and other IEC materials. MoE should take lead for role model in order to protect environment, such as recycling the waste in offices. 	This comment was not included.
8	<ul style="list-style-type: none"> - The Ministry of Environment has annually organized the World and National Clean Up Day. Mention should be given if the MoE has ever monitored and evaluated how people's attitudes have changed after the campaign. 	This comment was not included.
9	<ul style="list-style-type: none"> - MoE, along with other relevant government ministries, should seek to attract private sector investment to develop electricity generation projects in waste areas, in order to help produce electricity while reducing GHG in the atmosphere. 	This comment was not included.

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
10	<ul style="list-style-type: none"> - It is very good that the Ministry has air quality control stations, and we would like to suggest the Ministry of Environment include a table with basic air quality data from the 3 locations and mention how the public can obtain access to the air quality reports. The MoE should regularly collect data from each site. 	This comment was not included.
11	<ul style="list-style-type: none"> - MoE should build more air quality control stations located in urban areas and around industrial zones, in order to ensure that development activities have not polluted the environment. 	This comment was not included.
12	We would also like to kindly suggest that the name of the responsible ministry for monitoring water quality is provided and that they regularly conduct scientific study on the water quality of Cambodia's main rivers (3S Rivers, Mekong River, Tonle Sap lake) which are ecologically rich natural resources. The government should also ensure that impacts to water quality are promptly mitigated and information related to water quality is made public.	These comments were partly incorporated, specifically on responsible ministry to monitor the water quality (see <i>para. 128 & 457. In carrying out its functions, the MWRAM will focus on ensuring that sufficient lean water is available and water quality is well secured in order to meet the need for water of all sectors for the whole year and to protect the ecosystem.</i>); but rest comments were not included.
13	MoE should provide more detailed information on the Master Plan for the 18 protected areas.	This comment was not included.
14	MoE should provide more detailed information about the number of the communities increasing from year by year and what the government response to this increase is.	This comment was not included.
15	The report " <i>a Second National Report under the United Nations Convention on Climate Change</i> " should have a Khmer version and be made available to the public through website or other forms of dissemination.	This comment was not included.
16	The MoE should kindly provide the name of the reports and research that MoE has conducted to address climate change.	This comment was not included.
17	The MoE should play a very important role in coordinating governmental bodies, private sector and civil society to work together on global climate change events, such as COPs in order to raise more concern to developed countries. It would also be useful for the MoE to consider carrying out joint research projects with civil society on climate change.	This comment was not included.

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
18	<p>We would like MoE to write more detailed information regarding the type of environmental issues disseminated to the public, along with information on how the MoE disseminates the information and the main achievements made.</p> <p>As there have been many events organized by the MoE for the purpose of education and information sharing, through workshops and the national climate change forum, the key events organized by the MoE along with the main achievements should be mentioned.</p>	These two comments were not included.
19	<p>The challenges should also include mention on how the Government plans to address the problems.</p> <p>We would like to kindly suggest that the name of the Ministry(s) required to maintain constant watch and dialogue with the Mekong River Commission, and produce regulatory framework to manage Cambodia's eco-system is provided in the NSDP.</p>	This comment was not included.
20	We would like to suggest that the Ministry of Environment divide the activities according to the tasks and by departments, in order to more easily understood and allow the public to know the responsible departments for the implementation of the projects.	This comment was not included.
21	Some policy priorities mentioned seem to overlap, for instance ii & iii. For point i. MoE should clearly elaborate on how to ensure sustainable use of natural resources and ensure proper mitigation measures are in place which are acceptable both to the environment and people, so that development projects will not harm to the environment, natural resources and people.	This comment was not included.
22	<p>We would like to kindly suggest that the Ministry of Environment provide a chart outlining specific information regarding each type of legislation, including a date for when the MoE is expected to get the approval. A very brief explanation about each legislation will make the reader easier to understand.</p> <p>Some legislative plans are not clear and appear to overlap with each other, for example points 9, 10, and 14. Please clearly state the difference between protected area and natural protected areas.</p>	These two comments were not included.

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
23	<p>To ensure sustainable use of natural resource management through review and comments on EIA report with inter-ministry and ensure that the development projects will be not implemented without EIA reports and approval by MoE, we would like to kindly suggest the MoE to consider carrying out the following activities during the next NSDP.</p> <ul style="list-style-type: none"> - Collaborate with the CDC to collect data of development projects, in order to identify the projects that need to carry out EIA reports. 	This comment was not included.
24	<ul style="list-style-type: none"> - Review the existing projects, which have been implemented without EIA reports and halt projects until a EIA report has been developed and approved to ensure sustainable development. 	This comment was not included in the policy statement of NSDP Update.
25	<ul style="list-style-type: none"> - Review and revise the Guidelines of EIA report, in consultation and involvement with stakeholders such as line ministries and NGOs, while also including information such as cost and benefits analysis guidelines, detailed public participation processes, and legislation and policy relevant to EIA guidelines. 	Comment was not included.
26	<ul style="list-style-type: none"> - Set up monitoring tools to evaluate the conformity of the EIA by the development project. The monitoring guidelines should be documented and easy to understand and accessible to all staff of MoE and DoE in the provinces. The costs of all monitoring and necessary equipment should also be incorporated into the EMP of a project. 	This comment was not included.
27	<ul style="list-style-type: none"> - Strengthen technical capacity of national, city and provincial technical staff on EIA guidelines and EIA monitoring guidelines. 	This comment was not included.

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28	General comments: the text in English does not fit to the Khmer text. The English text should be improved. Points one and three overlap and are vague in meaning.	This comment was included because para 429 indicated this suggestion.
29	Point five appears to not be very relevant to this section as it mainly focuses on water pollution. It should be deleted or moved to another section of the NSDP.	This comment was not included as MoE changed the main title in para 429 to make it consistent with the original sentence of the bullet point #5.
30	In general, the MoE should clearly indicate the means or strategies to ensure that the eco-system, water and environment are not polluted and preserved. Clear indicators and tools will allow the MoE to easier evaluate the achievements made.	This comment was not included.
31	<p>Points to be considered by the MoE include:</p> <ul style="list-style-type: none"> <li data-bbox="233 695 1108 748">• Enhance the standard monitoring of waste water quality standards from industry and other business centers 	This comment was not included.
32	<ul style="list-style-type: none"> <li data-bbox="233 786 1108 873">• Explore the appropriate technologies or sound management of reusing the waste water for other purposes, such as for public gardening, for urban/peri-urban agriculture, and etc. 	This comment was not included.
33	<ul style="list-style-type: none"> <li data-bbox="233 906 1108 959">• Ensure that water sources used for local consumption are not polluted 	This comment was not included.

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
34	<p>MoE should write more detail to each point on how it plans to achieve each point. For example:</p> <ul style="list-style-type: none"> Address climate change: to minimize the impact of climate change by ensuring sufficient resources to implement NAPA with support from other ministries, NGOs, IOs, and development partners. At least 20 projects by NAPA will be completed in 2010 (or 2011). <i>(please note, the figure is just an example)</i> 	<p>This comment was included as stated in para. 430. In the area of management of natural resources and climate change, the MOE will: point # 8 with more detail action planned than the first draft NSDP Update.</p>
35	<p>We would like to kindly suggest that the MoE clarify its work on 'National Climate Change Adaptation' or 'National Adaptation Programme of Action to Climate Change (NAPA)'. We would like to kindly recommend that the MoE with other Government ministries, donor partners and civil society to monitor the progress of implementation of the National Adaptation Programme of Action to Climate Change (NAPA) and evaluate the achievements of NAPA using a participatory approach.</p>	<p>This comment was partly included as MoE changed the term to NAPA. Please see para. 430 point #8; however, other points were not incorporated.</p>
36	<p>As the Cambodian NAPA is in line with the RGC's development objectives as outlined in the "Rectangular Strategy for Growth, Employment, Equity and Efficiency", the Cambodian Millennium Development Goals, as well as the NSDP 2006-2010, NAPA should be revised based on the evaluation results and recommendations from public consultation processes, and updated in the NSDP 2009-2013, which follows the 4th mandate of the government.</p>	<p>This comment was included as stated in para. 430 point # 8 stated that "<i>Promote the implementation and update the National Action Programme on climate change adaptation.</i>"</p>
37	<p>We would also like the MoE to kindly consider adding the following points:</p>	
38	<ul style="list-style-type: none"> Promote gender mainstreaming in natural resources management 	<p>This comment was not included.</p>
39	<ul style="list-style-type: none"> Annually assess the effectiveness of Protected Area Management in Cambodia 	<p>This comment was not included.</p>
40	<ul style="list-style-type: none"> Continue to assess the biological resources/stock within the protected areas 	<p>This comment was not included.</p>
40	<ul style="list-style-type: none"> Draft the participatory guidelines or master plan for sustainable development within protected areas, and endorsed by the RGC 	<p>This comment was not included.</p>
41	<ul style="list-style-type: none"> Resubmit the proposal of listing of the Cardamom Mountains as a World Heritage site 	<p>This comment was not included.</p>

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42	Public awareness is an important part of the MoE's role, but if the MoE can encourage MoEYS and NGOs to raise public awareness on environmental issues, it will be the most effective and efficient way to preserve and protect Cambodia's natural resources and environment for the sustainable development and poverty reduction.	This comment was not included.
43	We would like to kindly suggest that an awareness plan should be provided, including information of each responsible department and detailed information on how the MoE will achieve each activity. Mention should also be made to whom within the MoE is responsible for coordinating environmental education and whether a monitoring and evaluation plan has been made for the projects.	This comment was not included.

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44	<ul style="list-style-type: none"> The NCCC should review the NAPA and validate the project priorities. Moreover there should be direct involvement with the private sector, line ministries and civil society to review and revise the NAPA as needed, in order to ensure that the NAPA responds to climate change in an effective and timely manner, and that it helps the most vulnerable people. 	This comment was not included.
45	<ul style="list-style-type: none"> NCCC should continue to find support from interested donors for NAPA implementation. 	This comment was not included.
46	<ul style="list-style-type: none"> NCCC should promote and encourage climate change initiatives, such as mitigation, adaptation and etc., 	This comment was not included.
47	<ul style="list-style-type: none"> NCCC should continue to collaborate with partners and stakeholders to co-organize and coordinate annual National Climate Change Forums 	This comment was not included as there was no policy statement on how NCCC will cooperate with other.
48	<ul style="list-style-type: none"> NCCC should engage in regional and global agendas on climate change. 	This comment was not included.
49	<ul style="list-style-type: none"> Climate change mainstreaming should be done to all MoE projects 	This comment was not included.
50	<ul style="list-style-type: none"> Awareness raising on climate change should occur and be targeted to the public and government ministries. 	This comment was not included.
51	<ul style="list-style-type: none"> NCCC should continue to monitor climate change impacts through surveys and research in cooperation with line ministries, private sectors, academics and civil society. 	This comment was not included.
52	<ul style="list-style-type: none"> In the plans of the MoE, the concept of climate change should be applied to all projects in order to help address climate change. E.g. how unmanaged waste contributes to the increase of Green House Gases (GHS) and how to mitigate the GHG through the plan of solid waste management. The MoE can also begin to find ways to mitigate the GHG through the EIA reports and encourage the implementation of sustainable Clean Development Mechanism (CDM) projects. All CDM projects should require community approval. 	This comment was not included.
53	<ul style="list-style-type: none"> The estimated budget for the implementation of the projects and its indicators should include in this NSDP. 	This comment was not included.

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
	General suggestions to be considered within the NSDP:	
54	<ul style="list-style-type: none"> Enforce the rectangular strategy by focusing on accountability, transparency and social responsibility within natural resources management. 	This comment will be continue observing during the implementation of NSDP Update.
55	<ul style="list-style-type: none"> Strengthen the implementation of social and environmental impact assessments before the development of projects, while also improving the quality of future reports. 	This comment would be seen during the implementation of NSDP Update.
56	<ul style="list-style-type: none"> Encourage all companies to hold meaningful public involvement and consultation in the EIA process. 	This comment was not included as there was not policy statement stated in NSDP Update.
57	<ul style="list-style-type: none"> Mainstream climate change into the MoE's plan and hold awareness raising activities to the public to ensure that the poor and vulnerable people will not suffer from the impacts of climate change. 	This comment was not included.
58	<ul style="list-style-type: none"> Mainstream climate change into other ministries' planning. 	This comment was not included.
59	<ul style="list-style-type: none"> Develop opportunities for NGOs and communities to cooperate in addressing climate change. 	This comment was not included in the final version of NSDP Update.
60	<ul style="list-style-type: none"> Cooperate with NOGs/IOs to provide training to communities to make them more adaptable to the impacts of climate change. 	This comment was not included in the final version of NSDP Update.

Inclusion Disaster Risk Reduction

It should be noted that there was no section of “**Disaster Management**” in the first draft NSDP Updated circulated on 17th December 2011. With commitment from Nation Committee for Disaster Management (NCDM), the Ministry of Planning (MoP) included disaster management section into the NSDP Update as written in para. 432 to para. 434. This inclusion was partly contributed by facilitation and encouragement from Oxfam GB and the NGO Forum.

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
1	<p>Strategic progress in mainstreaming DRR in Cambodia: The Royal Government of Cambodia (RGC) is one of the 168 signatory nations to the Hyogo Framework for Action (HFA) whose implementation spans 2005-2015 and provides a firm guideline on the understanding and practice of disaster management around the world. At the follow-up Beijing Action for Disaster Reduction in Asia conference in 2005, it was resolved that countries in Asia would develop national action plans for Disaster Risk Reduction (DRR) to comply with the principle of HFA The Cambodia National Committee for Disaster Management (NCDM) and the Ministry of Planning (MOP) subsequently spearheaded the formulation of a “Strategic National Action Plan” (SNAP) for the DRR 2008-2013 The RGC has also made firm commitments to implement and monitor progress in this regard.</p>	<p>This was included in progress of disaster management as para. 134 stated.</p>

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2	<p>Beside establishing the National Committee for Disaster Management (NCDM), the RGC also established a Risk Management Mechanism (RMM) in 2002. These mechanisms have structures at all levels of governance from the National to sub-national level. The respective structures beside the NCDM are Provincial Committee for Disaster Management (PCDM), District Committee for Disaster Management (DCDM), and Commune Committee for Disaster Management (CCDM). The RGC has also developed royal decree/sub-decree/policies to cope with Disaster Risk Reduction (DRR) such as:</p> <ul style="list-style-type: none"> ▪ Royal decree on establishment of the National Committee for Disaster Management on 16 February 2002. ▪ Sub-decree on preparation and implementation of National Committee for Disaster Management (national and local level) on 9 April 2002. ▪ Participated in Hyogo Framework 2005-2015 [HFA (2005-2015 action)], 2005. ▪ Decision on establishment of inter-institutions technical working group for developing Strategic National Action for Disaster Reduction 2008-2013, on 25 October 2007. ▪ Strategic National Action for Disaster Reduction (SNAP) 2008-2013, and ▪ Law on disaster risk management (drafting in progress) 	<p>This was just background provided.</p> <p>Five bullet points out of the six were included in the progress of disaster management, except strategic National Action for Disaster Reduction (SNAP) 2008-2013 that already mentioned above. Please see para.135.</p>
3	<p>Most recently, unpredictable disasters in Cambodia⁹ have significantly increased in impact thus affecting greater number of people and causing huge losses and damage. For example Typhoon Ketsana that hit Cambodia in late September 2009 not only resulted in human deaths and damage to crops and livestock, but also resulted in huge financial losses due to huge damage to the infrastructures including roads, bridges, drinking water and sanitation systems.</p>	<p>This was just raised the issue.</p>

⁹ SNAP 2008-2013, page 4

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4	<p>Justification for mainstreaming DRR into the NSDP: For the country to avoid losses due to disasters and be better prepared with institutions and resources there is an urgent need to mainstream DRR into all spheres of development. The mainstreaming of DRR requires a clear and firm policy commitment in order for its practical application to be realized at various levels. The NSDP is a pillar national document that needs to carry the weight and emphasis of DRR in all sectors.</p>	This was just descriptive of the issue.
5	<p>Beside the global commitment that Cambodia has made in with respect to implementing DRR, the integration of DRR into the NSDP:</p> <ul style="list-style-type: none"> ▪ will safeguard the gains made in poverty reduction ▪ is low cost investment with high return rates ▪ leads to social stability/cohesion ▪ is one way of tackling issues of Climate Change ▪ leads to big cumulative gains for Cambodia which though does not suffer big single disasters has multiple and repeated shocks that need tackling from all fronts and at all times starting from the policy level. 	This was just descriptive of the issue.
6	It is with some of those points in mind that the NGOs recommend that the RGC should take DRR into account and consider mainstreaming it into the final draft of the NSDP update 2009-2013.	This comment was included as a result there was a section of disaster management in the final version of NSDP Update.

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
	<p>Specific Recommendations for the mainstreaming DRR into NSDP update 2009-2013 are:</p>	
7	<ul style="list-style-type: none"> o NCDM representative(s) should be part of the working group to prepare for NSDP update as well in order to assist the Ministry of Planning regarding DRR sector. 	<p>This comment was not included as there was no contact list of NCDM in the working group list of preparation of NSDP Update.</p>
8	<ul style="list-style-type: none"> o Like with gender and other cross-cutting issues, there should be a clear mention of DRR consideration in design, implementation and evaluation of projects in all relevant sectors especially Education, Health, Local Administration, Agriculture Forestry and Fishery, Water Resources and Meteorology, Information, Land Management, Public Work and Transportation to minimize losses to investments due to disasters. 	<p>This comment was partly included as para. 432 stated that <i>"Formulate and implement 5-year strategic plan an annual action plan to promote the mainstreaming and integration of Disaster Risk Reduction (DRR) and Disaster Response Preparedness (DRP) into the development of social and economic sectors and the recovery/rehabilitation/ reconstruction"</i>. However, there was no policy statement mentioned in these sectors.</p>
9	<ul style="list-style-type: none"> o The NSDP should be emphatic especially within the department of Metrology on the establishment of a robust but user-friendly early warning system. 	<p>This comment was not included.</p>
10	<ul style="list-style-type: none"> o The NSDP should support establishment of properly mandated NCDM to enhance its coordination role for emergency response and disaster risk reduction. 	<p>This comment was included as para. 433 stated that <i>"The Royal Government will strengthen the role of the National Committee for Disaster Management in coordinating and implementing "National Action Plan and Strategy on Disaster Risk Reduction 2008-2013" "</i></p>
11	<ul style="list-style-type: none"> o The NSDP should through the Ministry of Rural Development support design of tool for public awareness and building the capacity of Commune Council members and people in the community for them enable to analysis the risk and more resilient and better prepare for DRR 	<p>This comment was included as para. 433 bullet point two stated that <i>"Strengthen the management of disaster risks and preparedness for emergency response at sub-national and community levels,"</i></p>
12		<p>This comment was not included.</p>
13	<ul style="list-style-type: none"> o The NSDP should through the Ministry of Planning and Ministry of Rural Development ensure that all the commune council will consider disaster risk reduction in developing the commune development plan (CDP). The CDP including DRR will be given the priority in the investment plan. 	<p>This comment was not included.</p>

No	NGO Inputs to and Comments/ Suggestions on the zero and first draft NSDP Update	Final version of NSDP Update 2009-2013
14	<p>Suggested DRR Indicators: We would like to suggest indicators for the ease of DRR monitoring and measurement as follow:</p> <ul style="list-style-type: none"> ▪ Province/District/Commune Investment Plan have integrated/integrated Risk Management (RM) ▪ New Project/programs have integrated RM ▪ DRR integration into school curriculum ▪ Early warning system effective where flood proud areas ▪ High risk communities have capacity regarding Early Warning (flood, drought, storm, human & livestock disease, pest infestation) ▪ Agriculture department have capacity to develop flood and drought resistance crop ▪ Multi-sector and multi-hazard Disaster Preparedness Plans developed and annually revised at provincial & district levels (including contingency planning) ▪ Effective & coordinated Disaster Response Preparedness mechanism established at all administrative levels ▪ Technical staff designated as focal points for DRR (& CCA) in all relevant Ministries (& Departments) at national and provincial levels ▪ Each NCDM Technical Working Group meets at least two times per year, and minutes disseminated to all relevant ministries focal points at national & provincial level ▪ National & provincial budget allocation for DRR (%) per ministry; and for NCDM ▪ Government & provincial expenditure on DRR (%) per ministry; and for NCDM 	This suggested DRR indicators were not included.