

March 14, 2013

**Comments from the United Kingdom on Approval by Mail: Cambodia: Climate Proofing of Agricultural Infrastructure and Business-focused Adaptation (ADB)**

Dear Colleagues

We would like to congratulate the project team on a detailed and substantial project document which we are content to endorse, but would like to ask for the issues below to be addressed in implementation. An additional comment is that whilst it is good to have been provided with a wealth of information this could be better and more succinctly presented than in 6 separate (many very long) documents with a lot of repetition and without the most important aspects (e.g. relating to safeguards) summarised in one place. With that in mind these comments are caveated on the basis that we weren't able to read every page in detail and so may have missed them in places.

We have some particular concerns, given the country context, about the references to resettlement and the lack of clear measures to address the associated risks in the main PPCR project documents. We would like to see an assessment of the likelihood of involuntary resettlement, including details of which components this would relate to, along with a risk assessment and action plan on how safeguards will be applied, based on a full social impact assessment. Given that land management is a sensitive issue in Cambodia, with donor funded programmes and private sector projects all coming under the spotlight on resettlement policies and being the subject of community demonstrations, it is important these issues are properly addressed. The UK has also previously raised concerns on resettlement for a previous PPCR project (Enhancement of Flood and Drought Management in Pursat Province) when we asked for reporting to be provided to the sub-committee on the implementation of the Resettlement Plan and application of safeguards.

Other comments

- Given the complex architecture on land management in the Government, involving the Ministry of Land Management, Ministry of Environment, Ministry of Agriculture, et al. It is important to ensure transparency around land management. Can the team confirm who is responsible for the consultations ahead of a project?
- Good to see the Gender Action Plan and specific plans for stakeholder consultation. However there appeared to be some issues not addressed in the social, environmental and institutional appraisals, or conclusions reflected in the main project document. What is the assessment of the risk of commercialisation of agriculture exacerbating food security problems? What are the environmental

risks associated with changing cropping patterns, zoning and increased irrigation? Could this environmental assessment also expand on potential opportunities for co-benefits of ecosystem restoration and preservation, and climate-smart agriculture, for providing resilience against droughts and floods (rather than relying only on hard engineering) and for carbon sequestration?

- A more detailed political and institutional assessment is also needed for a project of this size, what is the team's assessment of the partner Government agencies capability, particularly to manage fiduciary risk? **What is the risk to sustainability of project design posed by the upcoming elections and how will this be managed?**
- Is the evidence on projected climate change impacts good enough to justify some of the specific investments and approaches? For example to re-design irrigation infrastructure to withstand much larger peak flows, produce advisory technical bulletins on agricultural practice and to significantly alter cropping practices across the wet season – is there enough certainty to predict this? Weather data is cited as a constraint elsewhere in the project document, particularly in relation to index-based insurance. **Are there plans to invest in improving weather information and data collection to address these constraints?** For example within other linked ADB or SPCR projects.
- Can the team clarify in relation to the observation that farmers are increasingly harvesting crops early in the wet season to avoid the risk of flooding if the project is seeking to support this change or to reverse it?
- There is a significant portion of the project on consultancy and technical assistance, what are the plans for ensuring this is sustainable and builds local endogenous capacity of communities, farmers and Government staff? How will skills and capacity be transferred?
- The Results Framework is too long and imprecise currently, many of the indicators are not outputs or outcomes but relate only to process. Others do not describe *how* it will be assessed that an outcome is reached (e.g. 'percentage of agencies equipped to address climate change'; how will it be assessed whether they are equipped?). It is important that the results monitoring is prioritised. The core PPCR indicators could be focussed on for reporting and improvement (e.g. 'number of people supported'). The core indicator on 'integration into planning' does not currently measure this outcome. Could the project team also consider an outcome indicator on food security or nutrition – given the importance of this objective to the overall programme?

- Clarity requested on whether the balance of \$100,000 from the original supervision services request is included in the \$4.5 million grant request or is additional to it?

Many thanks

Juliet