

August 6, 2012

Comments from Germany on the Approval by Mail: Cambodia: Mainstreaming Climate Resilience into Development Planning (ADB) - Project Number XPCRKH016A

Dear all,

please find enclosed our comments on the PPCR project. We welcome the project but have some comments and recommendations for the project design and some questions we would be grateful to receive clarifications on.

Thank you,
best
Ina

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Summary

We welcome the proposed project, and would like to commend all involved parties for submitting the proposal. There are, however, some issues that, from our point of view, would require the proposal, and in particular its design and monitoring framework and indicators, to be revisited and amended as outlined in our recommendations below.

Individual Comments on the Proposed Project

In our comments on the Cambodian SPCR, we had highlighted the importance of establishing a steering committee overseeing the entire PPCR including all of its four components. To some extent, this recommendation appears to have been taken up in the project proposal at issue here (“a TA steering committee comprising senior representatives of the above agencies to oversee the operations of PPCR coordinating and technical backstopping unit”, para 16). However, the SPCR document specifies that “the National Steering Committee on Climate Change will serve as the cluster TA steering committee”. We would request clarification whether the National Steering Committee on Climate Change will indeed serve as the PPCR steering committee, or whether the “steering committee comprising senior representatives” is an altogether different and possibly less influential group of representatives, and if so, why the latter option was chosen. Furthermore, we recommend that an indicator be included at the output level that measures the success of the intersectoral steering committee in guiding PPCR implementation.

In accordance with our earlier recommendation, the proposal does touch upon the issue of linking adaptation with the process of decentralization and de-concentration under the National Program for Sub-National Democratic Development (para 6). However, the proposal does not clarify how mainstreaming adaptation in the process of decentralization and de-concentration would be achieved, nor does it reflect the issue in the key results and indicators for success or in the activities – which we had also recommended. We would therefore request clarification why the issue of mainstreaming climate change in the decentralisation and de-concentration process has not been considered more thoroughly.

The expected outcomes as listed in the project summary appear to some extent to be different from those in the technical assistance report. For instance, the expected outcomes

(i) “degree of integration (qualitative assessment) of adaptation and disaster risk reduction in annual development plans and budgets”; (ii) “routine application of climate information in decision making”; and (iii) “improved budget allocation for adaptation and disaster risk reduction” do not appear in the design and monitoring framework. We view these expected outcomes as listed in the program summary as being quite well formulated and more ambitious than those presently listed in the design and monitoring framework. Since implementation of the project will ultimately be guided by the technical assistance report rather than the project summary, we recommend using the wording for expected outcomes as listed in the project summary in the design and monitoring framework of the technical assistance report as well.

The impact indicator reads “By 2022 Reduction in number of households affected and economic losses from droughts, floods, and other extreme climate events by 20% from the 2012 baseline”. It is questionable whether a one year (2012) observation of droughts, floods, and other extreme climate events will provide a representative baseline, as this indicator is subject to substantial variability between years. The same applies to the target date of 2022. Also, it remains unclear who would monitor the achievement of the set target in 2022, considering that the project will end in 2017. We therefore recommend setting a baseline and a target which capture a certain time period rather than a single year. We further recommend observing and reporting the indicator annually starting no later than 2016.

Section III.A. Impact and Outcome (para 9) states that “by TA end, it is expected that (i) risk screening tools are applied for projects ...; and (ii) vulnerability assessments ... are performed”. However, these two elements, while certainly very important and central to successful climate change adaptation (and even more so in a project to mainstream climate resilience into development planning), are only indirectly reflected in the design and monitoring framework (“climate risk management integrated into manuals ...”). We therefore recommend that these two elements be included much more prominently in the design and monitoring framework, at the level of activities and outputs as well as at the level of outcome, where an indicator should be included measuring that performance of climate risk and vulnerability analyses has become standard procedure in development planning at all levels.

Some baselines in the design and monitoring framework have a value of 0, for instance “At least 25% of approved projects are climate-proofed (2012 baseline = 0)”. Considering the amount of on-going adaptation efforts in Cambodia, it seems unlikely that no project would have been climate proofed to date. For instance, the “ADB Sustainable Transport Initiative” supports climate proofing activities, and climate proofing work has also been undertaken by Danida and reportedly by the Cambodia Climate Change Office (CCCO). We therefore recommend either finding a more precise formulation for the indicator (whose and which projects are to be climate proofed: only those funded by the PPCR? government projects funded from other resources? etc) and/or revisiting the baseline value.

Also, it seems unlikely that there are currently no “trained focal points in charge of adaptation in government agencies” when considering Cambodia’s engagement in the UNFCCC, its involvement in MRC’s Climate Change and Adaptation Initiative and others, and given the fact that various climate change bodies and institutions have been set up at the national level since 1999 (as described in section II. Issues, para 4). Also, indicators like this should also have a clear target: how many focal points in how many government agencies would constitute an acceptable target? We therefore recommend either finding a more precise formulation for the indicator and/or revisiting the baseline value, and setting a clear target.

We wonder why the “civil society support mechanism including small grants” in the cost estimates and financing plan would be part of the budget line named “surveys”, and what

the financial volume available for small grants would actually be. (Would 1.4 mio \$ be available entirely for small grants, or would part of it be used for other purposes, and if so, how much?) We therefore recommend either listing small grants in a separate budget line, or providing clear figures on the financial volume available for small grants in the table's narrative.

Comments on Cross-Cutting Issues

Gender

We very much appreciate that, in accordance with our earlier recommendation, gender aspects have been incorporated into the results framework of the proposed project. However, gender aspects are not reflected in the problem analysis in section II. Issues. In order to sensitize the various national actors involved in implementing the proposed project to the importance of addressing gender issues in adaptation to climate change, and to increase understanding of why the project makes a heightened effort to address gender issues, we recommend including a brief analysis of the specific adaptation issues and needs of woman and children in Cambodia in chapter II. Issues.

Learning

Output 4. is about development and dissemination of climate change adaptation knowledge products, and among others includes planned efforts to publish and post information in global web portals. We would recommend that, in addition, the project take existing regional knowledge platforms (such as the Asia-Pacific Adaptation Network or the Climate Change and Adaptation Initiative of the Mekong River Commission) into consideration for disseminating the climate change adaptation knowledge it will generate, in order to spread information and best practices to countries in the region with adaptation challenges similar to those faced in Cambodia.

Synergies with German Climate Change Related Engagement in the Country / Region

Given that the Mekong River as the main source of Cambodia's waters is a trans-boundary resource, we recommend that the project interact closely with the Mekong River Commission's Climate Change and Adaptation Initiative (CCAI). On behalf of the German Federal Ministry for Economic Cooperation and Development (BMZ), GIZ is supporting the MRC's CCAI to improve its services as a knowledge and information hub for adapting to climate change the Mekong region. The proposed project Mainstreaming Climate Resilience into Development Planning would certainly benefit from exploring synergies with the work done at the MRC in areas such as capacity building; development of guidelines, communication plans and awareness raising materials; or the involvement of communities in adaptation planning.