

October 23, 2012

**Comments from Germany on Approval by Mail: Cambodia: Enhancement of Flood and Drought Management in Pursat Province (ADB)**

Dear colleagues,

thank you very much for submitting the proposal for the upcoming phase of the Greater Mekong Subregion Flood and Drought Management and Mitigation Project, which will be implemented in Pursat Province in the western part of Cambodia. It is a very relevant and comprehensive proposal, and we would like to receive some further explanations on some questions, in particular related to the planned resettlement, as outlined in our recommendations enclosed, before we can approve the project. We would also recommend some additional aspects to be taken into account in the project proposal, as outlined in our comments.

Thank you very much,

kind regards

Ina

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Bundesministerium für Wirtschaftliche Zusammenarbeit und Entwicklung / *Federal Ministry for Economic Cooperation and Development*

## **Comments on proposed project: Kingdom of Cambodia Enhancement of Flood and Drought Management in Pursat Province**

### **Summary**

We would like to commend all involved parties for submitting the proposal for the upcoming phase of the Greater Mekong Subregion Flood and Drought Management and Mitigation Project, which will be implemented in Pursat Province in the western part of Cambodia.

The main natural disasters in Cambodia are flood and drought. Therefore, flood and drought risk management as main intervention areas, combined with an enhancement of the regional information and knowledge base for the management of floods and droughts, upgraded water management infrastructure, and enhanced capacity for community based disaster risk management, constitute a suitable approach for Cambodia.

We would like to receive some further explanations on some questions, in particular related to the planned resettlement, as outlined in our recommendations below, before we can approve the project. We would also recommend some additional aspects to be taken into account in the project proposal, as outlined below.

### **Individual Comments on the Proposed Project**

We appreciate that the proposal mentions baselines for its indicators. However, the baselines do not in all cases provide the necessary information in relation to the respective indicator. The two baselines listed in connection with the five outcome indicators do not correspond clearly to these indicators. We therefore recommend specifying the baselines for the outcome indicators more carefully. The expected impact is “reduced ... losses from flood or drought events”. The baseline for the impact indicator however list only losses due to floods, and only on the basis of 2011 flood damages. We therefore recommend adding a drought baseline as well, and using a longer time period for establishing both the flood and drought baselines (as 2011 could have been an exceptional year).

The negative impacts of the project appear to be significant, with an estimated 792 households (3.960 people) having to be resettled. **The project proposal does not clearly discuss what causes the necessity of resettlements, and whether alternatives to resettling people have been considered.** Only the monitoring framework provided some fragmented detail, mentioning that that resettlement plans will be implemented for primary, secondary and tertiary canals. Considering the impact of this measure on the affected population, **we would like to receive more information on the resettlement issue in the project proposal itself (instead of in the resettlement plan, a separate document, only), and clarifying in greater detail, in the project proposal itself, which activities require a resettlement, how the resettlement will be undertaken, and what alternatives have been considered.**

### **Comments on Cross-Cutting Issues**

Cross-cutting elements have already been taken into account to a significant extent in the project summary. However, we would suggest considering the following recommendations in addition.

### **Participation**

In the paragraph c. Local participation, the resettlement of the estimated 3.960 concerned people, and options to involve them in decision making, are not being mentioned. However, we consider participation of the concerned population as very crucial in resettlement processes. We therefore recommend making provisions to maximise the involvement and participation of the to-be-resettled population during project planning and implementation.

### **Gender**

We welcome that the proposal addresses gender aspects in a very comprehensive way. It provides a gender analysis and detailed options for addressing gender issues through a Gender Action Plan. It further stresses the importance of gender issues by formulating three gender related indicators, two of which are aiming at promoting the equal treatment and stronger involvement of women. The regular monitoring of the Gender Action Plan is planned to take place twice a year. We very much appreciate the degree of attention being given to gender issues, and would, at an appropriate future time, ask for being informed about the twice-yearly results of tracking the Gender Action Plan, in particular with regard to the resettlement issue.

### **Learning**

Knowledge development and sharing between Cambodia, the Lao PRD and Vietnam is part of the project design. The project summary does outline the linkages with projects in these two countries, and the ample opportunity for cross learning. However, tracking the results of sharing knowledge between the countries is not part of the monitoring framework. We therefore recommend including a mechanism for measuring the frequency and quality of knowledge sharing practices between the countries, or pointing the reader towards such a mechanism, if it already exists.

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

We highly appreciate that the project proposal is seeking synergies with past and on-going flood and drought initiatives in the lower Mekong region. The Mekong River Commission's Flood Management and Mitigation Programme (FMMP), which is supported by Germany through a project funded by the German Federal Ministry for the Environment, Nature Conservation and Nuclear Safety, is listed as an important regional partner in the PPCR project proposal. The FMMP has the goal to support the relevant line agencies of the four lower Mekong riparian countries Cambodia, Laos, Thailand and Vietnam in improving their flood forecasting and management capacities on the basis of regionally linked climate data and information systems. In its plan for 2013, FMMP is envisaging to make the enhanced flood forecasting system available to the national flood forecasting centres of the MRC member countries. Against this background, we suggest close coordination in planning and implementation with the MRC's FMMP. Furthermore, the MRC's Drought Management Programme (DMP) and

the MRC's Climate Change and Adaptation Initiative (CCAI) are both planning to undertake studies related to climate change and drought in 2013. Since drought is also being addressed by the planned project, we recommend liaising with the MRC's DMP and CCAI as well, as their results could serve as an input for the proposed project, and/or vice versa the project's results could be fed into the DMP's and CCAI's work.