September 21, 2015

Approval by mail: Cambodia: Climate Resilient Rural Infrastructure in Kampong Cham Province (as part of the Cambodia: Rural Roads Improvement Project II) (PPCR) (ADB)

ADB Response to Comments Received from Germany, Japan and LEAD Pakistan

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ADB Response to Comments submitted by Germany

Comment	Response
Summary We have **no major** objections to the implementation of the project. However, we have a few comments (see **bold** highlights), which we would like to see incorporated during project implementation. Moreover, we recommend considering our earlier comments on the revised SPCR for Cambodia, submitted on 22nd January 2014.	Noted with thanks. The project team will ensure that the comments will be fully incorporated during project implementation.
The project proposal states that it seeks to enhance the resilience of rural infrastructure by, among other activities, improving about 240 km of rural roads "to climate resilient paved condition". The intended impact is an "improved access to markets, jobs, and social services in ten project provinces". While generally acknowledging the benefits of paving rural roads, it remains unclear what distinguishes this core activity of the proposed intervention from a regular development project. **We therefore recommend explaining how exactly climate change is taken into consideration when improving "rural roads to climate resilient paved condition" and how the "climate resilient paved roads" will be different from regular paved roads**.	*Previous efforts on rural road improvement did not consider future impacts of climate change, especially with regard to intense rainfall and floods. The current project aims to integrate considerations of future climate impacts in the design of rural roads, in most vulnerable parts of Kampong Cham and Tbong Khmom provinces. * Climate resilient paved roads integrate design features that reduce the vulnerability of the road to the expected wetter conditions, more extensive and longer flooding and other future climate changes in Tonle Sap. Adaptation measures such as raising embankments, provision of drainage, including cross drainage, and resistant material for water seepage during floods will be integrated in the design of the rural roads to ensure that the road is passable during 365 days of the year, whatever the climatic condition there may be. Regular paved roads are designed on the basis of historical data and may not integrate features to cope with future changes in climatic conditions.
In addition, the results framework indicates that "at least 100,000 people (30,000 households) [will be] supported by PPCR to cope with impacts of climate change and with all-year access to markets". **As this formulation is rather vague and leaves too much room for interpretation, we strongly suggest stating how this number of people will be able to cope with the impacts of climate change.**	*So far, movement of rural communities in the Mekong River Islands as well as other vulnerable areas of Kampong Cham and Tbong Khmom provinces during periods of heavy precipitation and flooding has been extremely risky. There have been several cases of loss of lives, and injuries.

	*The PPCR funded interventions including climate resilient roads and emergency management planning systems will enable year round access to services, markets, jobs and schools, and also reduce the loss of lives and injuries during natural calamities.
We appreciate that the project is consistent with "the country operations business plan (2014-2016), and government priorities, including Cambodia's National Strategic Development Plan 2014-2018". However, the project proposal does neither mention the Cambodia Climate Change Strategic Plan (CCCSP) 2014-2023, which captures the main strategic objectives and directions for a climate-resilient development of Cambodia in the next ten years, nor the Sectoral Climate Change Strategic Plans (SCCSPs), which focus on sector-specific responses to climate change. **Thus, we recommend outlining if and how the proposed project is aligned to the Cambodia Climate Change Strategic Plan (CCCSP) 2014-2023 and to one or more of the Sectoral Climate Change Strategic Plans (SCCSPs)**.	*The project is consistent with the Cambodia Climate Change Strategic Plan (CCCSP) 2014-2023, especially with regard to strategic objectives 2 and 5. The strategic objective 2 is aimed at reducing sectoral vulnerability to climate change impacts, while the strategic objective 5 is aimed at improving capacities, knowledge and awareness on climate change. *The project is consistent with 3 out of 4 strategies of the Climate Change Action Plan for Rural Development Sector 2014-2018. The 3 strategies are: a. Develop climate change resilient policies for rural infrastructure and to build resilient in rural infrastructure development to climate change b. Support for adaptation to climate change through increasing rural awareness to all vulnerable areas c. Capacity development on climate change adaptation to village development committee (primary health care, and water sanitation). *The project is consistent with MRD priority actions No. 3 (Build awareness and capacity at national and sub-national level for mainstreaming climate change into rural development planning processes) and No. 9 (Climate proofing Mekong river islands' connectivity (roads and Jetties), Kampong Cham and Tbong Khmom island networks). *The project is also consistent with the strategic objectives 1,2, 3 and 4 of the National Strategic Plan for Climate Change Adaptation and Greenhouse Gas Mitigation in Transport Sector; and strategy priority 1 (Promote climate resilience in transport sector) of the Climate Change Action Plan for Transport Sector (2014-2018).
The proposed project intends to mainstream climate change adaptation in rural infrastructure planning. We highly appreciate this approach and welcome the respective activities that are foreseen to achieve this objective. Yet, despite its importance for mainstreaming climate change, the project proposal does not make any reference to the evolving national adaptation plan (NAP) process in Cambodia. **Thus, in**	The objective of Cambodia's NAP process is to strengthen ongoing climate change adaptation actions through cross-sector programming and implementation at national and subnational level. *The proposed project fits into the context of the NAP process in two ways: first, it will provide feedback, lessons learned, data and technical

line with our earlier comments on the revised SPCR, we recommend describing briefly how the proposed project fits into the context of the NAP process in Cambodia and how potential synergies between the foreseen interventions and the NAP process can be exploited.	guidelines to four out of six strategic intervention areas of Cambodia's NAP process. They include: (i) inter-sectoral coordinated implementation, (ii) data systems and analysis, (iii) capacity development and vertical mainstreaming, and (iv) monitoring and evaluation. Secondly, the project will provide information on approaches for effective integration of climate risks in the design and implementation of future infrastructure projects. *The project interventions will promote synergies with both work stream II (implementing the NAP process) and work stream III (review and learning) of the NAP process. Also please note that the TA on Mainstreaming Climate Resilience into Development Planning I Cambodia (TA 8179-CAM: Mainstreaming Climate Resilience into Development Planning) serves as the overarching framework for the 7 SPCR investments, including the Rural Road Improvement Project. The TA has four outputs. Output 2 of the TA consists of conducting feasibility studies for priority adaptation projects. Collaboration with the NAP process will be ensured under output 2 of the TA. MRD, the executing agency of the project, will ensure close coordination between the project and MOE, the executing agency of the TA.
Synergies with German Climate Change Related Engagement in the Country In order to make use of possible synergies and complementarities – particularly regarding the mainstreaming activities of the proposed project – **we recommend coordinating with the Cambodian-German "Support on the NAP process in Cambodia Project", funded by the Federal Ministry for Economic Cooperation and Development (BMZ) and USAID, and implemented by the Gesellschaft für Internationale Zusammenarbeit (GIZ) in close cooperation with the Cambodian Climate Change Alliance (CCCA).**	*Noted with thanks. As noted above, the project has many opportunities to contribute the NAP process. We will ensure close collaboration with the "support on the NAP process in Cambodia project. *As the executing agency (MRD) has been managing a portfolio with the Government of Germany this coordination will be further enhanced by this proposed project thus establishing required synergies in climate change adaptation efforts.

ADB Response to Comments submitted by Japan

Comment	Response
We utmost appreciate the elaboration by the ADB for this useful proposal. In general, we have no major oppositions for this project and hope this project helps in enhancing climate resilience particularly in the rural parts of Cambodia. With apologies comments at last minutes, but we would like to submit three comments/queries on this project as below. *First, we recognize that this project will improve not only the adaptability in the rural area vulnerable to climate change but also the capacity of executing agencies of this project. We would like to see practice and lessons learned from this project will be fully disseminated and shared so that it can be utilized to possible future projects in similar areas of other Asian countries.	The project intends to disseminate the lessons learned to projects and initiatives not only in Cambodia but also other countries in the Greater Mekong subregion (GMS) and Association of Southeast Asian Nations (ASEAN), through regional forums such as Mekong Climate Change Adaptation Initiative, ASEAN Climate Change Initiative, GMS working Group on Environment, Phnom Platform of Action for Capacity Development and others such as Climate Investment Fund Partnership Forum.
Clarifications: *Second, we share the importance of embedding "climate resilience" into infrastructure investments in rural area that is vulnerable to climate change. In converting highly vulnerable rural roads to "climate resilient paved condition", we would appreciate it if you could elaborate us what methods or technics would be employed for this project.	*As noted in our response to Germany's comments, previous efforts on rural road improvement in Cambodia did not consider future impacts of climate change, especially with regard to intense rainfall and floods. The proposed project will integrate such considerations in the design of rural infrastructure, in most vulnerable parts of Kampong Cham and Tbong Khmom provinces. *As compared with normal paved roads, climate resilient paved roads integrate additional design features such as raising embankments, provision of drainage (including cross drainage), higher and wider road shoulders, adding culverts and use of resistant material for water seepage during floods, to cope with projected higher extreme discharge volumes. These measures will ensure that the road is passable during 365 days of the year.
*Finally, we noticed that the flood hazard risk index in page 6 of the supplementary appendix 15 helps to figure out the vulnerability to droughts and floods in the rural areas in the country. We are also interested in the applicability of these technics and methods to other potential projects particularly in rural areas that are vulnerable to drought and floods in Asian developing countries.	*The capacity building component of this project and the overarching technical assistance to Cambodia on Mainstreaming Climate Resilience into Development Planning will strengthen capacity for vulnerability and adaptation assessments, as well as integration of adaptation elements in the design of rural infrastructure in Cambodia, and disseminate lessons learned to other Asian countries through various forums.

ADB Response to Comments submitted by LEAD Pakistan

Comment	Response
*Thank you for providing the opportunity to review "Climate resilient rural infrastructure in Kampong Cham province (as part of the Rural Roads Improvement Project (RRIP – II))" project. Besides in house review, we also circulated the proposal for discussion among our network of experts in the region. We would like to make the following comments on this proposal.	
1. The major component of resilience in this project is based upon "climate resilient paving" of rural roads. It will be useful to have more information on the nature and design of these pavements. Especially how they compare in cost and benefit with traditional pavement design.	*The project refers to "paved roads", not just "paving" itself. As noted in our response to comments from Germany and Japan, climate resilient paved roads in the proposed project integrate additional design features such as raising embankments, provision of drainage (including cross drainage), higher and wider road shoulders, adding culverts and use of resistant material for water seepage during floods, to cope with projected higher extreme discharge volumes. These measures will ensure that the road is passable during 365 days of the year. Regular paved roads are usually designed on the basis of historical data and may not take into account future changes in climatic conditions. *Improving resilience of rural roads will involve additional costs, which vary with design features introduced in a given area depending on its vulnerability profile. However, benefits outweigh the costs especially in terms of lower operation and maintenance costs, and sustainability. The cost benefit analysis of selected road segments in Cambodia, in general, showed much higher benefits and sustainability (see Linked Document 6: Economic and Financial Analysis of the Additional Cofinancing for the Cambodia: Roads Improvement Project II).
2. Knowledge sharing component of the project envisions replication within Cambodia. It may be more appropriate to upscale knowledge sharing strategy to a regional level keeping in view the many unique features of this project.	*As noted in our response to comments from Japan, lessons learned from this project will be shared widely with other countries through various regional and international forums including, but not limited to, Mekong Climate Change Adaptation Initiative, ASEAN Climate Change Initiative, GMS working Group on Environment, Phnom Platform of Action for Capacity Development and others such as Climate Investment Fund Partnership Forum.
3. The efficacy of community based emergency management plans depends largely on local buy in. It will be useful if the operational design and community engagement strategies of these plans are also outlined.	*We agree that community participation and buy-in is crucial for the success of the proposed project. We also recognize challenges of engaging and involving community members in emergency management and safety issues, as community perspectives and emergency management perspectives may sometimes differ. Therefore, close consultations with affected communities will be conducted throughout. The project will involve

	communities in preparedness, response and recovery, and provide them with as much information as possible in the form of warnings, advice, instruction and general information. We stress that community engagement is not only about increasing the community's participation in and responsibility to emergency preparedness, but also about respecting difference, building trust and showing an understanding of where a community or individual is coming from. The project will develop a community resilience toolkit, especially for those in the Mekong River islands, as part of climate change adaptation and disaster risk reduction framework.
4. Given the commercial interests towards improved rural access, it will be interesting to explore possibilities for leveraging private sector finance for rural infrastructure development component of this project. This can significantly improve the future sustainability for financing other similar projects.	We appreciate the suggestion but attracting private sector to invest in rural infrastructure in Cambodia has been a challenge in the past and will be a challenge in the near future. This is mainly because of low rates of return to private investors in the short run, given the level of poverty in rural Cambodia. However, we will continue to provide opportunities to leverage private sector finance through other ADB initiatives such as the Mekong Business Initiative.
5. The gender considerations for the project are appreciable but it is important to ensure that these considerations especially employment roles are in line with the native culture and social norms.	*Thank you for the suggestion. All proposed activities in terms of gender mainstreaming and labor/employment of women have been designed and implemented in line with Cambodia's native culture and social norms.