Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Cambodia	EAST ASIA AND PACIFIC	P169930	
Project Name	Cambodia Road Connectivity Improvement		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Transport	Investment Project Financing	7/20/2020	10/15/2020
Borrower(s)	Implementing Agency(ies)		

Proposed Development Objective(s)

The project development objective is to improve climate resilient road access to economic and human capital development facilities in targeted provinces.

Financing (in USD Million)	Amount
Total Project Cost	100.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The design of the proposed project builds on a network-wide connectivity approach in targeted provinces in Cambodia to improve all-season road accessibility in rural areas, between rural areas and urban centers, and beyond. The project provinces include Kampong Cham, Kratie, and Tboung Khmum with a total population of over 2.3 million people. The selection of provinces was determined in close consultations with the Ministry of Economy and Finance (MEF), Ministry of Public Works and Transport (MPWT) and Ministry of Rural Development (MRD) considering several criteria including density of rural population, agricultural potential, vulnerability to floods, condition of roads and connectivity of provincial road networks to cover larger geographic area.

To achieve an optimal level connectivity, the proposed scope of road improvement works includes two-level interventions. The first intervention is to improve critical sections of the primary and secondary roads along the identified corridor which connect the rural and provincial roads with the core road network and the main economic centers in the country. These road sections are under the responsibility of MPWT. The second intervention is to improve rural road accessibility in the project area which is under the responsibility of MRD by focusing on critical rural roads to maximize the social and economic benefits and optimally use of limited resources. Prioritization of rural roads will be done based on the rural accessibility and climate resilience analysis, which is being undertaken jointly by the World Bank team and MRD using a geospatial analysis tool. The proposed project design allows scaling up of the investment with potential co-financing of the Government or other development partners.

The main expected impacts include: (i) enhancing market access for agriculture producers who are mostly cultivating high-value crops in the project area such as rubber, cassava, pepper and corn, as well as improving access to the Mekong dolphin sites, which are among major touristic destinations in Cambodia; (ii) supporting human capital development through improved access to schools and health facilities and reduced road crash-related fatalities and disabilities; and (iii) improving climate resilience of the road infrastructure and enabling all-season access along the proposed national, provincial and high priority rural roads. The proposed investment will contribute to economic growth and poverty reduction through enhanced connectivity to markets and jobs, improved all-season accessibility to education and health facilities and reduced transportation cost and time for population and business in the project area.

The proposed project will build on the existing strong partnership between the World Bank and the Royal Government of Cambodia in the road sector. The proposed project will explore synergies with the World Bank's ongoing investments in transport, education, health, agriculture and disaster risk management sectors as well as other projects in the sector financed by development partners to ensure close coordination and leverage a wider impact through complementarities.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

The project provinces include Kampong Cham, Kratie and Tboung Khmum provinces, in Central and Eastern Cambodia. For the Component 1, MPWT has prioritized three roads sections on NR7 (65 kms), NR73 (50 kms.) and PR377 (including its section PR377A, 50 kms in total). For the Component 2, the final list of rural road sections to be financed by the project will be defined after appraisal.

The national and provincial roads are under the responsibility of the MPWT and rural roads under the responsibility of MRD. The roads have several structures in some sections, such as small bridges, box/and pipe culverts, and water spilways. These structure will be assessed and improved/replaced to ensure resilince to floods. Solutions for the structures on rural roads will be similar and designed once the proposed candidate rural roads are identified. Due to different causes (years of war, recurrent flooding, insufficient maintenance, an increase of road traffic, among others), the road condition of the national and provincial network use to be poor. MRD reports that only 5% of the rural roads network is paved.

For the geographic point of view, Kampong Cham and Tbong Khmum provinces are located in the central and eastern lowlands of Cambodia with the Mekong River flowing through them. Agriculture and industrial crops are the most

common land use in both provinces, followed by forest, flooded land, plain land, and red soils. Kratie province has narrow floodplains caused by the Mekong, including undulating uplands and lowlands. For all the three provinces, there are large fluctuations in water levels between dry and rainy seasons. Periodic floods are a common cause of temporary loss of connectivity, mainly in rural areas. Kampong Cham and Tbong Khmum provinces are characterized by about 11 percent and 22 percent of forest cover, respectively (Cambodia Forest Cover 2016). There is no protected area, RAMSAR site or important bird area (IBA) in these two provinces. Kratie province has greater forest cover at 61 percent and consists of rich natural resources such as forests; Ramsar sites; wetland areas; IBA and Mekong dolphin protected area. Corridor of the MPWT proposed road sections in Kampong Cham, Tbong Khmum and Kratie are dominated by a ribbon of residential / commercial /small industrial properties and patches of agricultural land. Sensitive receptors along the roads include residential areas, schools, health facilities, temples, small businesses, etc. Areas of natural vegetation/forest can be noted although within the ROW most portions are degraded by human activities. No extensive natural forest located close to the proposed MPWT roads sections under the project. Fresh water habitat such as river, reservoir, creek, etc. can also be noted along the proposed roads.

From the social point of view, Kampong Cham and Tbong Khmum provinces are in a growing process of urbanization and industrialization. Taking advantage of its strategic location, Kampong Cham province has become a transportation hub for Cambodia with a relevant number of garment manufacture plants. Kratie province remains mostly rural with significant economic and social exchanges with its neighbor Vietnam (trade, migrations, family networks, etc). Traditionally the significant forest, grazing and farming lands, are increasingly converted to plantations and rice paddies due to economic development pressures. Tourism is also an increasing source of revenue. The Poverty Provincial Surveys conducted between 2014 and 2016 by the Government of Cambodia reported above-average percentages of poor households (level 1 & 2 poverty categories) for Kratie (24.6 percent), and average ratings for Kampong Cham (18.1 percent) and Tbong Khmum (19.2 percent). Each of the three provinces has its own rich and diverse socio-cultural features, with the presence in different proportions of Indigenous Peoples (among others, Phnong, Lung, Mil, Khonh, Kraol, Kreung, Steang, Stieng, Shamoun or Cham).

D. 2. Borrower's Institutional Capacity

MPWT and MRD have significant experience with the application of the World Bank's Safeguards Policies through a number of IDA-financed investment projects that have been implemented during the last years. Currently, among others, MPWT is implementing Road Asset Management Project II (RAMP II) and MRD the Livelihood Enhancement and Association of the Poor Project (LEAP), KETSANA Emergency Recovery Project, and the South East Asia Disaster Risk Management Project (SEA-DRM) with an improving track record on safeguards compliance. Both MPWT and MRD keep improving the internal capacities of their Environmental and Social Offices (ESO) in terms of staffing and their qualifications. Many of them graduated in the field of engineering, environment and public administrations, either bachelor or master level.

In general terms, it can be said that MPWT ESO has strong capacity and long experience working on environmental management, resettlement, Indigenous Peoples or stakeholder engagement. MRD ESO has less experience. Currently, MPWT ESO has three staff and two part-time consultants working in Environmental and Social areas (4 of them assigned to RAMP II). MRD ESO has seven assigned staff. In both cases, they have a heavy workload supporting different donor funded-projects as well as through bilateral funds at the national level, so their time availability is limited. The level of staff turnover is reported to be high due to changing and/or switching of positions. All their E&S specialists are based in the capital city Phnom Penh, with no assigned staff at provincial or district levels. One person from MPWT and two person from MRD had taken the face-to-face Environmental and Social Framework (ESF) roll-out training in Myanmar, where a number of them (including their provincial departments, and contractors) obtained ESF

orientation in Phnom Penh and at the Bank office. However, since this will be the first project in Cambodia and one of the first ones in the region applying the new ESF, staff will continue to receive additional training to ensure adequate capacity to implement and monitor all applicable Environmental and Social Standards (ESSs).

The overall Environmental and Social Management System (ESMS) at the corporate level for MPWT and MRD still needs strengthening in term of number of staff, allocation of role and responsibility, monitoring and reporting skills. The MPWT and MRD had agreed to assigned additional environmental, social and gender staff to their ESOs for this project. Assessment of institutional capacity will be conducted during the project preparation. Specific institutional capacity strengthening/ building measures such as provision of additional resources, training needs will be identified and listed in the Environmental and Social Commitment Plan (ESCP) to ensure ownership and sustainability of the resources.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC) — Substantial

Environmental Risk Rating — Substantial

A - type, location, sensitivity and scale of the Project including the physical considerations of the Project: The three proposed MPWT road sections which pass through Kampong Cham, Tbong Khmum and Kratie are not cutting through or located within critical natural habitats or critical wetland areas and not required major road widening. The road corridors are dominated by a ribbon of residential / commercial /small industrial properties and patches of agricultural land. One of the proposed road, PR 377, runs parallel to Mekong river and is the main road to the Irrawaddy Dolphin observation site. The road width is narrow, but currently accommodating an increasing traffic in the area. Some sections of this stretch may require widening of shoulders to improve road safety and reduce congestion. For rural roads, the project road sections will be confirmed after appraisal and go through robust prioritization process. There are no protected areas in Kampong Cham and Tbong Khmum. Rural road networks typically pass through rural residential and agricultural areas with some areas of modified habitats. There are potential impacts to natural habitats in Kratie if the project roads pass through natural/critical habitats. During rural road prioritization for investment decision, the proposed road sections will be screened to ensure that the proposed investment will not cause major negative environmental and social impacts (e.g. exclude roads which provide access to protected areas, may cause deforestation, etc.). Hence, the risk associated with baseline conditions, project location and scale is considered moderate.
B - nature and magnitude of the potential ES risks and impacts, the nature of the potential risks and impacts (e.g. whether they are irreversible, unprecedented or complex): At this stage, the road improvement measures including (a) limited widening of the existing carriageway, where land is available, to improve mobility and safety; (b) paving/sealing of the roads to all weather standards; and (c) improvement of roads structure to climate-resilient standards including raising above flood levels and reconstruction of bridges and culverts to adapt to the changing hydrology in the area. Potential negative environmental impacts from road works include: (i) possible erosion and run-off to water bodies during earthworks; (ii) occupational and community health and safety including temporary traffic blockages and traffic safety; (iii) the possibility of cutting small trees/branches; (iv) pollution from construction (dust, noise and vibration, wastewater, solid wastes and used oil); (v) use of construction materials such as soil, gravels, and uses of water for the construction; (vi) possibility of irrigation or drainage channel blockages, etc. These impacts are likely temporary and reversible and could be managed by applying good construction practices. Given the

overall significant scale of the project, the diversity of locations and the anticipated challenges in ES supervision, the risks under this type are rated substantial.
C - capacity and commitment of the Borrower to manage risks and impacts in a manner consistent with the ESSs: MPWT and MRD has significant experienced implementing the WB's financed-projects with improving track records on safeguards compliance. However, the ESOs availability may be limited due to existing heavy workloads. Risk from borrower capacity and commitment is considered moderate taking into account ESOs staff availability and high turn-over.
D - other areas of risk that may be relevant: The project area is vulnerable to floods, storms (including extreme precipitation events) and droughts. The risk from such external events is considered substantial. These disasters frequently interrupt road accessibility and cause severe damage to life and property, particularly in rural areas. The public's exposure to natural hazards will be assessed in the environmental assessment part of the plan (ESMP + ESMF)

Social Risk Rating Substantial

The social risk is categorized as "Substantial", because direct social risks associated with rehabilitation and improvement of existing national, provincial and rural roads are expected to be mostly temporary, predictable and avoidable. However the indirect and cumulative risks associated with opportunistic land encroachment, labor influx, and increased access to natural resources (even where already degraded) pose more substantial risks and impacts for the livelihoods of vulnerable groups such as indigenous communities. . The potential risks and impacts are likely to result from: a significant number (more than 200) of roadside vendors and fences of houses/farms encroaching the Right-of-Way (ROW), which will have to be partially economically displaced; temporary labor influx of workers in low density areas and risk of child labor. The project might cause potential cumulative adverse impacts to Indigenous Peoples living in forested areas as rural road improvements might potentially exacerbate pre-existing deforestation trends.

The project will potentially bring significant benefits to the communities: reduce the travel time to reach schools, health, and other public service centers, expand access to markets and work opportunities, enhance connectivity during rainy season, improve road safety and improve air quality due to dust dispersion from unpaved road surfaces.

It is expected that special attention will be needed to monitor and enforce compliance in the application of ESS2 (Labor and Working Conditions),particularly to child labor, and ESS4 (Community Health and Safety), since temporary labor influx of workers is expected. Similar for ESS5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement) due to the existing gaps between this standard against the national law.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

Improving the local connectivity through the rehabilitation, improvement, and maintenance of strategic national, provincial and rural roads is a recurrent demand coming from public authorities, productive sectors and the general public. Engagement with stakeholders (including indigenous chiefs or roadside vendors) during project identification phase highlighted that there was a general agreement that road improvement will potentially bring significant

benefits to the communities: reduce the travel time to reach schools, health, and other public service centers, expand access to markets and work opportunities, enhance connectivity during rainy season, improve road safety and improve air quality due to dust dispersion from unpaved road surfaces (community health). A school teacher interviewed in Dombne village (Kratie province) reported during the field visit that some students during the rainy season miss up to two months of classes due to the bad condition of access roads. The project has also the potential to cause some potential direct, indirect and cumulative adverse environmental and social risks and impacts.

The project will support roads improvement and maintenance which may including road widening within the existing ROW, overlaying, elevating flood-prone sections, improving small bridges and drainage, etc. By widening, this project means increasing the existing carriageway on the existing two-lanes to improve safety and reduce congestion, mostly affecting road shoulders which will be paved/sealed to enable motorbikes and bicycle's to use it instead of main carriageway. Based on that, potential adverse impacts to the environment will be derived primarily from labor influx, dust, noise, vehicle emissions, and other forms of pollution from construction, drainage blockage/flooding, traffic interruption, removal of vegetation, as well as increased traffic flow and speed during operations. While improving road conditions would greatly contribute to better access to public services, it could also increase access to natural resources, forest in particular, which could exacerbate deforestation from logging and land clearance/grabbing in the areas. Social risks and impacts anticipated for this project are: (a) risk of enhancing impoverishment of vulnerable groups to be economic displaced (mainly roadside vendors), in case resettlement plans are not adequately implemented; (b) if not appropriately managed labor, safety and working conditions impacts related with the construction works; (c) temporary labor influx of workers , which might increase the risk of gender based violence; (d) risk of child labor, since national Labor Law defines 12 years old as the minimum working age for children; (e) road safety and community health issues related with the increase of the average speed and number of vehicles using the improved roads; (f) potential cumulative adverse impacts to Indigenous Peoples and other vulnerable groups living in sensitive natural areas where rural roads improvements might exacerbate deforestation trends.

The project will be implemented in Kampong Cham, Tbong Khmum and Kratie provinces where risks associated with environmental baseline conditions are considered as moderate since the three proposed MPWT roads corridors are dominated by residential, commercial and agriculture areas. They are not passing through critical natural habitats. The MRD roads which will be identified after appraisal will pass a robust prioritization and environmental and social impacts screening to ensure the project activities will not cause major environmental impacts.

The project roads improvements and maintenance will include limited widening of the existing carriageway, paving/sealing of the roads, and improvement of roads structure to climate-resilient standards (raising flood-prone sections, and reconstruction of bridges and culverts, etc,). These activities may cause substantial impacts on the environment due to overall significant scale of the project, the diversity of locations and the anticipated challenges in ES supervision. Potential negative impacts on the environment will be derived primarily from labor influx, dust, noise, vehicle emissions, and other forms of pollution from construction, drainage blockage/flooding, traffic interruption, removal of vegetation, as well as increased traffic flow and speed during operations. There is potential risk from natural disasters on the project as the area is vulnerable to floods, storms and droughts. As such, the project has included CERC component to response to this event. Based on this, CERC-related potential impacts will be addressed as part of the project's assessments and plans (ESMF and ESMP).

For the MPWT component, an Environmental and Social Management Plan (ESMP) will be prepared to assess potential adverse environmental and social impacts and identify measures to be taken during the project's construction and operation phases to eliminate or mitigate such impacts for the proposed national and provincial road sections. This will be done in line with the indicative outline included in Annex 1 of the ESF and will include environmental and social assessment part (mainly inclusion of relevant baseline data, results of public consultations with affected stakeholders and matrix of environmental and social risks and impacts). The ESMP requirements for MPWT road sections will be incorporated into the project operation manual and road works contracts. For the MRD (rural roads) components, an Environmental and Social Management Framework (ESMF) will be prepared and disclosed since the final list and conceptual designs of the financed road projects will be defined after appraisal. The ESMF will be integrated into the Operations Manual and will provide practical guidance for environmental and social impacts screening and assessment and for preparation of environmental and social mangement tool once individual roads to be improved are identified. The ESMF and ESMP will consider, in an integrated way, all relevant direct, indirect and cumulative environmental and social risks and impacts of the project. These document will include specific provisions for Labor-Management Procedures (under ESS2), Pollution management (air, noise, solid and liquid wastes, etc.) and use of resources (sand, gravel, water and energy usage) measures (under ESS3), Community Health and Road traffic safety assessment and plan during construction and operation phases (under ESS4), Labor influx and Gender Based Violence assessments and plans (under ESS4), Biodiversity conservation and sustainable management of living natural resources (under ESS 6) and Cultural Heritage (ESS8). Additional stand-alone documents disclosed before appraisal will be a Resettlement Framework (RF), with specific provisions about voluntary land donation protocol and records reporting (under ESS5), Indigenous Peoples Development Framework (IPDF), including FPIC verification documents (under ESS7) and a Stakeholder Engagement Plan and Project Grievance Mechanism (under ESS10). An Environmental and Social Commitment Plan (ESCP) will be developed before project appraisal to define and recommend the type of assessment, mitigation plans, timeframe and resources to implement to avoid and minimize possible negative impacts induced by project activities. This will include provision for the inclusion of CERC-related aspects in the project's ESMF and ESMP.

Areas where "Use of Borrower Framework" is being considered:

The client's E&S Framework is not proposed to be relied on for the Project, in whole or in part.

ESS10 Stakeholder Engagement and Information Disclosure

The implementing agencies will prepare a Stakeholder Engagement Plan (SEP) before the appraisal stage. The SEP will be implemented, updated and disclosed by the MPWT (national and provincial roads) and the MRD (rural roads) throughout the different phases of the project life cycle. At this early stage various affected and interested stakeholders have been identified: (a) line ministries: MPWT, MRD, MoE, General Department of Resettlement (MEF), Ministry of Culture, MOWRAM, MLMUPC, MAFF), (b) local individuals or groups: local authorities and village chiefs, Indigenous leaders, Community Based Organizations (CBOs), women organizations and religious leaders, Indigenous Peoples Organizations (c) roadside vendors, farmers, companies in the project area, (d) school teachers, academia, environmental organizations.

The SEP will ensure that beneficiaries and affected communities will be engaged, as per ESS10 para. 5, especially regarding project design options (layout, width, surface material, road safety, etc.). The approach to engagement activities will consider the needs of Indigenous Peoples, vulnerability, language and literacy to ensure not only risks are managed but benefits are accessible to all. The Resettlement Framework and the Indigenous Peoples

Development Framework will include specific engagement requirements to reach out stakeholders to ensure accessibility and culturally-appropriateness effectively. The SEP will include a Project Grievance Mechanism. It will be informed publicly, and it will address compliances coming from project-affected peoples and groups. As part of the information disclosure arrangement, the ESMF, ESMP, RPF, IPDF, and the SEP will be disclosed publicly in the MPWT and MRD websites. The meaningful consultation with relevant stakeholders will be conducted before appraisal, and its results adequately recorded and disclosed.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

Labor practices in the country are governed by the Labor Law (1997), which includes provisions on health and safety in the workplace, non-discrimination in employment and wages. The ESMF and ESMP will develop a Labor Management Procedure to address any gaps between the national law with ESS2 and its inclusion in the bidding documents. The project's labor provisions will include any necessary measures with regard to the following forms of labor to be deployed under the investments. Project workers include MPWT and MRD's staff and their consultants working directly for the Implementing Agency (direct workers), employees of civil works contractor and subcontractors (contracted workers), primary supply workers (e.g., providers of construction materials) and community workers (especially for the rehabilitation and maintenance of rural roads, since it is a common practice in Cambodia). The procedures will need to take into account the needs of women workers including female apprentices and provide a safe working environment.

Since the national Labor Law defines 12 years old as the minimum working age, a specific provision on minimum working age in line with the ESF will be included in the Labor Management Procedure and bidding documents. Strong emphasis will be placed on monitoring compliance, so the ESMF/ESMP will include requirements on Occupational Health and Safety procedures and all relevant provisions that contractors need to prepare, implement and monitor on all construction sites for ensuring basic safety around work sites, use of personal protective equipment, and training and awareness education for workers. The contractor will develop a dedicated labor grievance mechanism for direct and contracted workers, and the general project's Grievance Mechanism (included in the SEP) will have to be adapted in order to collect grievances coming from community workers.

ESS3 Resource Efficiency and Pollution Prevention and Management

The water consumption would be used primarily in the mixing plants and campsites during the construction phase. As the project activities only involve improvements/ maintenance of existing roads, it will neither consume large amount of energy and raw materials, nor use or procure pesticides. The ESMF and ESMP will identify mitigation measures for efficient use of these resources where technically and practically feasible as well as to prevent use of resources from unlicensed sources. Typical pollutions generated from road improvement activities include: (i) dust and other forms of air pollution from construction site, transportation and auxiliary facilities; (ii) noise and vibration; (iii) solid waste (domestic waste and construction waste including used oil and lubricant); and (iv) wastewater from workers camps.

These impacts are temporary, site-specific and can be managed through a set of mitigation measures to be include in the ESMF and ESMP. Road improvement may require clearance of vegetation or fauna habitats and may lead to soil loss and erosion. This could lead to substantial impacts in the areas with steep slope and vulnerable to disaster or climate variation or sensitive habitats. Soil erosion can lead to blockage of drainage or change of surface water flow or sedimentation.

The ESMF and ESMP will provide guidance to screen and assess impacts and provide mitigation measures including application of good practice and close supervision of works to: (i) ensure that cutting of trees and vegetation is limited to a minimum and justified by technical requirements and that relevant national legislation is followed, and replacement where vegetation clearance is unavoidable; and (ii) soil loss and erosion is minimize/protected.

ESS4 Community Health and Safety

One of the main goals of this project is road safety enhancement to protect better both the drivers and the communities living near the roads. Often roads in these provinces are an essential source of opportunities and income for the communities but, at the same time, it is also a source of annoyances (noise, dust, air pollution) and risk (especially for children and sellers working close to the road). To address road safety risks during construction and operation phases, the project's ESMF and ESMP will include road traffic safety assessment and plan for later consideration in the final design of the improved roads. A separate road safety expertise will be invited to prepare the asessment and develop road safety plan (including requirements for the post construction road safety audit). It will have to take into account potential indirect and cumulative environmental and social impacts caused by the improvement and maintenance of the roads: traffic growth, higher speeds, more trucks, etc. The health and safety plan included at the ESMF and ESMP will have to be carried out in a participatory way, with the active participation of communities at the grass-root level. Consultations will help to identify accessibility and safety needs of socially vulnerable groups (women, elderly, disables, children) and reflect in engineering design solutions. The ESMF and ESMP will include as assessment of public's exposure to natural hazards.

It is likely that temporary workers' camps will have to be installed. The ESMP and the ESMF will include project induced labor influx and Gender Based Violence (GBV) assessments and plans, with clear procedures and institutional responsibilities to help minimize community conflicts, misunderstandings, and exposure to communicable diseases. Among others, it will include provisions to promote local recruitment of workforce plus mitigation measures such as a worker code of conduct (including provisions for both worker-community and worker-worker interractions). Additional activities to be included in the assessments and plans to avoid GBV are, among others: specific actions (training, public awareness, etc.) to avoid sexual harassment, sexual assault and exploitation and human trafficking, establishment of a health screening form and HIV/AIDS awareness program will be implemented to limit community exposure to labor influx and Gender Based Violence.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Even if most of the ROWs for the financed roads is expected to be public land, there is a significant number (more than 200) of encroachers of mainly roadside vendors and fences of houses/farms. No houses to be resettled were

reported during the field visits carried out during the pre-identification mission. In many cases, as agreed in the preparatory missions with the implementing agencies, permanent and temporary economic displacement will be avoided and/or minimized applying a flexible approach when doing the road technical designs: small changes in the layout, limit widening in particular road sections, etc. Part of the potentially affected roadside vendors are socially vulnerable, so their primary source of income can be likely temporary/permanently affected by project.

Cambodian Constitution, 2001 Land Law and the 2010 Law on Expropriation define the basic notions that govern land acquisition in the country. Key gaps between government practices and ESS5 have to do with assisting persons without legal titles, restoration of livelihoods after resettlement, and insufficient public disclosure and grievance redress. A recurrent problem in development projects in the country is land acquisition. Robust coordination at an early stage will the required with the General Department of Resettlement, under the MEF.

For the provincial roads under Component 1, since the project locations are already known, a Resettlement Plan (RP) will be prepared by MPWT prior appraisal stage (planned on July 2020). Its mininum contents will be the ones included in Annex 1 of ESS5 for the preparation of a RP. Additionaly, a stand-alone Resettlement Framework (RF) for the MRD component, with specific provisions about voluntary land donation (VLD) protocol and records reporting (in case it is needed, following a common practice in road projects in the country), will be prepared to outline the procedures on the management for the clearance of the ROW and required land acquisition for the rural roads in accordance with ESS5. They include specific provisions to ensure entitlements for those without formal titles and confirmation of compensation at full replacement cost. Arrangements will also be added to guarantee public disclosure of relevant documents and to put in place a grievance redress mechanism for the project affected peoples. Once the project designs are ready for the rural roads under Component 2, in case resettlement is needed, Resettlement Plan (or plans) following ESS5 requirement will be prepared after appraisal stage and to be implemneted before the commencement of road works.

Both the Resettlement Plan for Component 1 and the Resettlement Framework for Component 2 plus future Resettlement plans for the rural roads, will need to assess if the application of VLD provisions (in line with footnote 10 para 4 of ESS5) is the most appropriate approach for acquiring land in the different project locations.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The proposed MPWT national and provincial road candidates in Thbong Khmum, Kampong Cham and Kratie province run through peri-urban and inter-urban environment. Road corridors are dominated by a ribbon of residential / commercial /small industrial properties and patches of agricultural land including rice fields and farm lands and areas inundated (caused by prolong rain or river water in wet season). The roads are not cutting through or located within critical natural habitats or critical wetland areas. No extensive natural forest are observed along the ROWs. Biodiversity hotspot closest to the proposed MPWT roads is the Mekong river which lies along the proposed NR377 sections and is home to Mekong Irrawaddy dolphins. The proposed sections of NR377 is an important provincial road which links the main corridor to Irrawaddy dolphin observation site, an important touristic destination. Fresh water habitat such as river, reservoir, creek, etc. can also be noted along the proposed roads.

The project will not finance road improvement that could provide access to critical habitats such as wildlife sanctuary and protected areas or may cause deforestation. It is anticipated that impacts on biodiversity and habitats are limited to the construction site since the project activities will only involve improvements and minor widening of existing roads. Any activities that may adversely affect critical habitats such as protected areas and wildlife reserves will not be allowed. The ESMP for MPWT roads will include an assess of impact to biodiversity and flora, fauna community and proposed appropriate measures to avoid, reduce and/or mitigate potential impacts from the project. The ESMF, which will be prepared for the MRD roads, will provide practical guidance for rural road screening against ineligibility criteria, impacts screening check list, and identification and preparation of environmental and social management tool that will be prepared once rural roads are identified. The ESMF and ESMP will include guidance to ensure that cutting of trees and vegetation is limited to a minimum and justified by technical requirements and that relevant national legislation is followed, and replacement where vegetation clearance is unavoidable. Location and distance of proposed MRD roads from critical habitats will be screened and assessed to ensure that project activities will not cause negative impacts to important biodiversity site. The ESMF and ESMP will take into account Cambodia regulatory requirements and the ESF requirements into consideration. In Cambodia, the protected area law (2008) would play important role in assessing and selecting road candidate in an environmentally friendly manner. In addition, a new Environmental and Natural Resources Code of Cambodia is being developed – by March 2018. The draft Code includes general principles, environmental impact assessment, strategic environmental assessment, and biodiversity and protection of endangered species. It establishes biodiversity conservation corridors to provide linkages and protection for high-conservation areas. It also addresses protection of cultural heritage, public participation and access to information, a collaborative management process and dispute resolution procedures (Open Development Cambodia). Ministry of Environment (MoE) would be consulted at very early stage to inform about the risks and impacts, and seek further advisory support and collaboration.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

Each province of the initially assessed provinces has its own rich and diverse socio-cultural features, with the presence in different proportions of Indigenous Peoples -IPs- (among others, Phnong, Lung, Mil, Khonh, Kraol, Kreung, Steang, Stieng, Shamoun or Cham).

Cambodia's regulatory framework related to Indigenous Peoples (2009 National Policy on the Development of Indigenous Groups) is mostly in line with ESS7. In general terms, this project is not expected to result in adverse impacts on Indigenous Peoples, but there is a need to ensure that groups are not excluded, and there is equity in the benefits. Based in the field visits carried out during the pre-identification mission, in rural areas of the provinces there is a potential risk of cumulative negative impacts since the rehabilitation of some of the roads may exacerbate deforestation and land grabbing in some IP areas. However, it is important to note that the randomly consulted indigenous village chiefs (Phnong group) supported the road improvement to have better and more reliable access to public services, markets and job opportunities.

A stand-alone Indigenous Peoples Development Plan (IPDP) for the selected provincial roads under Component 1 and a Indigenous Peoples Development Framework (IPDF) for the rural roads for Component 2, including FPIC verification documents, will be prepared prior appraisal.

The IPDP will include both an assessment of the expected project impacts to the IPs, and the measures agreed with them to mitigate the negative ones in a time-bound plan. The IPDF for Component 2 will be prepared to screen the presence of indigenous communities with collective attachment to the project area following the four criteria included in WB's ESS7. The IPDF will include a methodology for screening for the presence of ethnic groups in the area of influence of the potentially eligible rural roads, and to assess the nature and degree of the expected direct and indirect economic, social, cultural (including cultural heritage), and environmental impacts on Indigenous Peoples who are present in, or have collective attachment to, the project area.

Special attention will be paid to ensure the active participation of the different resident Indigenous Peoples and representatives in the project's stakeholder engagement activities, and that any information shared is sensitive to cultural needs. A stakeholder grievance mechanism will be prepared, included requirements to allow indigenous peoples to submit any feedbacks or grievances. In case the project finally includes road improvement activities in areas inhabited by Indigenous Peoples, preparation of specific Indigenous Peoples Development Plans after appraisal stage for the rural roads (Component 2) will be needed to assess and mitigate potential cumulative adverse environmental and social risks and impacts affecting them.

ESS8 Cultural Heritage

Compared to other parts of Cambodia, the presence of cultural heritage assets in these four provinces are not as many as found in others like Siem Reap. However, close to the roads, it is common the presence of temples, mosques, stupas, funerary monuments, etc. During the field visit for the pre-identification mission, indigenous villages chiefs reported the presence of sacred rocks and trees in the project areas.

1996 Law on the Protection of Cultural Heritage widely recognizes the value of tangible and intangible cultural heritage as an asset for development and an integral part of people's identity. Therefore Cambodia's regulatory framework related to cultural heritage is in line with ESS8. The environmental and social screening procedures of the ESMF and the ESMP will include identification of cultural heritage and assessment of tangible and intangible significance in consultation with affected stakeholders, including the Ministry of Culture and Fine Arts (MoCFA) and (when required) religious leaders and indigenous village chiefs, and deployment of a chance find the procedure. Women and girls use to have different attachment to spaces and their own cultural heritage than men and boys, so specific consultations will have to be carried out about this topic with women and girls. The provisions and procedures will be provided in the proposed ESMF and ESMP for both MPWT and MRD components.

ESS9 Financial Intermediaries

At this stage no financial intermediaries are expected to be involved in the project.

B.3 Other Relevant Project Risks

None

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
OP 7.60 Projects in Disputed Areas	No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? Yes

Financing Partners

There are early discussions with the European Investment Bank (EIB) about the possibility of project co-financing.

B. Proposed Measures, Actions and Timing (Borrower's commitments)

Actions to be completed prior to Bank Board Approval:

- Preparation of Environmental and Social Commitment Plan (ESCP)
- Preparation of Environmental and Social Management Plan (MPWT component, national/provincial roads)
- Preparation of Environmental and Social Management Framework (MRD Component, rural roads)
- Preparation of Resettlement Plan (MPWT component)
- Preparation of Resettlement Framework (MRD component)
- Preparation of Indigenous Peoples Development Plan (MPWT component)
- Preparation of Indigenous Peoples Development Framework (MRD component)
- Preparation of Stakeholder Engagement Plan (MPWT and MRD component)
- Preparation of a chance finds procedure for PCR

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

- Preparation of Environmental and Social Management Plan (MPWT and MRD component)
- Preparation of Resettlement Plan (MPWT and MRD component)
- Preparation of Indigenous Peoples Development Plans specifically for the roads inhabited by Indigenous Peoples (MRD component)
- Preparation of Environmental and Social Capacity Building and Training Plan (MPWT and MRD component)
- Preparation of CERC Section as part of the ESMP and ESMF.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS 26-Jun-2020

IV. CONTACT POINTS

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VI. APPROVAL

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Practice Manager (ENR/Social)	Susan S. Shen Recommended on 25-Jun-2019 at 21:25:0 EDT
Safeguards Advisor ESSA	Surhid P. Gautam (SAESSA) Cleared on 26-Jun-2019 at 09:44:7 EDT