

October 8, 2012

**Comments from Germany on the Approval by Mail: Cambodia: GMS Southern
Economic Corridor Towns Development Project (ADB)**

Dear colleagues,

thank you very much for this draft project proposal - we would like to congratulate the Royal Government of Cambodia for presenting a very well written proposal. We particularly appreciate the program approval request making detailed statements "on cooperation / coordination", "on participation", "on gender" and "on learning", which sets this proposal apart from previous proposals.

We have no major objections to the implementation of the project. We have however some recommendations that we would like to see incorporated during project implementation and design.

Thank you very much,
kind regards

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Comments on proposed project: Cambodia - GMS Southern Economic Corridor Towns Development Project

Summary

We would like to congratulate the Royal Government of Cambodia for presenting a very well written proposal. It draws a picture of planned interventions, which certainly have the potential to improve climate resilience and contribute to capacity building on different levels. Its selection of sectors (water supply, municipal infrastructure and services, urban sector development, waste management) and themes appears highly sensible. We particularly appreciate the program approval request making detailed statements “on cooperation / coordination”, “on participation”, “on gender” and “on learning”, which sets this proposal apart from previous proposals. We would however encourage, as we have done a number of times before, going a step further and reflecting the good intentions outlined under these headings by corresponding indicators in the design and monitoring framework. Linked to this, we are concerned that the project may not benefit the poor to the extent intended.

We have no major objections to the implementation of the project. We however would like to see our recommendations (see bold highlights below) incorporated during project implementation.

Individual Comments on the Proposed Project

The project document states under the heading D. Poverty and Social Analysis: “Through the implementation of the subprojects, the project will improve the living environment and health status of the urban residents, especially of the poor.” However, this is not reflected in the project indicators. This is somewhat surprising, as the indicators make very detailed statements on the number of beneficiaries. There might even be a certain risk that the non-poor will receive a distinctly higher share of benefits: one indicator reads “the impact of the subproject will be that the population will increase rapidly as the land will become attractive for building”. Land becoming attractive for building typically benefits the non-poor more than the poor. **We therefore recommend including indicators that reflect the improvement of the living environment and health status of the poor. (See also the recommendation below on poverty data.)**

Comments on Cross-Cutting Issues

Participation

The proposal highlights that during project formulation, various consultation workshops and activities were done with the project stakeholders. These include amongst others household surveys for the preparation of the Project’s Poverty and Social Analysis (PSA).

Effective poverty alleviation requires a targeted orientation of development activities towards the poor. With this goal, since 2005 the Cambodian Ministry of Planning (MOP) has developed standardised and participatory procedures for the systematic identification of poor households (“IDPoor Procedures”). It has been supported by Germany through GIZ in this matter since 2005. The overall objective of the Support to the Identification of Poor Households (IDPoor) Programme is: “The data on poor households, systematically collected under the management of the MOP and available for rural and urban areas of Cambodia, is used as the primary means for targeting beneficiaries of government and non-governmental targeted poverty alleviation interventions.” **These procedures and data could be used as the basis of indicators that reflect the improvement of the living environment and health status of the poor. We encourage an active cooperation between the PPCR, MOP and GIZ to ensure existing poverty monitoring data are used to the maximum extent possible as the basis for key programme indicators.**

Gender

It is highly commendable that an effort has been made to reflect gender issues in the proposal. Women have been identified as particularly vulnerable to the negative impacts of climate change in Cambodia. We very much welcome the Gender Action Plan (GAP) as a priority reference document during the project implementation. However, in the design and monitoring framework gender is reflected only in indicators that are either not attributable to the project (“employment opportunities for women will increase ... (nationally)”), or only target project staff (“staff quota of 30% female in PMU and PIU”) and hired workers (“30% of construction workers to be hired ... female”). Similar to our recommendation regarding poverty indicators above, **we therefore recommend using more ambitious indicators with regard to gender, which measure the actual impact of the project interventions on women.**

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

The project proposal mentions that Germany does not support urban investment programs in Cambodia. However, the German contribution to the Mekong River Commission’s (MRC’s) Flood Management and Mitigation Programme (FMMP), implemented by GIZ, and GIZ’s work on integrating flood risk reduction measures into formal local government development plans have generated a wealth of data and tools on flood risk management, ready to be taken up and developed further by the PPCR. Germany is also supporting MRC’s Climate Change and Adaptation Initiative (CCAI) through GIZ, continuing to some extent to provide advisory services related to flood management.

In addition to the support provided to MRC, GIZ has implemented or is still implementing a wide range of projects and activities deemed necessary to prevent and manage floods, especially in cities. Examples in Asia are: early warning on flooding in regional cities in Leyte, Philippines; flood management in Mindanao, Philippines;

participatory flood prevention and management in Chennai, India; study on innovative risk reduction and management for business continuity in Bangkok (2011). Furthermore, GIZ is developing and implementing concepts and tools (e.g. risk analysis, climate sensitive urban planning) aiming at disaster and climate resilient cities.

We recommend exploring synergies with the German supported projects, which are implemented by GIZ. GIZ will be happy to offer a conceptual exchange on experiences made in implementing those projects.