



KINGDOM OF CAMBODIA



Ministry of Mines and Energy (MME)



Electricité du Cambodge (EDC)

**Cambodia Sustainable Energy Transition (CSET) Project
(P508278)**

**Indigenous People Policy Framework (IPPF)
(Draft Version)**

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ABBREVIATIONS

BESS	Battery Energy Storage System
CESMP	Contractor's Environmental and Social Management Plan
COI	Corridor of Impact
CSET	Cambodia Sustainable Energy Transition
EDC	Electricité du Cambodge
EE	Energy Efficiency
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
EV	Electric Vehicle
FPIC	Free Prior and Informed Consent
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GS	Grid Substation
HIV/AIDS	Human Immunodeficiency Virus/ Acquired Immunodeficiency Syndrome
IDA	International Development Association
ILO	International Labour Organization
IPs	Indigenous Peoples
IPP	Indigenous Peoples' Plan
IPPF	Indigenous Peoples Planning Framework
MME	Ministry of Mine and Energy
MLVT	Ministry of Labour and Vocational Training
MoSVY	Ministry of Social Affairs, Veterans and Youth Rehabilitation
NCDD	National Committee for Sub-National Democratic Development
NEEP	National Energy Efficiency Policy Program
NGO	Non-Government Organization
OHS	Occupational Health and Safety
PDP	Power Development Plan
PMO	Project Management Office
PMU	Project Management Unit
PIC	Project Implementation Consultant
PIU	Project Implementation Unit
RGC	Royal Government of Cambodia
RL	Riparian Land
RP	Resettlement Plan
RPF	Resettlement Policy Framework
SA	Social Assessment
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SEPRO	Social, Environmental, and Public Relation Office
SH	Sexual Harassment
SIB	Subproject Information Booklet
VAC	Violence Against Children
WB	The World Bank

DEFINITIONS

Disadvantaged individuals/groups

Refers to individuals or groups who, due to certain own circumstances such as their age, gender, disabilities, health, economic and ethnic status, and so forth, are more likely affected adversely by the project impacts and/or more limited in their ability to take advantage of project benefits. Disadvantaged individuals/groups are more likely excluded from, or unable to participate fully in the mainstream consultation process. Thus, they may require specific assistance to stay engaged during project planning and implementation. In this project, disadvantaged individuals/ groups are defined as those who have the following characteristics: i) from an ethnic group, (ii) landless/ limited productive land, (iii) female headed household with dependents, (iv) frequent lack of male labor at home (e.g. migrant workers); (v) jobless, or limited economic opportunities; (vi) family member(s) with chronic illness, or disabilities; (vii) elderly who live on their own; (viii) youth, particularly very young couple with children (early marriage), (ix) live in an especially difficult circumstance, and (x) don't meet above criteria but are concurred by local community as vulnerable to poverty and need project's support to reduce their vulnerability. Disadvantaged individuals are usually from a poor, or a near poor household.

Environmental and social risk

Environmental (including climate change and natural disasters) and social risks are determined by a combination of project design and operational characteristics, together with exogenous factors, which: (i) may adversely affect the ability of a project to achieve and sustain its development objective(s); and (ii) define the nature, scale and significance of direct and indirect environmental and social impacts.

Inclusion

Inclusion means empowering all people to participate in, and benefit from, the development process. Inclusion encompasses policies to promote equality and nondiscrimination by improving the access of all people, including the poor and disadvantaged, to services and benefits such as education, health, social protection, infrastructure, affordable energy, employment, financial services and productive assets. It also embraces action to remove barriers against those who are often excluded from the development process, such as women, children, persons with disabilities, youth and minorities, and to ensure that the voice of all can be heard.

Indigenous Peoples

According to the World Bank's Environment and Social Framework, the term "Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities" is used in a generic sense to refer exclusively to a distinct social and cultural group possessing all the following characteristics – in varying degrees:

- Self-identification as members of a distinct indigenous social and cultural group and recognition of this identity by others; and
- Collective attachment¹ to geographically distinct habitats, ancestral territories, or areas of seasonal use or occupation, as well as to the natural resources in these areas; and
- Customary cultural, economic, social, or political institutions that are distinct or separate from those of the mainstream society or culture, and
- A distinct language or dialect, often different from the official language or languages of the country or region in which they reside.

Information disclosure

¹ Collective attachment means that for generations there has been a physical presence in and economic ties to land and territories traditionally owned, or customarily used or occupied, by the group concerned, including areas that hold special significance for it, such as sacred sites.

The process of disseminating project information to stakeholders to allow them to understand the risks and impacts of the project, and potential opportunities. Information disclosure should be in line with the project's Stakeholder Engagement Plan which is in line with the requirements of ESS10. It is required that the disclosure of project information include: (a) purpose, nature and scale of the project; (b) duration of proposed project activities; (c) environmental and social risks and potential impacts of the project on local communities, particularly the vulnerable/disadvantaged groups and proposed mitigation measures; (d) proposed stakeholder engagement process highlighting approach that will be taken to promote meaningful participation of project affected persons; (e) time and venue of proposed public consultation meetings, and the process by which meetings will be notified, meeting results summarized, and reported back to project stakeholders; and (f) process and means by which grievances can be received and addressed timely.

Meaningful consultation

Two-way process that (a) begins early in project planning process to gather initial views on project proposal and inform project design; (b) encourages stakeholder feedback, particularly as a way of informing project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts; (c) continues on an ongoing basis, as risks and impacts arise; (d) is based on prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultation with project stakeholders in a format culturally appropriate, and in relevant local language(s) and is understandable to stakeholders; (e) considers and responds to feedback; (f) supports active and inclusive engagement with project-affected parties; (g) is free of external manipulation, interference, coercion, discrimination, and intimidation; and (h) is documented and disclosed by the Government.

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EXECUTIVE SUMMARY

Purpose of the Indigenous Peoples Planning Framework

The Indigenous Peoples Planning Framework (IPPF) aims to set out the requirements of the World Bank's Environmental and Social Standard 7 (ESS7) on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and the RGC's policy on the development of Indigenous Peoples. Based on the gaps between the WB and RGC's policies, measures are proposed to close the gaps through implementation arrangements, procedures, design criteria, etc. to be applied to all subprojects and project components that were confirmed during project preparation and will be identified during project implementation such as SC 1.4 of the component 1 and component 2.

This IPPF outlines procedures for screening, assessment, and development of a site-specific Indigenous Peoples Plan (IPP) for subprojects to be confirmed during project implementation. It is important to emphasize that in cases where an IPP is required (based on IP screening results), project activities, particularly physical construction, will not be commenced until the respective IPP is fully developed, finalized, and implemented based on meaningful consultation with potentially affected indigenous peoples present in the subproject area. It is also noted the project will need to obtain Free, Prior, and Informed Consent (FPIC) from the affected IP community if the project:

The IPPF has a grievance redress mechanism (GRM) which enables affected IPs to submit complaints for project's resolution. This IPPF also sets forth arrangements that have been made by the MME, EDC, and relevant stakeholders at national and local levels, such as provincial, district, and commune levels. This is to ensure that standards, requirements, and relevant methods, etc. prescribed in this IPPF are applied appropriately. The IPPF provides a cost estimate for relevant activities that may arise during project implementation, including sources of funding that has been arranged to warrant fund availability for implementation of activities outlined in the IPPF.

Environmental and Social Risks and Impacts

During construction, environmental risks are related primarily to the labor force, including risks related Occupational Health and Safety of contractors' workers, physical hazards, chemical hazards, and risks related to lack of, or improper use of Personal Protective Equipment. The SC1.5 under Project Component 1 is anticipated to cause local environmental adverse impacts, primarily at construction site, including temporary noise and vibration in areas connected to protected areas, pollution of air, water and soil, and waste, etc. that are generated from construction activities. Such impacts would potentially cause disturbance to biodiversity and people who live or have income generation activities going on nearby the construction sites. In addition, during construction activities, other potential negative environmental impacts may include: (i) possible erosion and run-off to the water bodies nearby, particularly during earthworks operation; (ii) water pollution from sourcing aggregates/construction materials such as soil, gravels, (iii) pollution caused by noise, wastewater, solid waste, used engine oil that are released from workers' camps. Most of these environmental impacts are likely temporary and thus reversible and manageable by applying good construction practices and environmental and social management plans. Cumulative environmental impacts are anticipated but are assessed to be small and negligible because of the nature and small scope of the civil work that take place in a short period of time. Screening for potential cumulative impact will be conducted during environmental and social screening exercise to be carried out for each identified sub-project.

The social risks that may apply to local people, including IP peoples who may happen to be present in a subproject area are related to labor influx, SEA/SH, child labor, force labor, Discrimination and Exclusion of Disadvantaged/ Vulnerable Groups, and temporary workers. The main impacts related land acquisition/loss of assets and livelihood are mainly from the construction activities of sub-component 1.5 under the Component 1. The activities under other sub-component and Component 2 does not involve land acquisition or impacts on the assets and livelihood of the people. Potential adverse impacts from the construction activities of sub-component 1.5 may include loss of lands, loss of assets affixed to land, loss of value tree, and loss of means of livelihoods, etc., particularly for those whose land are affected/ acquired for construction of MV and LV distribution networks to unelectrified villages. The acquire land MV and LV pole is only 5m x 5m and electric pole of 30cm x 30cm so that the impacts would not significantly affect daily living activities.

However, there is a possibility that the MV and LV line may pass through an area with indigenous villages including their spirit forests, burial grounds, or traditional use zones, which would be a significant cultural impact. IPs have deep spiritual connections to their land; taking or damaging these areas can cause not only tangible loss (of forest resources, etc.) but also cultural and psychological distress. There is also the risk of insufficient consultation – if the project does not properly engage IP communities in their language and with respect for their decision-making processes, there could be misunderstandings or resistance. Another aspect is intangible cultural heritage – indigenous languages and practices. If outside workers come into IP areas (for construction) without cultural sensitivity, there could be social conflicts or erosion of local customs. However, on the positive side, connecting indigenous villages to electricity is expected to have strong support if done with respect (many IP communities desire development but want to be partners in the process). Any works that would adversely impact the integrity or productivity of collectively owned IP land would be carefully screened for and excluded. Any Works maybe undertaken adjacent to collectively owned IP land, but should not impact the integrity or it's productivity. As such FPIC will not be applicable for the project.

Mitigation Measures

Although above environmental and social risks and impacts will be validated, and reassessed when the subproject locations become known, IP(s) in a subproject's area may be affected disproportionately compared to the mainstream group. The distinctive cultural and socioeconomic characteristics of the IPs, including their existing livelihoods, etc. may expose IPs to further risks and impacts, increase their vulnerability and compromise their ability to respond to such risks and impacts – if a holistic approach is not in place. Effective communication, such as IEC, and active participation of involved IPs, are among important factors that contribute to effective engagement of IPs for meaningful consultation during subproject preparation and participatory monitoring during subproject implementation. The coordination of project stakeholders, including PMU, Contractors, local authorities, local agencies, local service providers, and most notably the active and full participation of IPs, collectively contribute to minimizing identified risks and potential impacts at identified subprojects.

Detailed mitigation measures for the above environmental and social risks and potential impacts are proposed in the project's ESMF. These mitigation measures are specific for design stage, pre-construction stage, and construction stage.

Preparation of Indigenous People Plan

The MME and EDC will conduct an IP screening exercise for every subproject identified during project preparation and implementation. If IPs are present in the subproject area, the MME and EDC will conduct a targeted Social Assessment (SA) with technical assistance from an IP specialized qualified consultant. The SA will screen to know if subproject activities would create any potential adverse impact on the cultural properties of the IP (including tangible and intangible). The targeted SA will be conducted based on the meaningful consultation with affected IP which is grounded on the principle of free, prior and informed consultation. Sufficient information will be provided to potentially affected IP to ensure meaningful consultation. Details about scope, scale, nature of subproject activities, subproject location, and identified E&S risks and impacts associated with the construction activities will be provided to affected IP to ensure their feedback are meaningful.

Based on the results of the targeted SA, an Indigenous Peoples Plan (IPP) will be prepared. EDC will submit IPPs to the World Bank for prior review before implementation

Grievance Redress Mechanism

The MME and EDC will ensure through public consultation meetings in the project areas and through a Project Information Booklet distributed to the AHs that all the affected people are fully aware of their rights to complain and about the grievance redress mechanism. Any party who is affected by land acquisition or any other impacts related to the project construction and operation, is eligible to file a complaint. A GRC will be established at provincial level with a process starting from commune offices. As practiced, the GRC includes the relevant local commune or village chiefs and where needed, a local NGO may assist the affected persons in filing complaints. The designated commune officials shall exercise all efforts to settle complaints and issues at the commune level through appropriate community consultations. All grievance resolution

meetings shall be recorded, and copies shall be provided to the affected persons. A copy of the minutes of meetings and actions undertaken shall be provided to the MME, EDC and the WB upon request. All costs for resolving complaints (meetings, consultations, communication and reporting/information dissemination) will be borne by EDC.

The GRM will consist of the following four steps of conflict resolution: Step 1 can be presented to the Contractor, commune council via village or commune chief, Step 2 can take the issue to PMO / SEPRO via the commune council, step 3 brings the case to district office, and step 4 take the issues to provincial GRC.

Implementation Arrangement, Monitoring, and Reporting

MEE will be responsible for Project Component 2 on Industrial Energy Efficiency that is designed to promote the adoption of energy efficient technologies and practices within the industrial sector. It provides concessional loans via financial intermediaries to industrial enterprises for the purchase, installation, and operation of EE equipment, which helps reduce energy consumption and lower GHG emissions.

The EDC will be responsible for implementing this IPPF which involves design, construction, and operation and maintenance of the SC1.1, SC1.2, SC1.4, and SC1.5 under Component 1: Grid Strengthening for Facilitation of Energy Transition and Regional Power Trade. The EDC will establish the Project Management Office (PMO) and this will be the implementing agency on behalf of the EDC for the day-to-day management of the project and ensure that the IPPF will be followed. The PMO will recruit the Project Implementation Consultant (PIC) to assist the PMO/EDC with the implementation for the project and oversight of the contractors during construction and operation and maintenance. The PIC and SEPRO will work together to ensure that the proper screening of IP groups will be carried out for each sub-project, and steps for IP screening and targeted social assessment described in this IPPF are followed. The PIC and SEPRO will be responsible for carrying out day-to-day activities set forth in this IPPF. The PIC will also be responsible for assisting the PMO/SEPRO and contractors in handling complaints and/or grievances filed through the GRM, if any.

Costs and Budget

Indicative costs and budget for IPPF implementation are estimated during project preparation for the purpose of budget planning. The actual costs of IPPF implementation depend on the number of IPPs, including scope and activities to be carried out under each IPP, during project implementation. The total estimated cost is US\$161,040.00. This cost may be updated once the list of subprojects is finalized. Costs incurred as compensation payment for land acquisition and associated impacts are covered by the EDC and are estimated in the project' Resettlement Policy Framework (RPF).

1. INTRODUCTION

1.1 Project Background

The Cambodia Sustainable Energy Transition (CSET) Project (P508278) is a World Bank-financed initiative designed to support Cambodia's long-term energy transition by enhancing grid reliability, integrating renewable energy sources, and promoting industrial energy efficiency. The project aligns with Cambodia's Power Development Plan (PDP) and the government's commitment to achieving a 70% renewable energy mix by 2030, while also ensuring energy affordability and security. Through targeted infrastructure investments and policy interventions, the project aims to modernize Cambodia's energy sector, expand electricity access, and improve energy efficiency in key industries.

1.2 Project Development Objective and Project Components

- Project Development Objective.

The project aims to support the government's energy sector priorities by:

- strengthening grid reliability and capacity in the Phnom Penh–Kandal corridor.
- deploying grid-scale Battery Energy Storage Systems (BESS) to enable renewable integration and load shifting.
- expanding and reinforcing distribution networks in priority EDC service areas and
- supporting industrial energy-efficiency financing through a simplified credit-line arrangement managed by MME.

These objectives align with the goals of the NEEP and the government's socio-economic development agenda.

- Project Components.

To meet the above PDO, the following project activities will be implemented. These activities are organized into three components, as summarized below:

Component 1: Grid strengthening for Energy Transition (Implemented by EDC – US\$ 115 million IDA)

This component addresses the urgent need to reinforce grid capacity and reliability in support of renewable-energy integration. It includes three sub-components.

- **Sub-Component 1.1 Grid Strengthening (Transmission Lines and Substations) (US\$ 43.5 million)**

Construction of one 230 kV and one 115 kV double-circuit transmission line (approx. 15 km) connecting Lvea Am – Arey Ksat – Chroy Changvar III – Wat Phnom, including two new GIS substations (ARK and CCVIII), extensions of 230kV Line Bays at GS Lvea Am and extensions of 115kV Line Bays at GS Wat Phnom and GS9. Supports Phnom Penh load growth and clean-power imports from Laos.

- **Sub-Component 1.2 Battery Energy Storage System (BESS) (US\$ 35 million)**

Deployment of 100–150 MW grid-scale BESS to enhance system stability and enable load shifting for renewable energy integration.

- **Sub-Component 1.3 Distribution Network Expansion and Strengthening (US\$ 15 million)**

Upgrade and extend distribution lines (MV (underground, overhead lines), poles, transformers) in EDC license areas to reduce losses and improve service quality; prepare for future e-mobility connections and EV infrastructure. Installation of Advanced Meter Infrastructure (AMI) will also be included as part of the component.

Component 2: Industrial Energy Efficiency Improvement (Implemented by MME – US\$ 15 million IDA)

This component promotes the adoption of energy-efficient technologies across Cambodia's industrial sector through concessional credit facilities.

- **Sub-Component 2.1 Industrial Energy Efficiency Credit Line (US\$ 15 million)**
Establishment of a credit line managed by MME and implemented through the SME Bank of Cambodia (as Policy Bank) and the Foreign Trade Bank (FTB) (as Participating Financial Institution). Financing will be provided to industrial enterprises for eligible energy-efficiency technologies. The credit line will support both direct (Type-A) lending model and indirect (Type-B) lending model.

Component 3: Implementation Support and Technical Assistance (US\$ 6.5 million – US\$ 1.5 million IDA + US\$ 5 million Grant)

- **Sub-component 3.1 Implementation Support to MME (US\$ 5 million/Grant)**
Grant support to strengthen MME capacity to manage the energy-efficiency credit line and oversee environmental and social risk management. Covers training, technical consultancy, development of Operational Manual, and ESMS capacity building for policy banks.
- **Sub-component 3.2 Implementation Support to EDC (US\$ 1.5 million/IDA)**
Technical and safeguards support for EDC's PMU on procurement, financial management, engineering supervision, and E&S compliance monitoring through SEPRO.

1.3 Purpose of the Indigenous Peoples Planning Framework

The Indigenous Peoples Planning Framework (IPPF) aims to set out the requirements of the World Bank's Environmental and Social Standard 7 (ESS7) on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and the RGC's policy on the development of Indigenous Peoples. Based on the gaps between the WB and RGC's policies, measures are proposed to close the gaps through implementation arrangements, procedures, design criteria, etc. to be applied to all subprojects and project components that were confirmed during project preparation and will be identified during project implementation such as SC 1.4 of the component 1 and component 2.

The objectives of this IPPF are:

- Ensure the project planning and implementation process under the CSET fosters full respect for IP communities' human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods.
- Avoid adverse impacts of the project on IP communities. When avoidance is impossible, minimize, mitigate, and/or compensate for such impacts.
- Promote sustainable development benefits and opportunities for IP communities in a manner that is accessible, culturally appropriate, and inclusive.
- Improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with the IP communities affected by the CSET throughout the project cycle.
- Recognize, respect, and preserve the culture, knowledge, and practices of IP communities, and provide IPs with an opportunity to adapt to changing conditions in a manner and in a timeframe acceptable to them.

In line with the above objectives, this IPPF outlines, in particular, procedures for screening, assessment, and development of a site-specific Indigenous Peoples Plan (IPP) for subprojects to be confirmed during project implementation. It is important to emphasize that in cases where an IPP is required (based on IP screening results), project activities, particularly physical construction, will not be commenced until the respective IPP is fully developed, finalized, and implemented based on meaningful consultation with potentially affected indigenous peoples present in the subproject area.

It is also noted the project will need to obtain Free, Prior, and Informed Consent (FPIC) from the affected IP community if the project:

1. Requires permanent acquisition of land that is collectively owned by IP communities as traditional ownership or under customary use, or land that the IPs are in the process of requesting RGC’s recognition as IP’s collectively owned land.
2. Causes relocation of IP from land and natural resources subject to traditional ownership or under customary use or occupation;
3. Has significant impacts on IP cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the affected IP;

The IPPF has a grievance redress mechanism (GRM) which enables affected IPs to submit complaints for project’s resolution. This IPPF also sets forth arrangements that have been made by the MME, EDC, and relevant stakeholders at national and local levels, such as provincial, district, and commune levels. This is to ensure that standards, requirements, and relevant methods, etc. prescribed in this IPPF are applied appropriately. The IPPF provides a cost estimate for relevant activities that may arise during project implementation, including sources of funding that has been arranged to warrant fund availability for implementation of activities outlined in the IPPF.

2. OVERVIEW OF INDIGENOUS PEOPLES

2.1 General Information about Indigenous Peoples in Cambodia

“Indigenous Peoples” are referred to as “indigenous minority peoples” in Cambodia. This term is officially used by the Royal Government of Cambodia in various laws and policies. There are several ethnic groups living in Cambodia, but only those who are distinct from others and have languages, cultures, traditions, and customs that are different from the mainstream population (the Khmer) are considered “Indigenous Peoples”, according to the National Policy for the Development of Indigenous Peoples (2009). In Cambodia, there are also other small ethnic groups, such as the ethnic Lao living in northeastern Cambodia, the Chams, and the Vietnamese. These small ethnic groups are not considered “indigenous”.

Ethnic minorities in Cambodia have typically developed highly specialized livelihood strategies and occupations which include hunting, fishing, trapping, shifting cultivation or gathering food and forest products, handicrafts such as weaving, basketry, and woodcarving among others, and rural and community-based industries. However, due to the recent development process, some have become agricultural workers, or are involved in other works that are no longer part of traditional means of livelihoods activities. Indigenous Peoples generally lead a simple life – compared to that of the majority Khmer. They speak their languages, or dialects, and practice different religious beliefs. These groups can be found also in more remote areas².

The total population of Cambodia is 15.9 million (National Institute of Statistics 2020). The Khmer makes up 95.4% of the population, followed by Cham (2.4%, 376,560 people), Chinese (1.5%, 242,938 people), Thai (0.5%, 73,736 people), Vietnamese (0.2%, 27,449 people), Lao (0.0001%, 1,696 people), others (0.1%, 7,828 people), and group who do not state their ethnicity (4,991 people) (See Table 1 for details).

Table 1. Population of Ethnic Groups by Area (in Percentage)

Ethnicity	Whole country	Capital	Urban area	Rural area
Khmer	95.4	95.3	98.0	94.4
Cham	2.4	2.9	1.2	2.7
Chinese	1.5	0.0	0.2	2.4
Vietnamese	0.2	0.4	0.1	0.1
Thai	0.5	1.4	0.5	0.3
Lao	0.0	0.0	0.0	0.0
Other	0.1	0.0	0.1	0.1

² Schliesinger, Joachim (2011) Ethnic Groups of Cambodia Vol 1: Introduction and Overview.

Not Stated	0.0	0.1	0.0	0.0
TOTAL	100	100	100	100

Source: NIS, December 2020

The IP has the distinctive cultures, customs and habits. Their way of living is significantly different from that of the “Khmer Kroam” who live in small groups that are scattered across 15 provinces in in northeastern part of the country such as Ratanakkiri, Mondulkiri, Kratie, Stung Treng, Preah Vihear, Oddar Meanchey, Banteay Meanchey, Pursat, Battambang, Siem Reap, Kampong Thom, Kampong Cham, Kampong Spue, Koh Kong, and Preah Sihanouk. Of all IP groups living in Cambodia, twenty-two ethnic groups are characterized with distinct languages, cultures, customs and habits (See Table 2). These groups are small in population, ranging from under 100 to 19,000 individuals, including Bunong (Pnong), Kouy, Stieng, Mel, Kroal, Thmorn, Khaonh, Tompuonn, Charay, Kroeung, Kravet, Saouch, Lun, Kachak, Proav, Chorng, Pear (Poar), Souy (Sa’ong), Rhadaer, Roong, Khae, Spong, La-Eun, Somray and so forth. According to National Census (2020), Khmer language is spoken by 95.8% of the population, Chinese (0.6 percent), Vietnamese (0.5%), and other indigenous minority languages (2.9%).

Table 2. Population by Indigenous Minority Group

No.	Ethnic minority group	2008	2013	Change (In percentage)
1	Phnong	37,507	47,296	0.26
2	Tumpuon	31,013	51,947	0.68
3	Kuoy	28,612	13,530	-0.53
4	Charay	26,335	13,326	-0.49
5	Kroeung	19,988	22,385	0.12
6	Brao	9,025	13,902	0.54
7	Stieng	6,541	1,279	-0.80
8	Kravet	6,218	5,618	-0.10
9	Kraol	4,202	7,413	0.76
10	Ja’ong	1,831	266	-0.85
11	Prov	1,827	215	-0.88
12	Mel	1,697	1,905	0.12
13	L’moon	865	763	-0.12
14	Suoy (Sa’ong)	857	0	-1.00
15	Khaonh	743	270	-0.64
16	Kleung	702	208	-0.70
17	Saouch	445	837	0.88
18	Kajrouk	408	731	0.79
19	Lun	327	436	0.33
20	Radae	21	1,003	46.76
21	Mon/Thmor	19	174	8.16
22	Kachak	10	328	31.80

Source: Ministry of Planning 2018 (National Census of Indigenous Peoples in Cambodia, Final Report)

2.2 Overview of Indigenous Peoples in the Project Area

Most of the indigenous peoples in Cambodia originally live in the northern and eastern parts of Cambodia. Over a long period of time in the history, indigenous population has spread across Cambodia. In the six project provinces, including Kandal, Takeo, Prey Veng, Pursat, Kratie, and Stung Treng, various IP groups (of different population size) are living in different part of the province (See Table 3 below).

Table 3. Distribution of Indigenous People Groups in Project Provinces

No.	Province	Indigenous Groups (≥ 1000 people)	Indigenous Groups (≥ 100 people)	Indigenous Groups (<100 people)
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1	Kandal		Kjarai, Kleung, Stieng, Ja'ong	Kavet, Kuoy, Lun, Bunon, Brao, Tumpoun, Kroul, Radae, L'moon, Souy, S'och, Kajrouk, Mon
2	Takeo		Jarai, Ja'ong	Kavet, Kleung, Kuoy, Bunong, Stieng, L'moon, S'och, Kajrouk (Mel)
3	Prey Veng		Jarai, Stieng, Ja'ong	Kavet, Kleung, Kuoy, Kroul, Radae, S'och, Kajrouk (Mel)
4	Pursat		Jarai, Poar	Kavet, Kleung, Kuoy, Kreung, Stieng, Ja'ong, Kroul, S'och, Kajrouk
5	Kratie	Kuoy, Bunong, Stieng, Kroul, Mel	Jarai, L'moon, Khonh	Kavet, Kleung, Lun, Praov, Ja'ong, Poar, Souy, S'och, Kajrouk
6	Stung Treng	Kuoy, Kavet	Kreung, Lun, Bunong, Praov	Jarai, Kleung, Tumpuan, Stieng, Ja'ong, S'och

Source: Ministry of Planning and Ministry of Rural Development (2021) Report on Demographic and Socio-economic Situation of Indigenous Peoples in Cambodia.

2.3 Distinctive characteristics of major IP groups in project provinces

2.3.1 Overview of IPs In Cambodia.

Cambodia is a multicultural country. The largest ethnic group is the Khmer, followed by the Chinese, Cham, Vietnamese, Lao, Thai, and other indigenous groups. Among various indigenous groups in Cambodia, only groups that have been long-time inhabitants are considered native people in the country. These groups are both heterogeneous—given some aspects of their material and social life, and homogenous—in the sense that most of them belong to the same cultural substratum which is usually referred to as Proto Indo-Chinese civilization. Their religion and their way of life for centuries have been based on their relationship to the religious environment. They are engaged in a form of religion based on a spiritual culture³.

There are certain groups who have a common origin but have become separated over time as they migrated. On the contrary, some groups whose geographic and linguistic stocks are clearly distinct, intermarry as they live near to each other. This issue is so common that focusing on their differences becomes superfluous and arbitrary, such as the Jarai (Malayo-Polynesian) and the Tampuan (Môn-khmer) in Andong Meas district of Ratanakiri Province. Indeed, through their history, the highlanders have maintained close relationships with one another as well as with the Khmer and other peoples in the plains.

2.3.2 Some main characteristics of the IPs in the six project provinces.

Bunong (Phnong) is among the largest ethnic minority groups in Cambodia. Their language is related to Stieng and is part of the Bahnaric branch of the Mon-Khmer (within the Austro-Asiatic languages). They have no written script and traditionally grow rice, vegetables, sugar cane and do animal husbandry to earn a living. They are found primarily in Mondulakiri province.

Ja'ong (Chong) in Cambodia lives in the area of Thailand-Cambodia border – to the southeast of Chantaburi province, Thailand and west of Pursat province, Cambodia. Ja'ong speaks Lao and also speak Thai. Ja'ong group is also referred to as Chawng, Shong, Xong. They also speak Somray – a dialect in Cambodia. Their livelihood is based on agricultural production. Slash and-burn (swidden) cultivation is popular. Farming activities include wetland rice cultivation, raising chicken and pig, collecting food from forest, hunting, and fishing. Some of Ja'ong are involved in manufacturing, trading of goods and worked as hired labor.

Jarai are a minority group living in northeastern Cambodia, primarily in the districts of Bokeo, Andong Meas, O Yadou of Ratanakiri province which are located along the northeast border of Cambodia and Viet Nam's Central Highlands. The Jarai has inhabited these areas for thousands of years. Unlike the other indigenous minorities in Cambodia, the Jarai language is not related to Khmer. Rather, it is distantly related to the languages spoken in the island nations of Malaysia, Indonesia, and the Philippines. Their language is classified as belonging to Austronesian, Malayo-Polynesian, Malayic, Achinese-Chamic, Chamic, South, Plateau⁴. Most Jarai people engage in subsistence agriculture, growing rice and vegetables. Their diet is further

³ ADB (2002) Indigenous peoples/ethnic minorities and poverty reduction in Cambodia.

⁴ Dr. Paul Michael Taylor (2006), Annex B Ethnic Minorities and Indigenous Peoples of Cambodia

supplemented by hunting, fishing, and gathering food from the forest. The Jarai raise livestock, including oxen, buffalo, pigs and ducks. Jarai's respective religious beliefs, customs, practices and ways of life include animism in the natural world, such as trees, mountains, and rivers⁵.

Kravet is a subgroup of the Praov people. Praov refers to several sub-sets of peoples in northeast Cambodia and southern Laos. The Kravet has alternate names such as Kowet, Khvek, Kavet. The Kravet is classified as belonging to Austroasiatic, Mon-Khmer, Eastern Mon-Khmer, Bahnaric, West Bahnaric, Praov-Kravet group. The Kravet is known for their intricate handicrafts, chin tattoos, teeth filing and harvest festival. The Kravet practices slash-and-burn agriculture and is known as a semi-nomadic group in mountainous region of Southeast Asia. Their religion involves many taboos, as well as appeasement for good and bad spirits. They are especially concerned about using the spirit world to protect their communities⁶.

Kreung (Krung) live in Ratanakiri province, and in Northeastern Cambodia and eastern Stung Treng. Dialects spoken include Praov. The Kravet and Kreung in Cambodia are inherently intelligible with each other. In terms of ethnicity classification, the Kreung belong to Austro-Asiatic, Mon-Khmer, Eastern Mon-Khmer, Bahnaric, West Bahnaric, Braov-Kravet.⁷ They are culturally distant from the modern Khmer people. The Kreung communities are matrilineal, tracing ancestry through maternal rather than paternal bloodlines. The Kreung are very poor. They have limited access to schooling, healthcare, and electricity. The Kreung rely heavily on forest to maintain their means of livelihood. Upland rice is cultivated as their main crop. They also grow cash crops such as cashew nuts and cassava for additional (limited) income. The Kreung do hunting, fishing, and raising animals. Rolling forested hills of red volcanic earth cover much of the Kreung homeland and several major rivers traverse flat floodplains. The Kreung practice their own traditional religion⁸.

Kroul people live on the border of Kratie and Mondolkiri provinces. They number nearly 3,000, with most living in Kratie. They live primarily along the banks of the Krieng River. Most of the Kroul are rice farmers and they raise cows which are sold to Khmer every year. The cows are left to graze in the jungles during the day and brought back into the villages at night. The closest neighbors to the Kroul are the Mel people. They share much of the language with the L'moon people but have a distinct dialect. The Mel and Kroul languages are not mutually intelligible, so they converse using the Khmer language.

Kuoy are the original inhabitants of Cambodia and Thailand⁹. The Kuoy is one of the ethnic minority groups that have longest settled in the country. The Kuoy live in Northeastern Cambodia, mostly in districts of Preah Vihear, eastern Siem Reap, northern Kampong Thom, western Stung Treng, and several areas of Kratie Province. Their language is of the Katvic branch of Mon-Khmer and is part of the Austro-Asiatic languages. The Kuoy has written language. Their knowledge and traditions are passed down orally. Their preference for hill rice has also changed to more common paddy rice. However, they preserve traditional knowledge of plants and herbs and use these for medicinal and healing purposes. The Kuoy is mostly matrilineal. Mother has more authority than father and the woman in a family is money keeper. The Kuoy is animist and most Kuoy villages do not have a temple¹⁰.

Mel people live in the Northern Kratie province. They number about 3,000 people in the entire tribe. They live in an area which is down river from the Kroul people along the Krieng River. The Mel people are often the "middlemen" for the remote jungle tribes and the Khmers who wish to buy their products. The remote tribes of the Kroul and L'moon will gather jungle products like resin and small animals and will sell it to the Mel people who in turn sell it to the Khmers for a profit. Most of the Mel are rice farmers and they raise cows which are sold to Khmer every year. The cows are left to graze in the jungles during the day and brought back into the villages at night. The Mel are more assimilated to the Khmer lifestyle than other more remote tribes.

Pear (Poar) lives in Cardamoms, Koh Kong, Pursat and Southwestern Kompong Thom. The Pear is has ethnicity classification as Austro-Asiatic, Mon-Khmer, Pearic. The Pear's main livelihoods are agricultural

⁵ Schliesinger, Joachim. Ethnic Groups of Cambodia Vol 3: Profile of Austro-Thai and Sinitic-Speaking Peoples. 2011

⁶ https://joshuaproject.net/people_groups/12836/CB

⁷ Paul Michael Taylor (2006), Annex B Ethnic Minorities and Indigenous Peoples of Cambodia

⁸ https://joshuaproject.net/people_groups/11254/CB

⁹ Ibid.

¹⁰ All Ibid.

production, including slashing, wetland rice cultivation, raising pigs and chickens, gathering non-timber forest products, hunting and fishing.

Praov people are one of several hilltribes inhabiting isolated villages in Ratanakiri province of northeastern Cambodia and in Attapeu province of southeastern Laos. The Praov language is a member of the Mon-Khmer language family. Kreung, Kravet, Lun and Laveh are also names for the overall Praov ethnic group. These represent mutually intelligible dialects within the group. The Praov differ from the lowland paddy rice farmers of the region. They traditionally depend heavily on the forest for their livelihood and usually grow upland dry rice using swidden agriculture methods. Cash crops like cashew and coffee provide limited income. Rolling forested hills of red volcanic earth cover much of the Praov homeland and several major rivers traverse flat floodplains. Hunting, fishing and raising animals provide protein in their diet.

Stieng is patriarchal society and are generally monogamous, living in northeastern Cambodia Eastern, including Kratie province, Snuol district, and southern Mondolkiri. Ethnicity classification of Stieng is Austro-Asiatic, Mon-Khmer, Eastern Mon-Khmer, Bahnaric, South Bahnaric, Stieng-Chrau. Today, the Stieng is integrated into the local and national administrative system. They generally intermarry with other ethnic groups and Khmer. They are animist and have strong beliefs in spirits and their relations with humans. For instance, they may believe that illnesses or natural disasters are caused by spirits as a result of poor human behavior¹¹. Livelihoods are based on agricultural production, which includes slashing, growing rice, raising pigs and chickens, gathering food from the forest, hunting and fishing.

Suoy (Sa'ong) lives in central, Northwest of Phnom Penh, primarily in Aoral, Kampong Speu province. The Suoy is classified in terms of ethnicity into Austro-Asiatic, Mon-Khmer, Eastern Mon-Khmer, Pearic, Western, Suoy. Their dialects include Sa'och, Samre and Pearic which are less and less spoken in Cambodia. Only elderlies speak these dialects. Stieng language is spoken in Kampong Speu Province, Pursat Province, in Krang Trachak area¹². The Stieng engages in subsistence agriculture, growing rice and vegetables.

Tampoun is a largest indigenous group in Cambodia. They inhabit the hills of the northeastern corner of Cambodia. They are mostly farmers, living a more-or-less subsistence level lifestyle. Their main crops are rice (grown in swidden fields), fruits and vegetables. Cashew is now a popular cash crop. The Tampoun follows animistic religion, dominated by the fear of evil spirits and various sacrifices. Except for a few small groups who live in villages close to provincial capitals, most do not have good knowledge of Khmer. But the number of them speaking Khmer is likely to grow in the future as many of them are gradually integrated into the mainstream Cambodian society

3. LEGAL FRAMEWORK

3.1 National Laws and Regulations related to Indigenous Peoples

The national laws and regulation related to IP is described in Table 1.

Table 4. National laws and regulation related to IP

Laws/Regulations/ Guidelines/Standards	Responsible Ministry	Key Description
Constitution (1993)	All	<p>Article 31 stipulates that Khmer citizen shall be equal before the laws and shall enjoy the same rights, freedom and duties, regardless of their race, color, sex, language, beliefs, religions, political tendencies, birth of origin, social status, resources, and any position.</p> <p>Article 44 guarantees all persons, individually or collectively, shall have the right to own property. Only natural persons or legal entities of Khmer nationality shall have the right to own land. Legal private ownership shall be protected by law. Expropriation of ownership from any person shall be exercised only in the public</p>

¹¹ Schliesinger, Joachim. Ethnic Groups of Cambodia Vol 2: Profile of Austro-Asiatic-Speaking Peoples. 2011.

¹² https://dbpedia.org/page/Suoy_language

Laws/Regulations/ Guidelines/Standards	Responsible Ministry	Key Description
		interest as provided for by law and shall require fair and just compensation in advance.
Organic Law (2008)	Ministry of Interior	This law recognizes the vulnerability nature of the indigenous peoples in Cambodia. Councils at provincial and district levels in rural area (capital, municipal and khan levels in urban areas) are requested to formulate development plans that identify development needs of the vulnerable groups, including those from the IP communities.
Protected Area Law (2008)	Ministry of Environment	The law aims to ensure effective management and conservation of biodiversity, and sustainable use of natural resources in protected areas. The law recognizes the right of forest-dependent indigenous peoples to live within the protected areas and to use sustainably the natural resources. Under this law, protected area are divided into four zones, including core zone, conservation zone, sustainable use zone, and community zone. The law has provisions that define how land can be used and managed in each zone.
Law on Education (2007)	Ministry of Education, Youth, and Sport	was enacted by the National Assembly on 19 October 2007. The law aims to promote development of human resources of the nation by providing lifetime education to all people to enable their improvements in terms of knowledge, skills, capacities, dignity, good moral behaviors and characteristics. It also encourages people to learn to better understand, love and protect the national identity, cultures and language.
Forestry Law (2002)	Ministry of Agriculture, Forestry, and Fishery	Article 11, 15, 16, 40 recognizes and protect the right of indigenous peoples in continued access to, and use of certain forest areas which the indigenous peoples traditionally use to maintain their way of living and enjoy the forest benefits.
The Land Law (2001)	Ministry of Land Management, Urban Planning, and Construction	<p>recognizes the right of the indigenous communities in Cambodia to own immovable property - their land - with collective title.</p> <p>Article 23 of Land Law (2001) defines an indigenous community as a group of people who:</p> <ul style="list-style-type: none"> ● Manifest ethnic, social, cultural and economic unity; ● Practice a traditional lifestyle; and ● Cultivate the lands in their possession according to customary rules of collective use. <p>Article 25 defines the lands of indigenous communities as “those lands where the said communities have established their residencies and where they carry out their traditional agriculture”, and these lands “include not only lands actually cultivated but also includes reserves necessary for the shifting cultivation which is required by the agricultural methods they currently practice”.</p> <p>Article 26 states that ownership of the immovable properties (mentioned in Article 25) is granted by the State to indigenous communities as collective property. This collective property includes all the rights and protections of ownership as are enjoyed by private owners.</p>
Sub-Decree No. 83 ANK, BK (2009) on Procedures of Registration of Land of Indigenous Communities.	Ministry of Land Management, Urban	The objective of this Sub-Decree is to provide indigenous communities with legal rights to land tenure, ensure land tenure security, and protect collective ownership by preserving the

Laws/Regulations/ Guidelines/Standards	Responsible Ministry	Key Description
	Planning, and Construction	identity, culture, good custom and tradition of each indigenous community.
Policy on Environmental and Social Safeguards for Sub-National Democratic Development (RGC-NCDD, 2019)	Ministry of Interior	stated in the strategy No.7 that Indigenous Peoples also are known in Cambodia as ‘Khmer Leou’ who have their own cultures and customs, and make their own living in a way that is significantly different from those of ‘Khmer Kroam’ who live in small groups. The “Khmer Leou” is considered vulnerable IP groups and receive special care and attention by the government. It is required that development projects that are implemented at sub-national administration should not cause negative impacts (resettlement and land impacts) to their lives, and traditions and customs of the “Khmer Leou”. In terms of application, specifically in land acquisition and resettlement, this policy is mainstreamed to the RGC’s SOP-LAR (2018) – Land Acquisition and Involuntary Resettlement, which requires avoidance of land acquisition or minimized where avoidance is not possible.
Manual for Indigenous Communities Identification; Legal Entity Registration; and Communal Land Registration Process (OHCHR, MoI, MRD, MLMUPC (2018))	Ministry of Land Management, Urban Planning, and Construction	provide detailed guidance on steps and measures that need to be taken for identification of indigenous communities, registration of legal entities, and community land registration process.
Standard Operating Procedures for Externally Financed Projects in Cambodia on Land Acquisition and Involuntary Resettlement (2018)	General Department of Resettlement, Ministry of Economy and Finance	<p>Section E: Impact on Indigenous Peoples: any land acquisition and resettlement involving indigenous people is avoided to the maximum extent possible. This is one of the key principles in determining site selection/alignment/land demarcation. However, when LAR cannot be avoided, the impacts on their identity, culture, and customary livelihood will be studied in depth. A separate study on the social impacts will be carried out on how the indigenous peoples use their land, how they conduct their economic activities, and how they organize their social activities.</p> <p>A separate Indigenous Peoples Plan (IPP) is prepared to mitigate the social impacts, develop the compensation and resettlement package that will be offered, and set out implementation arrangements. The customary practices will need to be taken into consideration during the consultation process. In most cases, the consultation will be with the tribal/customary leaders as they make the decisions for the tribe or their people. The IPP is normally prepared by the Project Preparation Consultants (PPC) with the involvement of the Executing Agency/Implementing Agency (EA/IA) and relevant local commune authorities. This is separate from the preparation of the BRP and the DRP. However, the DRP will include the compensation package for this group of displaced persons.</p>
National Policy on the Development of Indigenous Peoples (2009)	Ministry of Rural Development	NPDIP is the guiding document that shapes how other government policies related to Indigenous Peoples should be implemented in the fields of culture, education, vocational training, health, environment, land, agriculture, water resources, infrastructure, justice, tourism, industry and mines and energy. The NPDIP recognizes the need for specific policies for Indigenous People communities. It defines principles regarding formal registration of

Laws/Regulations/ Guidelines/Standards	Responsible Ministry	Key Description
		<p>indigenous communities as legal entities with their own bylaws, and supports the indigenous communities in their participation in economic development that affects their lives and cultures.</p> <p>“Indigenous peoples shall be fully entitled to express their comments and opinions and to make any decisions on the development of the economy, society and their cultures towards growth in the society.”</p> <p>The NPDIP promotes use of local languages in multilingual primary education, media, and public consultation. It also lists ten brief sector strategies dedicated to culture, education and vocational training, health, environment, land, agriculture, water resources, infrastructure, justice, industry and mines and energy. The NPDIP calls for conducting impact assessments for all infrastructure projects:</p> <p>“Development projects in the living areas of indigenous peoples can function only if there has been an environmental and social impact assessment and publicity to relevant indigenous peoples’ communities in advance in order for those people to have an opportunity to provide input about their need.”</p> <p>The NPDIP recognizes the rights of indigenous peoples in traditional lands, culture and traditions. This is consistent with the national Land Law (2001).</p>
Policy on Registration and Right to Use of Indigenous Communities (2009)	Ministry of Rural Development Ministry of Land Management, Urban Planning, and Construction	This policy takes as its basis the recognition in the Land Law of 2001, of the right of indigenous communities to possess and use land as their collective ownership. The policy states that the registration of indigenous communities as collective ownership is different from the registration of individual privately-owned land parcels because the land registration of the indigenous communities is the registration of all land parcels belonging to the communities as a whole, consisting of both State Public Land and State Private Land in accordance with the articles 25, 26, and 229 of the Land Law and related Sub-decrees. These land parcels are different in size and can be located within the same or different communes/sangkat. Therefore, the registration of land parcels of indigenous communities requires a separate Sub-decree supplementing existing procedure of sporadic and systematic land registration.

3.2 Relevant International Agreements

Cambodia is a signatory to a number of international instruments that protect the rights of indigenous peoples¹³. The relevant international agreements are listed in Table 5 below.

Table 5. Relevant international agreements

Laws/Regulations/ Guidelines/Standards	Key Description
Convention on Biological Diversity (CBD) (1992)	The CBD recognizes the role of the indigenous peoples in biodiversity protection, sustainable use of biological resources, and ensures fair and equitable sharing of benefits resulting from the use of genetic resources.

¹³ This includes the International Covenant on Economic, Social and Cultural Rights (ICESCR), the International Covenant on Civil and Political Rights (ICCPR), the United Nations Declaration on the Rights of Indigenous People and more generally the Universal Declaration of Human Rights.

International Covenant on Economic, Social and Cultural Rights (ICESCR) (1992)	Article 13 of the ICESCR includes provisions on free primary education irrespective of gender, ethnicity or any other consideration.
UN Declaration on the Rights of Indigenous Peoples (UNDRIP) (2007)	Cambodia is among many countries that voted in favor of this nonbinding declaration.
International Convention on the Elimination of all Forms of Racial Discrimination (ICERD) (1969)	Article 5(e) of the ICERD ensures the enjoyment, on an equal footing and without discrimination, of economic, social and cultural rights, in particular the right to education and training.
UN Convention on the Rights of the Child (1992)	Article 28 - Right to Education mention every child has the right to education. Primary education must be free. Secondary education must be available to every child. Discipline in areas must respect children's dignity. Richer countries must help poorer countries achieve this.
UNESCO Convention on the Protection and Promotion of the Diversity of Cultural Expressions (2005)	This convention recognizes the rights of Parties to take measures to protect and promote the diversity of cultural expressions with a particular focus on women, minorities and indigenous peoples.

3.3 World Bank's Environmental and Social Standard 7 on Indigenous Peoples

The World Bank's ESS7 on Indigenous Peoples / Sub-Saharan African Historically Underserved Traditional Local Communities (hereinafter ESS7) recognizes that Indigenous Peoples (IPs) have identities and aspirations that are distinct from mainstream groups in national societies and often are disadvantaged by traditional models of development. The ESS7 also recognizes that IPs are inextricably linked to the land on which they live and the natural resources on which they depend and are therefore become vulnerable if their land and resources are transformed, encroached upon, or significantly degraded. Development projects may also undermine language use, cultural practices, institutional arrangements, and religious or spiritual beliefs of the Indigenous Peoples.

In the ESS, the term "Indigenous Peoples" is used in a generic sense to refer exclusively to a distinct social and cultural group possessing all the following characteristics in varying degrees:

- a) Self-identification as members of a distinct indigenous social and cultural group and recognition of this identity by others; and
- b) Collective attachment¹⁴ to geographically distinct habitats, ancestral territories, or areas of seasonal use or occupation, as well as to the natural resources in these areas; and
- c) Customary cultural, economic, social, or political institutions that are distinct or separate from those of the mainstream society or culture, and
- d) A distinct language or dialect, often different from the official language or languages of the country or region in which they reside.

The objectives of ESS7 are:

- To ensure that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples;
- To avoid adverse impacts of projects on Indigenous Peoples or, when avoidance is not possible, to

¹⁴ In the World Bank's ESS7, "Collective attachment" means that for generations there has been a physical presence in and economic ties to land and territories traditionally owned, or customarily used or occupied, by the group concerned, including areas that hold special significance for it, such as sacred sites.

minimize, mitigate and/or compensate for such impacts;

- To promote sustainable development benefits and opportunities for Indigenous Peoples in a manner that is accessible, culturally appropriate and inclusive;
- To improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with the Indigenous Peoples affected by a project throughout the project's life cycle;
- To obtain the Free, Prior, and Informed Consent (FPIC) of affected Indigenous Peoples as described in ESS7; and
- To recognize, respect and preserve the culture, knowledge, and practices of Indigenous Peoples, and to provide them with an opportunity to adapt to changing conditions in a manner and in a timeframe acceptable to them.

Requirements of ESS7 in the context of CSET:

General requirements:

- To ensure that Indigenous Peoples present in, or with collective attachment to, the project areas are fully consulted about, and have opportunities to actively participate in, project design and the determination of project implementation arrangements. The scope and scale of consultation, as well as subsequent project planning and documentation processes, will be proportionate to the scope and scale of potential project risks and impacts as they may affect Indigenous Peoples.
 - To assess the nature and degree of the expected direct and indirect economic, social, cultural (including cultural heritage), and environmental and social impacts

The World Bank's ESS7 requires that Free, Prior and Informed Consent (FPIC) of the ethnic groups be obtained in circumstances where the projects:

- Have adverse impacts on land and natural resources that are traditionally owned or under customary use or occupation;
- Cause relocation of Indigenous Peoples from land and natural resources that are traditionally owned or under customary use or occupation; or
- Have significant impacts on Indigenous Peoples' cultural heritage that holds material significance to the identity and/or cultural, ceremonial, or spiritual aspects of the affected Indigenous Peoples' lives.

Engaging appropriate specialists to provide technical advice and support in applying the ESS7 is important, especially in cases where indigenous peoples are vulnerable, or where national legislation and general socioeconomic data only provide limited information about specific groups that may be present. The specialists should have proven proficiency in social science research methods, and extensive knowledge and practical experience in dealing with IP in the country or region.

3.4 National policies related to Indigenous Peoples

Cambodia has a policy that recognizes the rights of Indigenous Peoples in culture, education, justice, health, environment, land, agriculture, water resources and infrastructure, among other things. The Land Law (2001) recognizes the rights of indigenous communities to ownership of immovable property, particularly their land through a collective title. However, no decrees, sub-decrees or procedures for specific safeguards are in place to protect the interests of indigenous peoples, apart from those linked to land or forestry. In practice, the processing of registering a collective land title is time consuming. As a result, only a handful of indigenous communities have received a collective land title since the enactment of the Land Law in 2001.

However, there is an overall consistency between national legislation and international agencies' standards and requirements on indigenous peoples. For instance, the self-identification criteria for indigenous communities as defined in the national policy in Cambodia is broadly consistent with those of international institutions. The national laws do not exclude communities who have become more mainstreamed to the

Khmer group. Indigenous communities may apply for legal status regardless of whether they still use their own language or engage in traditional agriculture.

While there is some complementary links between Cambodian laws and regulations related to indigenous people and the World Bank's ESS7, there is a lack of detailed regulations or operating procedures that facilitate full implementation of an Indigenous Peoples Plan (IPP). Therefore, the IPPF was developed based on the World Bank's ESS7, while considering relevant Cambodian policies and regulations to facilitate the implementation of an IPP in a manner that aligns with the objective of ESS7 mentioned above.

The IPPF provides procedures for screening for IP presence in subproject areas and how to conduct a targeted Social Assessment (SA). The IPPF also outlines a Grievance Redress Mechanism (GRM) developed based on the current practices as to how grievances are handled under development projects in Cambodia. Since there are various IP groups in the subproject areas and each group's distinctive customs and traditions, the GRM specified under this IPPF will be further customized to ensure it is culturally appropriate for the IP group being consulted for the project. Such customization will be made based on the consultations with the involved IPs identified at subproject level.

3.5 Gaps between National policies and the WB's ESS7

The gaps between the national policies and the WB's ESS7 on Indigenous People as well as the proposed mitigation measures is discussed in the Table 6.

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Table 6. Key Indigenous People's Policies Gap and Proposed Measures

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No.	Key themes	World Bank's ESF requirements	National Policies and Regulations			Gaps	Proposed Measures
			NPDIP ¹⁵	LAR – SOP ¹⁶	ESS-NCDD ¹⁷		
1	PUBLIC CONSULTATION AND PARTICIPATION	<ul style="list-style-type: none"> IPs shall be fully consulted about, and have opportunities to actively participate in, project design and the determination of project implementation arrangements. Actively engaged IP to ensure IP's ownership and participation in project design, implementation, monitoring and evaluation. If remote groups with limited external contact, also known as peoples "in voluntary isolation," "isolated peoples" or "in initial contact," the Borrower will take appropriate measures to recognize, respect and protect their land and territories, environment, health and culture, as well as measures to avoid all undesired contact with them as a consequence of the project. 	<ul style="list-style-type: none"> EIA disclose publicly to relevant IP's communities in advance for affected people to have opportunity to provide input about their need It must be consulted with IPs in order to ensure they benefit from the economy and development in the IP areas. 	<ul style="list-style-type: none"> In case indigenous communities will be affected by the project in terms of land acquisition, prior to the start of field work for Detailed Measurement Survey (DMS), provide information to affected IPs and consultation with IPs will need to also touch on socio-cultural implications of the basic resettlement plan and the indigenous people plan, if any. In most cases, the consultation will be conducted with the tribal/ customary leaders as they make the decisions for the tribe or their people. 	<ul style="list-style-type: none"> The IP shall be made aware of their rights, ensuring that they will be entitled to the enjoyment, compensations and appropriate benefits from the project. Any project implementation must be joined and discussed with the indigenous peoples especially with their representatives or village chiefs. 	While ESF and national policies share similarity in terms of information sharing for public consultation and ensure project benefits for IPs, national policies do not a) mention about allowing IP to determine project implementation arrangements and b) emphasize consultation needs to be maintained throughout project cycle (e.g. design and implementation)	<ul style="list-style-type: none"> Engage IPs, who are present in project area, in a meaningful consultation process in which consultation will be carried out in a manner that is culturally appropriate local IP's practices of Ensure affected IP are engaged continuously throughout project cycle (e.g. design and implementation process) Let affected IP determine project implementation arrangements, including how project would affect them.
2	ENVIRONMENTAL IMPACT ASSESSMENT	<ul style="list-style-type: none"> The Borrower will assess the nature and degree of the expected direct and indirect economic, social, cultural (including cultural heritage), and environmental impacts on IPs. The Borrower will ensure the timely delivery of agreed measures to affected IPs. 	<ul style="list-style-type: none"> Development projects in the living areas of IP can function only if there has been an environmental and social impact assessment 	<ul style="list-style-type: none"> If LAR cannot be avoided, the impacts on their identity, culture, and customary livelihood will be studied in depth. A separate study on the social impacts will be carried out on how 	<ul style="list-style-type: none"> Identify the identity of the IPs, natural resources and the area in which they suffer from the negative impacts of the project implementation and ensuring that 	While ESF and national policies share similarity in terms of the need to conduct study to understand the nature and the level of impacts on affected IP, national policies do not	<ul style="list-style-type: none"> During EIA exercise, all IPs potentially affected by the project (positively and/or adversely) will be consulted through a meaningful consultation process to agree on proposed mitigation measures and time-bound delivery of mitigation measures

No.	Key themes	World Bank's ESF requirements	National Policies and Regulations			Gaps	Proposed Measures
			NPDIP ¹⁵	LAR – SOP ¹⁶	ESS-NCDD ¹⁷		
				the IPs use their land, how they conduct their economic activities, and how they organize their social activities.	the project will benefit them	explicitly require that proposed mitigation measures need to be agreed with and timely delivered to affected IPs	
3	Impact minimization and/or compensation	<ul style="list-style-type: none"> Where alternatives have been explored and adverse impacts are unavoidable, the Borrower will minimize and/or compensate for these impacts in a culturally appropriate manner proportionate to the nature and scale of such impacts and the form and degree of vulnerability of the affected IPs. Eligibility for compensation can either be individually or collectively-based, or be a combination of both. 	<ul style="list-style-type: none"> Relocation is inevitable, as a national exemption measure for the needs of the national interest or an urgent need of the nation, this change is possible by complying with the resettlement standards and advance payment is appropriate and fair. 	<ul style="list-style-type: none"> IPP is prepared to mitigate the social impacts, develop the compensation and resettlement package that will be offered, and set out implementation arrangements. 	<ul style="list-style-type: none"> If effects are unavoidable, make sure that the effects will be put at a minimal level and then restored; or compensation will be made for such effects on their cultures. IP shall be made aware of their rights, ensuring that they will be entitled to the enjoyment, compensations and appropriate benefits from the project; 	<ul style="list-style-type: none"> National policies have no provisions that emphasize on the need to minimize and/or compensate for these impacts on IPs in a manner that is a) culturally appropriate, b) proportionate to nature and scale of impacts and c) consider the form and degree of vulnerability of the affected IPs. 	<ul style="list-style-type: none"> Impact minimization and compensation and support in livelihood restoration will be carried out vis-à-vis a) vulnerability of the affected IP and b) impact as perceived by affected IP from their cultural perspective.
5	FREE, PRIOR AND INFORMED CONSENT (FPIC)	<ul style="list-style-type: none"> The Borrower will obtain the FPIC of the affected IPs on land and natural resources subject to 	<ul style="list-style-type: none"> Indigenous communities have the right to access 	<ul style="list-style-type: none"> In case indigenous communities are affected people, 	<ul style="list-style-type: none"> People who may be negatively affected by 	<ul style="list-style-type: none"> National regulations do not have specific 	<ul style="list-style-type: none"> FPIC (as per WB's ESS7) shall be obtained from affected IP for project investment that

¹⁵ National Policy on the Development of Indigenous Peoples

¹⁶ Land Acquisition & Involuntary Resettlement – Standard Operating Procedures

¹⁷ Environmental and Social Safeguards of the National Committee for Sub-National Democratic Development

No.	Key themes	World Bank's ESF requirements	National Policies and Regulations			Gaps	Proposed Measures
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		traditional ownership or under customary use or occupation in the event the project will: (a) have adverse impacts on land and/or natural resources of their traditional ownership, or under their customary use or occupation; (b) cause relocation of IP communities; and (c) have significant impacts on IPs' cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the affected IPs' lives.	information of culture, technology, economic and political on issues related to their interests, and to access information related to equitable and stable living conditions. IPs have the right to express themselves and share their experiences with the government, citizens and others from other countries.	consultation will also touch on socio-cultural implications of the basic resettlement plan and the IPP, if any; <ul style="list-style-type: none"> In most cases, the consultation will be with the tribal/customary leaders as they make the decisions for the tribe or their people. The IPP is normally prepared by the PPC with the involvement of the EA/IA and relevant local authorities. 	environmental and social risks and impacts have the right to be fully informed about the risks and risk management measures. People have the right to be consulted and to give their free and informed consent	FPIC guideline for affected IPs. <ul style="list-style-type: none"> In addition, there are no explicit indication in national regulations that indicates free, prior and informed consent needs to be obtained from affected IP for project activities that cause 3 types of impacts – as mentioned in the ESS7 of the World Bank 	involves one of the three circumstances described in ESS7. <ul style="list-style-type: none"> Independent specialists will be engaged by Borrower to assist in the identification of the project's risks and impacts.
6	DISCLOSURE AND GRIEVANCE MECHANISM	<ul style="list-style-type: none"> The Borrower will ensure that a grievance mechanism is established for the project which is culturally appropriate and accessible to affected IPs, and takes into account the availability of judicial recourse and customary dispute settlement mechanisms among IPs. 	<ul style="list-style-type: none"> Community committees, as a mechanism for resolving conflicts in areas where IP live, are recognized and encouraged to participate in the service of justice. In the event of a dispute beyond its capacity to mediate, the Committee shall refer the case to other dispute resolution mechanisms or to the courts. 	<ul style="list-style-type: none"> Every project where LAR is necessary should therefore have in place a redress mechanism to resolve complaints and grievances from displaced persons. The arrangement should be transparent, fair, reliable and effective and function in such a manner that resolution of complaints is achieved in a timely 	<ul style="list-style-type: none"> All people also have the right to submit a complaint directly to NCDD Secretariat, either through the NCDD website, in writing, by telephone or in person. NCDD Secretariat will record and investigate all complaints received in accordance with the grievance 	<ul style="list-style-type: none"> National regulations do not mention the need to ensure the grievance redress mechanism is culturally appropriate to affected IPs s 	<ul style="list-style-type: none"> Project-level grievance mechanism will be designed taking into account current grievance resolution practices of each affected IP. This is designed based on the consultation with IPs potentially affected by the project on their preference over grievance redress procedures.

No.	Key themes	World Bank's ESF requirements	National Policies and Regulations			Gaps	Proposed Measures
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				manner.	mechanism in the NCDD Secretariat Operational Policies and Procedures Manual.		

1. Royal Government of Cambodia (2009) National Policy on the Development of Indigenous Peoples (NPDIP).
2. RGC (2018) Land Acquisition and Involuntary Resettlement, Standard Operating Procedures (LAR-SOP) for Externally Financed Projects in Cambodia.
3. RGC-NCDD (2019) Policy on Environmental and Social Safeguards for Sub-National Democratic Development.

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4. ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

4.1 Environmental Risks and Impacts

Environmental Risks

During construction process, environmental risks are related primarily to the labor force, including risks related Occupational Health and Safety of contractors' workers, physical hazards, chemical hazards, and risks related to lack of, or improper use of Personal Protective Equipment. These risks are elaborated below.

- **Occupational Health and Safety (OHS) Risks:** OHS risks identified under the project include physical hazards, chemical hazards, and Personal Protective Equipment, as follows:
- **Physical Hazards.** Physical hazards represent potential for accident or injury or illness due to repetitive exposure to mechanical action or physical activities. Physical hazards may result in a wide range of injuries, from minor and need medical aid only, to disabling, catastrophic, and/or fatal.
 - Accidents due to falls: falling from ladders, scaffoldings, vehicles, etc.
 - Drowning and water injury accidents: workers may have to walk on structure above the water, or beams across the river or stream.
 - Accident due to falling objects: Tools, machinery, equipment and materials used during construction may fall from the height, causing injuries.
 - Fall into open holes: holes, manhole, and areas of deep excavation may be commonly found at road and bridge works. Fall into these holes may cause injuries of various degrees.
 - Physical injury related to the operations of heavy equipment: Injury may result during operations of heavy equipment, such as crane, excavator, etc.
 - Risk of cuts from sharp items: during construction, workers are exposed to risks of being cut due to sharp blade and edge while using tools such as knives, scissors, and other utensils, or while equipment or vehicle are in operations.
- **Chemical hazards.** Chemical hazards represent potential for illness or injury due to single acute exposure or chronic repetitive exposure to toxic, corrosive, sensitizing or oxidative substances. Common chemicals used in construction include Portland cement clinker (mineral binders), formaldehyde (wood-based materials), polyurethane, vinyl, cadmium or lead (paints and resins), and solvents. They also represent a risk of uncontrolled reactions, including the risk of fire and explosion, if incompatible chemicals are inadvertently mixed.
 - Fire and Explosions. Fires and or explosions resulting from ignition of flammable materials or gases can lead to loss of property as well as possible injury or fatalities to project workers.
 - Corrosive, oxidizing, and reactive chemicals. Corrosive, oxidizing, and reactive chemicals present similar hazards and require similar control measures as flammable materials.
 - Personal Protective Equipment. PPE provides additional protection to workers exposed to workplace hazards in conjunction with other facility controls and safety systems. Lack of appropriate PPE and the poor use of PPE may, in circumstance, result in injuries workers' eyes, heads, necks, ears, hands, arms, feet, legs, ears, lungs, and even the whole body. Inappropriate use of PPE by workers can also increase the risk of accidents.
- **UXOs.** There is risk of UXOs, fire and explosion incidents, leakage of oils and chemical which cause soil and/water pollution.

Environmental Impacts

The SC1.5 under Project Component 1 is anticipated to cause local environmental adverse impacts, primarily at construction site, including temporary noise and vibration in areas connected to protected areas, pollution of air, water and soil, and waste, etc. that are generated from construction activities. Such impacts would potentially cause disturbance to biodiversity and people who live or have income generation activities going

on nearby the construction sites. In addition, during construction activities, other potential negative environmental impacts may include: (i) possible erosion and run-off to the water bodies nearby, particularly during earthworks operation; (ii) water pollution from sourcing aggregates/construction materials such as soil, gravels, (iii) pollution caused by noise, wastewater, solid waste, used engine oil that are released from workers' camps. Most of these environmental impacts are likely temporary and thus reversible and manageable by applying good construction practices and environmental and social management plans. Cumulative environmental impacts are anticipated but are assessed to be small and negligible because of the nature and small scope of the civil work that take place in a short period of time. Screening for potential cumulative impact will be conducted during environmental and social screening exercise to be carried out for each identified sub-project.

4.2 Social Risks and Impacts

Social Risks

During subproject construction, there are a number of social risks that may apply to local people, including IP peoples who may happen to be present in a subproject area.

- **Labor Influx:** During project implementation, particularly before construction take place, the contractors will mobilize their staff, such as project manager, technician and skilled workers, to subproject area to support the construction works. The contractor's staff may not share cultural characteristics with local people, including IP communities. As a result, some social risks are anticipated as a result of the labor influx, including:
 - Increased health risks due to contracting communicable diseases such as HIV/AIDS, and other non-communicable diseases from contractors' workers. These risks are likely increased if IP in subproject areas are not aware of these risks and take appropriate measures to avoid/reduce the risks.
 - Potential social conflicts between construction workers with local people, particularly when non-local workers are not familiar with local cultural practices, taboos as to women, and to cultural and spiritual things of local IPs such as spiritual trees, stones, rivers, temples, graveyards, etc, near the construction sites;
 - Increased pressures to local inhabitants due to increased demand for food, fuel, housing, etc. on the part of construction workers.
 - Concentration of labor force at project's construction sites may give rise to gathering of sex workers, increased number of local small businesses, job seekers and others, which may be opposite to the cultural belief and practices of local IPs, increasing tension between IPs and contractors' workers.
- **Sexual Exploitation and Abuse, Sexual Harassment, and Violence against Children due to labor influx:** The social risks under this CEST project may include risks related to Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), and Violence Against Children (VAC). These risks are identified based on potential concentration of a large number of workers at the subprojects, to support physical construction. For a civil-work subproject, around 30-40 workers may be engaged to carry out construction activities. Given the good awareness of IP and local communities, the risk of SEA/SH/ VAC is considered as "low" by the time of project preparation.
- **Child Labor:** According to the World Bank's ESS2, the minimum working age required is 14 or higher as the national law specified. According to Labor Law 1997 (article 177, section B), children from twelve to fifteen years of age can be hired to do light work provided that: a) the work is not hazardous to their health or mental and physical development; b) the work will not affect their regular school attendance, their participation in guidance programs or vocational training approved by a competent authority. Since the construction of MV and LV distribution networks to unelectrified villages will take place in rural areas where child labor is common, there is a possibility that local labor under 18 years of age is engaged by construction contractors and subcontractors to perform unskilled works. To ensure children are prevented from being engaged in typically heavy works at construction sites, all contractors under the project are required to engage laborers of 18 years of age or above. The contractors are required to verify

the workers' age using valid supporting documents (i.e. identification card or other certification by local authorities) before a contract is signed. The requirement for minimum working age (18 years of age) will be included in bidding documents, and in work contract that PMU signs with each of the awarded contractors. Risks of engaging of child labor associated with primary supply workers will be screened and assessed once primary suppliers are identified by Contractors. To keep this risk to the minimum, measures and remedial process have been proposed in Labor Management Procedure that will be applied by all project's construction Contractors. With these measures in place, the risk of engaging child labor to support project construction is rated "low".

- **Forced labor** or compulsory labor is forbidden under the Labor Law (Article 15, Section 5). Forced labor includes situations where persons are coerced to work through use of violence or intimidation, manipulation of debt, retention of identity papers, threats, or other forms of retaliation. Hiring of people to work in order to pay off their debt is considered forced labor. Since project construction activities will take place mainly in rural area and most people are likely unskilled for the construction works, effort will be made by PMU and contractors to avoid forced labor. This will be done through requirement of avoiding forced labor in contractors' work contract, and requirement for contractors to verify if a local worker to be hired provides their genuine consent work. PMU will notify the Bank of any violation within 24 hours and take appropriate remedial action. Risks of engaging of forced labor associated with primary supply workers will be screened and assessed once primary suppliers are identified by Contractors. To keep this risk to the minimum, measures have been proposed in Labor Management Procedure that will be applied by all project's construction Contractors. Under this project, the risk of engaging forced labor to support project construction is very "low".
- **Discrimination and Exclusion of Disadvantaged/ Vulnerable Groups:** Vulnerable/disadvantaged people, such the poor, indigenous peoples, women, etc., may be excluded from accessing temporary employment opportunities, such as those offered by construction contractors. Unequal wage payment on the account of gender may happen, particularly with local people engaged as unskilled workers. Every effort will be made to ensure local disadvantaged/ vulnerable groups are informed by contractors about job opportunities and contractors are also required, though their work contract, avoid impartial pay based on gender and employment status. Contractors may ask commune office and/or local mass organizations for their support in making job opportunities timely accessible to vulnerable people. The risk of discrimination and exclusion of disadvantaged/ vulnerable groups is "low".
- **Temporary Workers:** Local people, recruited as unskilled workers by project contractors, may not be offered a written working contract. As a result, there is a possibility that they may be underpaid for the nature, scope, and quantity of work that they undertake. They may also be asked to work under conditions that are hazardous to them, such as working without personal protective equipment as required for such work. Underpayment may also take place on the basis of gender, temporary work status – at the discretion of contractors. To address this risk, contractors will be required to sign a contract with temporary workers. The contract will clearly specify the nature and scope of the work, including the number of work hours the workers are expected to work per day, including the workload expected based on physical suitability of the temporary workers. This requirement will be incorporated into bidding documents and work contract between PMU and awarded contractors to minimize the risk. This risk is assessed to be "low".

Social impacts.

The project is expected to have an overall beneficial impact to local people, including the indigenous people, through (i) providing accessibility to electricity and improving overall economic activities; and (ii) increasing saving costs from pumping expenses. Although the project brings about overall positive impacts to IP in the subproject area, some negative impacts are anticipated based on project's nature and scope, as well as experience of similar projects and consultation at national and local levels regarding IP issues during project preparation. Identified impacts and risks are discussed briefly in sections below, followed by key proposed mitigation measures. These risks, impacts, including proposed mitigation measures, are not exhaustive because subprojects have not yet identified. Therefore, during project implementation, these pre-identified impacts and risks will be validated and assessed based on a) site-specific scope of works, b) meaningful

consultation with potentially affected IPs, c) local context (e.g. local experience and capacity in addressing identified risks and impacts, etc.), d) contractors' capacity, and e) other factors.

The main impacts related land acquisition/loss of assets and livelihood are mainly from the construction activities of sub-component 1.5 under the Component 1. The activities under other sub-component and Component 2 does not involve land acquisition or impacts on the assets and livelihood of the people. The project may cause certain social risks and unintended adverse impacts specially for the SC1.5: Service Improvement in Rural Areas and Grid Connectivity of "Unelectrified Villages" under Component 1. Potential adverse impacts may include loss of lands, loss of assets affixed to land, loss of value tree, and loss of means of livelihoods, etc., particularly for those whose land are affected/ acquired for construction of MV and LV distribution networks to unelectrified villages. The acquire land MV and LV power tower is 5m x 5m and electric pole of 30cm x 30cm so that the impacts would not significantly affect daily living activities. However, there is a possibly that the MV and LV line may pass through an area with indigenous villages including their spirit forests, burial grounds, or traditional use zones, which would be a significant cultural impact. IPs have deep spiritual connections to their land; taking or damaging these areas can cause not only tangible loss (of forest resources, etc.) but also cultural and psychological distress. There is also the risk of insufficient consultation – if the project does not properly engage IP communities in their language and with respect for their decision-making processes, there could be misunderstandings or resistance. Another aspect is intangible cultural heritage – indigenous languages and practices. If outside workers come into IP areas (for construction) without cultural sensitivity, there could be social conflicts or erosion of local customs. However, on the positive side, connecting indigenous villages to electricity is expected to have strong support if done with respect (many IP communities desire development but want to be partners in the process). Any works that would adversely impact the integrity or productivity of collectively owned IP land would be carefully screened for and excluded. Works maybe undertaken adjacent to collectively owned IP land, but should not impact the integrity or it's productivity. As such FPIC will not be applicable for the project.

5. MITIGATION MEASURES

Although above environmental and social risks and impacts will be validated, and reassessed when the subproject locations become known, IP(s) in a subproject's area may be affected disproportionately compared to the mainstream group. The distinctive cultural and socioeconomic characteristics of the IPs, including their existing livelihoods, etc. may expose IPs to further risks and impacts, increase their vulnerability and compromise their ability to respond to such risks and impacts – if a holistic approach is not in place. Effective communication, such as IEC, and active participation of involved IPs, are among important factors that contribute to effective engagement of IPs for meaningful consultation during subproject preparation and participatory monitoring during subproject implementation. The coordination of project stakeholders, including PMU, Contractors, local authorities, local agencies, local service providers, and most notably the active and full participation of IPs, collectively contribute to minimizing identified risks and potential impacts at identified subprojects.

Detailed mitigation measures for the above environmental and social risks and potential impacts are proposed in the project's ESMF. These mitigation measures are specific for design stage, pre-construction stage, and construction stage.

During subproject design stage:

To avoid, minimize potential impacts related to land acquisition:

- Effort will be made by the MME and EDC to ensure the subproject design avoid acquisition of land from IPs;
- In case where avoidance is not feasible (because of technical requirements), minimize the need for land acquisition through alternative designs;

During pre-construction stage:

To address identified risks and impacts for affected IPs at subproject level, the MME and EDC will implement the following:

- Prepare site-specific ESMP

- Screen for presence of IP(s) in subproject area, based on detailed design
- Conduct targeted Social Assessment (based on site-specific ESMP)
- Develop IPPs, incorporating results from targeted SA, including mitigation measures, etc. based on meaningful consultations
- Implement IPP (as part of site-specific ESMP)
- Compensate affected IP in accordance with RPF, if avoidance is not possible.
- Provide additional financial and developmental support, as needed, based on meaningful consultation, to support affected IPs to fully and timely restore their livelihoods and income to the pre-project level, as a minimum.
- As part of IPP, conduct Behavior Change Communication using audio-visual and local IP language to provide knowledge, raise awareness, change attitude, and promote behavior change among IP and local stakeholders to respond effectively to identified risks, particularly risks related to SEA/SH/VAC, communicable disease, OHS, culture related conflicts, etc.
- Where necessary, engage service provider (e.g. SEA/SH service providers) (for subproject being risk “high” or “substantial” on SEA/SH risk (risk is assessed as part of preparation of site specific ESMP).

During construction stage:

Implement the following as an integrated approach:

- The MME and EDC to implement site-specific ESMP
- The MME and EDC to continue implementing IPP – as part of site specific ESMP (in close collaboration with IPs and local partners)
- Contractor to implement C-ESMP (including IEC campaign)
- The MME and EDC to allow budget fully and timely (based on budget plan in IPP, Contractors’ bill-of-quantity)
- The MME and EDC will enhance monitoring process to ensure risks are minimized. This can be achieved through coordinated works of the PIC, SEPRO, E&S consultants, and participatory consultation of local IPs.

6. PREPARATION OF INDIGENOUS PEOPLES PLAN

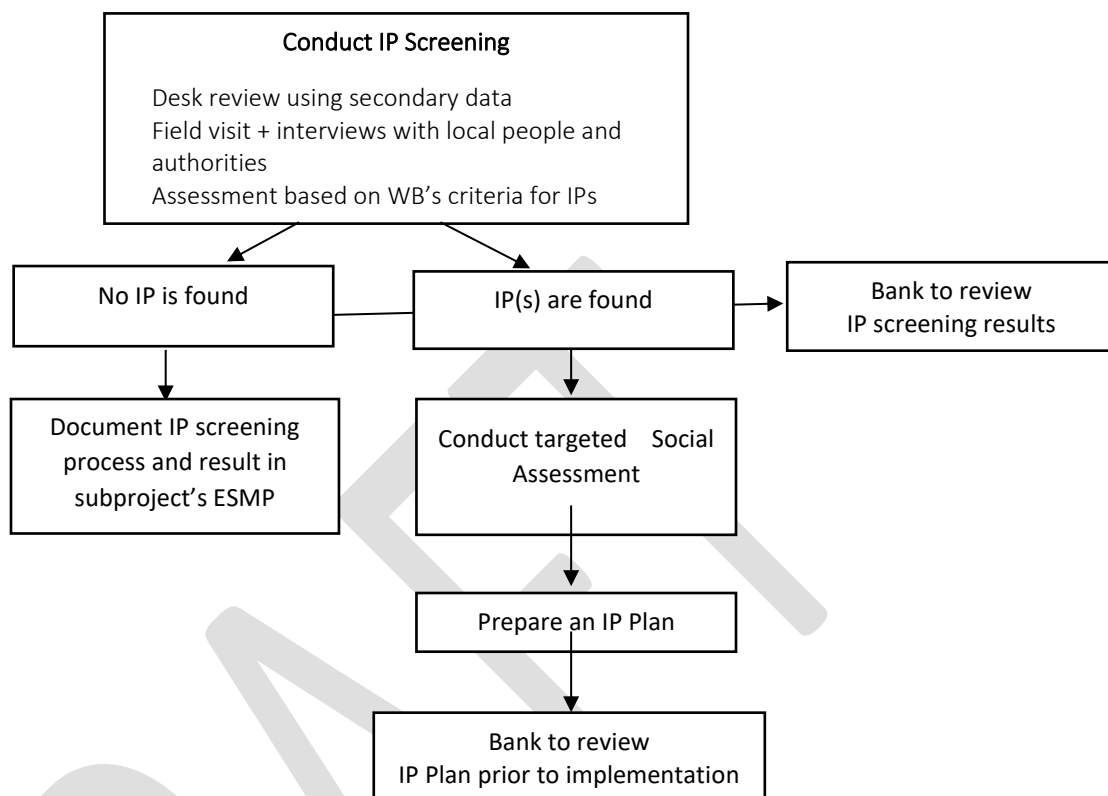
6.1 Steps for Preparing an IPP

The MME and EDC will conduct an IP screening exercise for every subproject identified during project preparation and implementation. The following steps will be taken:

- 1) Conduct IP screening to confirm if IPs (as per WB’s ESS7) are present in the area of a subproject. If no IP is found, document the IP screening process, including methods applied and results of the IP screening, in the ESMP of the relevant subproject. No further step is required.
- 2) If the IP screening concludes that IP(s) – as per World Bank’s ESS7, is present in the subproject area, the MME and EDC shall conduct a targeted Social Assessment following the guidance in this IPPF.
- 3) Based on the targeted Social Assessment conducted for the affected IPs, the MME and EDC will prepare an Indigenous Peoples Plan (IPP) with assistance of a specialized consultant in IP issues, as necessary. It is noted that where possible, the IPP could be developed as part of the site-specific ESMP. If this is the case, all key elements required for an IPP will be added in the site-specific ESMP.
- 4) MME and EDC will disclose the draft Indigenous Peoples Plan, or the site-specific ESMP (that contains IPP elements) making sure that potentially affected IP(s) can access and understand the draft IPP and provide feedback on the draft IPP.
- 5) If the scope and nature of the risks and impacts are changed as a result of design modifications, additional consultations with the affected IP should be carried out and the draft IPP will be updated

to reflect additional/updated feedback from the affected IP (See Figure below for steps presented in a flowchart).

Figure 1. Steps in IP Screening and conducting targeted Social Assessment



6.1.1 Screening for IP(s)

Once a subproject is identified and confirmed, the MME and EDC will:

- 1) **Conduct desk review.** This involves reviewing data that is available in the Commune Database or IP databases of the MRD. Key information to be collected for a desk review includes socioeconomic and demographic information of ethnic groups living in the subproject area of influence. The MME and EDC may ask local authorities in the subproject area or nearby to provide additional information to allow a thorough desk review.
- 2) **Make field visit.** The MME and EDC will visit the subproject area. In addition to field observation, the MME and EDC will need to meet with local authorities and interview local people, particularly those who are knowledgeable about IP in the area, such as local leaders at village and commune levels to explore if there are IP living in or adjacent to subproject area.
- 3) **Conduct assessment of IP(s).** This would involve examination of all information collected above to confirm if the IPs (as per WB's ESS7) are present in the subproject (IP Screening Form in Annex 1 shall be used). The IP(s) under examination should meet all four criteria below to be considered IP as per WB's ESS7 (see Guidance in Annex 2):
 - a) Self-identification as members of a distinct indigenous social and cultural group and recognition of this identity by others; and
 - b) Collective attachment to geographically distinct habitats, ancestral territories, or areas of seasonal use or occupation, as well as to the natural resources in these areas;
 - c) Customary cultural, economic, social, or political institutions that are distinct or separate from those of the mainstream society or culture; and
 - d) A distinct language or dialect, often different from the official language or languages of the

country or region in which they reside.

It is important to note that an IPP will be prepared regardless of

- a) whether the IPs in the subproject area are positively or negatively affected by the subproject;
- b) significance of any such impacts, and
- c) presence or absence of discernible economic, political or social vulnerabilities of the IPs.

During IP screening process, when in doubt, the MME and EDC should consult with the World Bank's team for advice or guidance.

6.1.2 Conducting a targeted Social Assessment

If IPs are present in the subproject area, the MME and EDC will conduct a targeted Social Assessment (SA) with technical assistance from an IP specialized qualified consultant. The breadth, depth, and type of analysis in the targeted SA will be proportional to the nature and scale of the subprojects' potential effects on the IP community. The consultation results, mitigation measures, proposed actions. from targeted SA report will be integrated into site-specific Environmental and Social Management Plan (ESMP) to inform mitigation measures for affected IP for preparation of site-specific ESMP.

The targeted SA will include the following elements as needed:

- a) Baseline data collection on the demographic, economic, social, cultural and political characteristics of the affected IP groups, habitats, ancestral territories, or areas of seasonal use and occupation that they have traditionally owned or customarily used or occupied, as well as the land in the project area and the natural resources in these areas on which they depend;
- b) Assessment, based on meaningful consultations tailored to the IPs, of the potential adverse and positive effects of the subproject. Special attention is given to analysis of the relative vulnerability of, and risks to, the affected IPs given their distinct circumstances (such as small population which may increase their vulnerability due to limited social network), and their level of dependence on land and natural resources, as well as their potential lack of access to opportunities relative to other social groups in the communities and regions in which they live. The assessment should consider differentiated gender impacts of subproject activities and impacts on potentially disadvantaged or vulnerable groups within the IP community, as well as the preferred grievance redress mechanism that may be preferred as a cultural practice of the affected IP(s);
- c) The identification and evaluation of measures necessary to avoid adverse effects, or if such measures are not feasible, the identification of measures to minimize, mitigate, or compensate for such effects, and to ensure that IPs receive project benefits;
- d) A description and assessment of the legal and institutional framework applicable to IP communities, as detailed in this IPPF. Besides describing the legal status of IPs in the country's constitution, legislation (laws, regulations, administrative orders) and customary law, this section should also include an assessment of the ability of the communities to obtain access to and effectively use the country's legal system to defend their rights;
- e) A summary of the Stakeholder Engagement Plan, which would include stakeholder analysis and engagement planning, disclosure of information, and meaningful consultations, in a culturally appropriate and gender and inter-generationally inclusive manner. The project's existing SEP would be expected to guide this¹⁸.
- f) A summary of meaning consultation results. The consultations should: (i) involve representative bodies and organizations and, where appropriate, other community members; (ii) provide sufficient time for IPs' decision-making processes; and (iii) allow for the effective participation by IPs in the design of project activities or mitigation measures that could potentially affect them either positively

¹⁸ EDC should consult IPs as to the cultural appropriateness of the Project's components and documents such as the SEP and identify and address any social or economic constraints that may limit opportunities to benefit from, or participate in, the Project.

or negatively. Feedback on the project would be gathered through separate group meetings with IPs, vulnerable groups, including their traditional leaders, NGOs, community-based organizations, CSOs and other affected persons. The consultations would also help inform the Social Assessment with regard to demographic data, such as the social and economic situation and impacts (See Annex 4 for suggestive questions that can be used for a targeted Social Assessment).

The SA will screen to know if subproject activities would create any potential adverse impact on the cultural properties of the IP (including tangible and intangible). The targeted SA will be conducted based on the meaningful consultation with affected IP which is grounded on the principle of free, prior and informed consultation. Sufficient information will be provided to potentially affected IP to ensure meaningful consultation. Details about scope, scale, nature of subproject activities, subproject location, and identified E&S risks and impacts associated with the construction activities will be provided to affected IP to ensure their feedback are meaningful.

6.1.3 Prepare an Indigenous Peoples Plan

Based on the results of the targeted SA, an Indigenous Peoples Plan (IPP) will be prepared. The IPP will have the following elements, as needed:

- a) A summary of the targeted Social Assessment report, including the applicable legal and institutional framework and baseline data;
- b) A summary of sub-project description and its impacts on IPs
- c) A summary of results of meaningful consultation tailored to IPs. If the subproject involves the three circumstances specified in Section 6.3 (below), the outcome and process associated with FPIC consultation will be described in the IPP;
- d) A framework for meaningful consultation tailored to IPs during subproject implementation;
- e) A detailed description of measures to ensure that any potential adverse impacts on the consulted IPs are avoided/minimized and mitigated and that the IPs receive socioeconomic benefits during project implementation that are culturally appropriate to them. Measures will be gender sensitive and include steps for implementation.
- f) Arrangements for IPP implementation with a clear description of roles and responsibilities of relevant stakeholders. This should include measures to strengthen the capacity of local authorities, as needed, as well as the involvement of NGOs or CSOs as necessary;
- g) A project's Grievance Redress Mechanism is adapted to ensure it is culturally appropriate and accessible to the affected IPs, taking into account the availability of judicial recourse and customary dispute settlement mechanisms among the IPs. This should be done in consultation with the IP groups present in the subproject area;
- h) The cost estimates and financing plan for the IPP implementation;
- i) Mechanisms and benchmarks appropriate for monitoring, evaluation, and reporting on the implementation of the IPP. Monitoring arrangements should include the following: (i) administrative monitoring to ensure that implementation is on schedule and problems are solved timely; (ii) monitoring of IPP implementation utilizing the socioeconomic baseline established in the targeted SA report, including ways to consider inputs from the affected IPs in such mechanisms.

EDC will submit IPPs to the World Bank for prior review before implementation.

6.2 Stakeholder Engagement and Information Disclosure

6.2.1 Stakeholder Engagement

The WB's ESS7 defines stakeholder engagement as a process of identifying relevant stakeholders, conducting stakeholder analysis, and organizing a series of consultations to meet with project stakeholders for collecting stakeholders' feedback and concerns on project's risks and impacts, as well as stakeholders' development needs in relation to project purposes and activities. This aims to ensure the project's adverse impacts on IPs

can be avoided, or minimized and mitigated if avoidance is not possible. For this project, it is important that IPs need to be consulted on their development needs (in relation to project purposes) to ensure they can receive socioeconomic benefits that are appropriate to them culturally.

6.2.2 Consultation with IPs during Project Preparation

Consultation on project design and related IP issues was conducted at national level during the ESMF disclosure. This IPPF will be disclosed for public consultation. Feedback of consulted IP has been incorporated into relevant subproject design to a minimize impact on IP – based on the FPIC obtained from affected IP for the associated impacts.

6.2.3 Consultation with IPs during Project Implementation

During project implementation, consultations with IPs will be carried out for subprojects where IP screening has confirmed that IPs, as per WB ESS7, are present in the subproject areas. The consultations with identified IPs will be carried out on an iterative basis throughout project cycle, to facilitate the process of adaptive management of risks and impacts identified for the subproject. To ensure relevant IP stakeholders are engaged in project consultations, the MME and EDC will identify IP group(s) present in subprojects, then conduct consultations with them – as per Section 6.1. The consultations with identified IP groups will be conducted in a culturally appropriate manner that takes into consideration gender sensitivity and intergenerational perspectives.

The consultations will seek also feedback from IPs on subproject's risks and impacts, suggestions to avoid or mitigate such risks and impacts, and developmental needs of the IP in relation to the project goal and subproject activities.

To promote effective project design and build project support and ownership of local IPs, while reducing risk of potential delays during subproject implementation, the MME and EDC will apply the engagement strategy described in the project's SEP. The engagement process will include analysis of IPs as project stakeholders, engagement planning, disclosure of information, and conducting meaningful consultations with the affected IP(s). The consultations will be based on the existing customary institutions and decision-making processes of the consulted IPs to promote IP's participation and support for the subprojects. In particular, the consultations to be conducted by the MME and EDC at subproject level will:

- a) Involve the participation of IPs' representative bodies and organizations, such as councils of elders or village councils, or chieftains. Where appropriate, consultations shall be carried out with other members of the IP communities;
- b) Allow for IPs to participate effectively in the design of project activities or mitigation measures that could potentially affect them – either positively or negatively;
- c) Provide IPs sufficient time to make informed decisions.

6.2.4 Information Disclosure

Prior to conducting consultations, the MME and EDC will notify the concerned IPs of the consultation plan during preparation. The MME and EDC will provide affected IPs with initial subproject information in the form of booklet in both Khmer and local language (if applicable). This initial information should be provided to IP at least two weeks prior to consultation. If the concerned IPs do not have a written language, the IP will be provided the information in Khmer and are explained verbally in the local language of the concerned IP to ensure the IP are fully informed of the consultation purpose and initial subproject information.

For public consultation, the draft IPPF (in English) and its Executive Summary (in Khmer) shall be disclosed on the MME's website on dd mm, 2026 (<https://www.>) and EDC's website on dd mm 2026 (<https://www.>). The Executive Summary (in Khmer) shall also be disclosed in hard copy at the MME's and EDC's public library in Phnom Penh, and in the offices of Provincial EDC. Once finalized, the IPPF will be re-disclosed again through the above channels as per guidelines of the SEP prior to WB's project appraisal. The draft and final IPPF will be disclosed in English on the WB's website.

During project implementation, all draft IPPs, once completed by the MME and EDC and submitted to the Bank for review, shall be disclosed to affected IP communities in Khmer language. The summary of the IPP

(in the form of an Information Booklet) will be translated into IP's language if the consulted IPs have their own written language. Public meetings will be held with the affected IP(s) to explain the contents of the relevant IPP in their IP language to ensure affected IPs understand what and how the activities under the IPP will be carried out, including E&S risks and impacts of subproject activities, and how the IPs will be engaged by the MME and EDC in consultation meetings during subproject preparation, and in monitoring during subproject implementation to minimize identified E&S risks and impacts. IPPs – prepared for relevant subprojects, will be disclosed locally in Khmer and local IP language (if applicable), as well as in Khmer and English language on the MME's website and EDC's website. The English version of the IPPs will be disclosed on the World Bank's website.

6.3 Free, Prior and Informed Consent (FPIC)

6.3.1 Circumstances requiring FPIC

As part of the environmental and social screening, if the proposed subproject affects the IP people(s) under one of the following circumstances, the MME and EDC needs to obtain the Free, Prior and Informed Consent (FPIC) of the affected IP people(s):

- The proposed subproject has adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation.
- Causes relocation of IPs from land and natural resources subject to their traditional ownership or under customary use or occupation.
- Has significant impacts on the IP's cultural heritage that is material to their identity and/or cultural, ceremonial, or spiritual aspects of their lives.

6.3.2 Consultation of Vulnerable Groups

During consultation process, the MME and EDC is required to pay attention to the affected disadvantaged or vulnerable individuals/group such as the poor, women-headed households, and people with disabilities. When this is the case, efforts will be made to facilitate the participation of representatives of this group in the FPIC process to ensure their concerns and/or interests are adequately considered and addressed towards in the process towards establishing the FPIC for the relevant subproject's activities. When this is the case, consultants who have significant experience in issues of concern to IPs should be engaged to assist the MME and EDC in consultation with the vulnerable and/or disadvantaged individuals/groups.

6.3.3 Negotiation for FPIC

The MME and EDC will ensure that the negotiation with the affected IPs are carried out in good faith of all parties involved and that all parties are:

- a) Willing to engage in the FPIC process and are available to meet at reasonable times and frequency;
- b) Willing to share the information necessary for the informed negotiation;
- c) Use mutually acceptable procedures for the negotiation;
- d) Willing to change initial positions and modify offers, where possible; and
- e) Provided with sufficient time for discussion and decision making throughout the FPIC process.

It is important to note that the word 'consent' refers to the collective support of affected IPs for the project activities that affect them, reached through a culturally appropriate process. Consent may exist even if some individuals or groups object to project activities. FPIC does not require unanimity and may be achieved even when individuals or groups within or among affected IPs explicitly disagree. This process should be properly assessed and documented as part of the targeted Social Assessment.

When the FPIC of the affected IP cannot be ascertained by the Bank, the aspects of the subproject relevant to the affected IP(s) for which the FPIC cannot be obtained will not be processed further. Where the Bank has made the decision to continue processing the subproject other than the aspects for which the FPIC of the affected IP(s) cannot be determined, the MME and EDC will ensure that no adverse impacts result on such IP(s).

6.3.4 Subprojects located on land traditionally owned by, or under the customary use or occupation of IP(s)

When this is the case, the MME and EDC will take the following steps toward obtaining the FPIC of the affected IP(s):

- a) Document the efforts of the MME and EDC in avoiding and otherwise minimizing the area of land proposed for the subproject;
- b) Document efforts in avoiding and otherwise minimizing impacts on natural resources subject to traditional ownership or customary use or occupation;
- c) Identify and review all property interests, tenurial arrangements, and traditional resource usage prior to carrying out land acquisition;
- d) Assess and document IP's resources use without prejudicing any IP(s); and
- e) Ensure that affected IPs are informed of: (i) their land rights under national law, including any national law recognizing customary use rights; (ii) the scope and nature of the subproject; and (iii) the potential impacts of the subproject.

6.3.5 Documentation of FPIC process and outcome

In terms of documenting the FPIC process and outcome, the MME and EDC will ensure that the following is documented:

- a) The mutually accepted process to carry out good faith negotiations that has been agreed by the MME and EDC and IPs; and
- b) The outcome of the good faith negotiations between the MME and EDC and IPs, including all agreements reached as well as dissenting views.

The consultation records will document the consultations, interviews, attendance lists, photographic evidence and minutes of other meetings and/or back-to-office reports.

7. GRIEVANCE REDRESS MECHANISM

7.1 Objective of Project's GRM

The objective of the GRM in this IPPF is to provide aggrieved IP with grievance redress procedures that are accessible, easily used, and free of charge to ensure that the grievances submitted by the affected IPs are solved timely. The GRM in this IPPF guides how a complaint of affected IP can be lodged, including forms of grievance lodging, channels, and steps that can be taken.

The GRM also describes the time-limits, where possible, for each step, such as time-limit for acknowledging receipt of complaints, notification of resolution decision. During the grievance resolution progress, where necessary, dialogues will be held between the aggrieved IP and GRC that are designated for each step. Dialogues with affected IP during complaint resolution process aims to promote mutual understanding and collaboration among concerned parties.

The project also includes an appeal process that a complainant can use when they are dissatisfied with the resolution results/decision, or their complaints are not resolved within a specified timeframe. During subproject implementation, IPs in the subproject area will be reminded of the availability of this GRM and will be explained during consultations about how to use it.

7.2 Grievance Redress Mechanism

The MME and EDC will ensure through public consultation meetings in the project areas and through a Project Information Booklet distributed to the AHs that all the affected people are fully aware of their rights to complain and about the grievance redress mechanism. Any party who is affected by land acquisition or any other impacts related to the project construction and operation, is eligible to file a complaint.

A GRC will be established at provincial level with a process starting from commune offices. As practiced, the GRC includes the relevant local commune or village chiefs and where needed, a local NGO may assist the affected persons in filing complaints. The designated commune officials shall exercise all efforts to settle complaints and issues at the commune level through appropriate community consultations. All grievance

resolution meetings shall be recorded, and copies shall be provided to the affected persons. A copy of the minutes of meetings and actions undertaken shall be provided to the MME, EDC and the WB upon request.

All costs for resolving complaints (meetings, consultations, communication and reporting/information dissemination) will be borne by EDC.

7.1 EDC's GRM

The GRM follows EDC's existing structure, which enables affected people to submit complaints through the Commune Council, Social, Environment and Public Relations Office (SEPRO), District Office, and Provincial Grievance Redress Committees, before referring unresolved cases to the judicial system if necessary. The grievance procedure includes six stages, as illustrated in Figure 2.

Stage 1 – PMU (SEPRO)

- Affected persons or households may submit written or verbal complaints to the PMU (SEPRO) via the Village Leader or Commune Chief, through phone, letter, email, or in-person visit.
- Grievance cases related to land acquisition, the environment issues will be handled by PMU (SEPRO), while other issues (including workers, Indigenous people, agriculture, or others) will be handled by the PMO of the PMU.
- The Village leader /Commune Chief must register the complaint and provide immediate written acknowledgment to the complainant, copying SEPRO.
- SEPRO has 15 days to review and negotiate a solution with the complainant. If unresolved or if the complainant is unsatisfied, the case is elevated to the District Office and report to PMU (EDC).

Stage 2 – District Office

- The District office has 15 days to investigate and mediate the case through various approaches depending on the type of complaints. PMU (SEPRO) will coordinate with district office along the resolving process.
- If the issue cannot be resolved satisfactorily at this level, the complaint is referred to the Provincial GRC along with all supporting documents.

Stage 3 – Provincial Grievance Redress Committee

- The Provincial GRC is Deputy Governor as a Chairperson, other members include representative from different ministries, different communes and villages chiefs involved. Also, the representatives from SEPRO, and other stakeholders such as the Project Implementation Consultant (PIC) will be involved.
- The Committee must meet with the complainant within 15 days of receiving the case and make a written decision within 30 days.
- Copies of the decision are shared with PMU (SEPRO) and the complainant.
- If the complainant does not receive a decision or remains unsatisfied, they may take the case to the Provincial Court.

Stage 4 – Provincial Court

- The Provincial Court reviews the case and issues a written ruling, with copies provided to EDC and the complainant.
- If either party disagrees with the decision, the case may be appealed to the Higher-Level Court which will serve as the final appellate body and its judgment will be final and binding on all parties.

Grievance redress mechanism and information should be well-publicized in the local language (Khmer, via posters or facebook). All grievances will be recorded in a Grievance Register maintained by PMU (SEPRO), with support from the PMO for grievances related to workers, Indigenous Peoples, agriculture, or other non-environmental issues. The PMU (SEPRO) will involve and assist the process of grievance resolution at all stage. The Register will capture key details including the date of receipt, complainant information (if provided), a description of the issue, actions taken, responsible persons or units, and the resolution status. Anonymous complaints will be accepted and handled with equal seriousness, and complainants will not incur any costs

for submitting grievances. To ensure transparency and accountability, SEPRO will compile and report regular summaries of grievances received, resolved, and pending as part of EDC’s quarterly environmental and social monitoring reports.

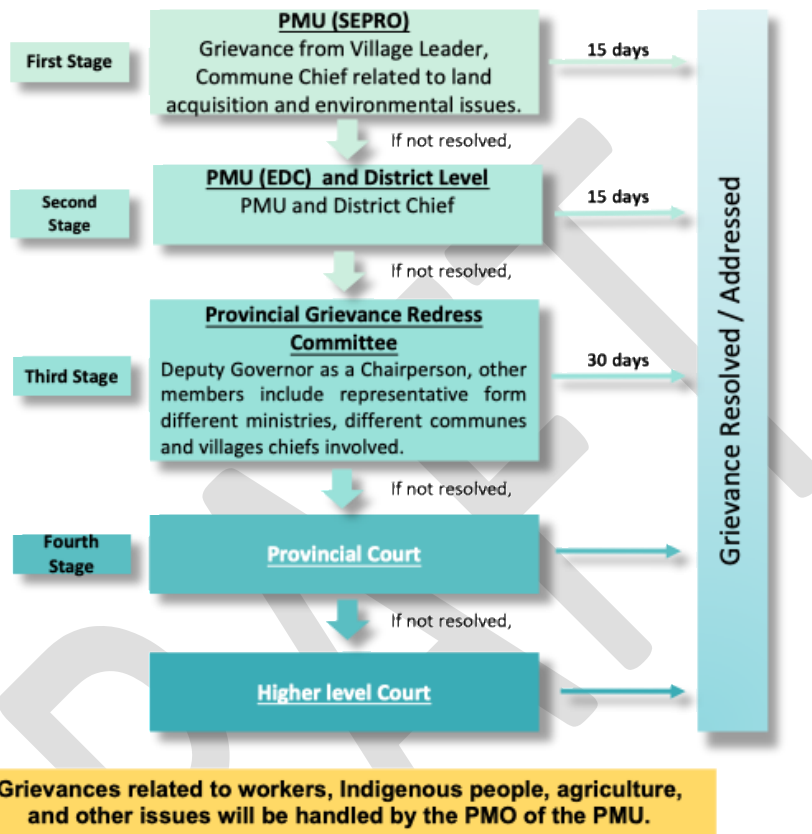


Figure 2. GRM Procedures for EDC

7.2 MME’s GRM

The grievance process for Component 2 follows a three-stage mechanism reflecting the roles of the Policy Bank/Participating Financial Institutions (PFI) and the MME PMU. Complaints can be submitted verbally or in writing, and all grievances will be handled confidentially and without cost to complainants. The grievance procedure for MME, as illustrated in Figure 3.

Stage 1 – Policy Bank/PFI ‘s GRM (SEM Bank, FTB)

- Affected industrial enterprises or individuals may submit grievances to the internal grievance mechanism of the Policy Bank or PFI through phone, email, letter, or in-person visit.
- The Policy Bank/PFI must register the complaint and provide immediate written acknowledgment to the complainant.
- The institution has 15 days to review, investigate, and attempt to negotiate a mutually acceptable solution.
- If the complaint is not resolved, or if the complainant is not satisfied with the proposed resolution, the case is elevated to PMU of MME.

Stage 2 – PMU of MME

- PMU (MME) reviews the grievance and seeks resolution through consultation and negotiation within 15 days.
- If the issue remains unresolved after this period, PMU (MME) forwards the grievance to the Supreme Court.
- PMU (MME) also documents and escalates systemic or sensitive issues to the Project Steering Committee and includes them in regular reporting to the World Bank, in accordance with the ESCP.

Stage 3 – Supreme Court

- The Supreme Court reviews the case and issues a written ruling, with copies provided to MME and the complainant.
- If either party disagrees with the decision, the case may be appealed to the Higher-Level Court which will serve as the final appellate body and its judgment will be final and binding on all parties.

All grievances will be recorded in a Grievance Register maintained by E&S focal point of the PMU capturing key details such as the date of receipt, name of the complainant (if provided), description of the issue, actions taken, persons responsible, and the resolution status. Anonymous complaints will be accepted and treated with equal seriousness, and complainants will not incur any costs in submitting their concerns. To ensure transparency and accountability, E&S focal point of the PMU will compile and report regular summaries of grievances received, resolved, and pending as part of the quarterly environmental and social monitoring reports.

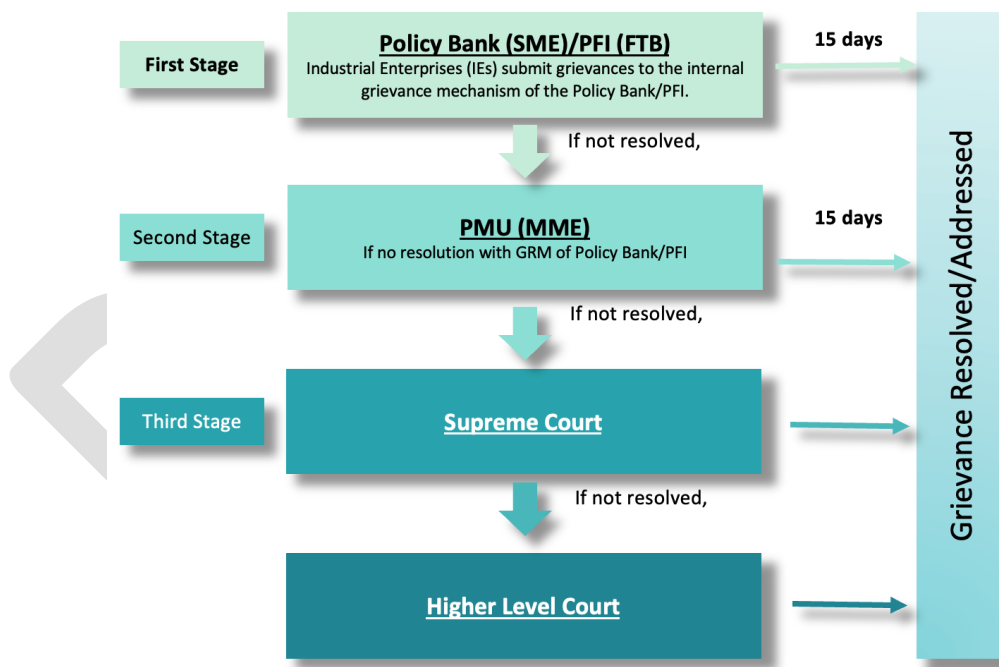


Figure 3. GRM Procedures for MME

The GRM of CSET project will be widely disseminated to stakeholders through commune offices, project information boards, and public consultations, as well as local radio, printed leaflets, and social media platforms through project cycle. Information about the GRM will be provided in Khmer and, where necessary, translated into local or indigenous languages to ensure accessibility for all affected communities.

Moreover, communities and individuals who believe that they are adversely affected by a project supported by the World Bank may submit complaints to existing project-level grievance mechanisms or the Bank’s Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their

complaint to the Bank's independent Accountability Mechanism (AM). The AM houses the Inspection Panel, which determines whether harm occurred, or could occur, as a result of Bank non-compliance with its policies and procedures, and the Dispute Resolution Service, which provides communities and borrowers with the opportunity to address complaints through dispute resolution. Complaints may be submitted to the AM at any time after concerns have been brought directly to the attention of Bank Management and after Management has been given an opportunity to respond. For information on how to submit complaints to the Bank's Grievance Redress Service (GRS), visit <http://www.worldbank.org/GRS>. For information on how to submit complaints to the Bank's Accountability Mechanism, visit <https://accountability.worldbank.org>.

7.3 Recording Grievances in Logbook

The SEPRO of the EDC is responsible for establishment and effective functioning of a Project Grievance database. The SEPRO of the EDC will record all concerns/grievances that are submitted by commune offices and project stakeholders into the Project Grievance Logbook (PGL) during project implementation. Data information received will be kept and maintained carefully to ensure privacy and confidentiality. In case there is serious complaint, such as accidents, SEA/SH cases, the World Bank shall be notified within 24 hours of complaint receipt and/or report on the incidence.

8. IMPLEMENTATION ARRANGEMENTS, MONITORING AND REPORTING

8.1 Implementation Arrangements

MEE will be responsible for Project Component 2 on Industrial Energy Efficiency that is designed to promote the adoption of energy efficient technologies and practices within the industrial sector. It provides concessional loans via Financial intermediaries to industrial enterprises for the purchase, installation, and operation of EE equipment, which helps reduce energy consumption and lower GHG emissions. The MEE is responsible for implementing this IPPF.

The EDC will be responsible for implementing this IPPF which involves design, construction, and operation and maintenance of the SC1.1: Grid Investment (Transmission, Distribution, Smart Metering and Controls), SC1.2: Battery Energy Storage System, SC1.4: Strategic Investment for EV infrastructure, and the SC1.5: Service Improvement in Rural Areas and Grid Connectivity of "Unelectrified Villages" under component 1: Grid Strengthening for Facilitation of Energy Transition and Regional Power Trade. The EDC will establish the Project Management Office (PMO) and this will be the implementing agency on behalf of the EDC for the day-to-day management of the project and ensure that the IPPF will be followed. The PMO will recruit the Project Implementation Consultant (PIC) to assist the PMO/EDC with the implementation of the project and oversight of the contractors during construction and operation and maintenance. The PIC and SEPRO will work together to ensure that the proper screening of IP groups will be carried out for each sub-project, and steps for IP screening and targeted social assessment described in this IPPF are followed. The PIC and SEPRO will be responsible for carrying out day-to-day activities set forth in this IPPF. The PIC and SEPRO will be responsible for conducting consultation with affected IP in the subprojects that have IP and need to inform the WB of the IP screening results and steps that the EDC will take. The PIC will recruit the IP consultant to work closely with the PIC and SEPRO to conduct targeted Social Assessment in the subproject that have IP and prepare the IPPs, respectively. The IP consultants will visit the sub-project sites and work closely with the local authorities, relevant agencies, NGOs, particularly local IP leaders and IP members, including vulnerable groups of affected IP communities, to conduct targeted Social Assessment. The PIC will also be responsible for assisting the PMO/SEPRO and contractors in handling complaints and/or grievances filed through the GRM, if any.

8.2 Capacity Building

The MME and the EDC are new to ESF, they may not be able to conduct meaningful consultation in compliance to the requirements of ESS7. However, the EDC has experience implementing the ADB Safeguard Policy Statement (SPS) with good performance on E&S risks management. The EDC is also familiar with national regulations on environmental and social impact assessment and requirements as they follow the national system for private sector investment projects in the energy sector. The EDC demonstrates and has good experience in the preparation of resettlement plans and compensation as transmission towers acquire

land for construction, and transmission lines have their right of way that does not allow any construction below the high voltage lines. The ESF Training by the WB task team with a particular focus ESSs that apply to this project are needed to enhance the capacity of the EDC as well as to the newly appointed ES focal persons of the MME.

8.3 Monitoring

The application of this IPPF and preparation and implementation of sub-project IPPs will be monitored internally by the MME and EDC including the adverse impact on IPs (if any) due to land acquisition as stated in the project's Resettlement Policy Framework (RPF).

The MME and EDC are responsible for conducting quarterly monitoring activities of the activities set for under all subproject IPPs. Monitoring of IPPF/IPP implementation will focus on assessing the compliance of IPP implementation against the followings:

- IP screening process and results;
- Quality of targeted Social Assessment and adequacy of IPPs prepared based on targeted SAs;
- Information disclosure;
- Functioning of project's GRM (as customized to the respective IP groups present in each subproject area to ensure the GRM is culturally appropriate to the local IPs);
- Development activities carried under IPPs (based on development needs of IPs);
- Results and impacts of IPPs (in ensuring the affected IP receive socioeconomic benefits of the project that is culturally appropriate, gender and intergenerational inclusive, and contributing to achieving the objective of the WB's ESS7).

In addition to internal monitoring, the project will encourage IPs in subproject areas to participate in monitoring and evaluation of IPP implementation process and implementation outcome which affects them. During targeted SA exercise, feedback and suggestions from IPs will be solicited as to how they wish to participate in monitoring and evaluation of IPP activities.

The MME and EDC will prepare the quarterly IPP implementation report and submit to the World Bank. These results will be incorporated into the consolidated Environmental and Social Compliance Report (ESCR) (See Annex 4 for Indicative Indicators for Internal Monitoring of IPP implementation).

8.4 Reporting

The MME and EDC will ensure feedback from affected and interested IP, as well as grievances submitted by affected IPs, are resolved timely and effectively, and that resolution results are reported timely back to the aggrieved IPs. The method of reporting back depends on the stakeholders, and as follows:

- For stakeholders at national level, email and/or official letter will be used to report back to stakeholders following consultations and/or workshops. The content of the report will summarize what comments, suggestions, concerns that have been received, by whom and when, and how such comments, suggestions, concerns were considered;
- For stakeholders at local level, follow-up meetings/consultations will be conducted to informed stakeholders know on how comments, suggestions, concerned were considered;
- For Indigenous Peoples, project's responses to their comments, suggestions, concerns are reported back to them in subsequent face-to-face consultations – in line with the project's SEP and the IPPF, including how the project had considered and addressed their concerns through concrete actions to be carried out during subproject implementation process and through IPP implementation.
- Grievances of all project IP will be reported back to them through project's GRM channels within the timeframes specified for each step of the above GRM procedure.

9. COSTS AND BUDGET

Indicative costs and budget for IPPF implementation are estimated during project preparation for the purpose of budget planning. The actual costs of IPPF implementation depend on the number of IPPs, including scope and activities to be carried out under each IPP, during project implementation. The total estimated cost is US\$164,040.00. This cost may be updated once the list of subprojects is finalized. Costs incurred as compensation payment for land acquisition and associated impacts are covered by the EDC and are estimated in the project' Resettlement Policy Framework (RPF).

Table 7. Key activities and costs for supporting IPPF implementation (in US Dollars)

No.	Key activities	Stakeholders involved	Estimated costs (per province x 6)	Sub-Total	Total
1	Recruitments of IP consultants to conduct targeted SA	<ul style="list-style-type: none"> PMO (oversight) PIC and SEPRO (implement) 	3,500 x 6	21,000	21,000
2	Recruitment of bilingual facilitators to support consultations as part of SA	<ul style="list-style-type: none"> PIC and SEPRO (implement) 	1,000 x 6	6,000	6,000
3	Conduct targeted Social Assessment and Prepare sub-project IPPs	<ul style="list-style-type: none"> PIC and SEPRO (oversight) IP Consultant (implement) 	6,000 x 6	36,000	36,000
4	Conduct mitigation measures, development activities, and relevant activities, as part of IPP	<ul style="list-style-type: none"> PIC and SEPRO (oversight) IP Consultant (implement) 	5,000 x 6	30,000	30,000
5	Monitoring and Evaluation, Reporting	<ul style="list-style-type: none"> PMO (oversight) PIC and SEPRO (implement) 	2,000 x 6	12,000	12,000
6	Staff allowance	<ul style="list-style-type: none"> PMO (oversight) PIC and SEPRO (implement) 	\$35 x 10 staffs x 14 days x 6 provinces	29,400	29,400
7	Transport		1,500 x 6	9,000	9,000
8	Data collection		1,000 x 6	6,000	6,000
9	Contingency (10% of above 8 items)				14,640
				Total	164,040

Annex 1: IP Screening Form

When to do screening: When the subproject to be constructed is known.

Secondary Data: Check the Commune Database and/or Ministry of Planning (MoP) and Ministry of Rural Development (PMU)'s IP database for presence of IP groups in identified villages in the unelectrified villages.

Primary Data/Field Work: Check directly with key informants (such as commune and village chiefs as well as local people) whether there are IPs along, or in connection with, each subproject area. If no IPs are found, document this in the ESMP and no further steps are needed.

Checking Against WB Criteria: If IPs are found based on primary and/or secondary data, assess whether they meet all four WB criteria (also see Annex 3).

1. Self-identification as members of a distinct indigenous social and cultural group and recognition of this identity by others; and
2. Collective attachment to geographically distinct habitats, ancestral territories, or areas of seasonal use or occupation, as well as to the natural resources in these areas; and
3. Customary cultural, economic, social, or political institutions that are distinct or separate from those of the mainstream society or culture; and
4. A distinct language or dialect, often different from the official language or languages of the country or region in which they reside.

Who will do the screening: The PIC or SEPRO.

Table 1: IP Screening Information

Province/ District/ Commune/ Village	Name of IP Group	Number of Households	Fulfil WB Criteria 1 (Y/N) and <u>explain</u> – see Annex 3	Fulfil WB Criteria 2 (Y/N) and <u>explain</u> – see Annex 3	Fulfil WB Criteria 3 (Y/N) and <u>explain</u> – see Annex 3	Fulfil WB Criteria 4 (Y/N) and <u>explain</u> – see Annex 3

Assessment Summary:

- If no IP groups are found, or if IP groups are found but do not meet WB criteria, carefully document the process in the ESMP.
- If IP groups are found, provide a summary as to potential impacts and risks. Proceed to hire a national IP consultant, or PIC, to assist with preparation of Social Assessment and IPP.

Annex 2: Guidance on WB Criteria to Determine IP

This Annex helps to explain the four criteria used by the WB to determine whether a given group should be considered an Indigenous Group/Indigenous Peoples.

The World Bank's ESS7 notes that the term "IP" is used in a generic sense to refer exclusively to a distinct social and cultural group possessing the following characteristics in varying degrees:

Questions	Questions and Factors to Consider
<p>1. As members of a distinct indigenous social and cultural group and recognition of this identity by others</p>	<ul style="list-style-type: none"> ● Do IPs identify themselves as an Indigenous community or a traditional community or around a distinct cultural identity? ● You can ask: What does it mean to you to be an IP? How would someone outside of your community describe who you are, especially distinguishing features as a community? Do others recognize them as belonging to those groups? <p><i>Note: When asking if others would recognize them, it is not about being described as "indigenous" but whether others would recognize their distinctness as per the characteristics under ESS7.</i></p>
<p>2. Collective attachment to geographically distinct habitats, ancestral territories, or areas of seasonal use or occupation, as well as to the natural resources in these areas;</p>	<ul style="list-style-type: none"> ● How long has the community lived on that land? Do members of the community have historical knowledge of these ancestral lands? Is there anthropological, ethnographic or legal data that can validate? Do they consider that land to be their ancestral or traditional land? Have they moved from their traditional lands? ● Is the community using the land and resources in accordance with their customary laws, values and traditions? <p><i>Note: for the purposes of this question, it is not relevant whether IP groups have collective title to the land or not, given that the number of IP groups with collective land title is still very low in Cambodia.</i></p>
<p>3. Customary cultural, economic, social, or political institutions that are distinct or separate from those of the mainstream society or culture</p>	<ul style="list-style-type: none"> ● Are there traditional leaders or a traditional leadership structure? If so, how do they work with other levels of government? Does the community have an internal decision-making process? ● What are the main modes of economic activity? Has this changed over time? How have these changes, if at all, impacted their identity, other cultural practices, traditional knowledge, language, etc.? ● Does the community have traditional education/learning systems, cultural systems or health systems that are distinct from those of Khmer society?
<p>4. A distinct language or dialect, often different from the official language or languages of the country or region in which they reside.</p>	<ul style="list-style-type: none"> ● What is the language or dialect of the community? ● Does the community speak and understand Khmer? ● Does the community have traditional education systems, using their own languages, teaching and learning methods?

Annex 3: Guidance Questions for targeted Social Assessment

If IP groups are identified, these guiding questions may be helpful when conducting Social Assessment.

PROFILE OF THE LAND USED BY IP GROUPS	
1.	Describe the land used by IP groups that is near, or in some way connected to, the infrastructure being constructed. What is the land type (public, state, communal, private, etc.)? Are there pressures on this land?
2.	Who else, legally or illegally, uses the land used by IPs for their livelihoods or any other use?
3.	Are there, or have there been, any conflicts relating to this land? If so, conflict between whom?
4.	How long has the IP community lived on that land? Do members of the IP community have historical knowledge of these ancestral lands – have these boundaries changed? Why? Is there anthropological, ethnographic or legal data that can validate?
5.	How are livelihoods attached to these lands? Do IPs rely on land and natural resources for housing, water, traditional subsistence, economic development, dress, traditional medicines, etc.?
6.	Is there a likelihood that the project construction activities will attract outsiders to lands that IPs have collective attachment to and/or are used by IPs, or that it may exacerbate pressures on these lands?
DESCRIPTION OF THE IP GROUPS	
7.	How many people are there in the IP group? Please describe the IP group, including their name, heritage and how many people/households.

8.	Would you please give us some information about your IP group? What kind of activities go on in your village on a normal day? How does your group (e.g. women, elderly, farmers) experience life?
9.	Which languages are spoken by the IP group? Do they speak Khmer language?
10.	Are there any cultural or religious items/artifacts/areas connected with the subproject being constructed? Where? What is the belief/practices?
11.	Has there been migration into this commune or the surrounding area? If so, where from, and why?
12.	What is the main source of livelihoods for the IP group? What about for people in the commune?
<u>13.</u>	Are there traditional leaders or a traditional leadership structure within the IP group? If so, how do they work with local and other levels of government?
<u>14.</u>	Does the IP community have an internal decision-making process? How are representatives chosen? How do women, youth, elders, persons with disabilities participate?

<u>15.</u>	What are the main jobs/livelihoods for the IP community?																
<u>16.</u>	Does the community rely in whole or in part, traditional medicines and health practices? Has this changed over time? What are the factors for this change?																
<u>17.</u>	Does the community have traditional conservation practices which they rely on? If so, how do they (both past and present) deal with climate change, disasters, habitat or wildlife loss?																
<u>18.</u>	Has there been any conflict or tension over the following issues during the past years with the IP community and other local communities? With outsiders?																
POTENTIAL IMPACTS TO IP GROUPS																	
<u>19.</u>	Is the subproject being constructed near or within any of the following areas?																
	<table border="1"> <thead> <tr> <th></th> <th>Yes/No</th> <th>NA</th> <th>Don't know</th> </tr> </thead> <tbody> <tr> <td>Land IP group has collective attachment to (for example for cultural, spiritual or livelihood reasons)</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Medicinal plants used by IP groups</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Non-timber forest products are used by IP groups</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		Yes/No	NA	Don't know	Land IP group has collective attachment to (for example for cultural, spiritual or livelihood reasons)				Medicinal plants used by IP groups				Non-timber forest products are used by IP groups			
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	Important trees or natural landmarks of importance to IP group			
	Other (Specify)			
<u>20.</u>	Are there any people in your IP group who are very poor/dependent/supported by others and/or considered vulnerable in any way?			
<u>21.</u>	What types of social support networks exist within your IP community? Could you explain us when a person needs support, what types of contributions are provided to those in need?			
<u>22.</u>	What do you think would be the positive effects of the subproject construction for your IP group?			
<u>23.</u>	What do you think would be the negative effects of the subproject construction for your IP group?			
<u>24.</u>	In your opinion, what is the main problem related to temporary worker camp sites that your IP group faces? According to you, how can this problem be resolved?			
<u>25.</u>	If there were opportunities for jobs in civil works, would men and women in your group be interested?			
<u>26.</u>	What is the best way to provide information to your group? What is the best way for you to share information with project planners? Does the project's proposed SEP fulfil the needs of your group?			
<u>27.</u>	Is the project's proposed GRM adaptable to the needs of your IP group? How would this GRM need to be adapted?			
<u>28.</u>	Is there anything else you would like to talk about, or want me to know?			

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Annex 4: Indicative Indicators for Monitoring

1. Monitoring indicators should assist the project to assess progress of the Indigenous Peoples Plan (IPP) and whether mitigation measures are effective, resulting in desired outcomes. This enables the project to respond to any issues and manage change accordingly.
2. Indicators that show implementation progress are called process indicators and give some certainty that the project is proceeding according to plan.
3. Indicators that measure whether the IPP mitigation measures are successful are called outcome indicators and reflect the results of the process.
4. It is important that an appropriate number of indicators be included in the monitoring plan. Too few may leave gaps in critical areas. Too many may overburden the collection process, and diminish quality. Use the minimum but necessary number of monitoring indicators to ensure adequate IPP implementation and expected outcomes.
5. Some examples of process and outcome indicators are shown below. They are not an exhaustive list, and should be selected as required.

Example of Process Indicators	
Demographic baseline	<ul style="list-style-type: none"> · The numbers of affected Indigenous Peoples (IP) by category of impact, gender, age, habitat (village etc.), income, status and position · Number of households with handicapped, elderly or invalid members · Number of females headed households · Number of vulnerable households (poor, elderly) · Number of households by ethnic group · Number of births and deaths
Consultation and participation	<ul style="list-style-type: none"> · Number of consultation and participation activities that occur—meetings, information dissemination, brochures; flyers, training · Percentage of IP women as participants; number of meetings exclusively with IP women · Percentage of vulnerable IP groups represented / attending meetings; number of meetings exclusively with vulnerable IP groups. · Languages used at meetings · Good faith negotiations—recording of process, participants, locations, correspondence · Broad community support—record of processes, participants, locations and agreement obtained · Consultation and participation progress against plan and budget
Mitigation measures	<ul style="list-style-type: none"> · Progress of implementation of mitigation / beneficial measures against plan · Number of activities that occur/completed—such as construction, livelihood restoration, disbursements, training · Percentage progress against timelines and budget
Grievance redress	<ul style="list-style-type: none"> · Total number of people/groups using the grievance redress procedure. · Number of distinct people/groups. Any IP group with significantly more grievances? · How many times has a household submitted the same grievance? · Number of grievances resolved? · Length of time taken to be resolved? · Types of grievance categories and prevalence
Implementation problems	<ul style="list-style-type: none"> · Identified delays — (days, cost) due to personnel, capacity, insufficient funds, etc. · Number of times implementation schedule revised
Example of Outcome Indicators	
Consultation and	<ul style="list-style-type: none"> · Awareness of IP issues among implementing stakeholders in each sector · Awareness of IPP mitigation and beneficial measures amongst recipients · Awareness of project details amongst stakeholders

participation program	<ul style="list-style-type: none"> · IP perception of effectiveness, cultural appropriateness and inclusiveness of consultation measures · Attendance at consultation and participation activities Level of involvement by IP and representatives in the design and implementation of consultation and participation
Enhanced dignity of IP groups, integrity of traditional kinship networks and livelihood patterns	<ul style="list-style-type: none"> · Changes in religious/cultural practices · Changes in cultural governance · Participation in cultural governance (by gender, status) · Number of people (age and sex) who can speak national language and/or local dialect · Changes in condition of schools, community buildings, temples structures · Numbers of religious/cultural events and persons (monk shamans, priests etc.) · Participation in cultural/religious events (by gender, time/resources allocated)
Livelihoods and living standards	<ul style="list-style-type: none"> · Major asset inventory—e.g. vehicle, phone, tools, kitchen equipment · Changes in patterns of IP occupation, production, and resource use · Changes in income and expenditure patterns among IP households · Savings · Change in food used by IP—amount, nutrition source · Cost of living changes—market prices etc. · Changes in key social parameters—gender roles of production · Vulnerable groups—status, relative income, livelihood · Education—literacy and numeracy level in national/ethnic language · School attendance of IP children (by sex and age) · Key health indicators of IP (by gender, age)

Annex 5: Outline for Subproject Information Booklet (SIB)

SUB-PROJECT INFORMATION BOOKLET

1. PROJECT BACKGROUND

- 1.1 Project description
- 1.2 Project outcome
- 1.3 Project beneficiaries

2. PROJECT ACTIVITIES

3. ENVIRONMENTAL AND SOCIAL RISKS AT SUBPROJECT

- 3.1 Social risks and impacts
- 3.2 Environmental, Health and Safety risks and impacts:

4. MITIGATION MEASURES

5. COMPENSATION PRINCIPLES FOR AFFECTED LAND AND NON-LAND ASSETS

6. GRIEVANCE REDRESS MECHANISM

7. PREPARATION OF ENVIRONMENTAL AND SOCIAL DOCUMENTS

8. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

For more information, please contact

Name:

Telephone:

Email:

Facebook:

Website:

Telegram:

Annex 6: Ethnic Groups in Cambodia

No.	Province	Ethnic minority groups (≥ 100 people)	Group Number	Ethnic minority group (<100 people)	Group Number
1	Battambang	Jarai, Stieng, Ja'ong	3	Kavet, Kleung, Kuoy, Kreung, Lun, Stieng, Ja'ong, Kroul, S'och, Kajrouk	10
2	Siem Reap	Jarai, Stieng, Ja'ong	3	Kavet, Kleung, Kuoy, Kreung, Bunong, Kroul, S'och, Kajrouk, Mon	9
3	Kampong Speu	Jarai, Souy	2	Kavet, Kleung, Kuoy, Kreung, Lun, Stieng, Ja'ong, Kroul, S'och, Kajrouk	10
4	Pursat	Jarai, Poar	2	Kavet, Kleung, Kuoy, Kreung, Stieng, Ja'ong, Kroul, S'och, Kajrouk	9
5	Banteay Meanchey	Jarai	1	Kavet, Kleung, Kuoy, Brao, Stieng, Ja'ong, Kroul, S'och, Kajrouk	9
6	Kampong Chhnang	Jarai	1	Kavet, Kleung, Kuoy, Kreung, Lun, Tumpoun, Stieng, Ja'ong, Kroul, Radae, S'och, Kajrouk	12
7	Phnom Penh	Jarai, Kavet, Kleung, Stieng, Ja'ong	5	Kuoy, Kreung, Lun, Bunong, Brao, Tumpoun, Kroul, Radae, L'moon, Mel, Souy, S'och, Kajrouk, Mon, Kachok	15
8	Stung Treng	Kreung, Lun, Bunong, Brao	4	Jarai, Kleung, Tumpoun, Stieng, Ja'ong, S'och	6
9	Kampong Cham	Jarai, Kavet, Stieng, Ja'ong	4	Kleung, Kuoy, Bunong, Brao, Kroul, Radae, Mel, S'och, Kajrouk, Mon	10
10	Kandal	KJarai, Kleung, Stieng, Ja'ong	4	Kavet, Kuoy, Lun, Bunong, Brao, Tumpoun, Kroul, Radae, L'moon, Souy, S'och, Kajrouk, Mon	13
11	Kratie	Jarai, L'moon, Khonh	3	Kavet, Kleung, Lun, Brao, Ja'ong, Poar, Souy, S'och, Kajrouk (Mel)	9
12	Mondulkiri	Stieng, Kroul, L'moon	3	Jarai, Kavet, Kuoy, Kreung, Brao, Tumpoun, Ja'ong, Mel, S'och, Kajrouk	10
13	Prey Veng	Jarai, Stieng, Ja'ong	3	Kavet, Kleung, Kuoy, Kroul, Radae, S'och, Kajrouk (Mel)	7
14	Kampot	Jarai, Ja'ong	2	Kavet, Kleung, Kuoy, Lun, Bunong, Stieng, Khonh, S'och, Kajrouk	9
15	Takeo	Jarai, Ja'ong	2	Kavet, Kleung, Kuoy, Bunong, Stieng, L'moon, S'och, Kajrouk (Mel)	8
16	Ratanakiri	Bunong	1	Kleung, Kuoy, Lun, Stieng, Ja'ong, Kroul, L'moon, Souy	8
17	Preah Vihear	Jarai	1	Kavet, Kleung, Bunong, Brao, Tumpoun, Stieng, Ja'ong, Kroul, L'moon, S'och, Kajrouk	11
18	Kampong Thom	Jarai	1	Kavet, Kleung, Bunong, Stieng, Ja'ong, S'och, Kajrouk	7

19	Preah Sihanouk	Jarai	1	Kavet, Kleung, Kuoy, Kreung, Brao, Tumpoun, Stieng, Ja'ong, Kroul, Mel, S'och, Kajrouk	12
20	Svay Rieng	Jarai	1	Kavet, Kleung, Kuoy, Stieng, Ja'ong, S'och, Kajrouk, Kachok	8
21	Koh Kong	-	0	Jarai, Kavet, Stieng, Ja'ong, S'och, Kajrouk	6
22	Oddar Meanchey	-	0	Jarai, Kavet, Kleung, Kuoy, Bunong, Stieng, Ja'ong, S'och, Kajrouk	9
23	Kep	-	0	Jarai, Kavet, Stieng, S'och	4
24	Pailin	-	0	Jarai, Kleung, Kuoy, Stieng, Ja'ong	5
25	Tboung Khmum	-	-	Stieng	1

Source: MRD 2020

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Electricité du Cambodge (EDC) invites any comments or suggestions from any interested stakeholders, to send the feedback from the following contacts :

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-Period of Disclosure : 19 Jan -03 Feb 2026

Printed copies of the ESMF and associated documents are available upon request at the Office of MME/EDC.