

## **Grievance Mechanism Policy**

### **(Internal and External)**

#### **1. Purpose**

This Grievance Mechanism Policy is prepared for internal and external stakeholders of the Techo International Airport ("the Project") located in Kandal Province, Cambodia.

Cambodia Airport Investment Co., Ltd. ("CAIC") is a joint venture between the Royal Government of the Kingdom of Cambodia ("RGC") represented by the State Secretariat of Civil Aviation ("SSCA") and Overseas Cambodian Investment Corporation ("OCIC"). The RGC has, pursuant to a joint venture agreement executed on 21 May 2019, granted CAIC the exclusive right to own, design, construct, finance, operate, maintain and manage the Project.

The purpose of this document is to outline the principles of internal and external grievance mechanisms which provide an avenue for stakeholders to voice their concerns and gives transparency on how grievances will be managed internally and externally, which aims to reduce conflict and strengthen relationships between internal and external stakeholders. The grievance mechanism aims to ensure that all comments, suggestions and complaints concerning the Project will be considered transparently and the related measures will be taken.

#### **2. Scope**

This document outlines the grievance mechanism procedure which is applied to all internal direct and indirect workers and external stakeholders. The commitment and approach of the Project are on the basis of handling complaints and comments that may arise in relation to the Project.

#### **3. Definitions**

<b>Term</b>	<b>Definition</b>
Grievance	An issue, concern, problem, or claim (perceived or actual) that an individual or community group wants addressed by the company in a formal manner.
Complaint	A notification provided by a community member, group or institution to the Project that they have suffered some form of offense, detriment, impairment or loss as a result of business activity and/or contractor behavior.
Grievance Handling Mechanism	A way to accept, assess and resolve community complaints concerning the performance or behavior of the company, its contractors, or employees. This includes adverse economic, environmental, and social impacts.
Internal Stakeholders	Groups or individuals who work directly within the business, such as employees and contractors.
External Stakeholders	Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, community, NGOs and the government.

## CAMBODIA AIRPORT INVESTMENT CO., LTD

5A floor of C2 Building of the Olympia City Project, Street Preah Monireth (N° 217) &  
Street Oknha Tep Phan (N° 182), Sangkat Veal Vong, Khan 7 Makara, Phnom Penh, Cambodia  
Tel: (+855) 23 922-862

---

### 4. Grievance Reporting Channels

CAIC will communicate this procedure to its external stakeholders to raise awareness and offer transparency of how stakeholders can voice their grievances.

Employees should know whom they should notify in case of the event of a grievance and support is available. Managers should be familiar with the procedures. Details about the procedures should be easily available, for example in employee handbooks.

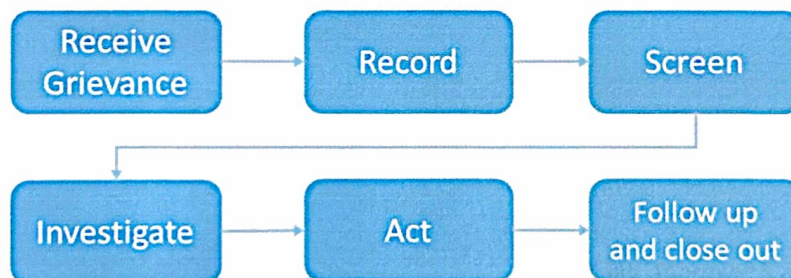
For the collection of internal grievances from employees:

- Grievance mechanism process is communicated with all employees (including contractor's employees) during the recruitment process and the first induction training sessions also include the stakeholder engagement and grievance mechanism process;
- Communication about the grievance mechanism is repeated regularly; and
- Employees can submit their grievances by telephone, email, or directly to the following personnel:  
Contact to: Hotline Correspondent  
Contact information: 070 222 689 / 071 9222 906

For the collection of external grievances from external stakeholders:

- Grievance mechanism process will be communicated with external stakeholders during stakeholder engagement meetings;
- Stakeholders can submit their grievances by telephone, email, or directly to the following personnel:  
Contact to: Hotline Correspondent  
Contact information: 070 222 689 / 071 9222 906

### 5. Grievance Mechanism Process



#### a. Receive grievance

The stakeholder contact officer receives all grievances that come through via email. The stakeholder contact officer will review the grievance form and process the grievance in accordance with this procedure.

#### b. Record

All formal grievances will be logged in the Grievance Register Form will be saved in record of correspondence.

#### c. Acknowledge

A grievance will be acknowledged, by the grievance owner, within five working days of a grievance being submitted.

## **CAMBODIA AIRPORT INVESTMENT CO., LTD**

5A floor of C2 Building of the Olympia City Project, Street Preah Monireth (N° 217) &  
Street Oknha Tep Phan (N° 182), Sangkat Veal Vong, Khan 7 Makara, Phnom Penh, Cambodia  
Tel: (+855) 23 922-862

---

**d. Investigate**

The Stakeholder officer along with the employees is responsible for investigating the grievance. The investigation may require the team to make site visits, consult employees, contact external stakeholders and complete other activities. Records of meetings, discussions and activities all need to be recorded during the investigation. Information gathered during the investigation will be analyzed and will assist in determining how the grievance is handled and what steps need to be taken in order to resolve the grievance.

**e. Act**

Following the investigation, the Stakeholder officer will use the findings to create an action plan outlining steps to be taken in order to resolve the grievance. The Stakeholder officer is responsible for assigning actions, monitoring actions undertaken and making sure deadlines are adhered to. Once all actions have been completed and the team feels the grievance has been resolved, they will then formally advise the external stakeholder via their preferred method of contact.

**f. Follow up and close out**

The Stakeholder officer will make contact with the external stakeholder/s three weeks after the grievance is resolved. When contacting the external stakeholder the stakeholder officer will verify that the outcome was satisfied and also gather any feedback on the grievance process.

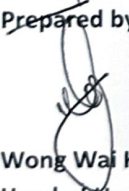
### **6. Record Keeping**

All records, including grievance forms, investigation notes, interviews and minutes of meetings will be securely filed, and confidentiality is maintained for all parties involved.

### **7. Recommendation:**

That you approve the above policy and take effective on day of sign onward.

*1st adoption*  
**Prepared by:**

  
**Wong Wai Hong**  
Head of Human Resources

**Agreed and Approved by:**

  
**Yee Con Long**  
Project Steering Committee

**CAMBODIA AIRPORT INVESTMENT CO., LTD**  
5A floor of C2 Building of the Olympia City Project, Street Preah Monireth (N° 217) &  
Street Oknha Tep Phan (N° 182), Sangkat Veal Vong, Khan 7 Makara, Phnom Penh, Cambodia  
Tel: (+855) 23 922-862

---

**Annex 1 – Grievance Register Form**

Date	Stakeholder	Grievance Description and Cause	Outcome	Remarks



## Chapter 6 Public Participation

### 6.1. Introduction

In this chapter, the study describes the public consultations with all relevant stakeholders, including local people, local authorities, schools, pagodas, health centres and relevant provincial departments, involved in the project. These consultations aimed to interface with the individuals and institutions who may be affected by the construction of the New Phnom Penh International Airport by CAIC and, as a result, the consultant team collected the feedback, suggestions and recommendations from the interviewees in order to analyze, compile and review the full report of environmental and social impacts assessment. In addition, it sought to get all stakeholders informed about the project and gave them an opportunity to offer their opinions and monitor the implementation of the project.

This consultation process was fully applicable to all target groups and interested people (i.e. local people and families who already owned land in the project area) and stakeholders involved in the project. Additionally, this consultation offered the opportunity to local people and stakeholders to express their opinions concerning the project in terms of development and environmental protection. The objectives of the public consultation were:

- To disseminate project information to local people, local authorities and stakeholders to be informed about the project.
- To explain project activities to the participants (stakeholders) and allow them to discuss and comment on the project.
- To seek the positive and negative impacts of the project in order to prepare the mitigation measures reducing the adverse impacts to the minimum level.
- To collect data, comments and recommendations from all stakeholders in general and numbers of issues related to the proposed development project aiming to prepare a quality full report of environmental and social impacts assessment.

### 6.2. Public Participation

According to Prakas No. 120 Pr.B.St, issued by Ministry of Environment on April 11, 2018, on the deployment model of working conditions for infrastructure and tourism development, the planning of public participation consist of three stages: (1) information dissemination at the project site, (2) the interviews with local authorities, affected communities and stakeholders, and (3) the consultation workshops.

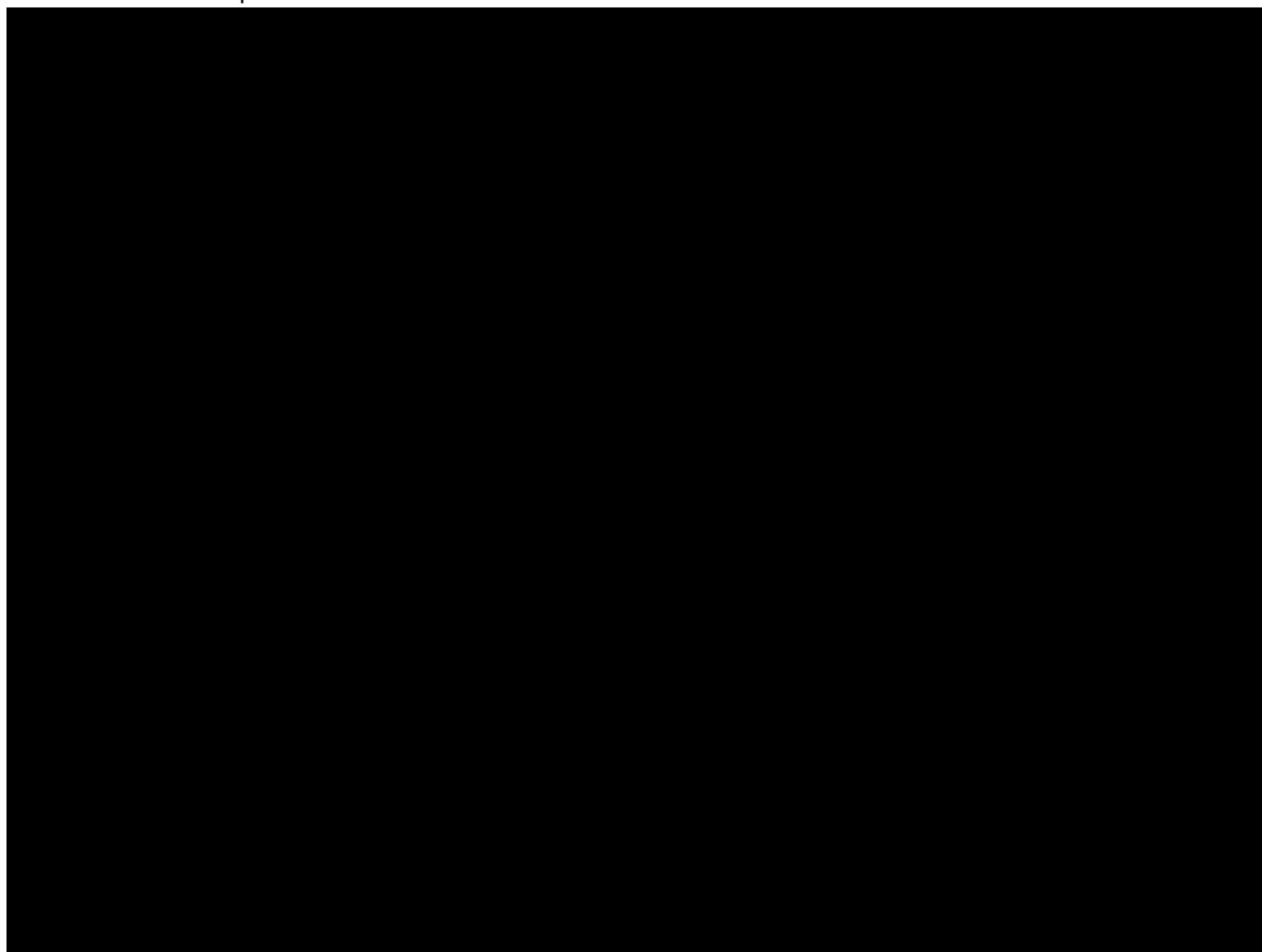
#### 6.2.1. Information Dissemination at the Project Site

The information dissemination at the project site was made through household surveys with target villages and also through consultations with local authorities. Household survey and consultation workshops aimed to (1) disseminate the information related to the project in general, project owner, scope of project and the environmental impact assessment of the project, as well as obtaining preliminary data and information from relevant local authorities and affected people (2) provide opportunities to the involved local authorities, local people, local institutions and stakeholders, to be aware of the project, raise concerns, suggestions and recommendations to the consultant team in order to complement the full report of the environmental and social impacts assessment.

Household surveys were carried out in 32 villages situated within 3 km around the project site, in which 375 households were interviewed within 07 days from 4-10, May 2019, as listed in Chapter 5 on the

socio-economic resources. The consultations with the Local authorities were held on the same dates. The detailed consultation outcomes are presented in Table 92 below.

Photo 94: Consultation workshops with local people, local authorities, pagoda representatives and health center representatives



Source: E&A Consultant 2019

Table 91: Results from the Interviews of Local Authorities and Local Institutions

Name/Institutions	Comments/Concerns	Suggestions
<ul style="list-style-type: none"> <li>- 6 commune/district representatives, including Put Sor Commune, Bati District, Takeo Province</li> <li>- 32 representatives of village chiefs/vice village chiefs</li> <li>- 2 monk representatives (Prey Chea Pagoda and</li> </ul>	<p>As the local authorities, they are happy with the project because it would make some positive impacts, such as:</p> <ul style="list-style-type: none"> <li>- creating jobs to people directly and indirectly</li> <li>- contributing to the national economic development</li> <li>- making the communities more developed as the airport would be nearby</li> <li>- the prices of real estates would increase</li> </ul>	<ul style="list-style-type: none"> <li>- If it affects paddy/farmland and houses of local people, it is suggested that the company should provide appropriate compensation</li> <li>- resolve compensations as soon as possible to make it easier for people to resettle in new places</li> <li>- If the roads are damaged through transporting construction materials, the company should repair the roads</li> <li>- To water the roads regularly in order to avoid dusts affecting local people and houses</li> <li>- Do not ban the people who depend on fishing in Beoung Chueng Loung</li> <li>- Do not close off any fences, leaving any part for the people to go fishing</li> <li>- Request sponsorships from the company to pagodas and schools</li> </ul>

Name/Institutions	Comments/Concerns	Suggestions
Kraing Yov Pagoda) - 3 representatives from healthcare centers - 3 representatives from schools (1) Samdech Hun Sen Kraing Yov High School, (2) Prey Chea Primary School, (3) Kompong Talong Primary School	<ul style="list-style-type: none"> <li>- In the construction stage, dust pollution and traffic congestion could happen.</li> <li>- Villagers could no longer go fishing.</li> <li>- Accidents may happen when students break as the project's trucks transport construction materials.</li> <li>- Overspeeding around school area.</li> </ul> <p>On the other hand, they expressed some concerns including:</p> <ul style="list-style-type: none"> <li>- affect on people's land and housing</li> <li>- the dust is rising to people and commuters through transporting trucks</li> <li>- noise disturbance may affect the nearby pagodas and schools</li> <li>- affect to fish in the lake, and affect people whose livelihoods depend on fishing</li> <li>-</li> </ul>	<ul style="list-style-type: none"> <li>- Give the priority to local people to work in the project</li> <li>- Request to take care of the surrounding environment so that it will not affect the water sources and people's paddy/farmland</li> <li>- Build and repair roads in the village</li> <li>- The company should minimize the adverse impacts to the environment and people living nearby the project area</li> <li>- The company must speed up the construction process as quick as possible</li> <li>- Allow people to access to the fishing areas</li> <li>- The project should contribute to community development (rebuild schools, roads and pagodas)</li> <li>- Any conflicts should be avoided</li> <li>- Cambodia Airport Company is suggested to contract with waste collection company</li> <li>- Request sponsorships from the company to pagodas and schools</li> <li>- Speed up the construction and development as quick as possible</li> <li>- Take a good care of environment</li> <li>- Do not fill up the whole lake because people's livelihoods depend on it</li> <li>- The company is suggested to build monasteries (cathedrals, pagodas) if can afford to do so</li> </ul>

Source: E&amp;A Consultant 2019

## 6.2.2. Interviewing Stages with Local Authorities, Relevant Departments and Stakeholders

### 6.2.2. 1. Interviews and Focus Group Discussions with Communities and Local People

The discussions with local authorities, affected communities and stakeholders took place from 7-8 May 2019 in the form of focus group discussions (FGD) with two groups (see Photo 8 on page 138). The discussions aimed to (1) disseminate information about the project, project owner, and the scope of the project, and the environmental and social impacts assessment of the project, (2) explore the trend of local people's livelihoods and other infrastructure development projects; and (3) seek feedback and give the floor to the community representatives and affected persons to raise their concerns, suggestions and recommendations to the project owner and consulting team.

#### **a) Focus group discussion with local people and Kraing Yov Community Fisheries, Kandal Province**

On May 7, 2019, the discussion took place at local people's houses in Kraing Yov Commune, Sa'ang District, Kandal Province. The meeting was attended by representatives of local people, senior citizens, fishermen of Kraing Yov Community Fisheries and E&A Consultant Co Ltd Company, with 17 participants in total.

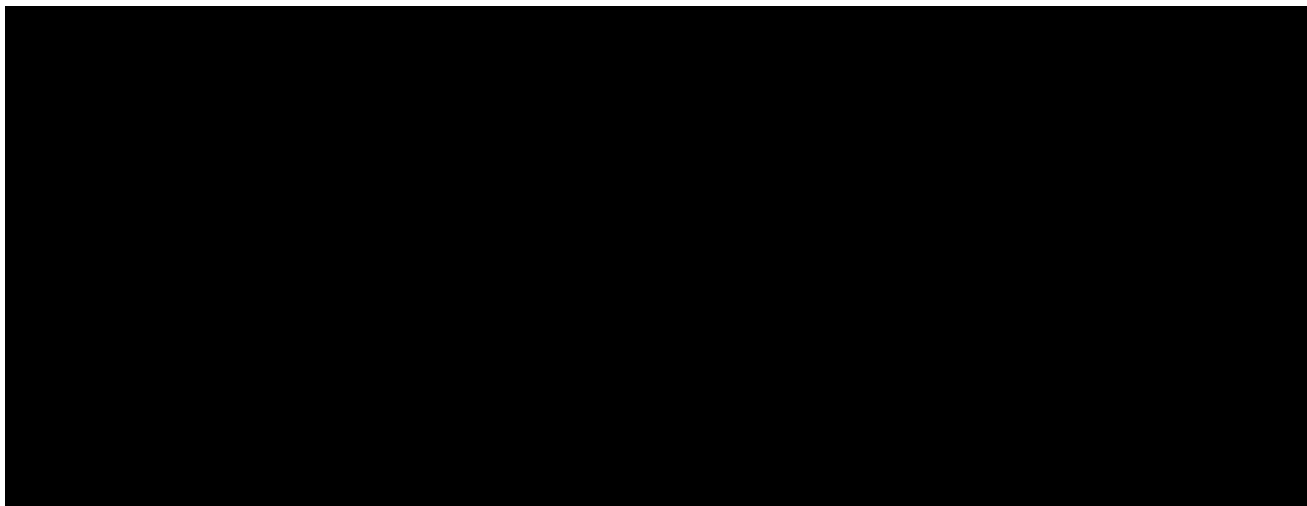
#### **According to the discussions:**

- Kraing Yov Community Fisheries was created in 1990 covering two communes: Kraing Yov and Sa Ang Phnom. This community was registered and under the management of Fisheries Administration.
- Until 2000s, the main occupation of the local people in these two communes was fishing (80%). Since the development activities in this area - such as garment factories and road construction/improvement - is growing, people have changed their jobs from fishing to garment factory workers, etc. Nowadays, only around 50% of villagers in Kraing Yov Commune remain fishermen. On the other hand, people at Sa Ang Phnom gave up fishing completely.
- Water Utilisation at Beoung Chueng Loung: local people depend on this lake for water for their rice fields. People don't use this water for drinking because pure drinking water is consumed instead.
- Fisheries of Beoung Chueng Loung: local people noted that during rainy season this lake allows the floodwater to flow from Prek Hor waterway and Tonle Bati River into Koh Khel in October, and the water flows from Prek Ambel waterway into Beoung Chueng Loung in May. Local people could not confirm the specific size of the lake for releasing waterflow because the lake, called the "500 Lakes", is a series of lakes and stretches.
- Local people are aware of the plan of constructing a New Phnom Penh International Airport, located near Beoung Chueng Loung and Beoung Rean in Kandal Steung District. The participants in the meeting supported the investment project of constructing a New Phnom Penh International Airport.

**Suggestions:**

- It was suggested that the company do not close the waterway flowing from Tonle Bati to Beoung Chueng Loung because it is the main water source for the Lake. If it's closed, the Lake will lack water and accordingly biodiversity will disappear.
- It was suggested that the company do not dump untreated wastewater into the Lake, which can affect water quality (for agriculture) and the lake biodiversity may be lost due to water pollution.

Photo 95: Focus Group Discussions



Source: E&A Consultant 2019

***b) Focus Group Discussion with fishing villagers in Sala Taprom village***

On May 9, 2019, discussions took place at local people's houses in Sala Taprom village, Boeung Khnang commune, Kandal Stung district, Kandal province. The meeting was attended by representatives of local people, senior citizens, and fishermen of Kraing Yov Community Fisheries, living along the Dike (Tomnub) 92 and in the project area, and E&A Consultant Co Ltd Company, with 19 participants in total.

**According to the discussions:**



- Occupations: People living in Sala Ta Prum village are mostly regular fishermen. They mentioned that they have started fishing along Boueng Cheung Loung since the Pol Pot Regime. Their fishing tools consist of fishing poles, sticks, nets, traps, etc. Fishing activities normally take place in two periods: early night and early morning. The fish harvest yields for each household are around 10-15 kg in average and may up to 25-40 kg in high season. The fish is sold to local middlemen based on the price range of each specie. In addition, they mentioned that fish harvesting happens for a whole year, although February is the most productive period. They added that they knew about the upcoming development project in their living areas.
- Local people are aware of the plan to construct the New Phnom Penh International Airport, located near Boueng Cheung Loung Lake and Boueng Rean in Kandal Steung District. The participants in the meeting supported the investment project of constructing a New Phnom Penh International Airport.

**At the same time, people also raised the following concerns:**

- The project will likely endanger the fisheries and their livelihoods,
- In the meantime, the project needs to infill the site area with soil to construct an airport which can affect fisheries resources (eg. fish loss), and
- Conflicts between the people and the project owner (CAIC) may occur and it will cause people to lose their homes.

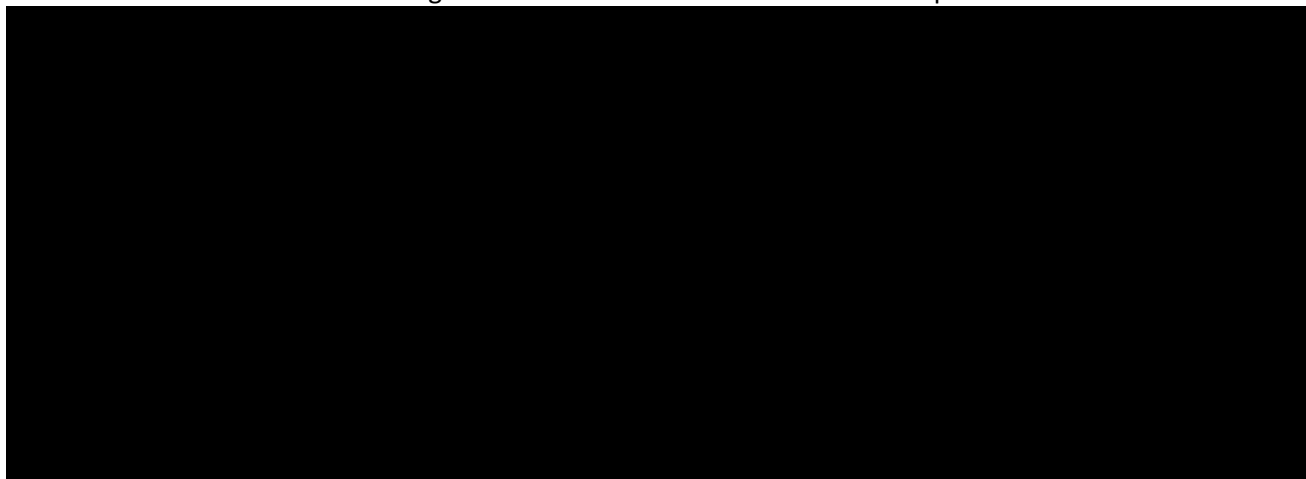
**Suggestions:**

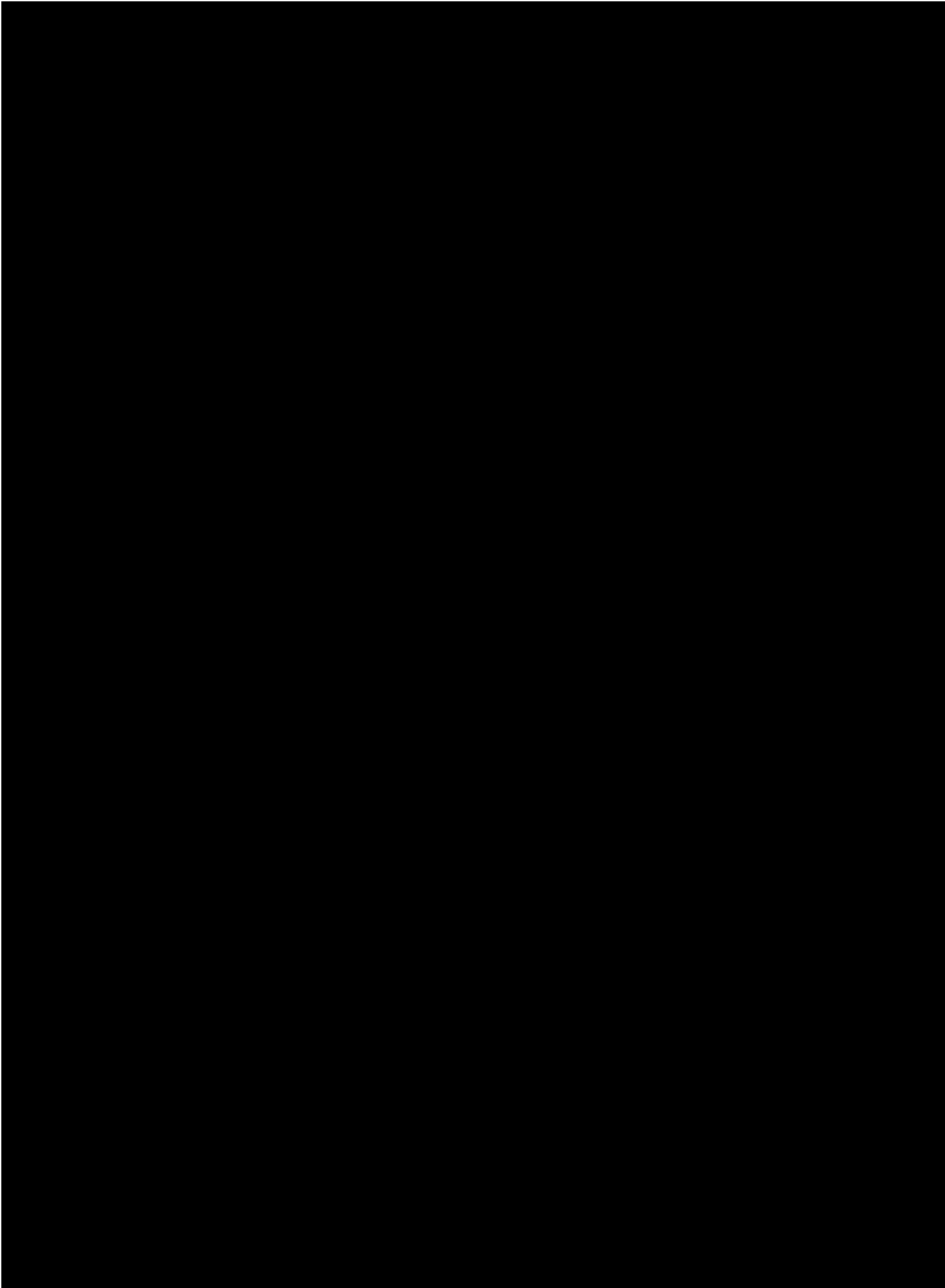
- The project needs to provide appropriate compensation to displaced people.
- People requested that CAIC does not ban them from accessing the nearby fishing areas or Boueng Cheung Loung area.
- The project should offer opportunities for local people to work inside the new airport and provide additional or necessary training.

***6.2.2.2. The Interviews with Local Authorities and Provincial Departments***

Key Informants Interview (KII) with local authorities and relevant provincial departments took place on 18-20 May, 2019 at each unit and departments. The purposes of these interviews were to (1) disseminate project information including project owner, the scope of the project, and the environmental and social impact assessment of the project, (2) give the opportunities for local authorities and relevant provincial departments raising their concerns, suggestions and recommendations to project owner and the consulting team to improve the environmental and social impacts assessment report. The interview results are detailed in the table below.

Photo 96: Consultation Meetings with Local Authorities and Provincial Department





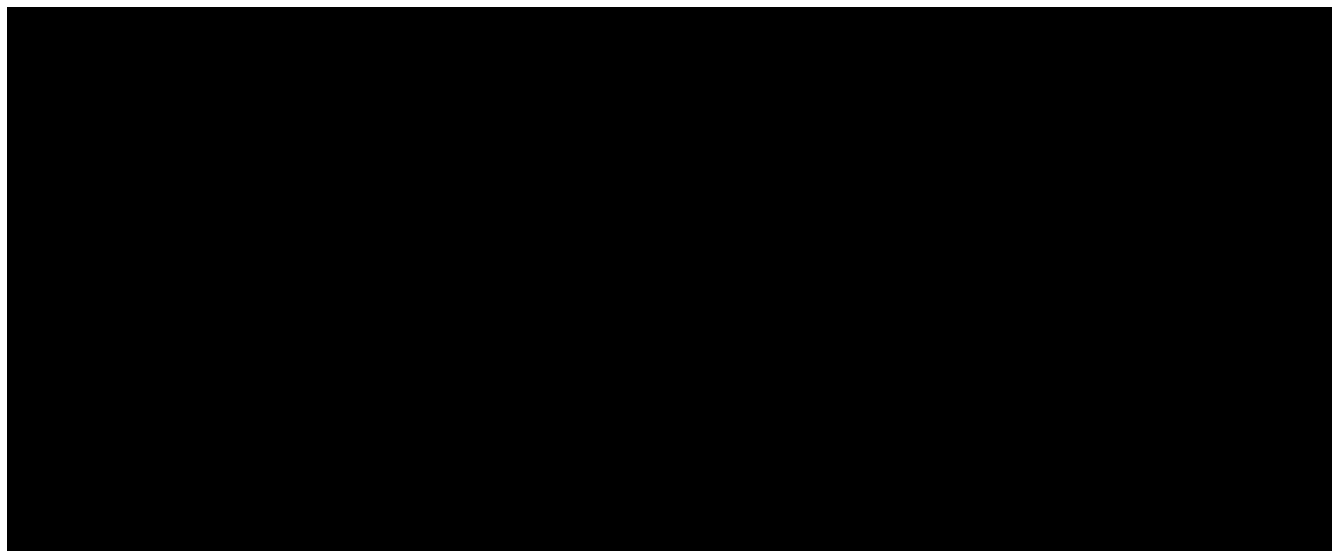


Table 92: Consultation Meetings with Local Authorities and Relevant Provincial Departments

No.	Date	Name/Organizations	Comments/Concerns	Suggestions
1	May 02, 2019	Interview with Mr. Tout Lim, Bati District Governor	<p>During the consultation meeting, he mentioned that he was aware of the upcoming project of constructing the New Phnom Penh International Airport of Cambodia Airport Investment Co Ltd, and he has supported the project. At the same time, he mentioned the following benefits and concerns from the project:</p> <p>❖ <b>Negative Impacts and Concerns</b></p> <ul style="list-style-type: none"> <li>- The construction may cause some road damages</li> <li>- Water gates would be cut off (wells gateway) which are the water storage for using during dry season rice farming</li> <li>- Loss of agricultural land and fishing areas of local people</li> <li>- There is a concern that the project owner buy the land below market values</li> <li>- Building height restriction may affect villager/investor.</li> <li>- Noise disturbance from traffics and the take-offs and landing of the airplanes</li> <li>- Aircraft accidents due to technical issues, climate, or other risks.</li> </ul> <p>❖ <b>Positive Impacts of the Project</b></p> <ul style="list-style-type: none"> <li>- Provides employment to people in the project area indirectly (e.g. vending, houses rental, services, etc), and directly (e.g. working in the airport)</li> <li>- Land prices will rise and spur growth in the area.</li> </ul>	<p>On behalf of Bati District Council, he had some suggestions as following:</p> <ul style="list-style-type: none"> <li>- The company should offer jobs to local people based on their qualifications and experiences</li> <li>- The company should solve land conflicts before implementing the project</li> <li>- Suggest developing the villages and communes near the project area</li> </ul>
2	May 03, 2019	Interview with Mr. Nhim Vandim, Sa'ang District Governor	<p>During the consultation meeting, he mentioned that he was aware of the upcoming project of constructing a New Phnom Penh International Airport of Cambodia Airport Investment Co Ltd (CAIC) through information dissemination and government documents, and he did field observation about the current situation of New airport construction area. Under the name of Sa'ang District administration, he has supported the project because it would offer numbers of positive impacts including:</p> <ul style="list-style-type: none"> <li>- Local economic growth, as well as, national economic growth</li> <li>- Enhance the development of aviation sector</li> </ul>	<p>On behalf of Sa'ang District Council, he had some suggestions as following:</p> <ul style="list-style-type: none"> <li>- The company should offer jobs to local people based on their qualifications and experiences</li> <li>- The company should solve land conflicts before implementing the project</li> </ul>

No.	Date	Name/Organizations	Comments/Concerns	Suggestions
			<ul style="list-style-type: none"> <li>- Improve the status and beauty of Sa'ang District which is close to the New airport</li> <li>- Offer job opportunities for local people directly and indirectly</li> <li>- Land prices would increase</li> </ul> <p>In the meantime, he also raised some concerns including:</p> <ul style="list-style-type: none"> <li>- Some waterways may be affected, especially the canals in the project areas</li> <li>- Loss of agricultural land and affect the fishing areas of local people</li> <li>- Land conflicts may occur between the residing people</li> </ul>	
3	May 03, 2019	Interview with Mr. Bonareth, Kandal Steung District Governor	<p>During the consultation meeting, he mentioned that he was aware of the upcoming project of constructing a New Phnom Penh International Airport of Cambodia Airport Investment Co Ltd (CAIC) through information dissemination and government documents, and he did field observation about the current situation of New airport construction area. Under the name of Kandal Steung District administration, he has supported the project because it would offer numbers of positive impacts including:</p> <ul style="list-style-type: none"> <li>- There would be more employment opportunities and people moving in the area around the project</li> <li>- Offer job opportunities for local people directly and indirectly</li> <li>- Land prices would increase</li> </ul> <p>In the meantime, he also raised some concerns including:</p> <ul style="list-style-type: none"> <li>- A number of private companies have been occupying 2,600 hectares of land area within the project site while CAIC has yet to resolve any land acquisitions by private companies or individuals. The resolutions have been handled by the Land Conflicts Commission.</li> <li>- The construction may cause some road damages</li> <li>- Some waterways would be lost and replaced</li> <li>- Loss of agricultural land and affect the fishing areas of local people</li> <li>- Noise disturbance from traffics and the take-offs and landing of the airplanes</li> </ul>	<p>On behalf of Kandal Steung District Council, he had some suggestions as following:</p> <ul style="list-style-type: none"> <li>- Suggest the company to have good cooperation with local authorities</li> <li>- The company should solve land conflicts before implementing the project</li> <li>- Suggest developing the villages and communes nearby the project area</li> </ul>

No.	Date	Name/Organizations	Comments/Concerns	Suggestions
4	May 03, 2019	Interview with Mr. Choup Sorphoan, Director of Kandal Provincial Tourism Department	<p>During the consultation meeting, he mentioned that he was aware of the upcoming project of constructing a New Phnom Penh International Airport of Cambodia Airport Investment Co Ltd (CAIC) through information dissemination and government documents. On behalf of Kandal Provincial Tourism Department, he has supported the project because it would offer numbers of positive impacts including:</p> <ul style="list-style-type: none"> <li>- This New airport will improve tourism sector</li> <li>- Local economic growth, as well as, national economic growth</li> <li>- Enhance the development of aviation sector</li> <li>- Improve the status and beauty of Sa'ang District which is close to the New airport</li> <li>- Offer job opportunities for local people directly and indirectly</li> </ul> <p>In the meantime, he also raised some concerns including:</p> <ul style="list-style-type: none"> <li>- During construction, the dusty atmosphere would affect the beauty and tourism in the area because tourists want to enjoy clean environment and fresh air, also there is "Sa Ang Phnom Resort", a natural and cultural tourism site, which people regularly visit.</li> <li>- The other issue in tourism sector of Kandal Province is the lack of understanding and awareness related to health, hygiene, wastes and environment; hence, solid waste management should be well-managed.</li> <li>- The increase of traffics should be considered in the project.</li> </ul>	<p>On behalf of the Kandal Provincial Tourism Department, he requested the following:</p> <ul style="list-style-type: none"> <li>- The company needs to consider about health safety management and proper solid waste management.</li> <li>- The company must comply with the principles and plans set out by the government and relevant departments.</li> </ul>
5	May 03, 2019	Interview with Mrs. Moung Sarim, Director of Kandal Provincial Culture and Fine Arts Department	<p>During the consultation meeting, she mentioned that she was aware of the upcoming project of constructing a New Phnom Penh International Airport of Cambodia Airport Investment Co Ltd (CAIC) through information dissemination and government documents. On behalf of Kandal Provincial Culture and Fine Arts Department, she has supported the project because it would offer numbers of positive impacts including:</p> <ul style="list-style-type: none"> <li>- Numbers of tourist would increase</li> <li>- Land prices would increase</li> <li>- Local people would have more employment opportunities from the project</li> <li>- Local economy would grow rapidly</li> </ul>	<p>On behalf of Kandal Provincial Culture and Fine Arts Department, she requested the following:</p> <ul style="list-style-type: none"> <li>- The company should provide information to the Department so that the technical team can inspect and excavate the ancient artefacts to preserve them.</li> </ul>



No.	Date	Name/Organizations	Comments/Concerns	Suggestions
			<p>In the meantime, she also raised some concerns including:</p> <ul style="list-style-type: none"> <li>- In Kandal Steung District, she mentioned, there are numbers of tangible heritage sites including 2 temples, 331 ancient hills, 6 historical sites, 206 ancient houses, 68 ancient pagodas, 33 ancient monasteries, 20 ancient stupas, 4 ancient ponds, 1 museum, and 1 archaeological site. There are 10 ancient hills in Prolay village (Lok Ta Kes hill and Kdouch hill), Chrey Yong village (Kok Dongkor hill and Thmor hill), Ampov Prey village (Ta Ngil hill), Tork Ma village (Kontork hill and Mok Khmao hill), Teuk Nim village (Por Snay hill), Ta Dorl 3 village (Nak Ta Tong hill), and Ta Dorl 2 village (Ta Chey hill), Kandal Steung District, Kandal Province.</li> <li>- Noise disturbance - from the airplane take-offs and landings – would affect some nearby pagodas.</li> </ul>	<ul style="list-style-type: none"> <li>- The company should take the conservation of heritage sites into consideration.</li> </ul>
6	May 09, 2019	Interview with Mr. Pha Tham, Deputy Director of Agriculture, Forestry and Fisheries Department	<p>During the consultation meeting, he mentioned that he was aware of the upcoming project of constructing a New Phnom Penh International Airport of Cambodia Airport Investment Co Ltd (CAIC) through information dissemination and government documents.</p> <p>He added, according to the geography, the project land area would cover 4 communes, which the total cultivated rice fields are 2,469 hectares, ranging from Canal 92 to Canal 94, and the small-scale cultivated farmlands are only 21.5 hectares. Nowadays, the land areas of cultivated rice fields are slowly disappearing in each commune since numbers of housing and land development projects have increased; on top of that, agriculture labor have declined as people have preferred to work in factories over the farmlands. Therefore, the impacts of the project on the cultivated area is limited.</p> <p>On behalf of Kandal Provincial Agriculture, Forestry and Fisheries Department, he has supported the project because it would offer numbers of positive impacts including:</p> <ul style="list-style-type: none"> <li>- The new airport would improve the agriculture sector and increase international supply rapidly</li> <li>- Land prices would increase</li> </ul>	<p>On behalf of Kandal Provincial Agriculture, Forestry and Fisheries Department, he had several suggestions in the following:</p> <ul style="list-style-type: none"> <li>- The company should resolve any impacts with all the stakeholders.</li> <li>- The project should benefit both the company and local people.</li> </ul>
7	May 09, 2019	Interview with Mr. Su Tyro, Deputy Director of Kandal Provincial Public	<p>During the consultation meeting, he mentioned that he was aware of the upcoming project of constructing a New Phnom Penh International Airport of Cambodia Airport Investment Co Ltd (CAIC) through information dissemination and government documents. Kandal Province, he added, will have an investment on water treatment system from</p>	<p>On behalf of Kandal Provincial Public Works and Transportation Department, he had several suggestions in the following:</p>

No.	Date	Name/Organizations	Comments/Concerns	Suggestions
		Works and Transportation Department	<p>Korean company near a New Phnom Penh International Airport. Currently, the consultant team is studying site selection for the project. Nowadays, the Department of Public Works and Transportation has not yet released any details on the project.</p> <p>On behalf of Kandal Provincial Public Works and Transportation Department, he has supported the project because it would offer numbers of positive impacts including:</p> <ul style="list-style-type: none"> <li>- There will be more road infrastructure development, as well as, the increase of hotels, restaurants, commercial areas and the improvement of people's economy.</li> <li>- Direct flights to major countries will increase</li> </ul> <p>Along with the positives mentioned above, he was concerned that the presence of the new airport would produce noise disturbance to the public, especially those living near the airport.</p>	<ul style="list-style-type: none"> <li>- The project needs to design a large and capable drainage system to avoid garbage congestion</li> <li>- The project must include a wastewater treatment tank to prevent the discharge of potentially hazardous waste</li> <li>- The project needs to resolve or find a suitable transport route in order not to affect people's farmland</li> <li>- The project must widen the airport gateway to avoid future traffic congestion</li> </ul>
8	May 09, 2019	Interview with Mr. Teat Sar, Deputy Director of Land Management Urban Planning and Construction Department	<p>During the consultation meeting, he mentioned that he was aware of the upcoming project of constructing a New Phnom Penh International Airport of Cambodia Airport Investment Co Ltd (CAIC) through information dissemination and government documents. He added that Sa'ang District was Kandal Province's first district to systematically register land titles, therefore more than 98% of residents had land titles. Land Titling is defined as a solid legal certificate under the administration of 2001 Land Law or it is defined as Landlord Certificate - a highest certificate. Since this New airport project will produce adverse impacts related to land, the Royal Government has issued a decision to set up a Commission on Site Selection of New Phnom Penh International Airport on February 18, 2019, presided by H.E. Chea Sophara. Currently, the Commission is working on land issues in which some local people have encroached the buffer zone near the Lake and taken ownership over the area.</p> <p>On behalf of Kandal Provincial Land Management Urban Planning and Construction Department, he has supported the project because it would offer numbers of positive impacts including:</p>	<p>On behalf of Kandal Provincial Land Management Urban Planning and Construction Department, he had several suggestions in the following:</p> <ul style="list-style-type: none"> <li>- The project must resolve land issues based on the current market prices for people</li> <li>- All construction work of the project should be carried out according to plan and technical work properly.</li> </ul>

No.	Date	Name/Organizations	Comments/Concerns	Suggestions
			<ul style="list-style-type: none"> <li>- The New airport would improve the agriculture sector and increase international supply rapidly</li> <li>- The information of New airport construction will make the land prices increase</li> </ul> <p>In the meantime, he also raised some concerns including:</p> <ul style="list-style-type: none"> <li>- Following the news of the upcoming airport construction, various disputes over land grabbing have occurred through the competition over land purchase and sales, provoking uproar and disputes.</li> <li>- Moreover, due to the incidence of land disputes and the establishment of clear land demarcation, the land in Kandal Steung District and relevant districts has been set aside (prohibiting land purchases and sales temporarily) based on the decision of the Royal Government. Therefore, this embargo will affect the economy of some people.</li> <li>- The rise of land prices makes people leave the land idle/unused.</li> <li>- The flow of sewage from the airport into the lake would affect the lake quality.</li> </ul>	
9	May 09, 2019	Interview with Mr. Om Phat, Director of Kandal Provincial Environment Department	<p>During the consultation meeting, he mentioned that he was aware of the upcoming project of constructing a New Phnom Penh International Airport of Cambodia Airport Investment Co Ltd (CAIC) through information dissemination and government documents. Kandal Province, he mentioned, does not yet have a National Park or Protected Area. Moreover, no project or organisation has ever studied or initiated a plan to protect the natural resources such as birds and wildlife in this area. Overall, the project site is a flood plain, in which local people do their farm work during the dry season.</p> <p>He also expressed his support for the project of constructing a New Phnom Penh International Airport because it will produce some positive impacts, including:</p> <ul style="list-style-type: none"> <li>- The project of constructing a New Phnom Penh International Airport needs to be filled up, according to the master plan, the company will restore Boueng Cheung Loung and Boueng Rean in order to access and consume the excavated dirt. Therefore, the excavation of these two lakes would enable the lakes to be deeper and more resilient for storing a huge volume of water.</li> </ul>	<p>On behalf of Kandal Provincial Environment Department, he had several suggestions as following:</p> <ul style="list-style-type: none"> <li>- The company needs to design a capable wastewater treatment facility</li> <li>- The company should consider planting trees around the airport</li> <li>- The company must provide appropriate compensation to the affected people</li> </ul>

No.	Date	Name/Organizations	Comments/Concerns	Suggestions
			<ul style="list-style-type: none"> <li>- This project will also support the economic improvement of the people around the project area through other commercial activities</li> </ul> <p>Along with the positive impacts mentioned above, he is concerned that the new airport establishment could lead to surface water pollution (lake quality) through the drainage of untreated sewage into the lake. On the other hand, the wastewater from the project would be released in numbers of cubic meter volumes, and if the drainage runs at a fast pace, it can affect the natural resources of the lake.</p>	
10	May 09, 2019	Interview with Mrs. Lao Vannaroth, Director of Kandal Provincial Women's Affairs Department	<p>During the consultation meeting, she mentioned that she was aware of the upcoming project of constructing a New Phnom Penh International Airport of Cambodia Airport Investment Co Ltd (CAIC) through information dissemination and government documents. She also expressed his support for the project of constructing a New Phnom Penh International Airport because it will produce number of positive impacts not only to Kandal Province but also the whole country, including:</p> <p>Along with the positives, she was concerned that the new airport establishment would affect women's mental health as well as the safety and mental health of children as the area's environment might be changed in a way that women and children cannot cope with, including the effects from some project activities such as transportation, construction and so on.</p>	<p>On behalf of the Kandal Provincial Women's Affairs Department, she requested the following:</p> <ul style="list-style-type: none"> <li>- The project should have a proper protection plan for public health and safety.</li> <li>- The company should take into account women's mental state since women physically are not able to work as much as men, especially when they have families.</li> </ul>
11	May 10, 2019	Interview with Mr. Lim Sarom, Director of the Labor Inspection and Dispute Unit of the Kandal Provincial Labor and Vocational Training Department	<p>During the consultation meeting, he mentioned that he was aware of the upcoming project of constructing a New Phnom Penh International Airport of Cambodia Airport Investment Co Ltd (CAIC) through information dissemination and government documents.</p> <p>He also expressed his support for the project of constructing a New Phnom Penh International Airport because it will produce some positive impacts, including:</p> <ul style="list-style-type: none"> <li>- Local and sub-urban residents can find jobs close to home</li> <li>- Kandal Province may become a satellite city with high rise buildings and commercial complexes which it is going to keep it up with Phnom Penh City</li> <li>- It may become a growing hub of trade and tourism and have many kinds of shopping malls</li> </ul>	<p>On behalf of the Kandal Provincial Vocational Training and Youth Rehabilitation Department, he requested the following:</p> <ul style="list-style-type: none"> <li>- Provide information on the number of construction workers, accommodations and other information to the Department of Labor within 30 days of the construction process.</li> </ul>

No.	Date	Name/Organizations	Comments/Concerns	Suggestions
			<p>At the same time, he raised some concerns that the project should pay attention to, including:</p> <ul style="list-style-type: none"> <li>- Land disputes with people and the company</li> <li>- The safety of construction workers in using personal safety equipment</li> <li>- The healthiness of construction workers in food and water consumption</li> <li>- The health and safety of construction workers in their living conditions at the labour camps, etc.</li> </ul>	<ul style="list-style-type: none"> <li>- The project should utilise the local labour force as much as they can before recruiting outside workers. Also, the project needs to consider the equal labor allocation of male and female workers.</li> <li>- The project must abide by the rules of the Labour Law</li> <li>- The project must cooperate with the Labour Department at every labour inspection.</li> </ul>
12	May 13, 2019	Interview with Lt. Gen. Eav Chamroeun, Commissioner of Kandal Province	<p>During the consultation meeting, he mentioned that he was aware of the upcoming project of constructing a New Phnom Penh International Airport of Cambodia Airport Investment Co Ltd (CAIC) through information dissemination and government documents.</p> <p>He also expressed his support for the project of constructing a New Phnom Penh International Airport because it will produce some positive impacts, including:</p> <ul style="list-style-type: none"> <li>- The presence of the airport can improve local people's livelihoods through more job opportunities and incomes</li> <li>- The presence of the airport would make Ta Khmao an economically viable city</li> <li>- The presence of the airport will raise land prices</li> </ul>	

### 6.2.3. The Results of Consultation Workshops

On Friday morning, July 19, 2019, a public consultation workshop took place at the meeting hall of Kandal Provincial Environment Department – joined by the representatives from other relevant departments of Kandal Province – aiming to complement more inputs for the preparation of the full report on environmental and social impacts for New Phnom Penh International Airport Project, which is developed by Cambodia Airport Investment Co Ltd (CAIC). The company is located at Building No. 315, Canadia Palace, 28<sup>th</sup> Floor, Monivong Blvd, Sangkat Wat Phnom, Khan Daun Penh, Phnom Penh. This consultation workshop was joined by 28 people (2 company representatives, 2 project owners, 4 people from E&A Consultant and 22 representatives of relevant technical departments and Ministry of Environment).

#### **a) The Survey Results of Supporting the Development of this Project**

The analysis revealed that 100% of the participants in the meeting supported the project by highlighting 3 major benefits of the project including: (1) the contribution to the air transportation: both air freight and air travel (2) tourism growth (3) raising Cambodia up to international level for having a standard and huge international airport. Along with the support, the company must comply with the environmental and social impacts assessment report to mitigate the current and future impacts to the minimum level.

#### **b) Concerns**

- Since the project requires large volumes of clean water, Ta Khmao Water Supply does not have enough capability to supply clean water.
- Wastewater from the project may be drained into water sources (Boueng Cheung Loun and Boeung Rean) which could affect people around the area.
- The nearby residents may be affected from the noise disturbance of airplane takeoffs and landings.

#### **c) Suggestions**

- It was suggested that CAIC should construct a road around the Lake, from which the soil is excavated to be used as infill for constructing the airport. Also, the company should plant more trees to turn the lake area into a tourist attraction and protect the State's lake area.
- The company must provide on-job training to the staffs in every unit before starting off their duties at the airport. This to ensure that the staff, for example, sanitary workers and cleaners, can perform well based on agreed standards.
- Prior to the project implementation phase, the project owner must organise a dissemination forum to inform the public about the project.
- The company must fully resolve all land issues related to the project to ensure that the project implementation will not be subject to complaints or suffer delays due to those issues.
- With regard to the clean water supply, the company must have detailed discussions with the technical teams and relevant ministries/departments (e.g. Ministry of Industry and Handicrafts) to ensure an adequate water supply.
- The company must have strict internal regulations, particularly for transporting trucks in which they necessarily need to be covered with plastic/wrapper to prevent dust swirling or dirt dropping onto the roads.
- The company needs to reserve funds for the conservation and restoration of the natural resources around the project area, such as the purchase of small fish, the budget for flooded forests conservation along the Boueng Cheung Loun and Boueng Rean.



### 6.3. Conclusions and Suggestions from the Public Consultation Workshop

The public consultation workshop to which all participants contributed greatly was a helpful forum to allow local people, local authorities, relevant departments, and other stakeholders the opportunity to give inputs, review and comment on the results of the environmental and social impacts assessment report and proposed the measures and suggestions for the project owner to consider implementing.

As a result, local people, local authorities, relevant departments, and other stakeholders expressed their 100% support for the project since it would produce 3 major benefits such as: (1) the contribution to air transportation both : air freight and air travel (2) tourism growth (3) increase national awareness and prestige.

To improve the proposed project, local people, local authorities, relevant departments, and other stakeholders made the following suggestions:

**a) Suggestions from local people:**

- Do not drain any wastewater generated from the airport into the natural lake.
- Do not close the waterway of Bati River because it is the main source of water flowing into the lake area.
- Give priority to the people living near the project area to be employed at the airport.
- Provide additional training to people living near the project area so that they can work at the airport.

**b) Suggestions from participants in the consultation workshop:**

- It was suggested that CAIC should construct a road around the lake, from which the soil is excavated to provide infill for the airport construction. Also, the company should plant more trees to turn the lake area into a tourist attraction and protect the State's lake area.
- The company must provide on-the-job training to the staff in every unit before starting off their duties at the airport. This to ensure that the staff, for example, sanitary workers and cleaners, can perform well based on agreed standards.
- Prior to the project implementation phase, the project owner must organize a dissemination forum to inform the public about the project.
- The company must fully resolve all land issues related to the project to ensure that the project implementation will not be complained or delayed due to those issues.

- Regarding the clean water supply, the company must have detailed discussions with the technical teams and relevant ministries/departments (e.g. Ministry of Industry and Handicrafts) to get adequate water supply.
- The company must have strict internal regulations, particularly for transporting trucks in which they necessarily need to be covered with plastic/wrapper to prevent dust swirling or dirt dropping onto the roads.
- The company needs to reserve funds for the conservation and restoration of the natural resources around the project area, such as the purchase of small fish, the budget for flooded forests conservation along the Boueng Cheung Loung and Boueng Rean.

## **Excerpt from ESDD**

### **5.4 Community engagement**

Chapter 6 of the local ESIA describes the public consultation carried out at the time. It was implemented for target and vulnerable groups and interested parties namely local people, local authorities, pagoda representatives and representatives from community services such as healthcare and fisheries. The engagement adopted the following objectives.

#### **All stages**

- Disseminate project information to keep the informed and support participation

#### **When preparing the local ESIA**

- Gather insights on the potential positive and negative impacts and help identify mitigation measures to reduce the adverse impacts to a minimum level
- Collect data, comments, and recommendations from all stakeholders aimed to supplement a full environmental and social impact assessment report

#### **During construction**

- Provide updates on project activities and be open to discussion and feedback, while acting on recommendation

The public participation process followed Prakas No. 120 Pr.B.St. (Ministry of Environment, 2018). This document presents the deployment model of working conditions for infrastructure and tourism development outlining that the planning of public participation should consist of three stages - information dissemination at the project site, interviews with local authorities, affected communities and stakeholders, and consultation workshops, Prakas No. 120 Pr.B.St is produced by the Ministry of Environment to meet national requirements.

Following the consultation undertaken for the local ESIA, CAIC have undertaken ongoing engagement with the communities through the CLO but do not have a defined program and record of this engagement.

#### **5.4.1 Stage 1: information dissemination**

According to Chapter 6 of the local ESIA, information was distributed to the community via household surveys in specific villages and through consultations with the local authorities between the 4<sup>th</sup> to 10<sup>th</sup> May 2019. Thirty-two (32) villages within 3 kms of the Project site were covered by the household surveys, which included 375 households.

From the surveys, it was identified that overall stakeholders surveyed were happy with the project identifying specific positive impacts associated with economic and community development however concerns were raised with regards to construction pollution (dust and noise pollution and traffic congestion), people's livelihoods and housing/land prices. It is not clear from the local ESIA, how the comments and concerns raised by the stakeholders were actioned in the Project development.

#### **5.4.2 Stage 2: stakeholder interviews**

Relevant stakeholders were engaged in interviews and focus group discussions between the 7<sup>th</sup> and 8<sup>th</sup> May 2019. This built on Stage 1, with the targeted interviews and focus groups serving to collect specific information on the people's livelihoods and socioeconomic characteristics, along with other infrastructure development projects that are planned in the area to support the CIA.

Focus group discussions were held with representatives of Kraing Yov Community Fisheries, Kandal Province and Sala Taprom Village as these were identified as to be able to provide perspectives on local livelihood impacts and links to other infrastructure development projects. These sessions were used to disseminate information about the project (including information on potential environmental and social impacts), explore the trends in local livelihoods and other infrastructure developments and to seek feedback on concerns, suggestions and recommendations to the project owner and their consulting team. It is not clear from the local ESIA how the information gathered was used to inform the project.

To improve the environmental and social impact assessment, further key informant interviews were held with the local authorities and relevant provincial departments, as listed in Chapter 6 of the local ESIA. These authorities provided the following feedback and recommendations.



- **Employment and social responsibility** | provide job opportunities for locals based on qualifications, ensuring gender equality during the hiring process, and compliance with the labor laws
- **Conflict resolution and stakeholder engagement** | ensure that all land disputes and other conflicts are resolved prior to project implementation and establish coordination with authorities
- **Heritage and environmental protection** | preserve cultural sites, conduct tree planting activities, and ensure proper solid and wastewater management
- **Infrastructure** | develop transport plans that outline suitable transport routes and management approaches to prevent traffic congestion
- **Health and safety** | ensure proper health and safety measures are in place for workers and the community
- **Community wellbeing** | compensate affected persons, while also protecting women's rights
- **Compliance and reporting** | allow various external authorities to conduct environmental and archaeological inspections) and ensure adherence to the regulations.

#### 5.4.3 Stage 3: consultation workshop

A public consultation workshop was held on Friday 19<sup>th</sup> July 2019 at the Kandal Provincial Environment Department. This aimed to gather additional inputs for the local ESIA specifically aiming to gain more insights on the support levels for the project and on concerns associated with Project and suggestions for addressing these concerns. Twenty-eight (28) people attended the meeting including 2 community representatives', four representatives from CAIC (referred to as company representatives and project owners), four environmental consultants, and 22 representatives from the relevant technical departments in the MOE. Overall, participants who attended were supportive of the project and identified three benefits; namely its contribution to air transportation for both air freight and air travel, growth in tourism, and increased national awareness and prestige. Concerns were raised regarding the Project water supply requirements based on local constraints and the impacts of wastewater drainage and noise during construction and operation on the local community.

The support for the Project was also expressed during our site audit and interviewing with community representatives. Circumstantially, the communities appear to favor the economic and flow-on benefits in place of any environmental or social impacts. This may indicate why they offered their support during these meetings.

#### 5.4.4 Overall conclusion

In summary, the consultation undertaken for the development of the local ESIA was undertaken in line with the three-stage process outlined in the Prakas No. 120 Pr.B.St. (Ministry of Environment, 2018) and gained useful insights on community concerns and suggestions for the Project. It is not clear how these concerns and suggestions have been integrated into the subsequent development of the Project, but it is noted that the site audit identified that communities appear to remain supportive of the Project.

Following the engagement undertaken for the local ESIA, no further consultation programs have been implemented during construction or as part of the Addendum ESIA. This includes the absence of a *Stakeholder Engagement Plan* for construction. The absence of a *Stakeholder Engagement Plan* could potentially lead to increased risk of misinformation and community resistance. It is also important to have such a Plan as a reference to map stakeholders, identify consultation methods, develop a means for feedback and grievances, and gauge the Project's performance in terms of community relations and ensure their awareness of project's activities and plans. However, the CAIC CLO maintains a two-way dialogue with the communities which is focused on discussions around processing land acquisition payments (see **Chapter 9**

for further details). No formal record of this ongoing consultation has been provided by CAIC and/or evidence of any actions undertaken to respond to any concerns and suggestions being raised by the communities.

**Table 5-1 Status of EMP and ESMP implementation**

Aspect	Status of Implementation
Community engagement	<p>(●) There has been sufficient and deliberate stakeholder, Indigenous and community engagements to date, which has informed the EMP and ESMP. This extends to informing and compensating affected persons, compensating for livelihood loss and displacement, and latterly creating jobs in the local community, which outwardly should extend beyond the construction phase.</p> <p>(●) A CLO provides a mechanism to support feedback and solicit grievances. The CLO is also responsible for all communication between the community and project management team. This ensures consistency across the Project.</p> <p>(●) Stakeholder feedback has been considered throughout the project. This is evident through the local ESIA and Addendum ESIA, but more critically from the feedback received during the site audit consultation, with all community representatives continuing to give their unwavering support for the Project. However, many of the responses appeared to follow a consistent (potentially scripted) narrative and translated by CAIC. This appeared not to be a forced attempt by CAIC to solicit these answers, but rather the community appreciating the background to the site audit (i.e., to secure a loan) and their ongoing aspiration to benefit from the Project in terms of job creation, economic uplift, and flow-on benefits. There may be benefit in interrogating this further through using an independent to engage in community outreach to validate their support for the project. however, there is reasonable evidence in similar projects that communities typically favor their impact such as they are set to benefit from economic uplift and wealth generation.</p>

#### ESAP Items:

No #	Issue	Action	Timeframe for Completion	Responsible Party	Indicator of Completion	Status
25	Community grievances	Compile a database of all community grievances raised during construction. The database should describe the grievances, the date they were raised, the actions taken by the Project to address the grievances and evidence of how the response was shared with community members. It should also identify any outstanding grievances that need to be resolved prior to operation. Update the grievance procedure for operation and maintain the grievance database	Construction to Operation	CAIC	Grievance database updated for construction Identification of any outstanding grievances for construction Updated grievance procedure for operation Grievance database maintained for operation	Open
26	Community perspectives on the project	Undertake an independent assessment of community perspectives on the Project to validate whether the positive sentiment towards the Project expressed during the site audit extends beyond the nominated community representatives (in absence of project management).	Pre-operation	CAIC	Independent assessment report on community perspectives Evidence of implementation of any recommended corrective actions	Open
27	Stakeholder Engagement Plan	Prepare and implementation of a Stakeholder Engagement Plan (SEP) to ensure that effective communication channels with local stakeholders are put in place to address any issues which might arise during the remainder of construction and operation phases of the Project and establish appropriate protocols for ongoing communication with local stakeholders.	Pre-operation	CAIC	Stakeholder Engagement Plan for operational stage	Open
		Provide evidence of engagement with local communities to provide transparent updates on the Project's status, activities, and expected impacts. This could include a bi-annual community engagement and awareness campaign to ensure understanding of rights and the grievance mechanism.	Operation	CAIC	Records of engagement with local communities	Open