



**Rapid Assessment of the**  
**Incorporation of NGO Comments in the**  
**National Strategic Development Plan (2006-2010)**

Prepared by the NGO Forum on Cambodia on behalf of the  
Asian NGO Coalition (ANGOC)

May 2006

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## Introduction

This assessment gives an overview of the degree to which comments from the NGO community have been incorporated in the final version of the National Strategic Development Plan (NSDP). The discussion draft of the NSDP on which the comments are based is dated 10 October 2005, the letter from the NGO Forum containing the comments is dated 8 November 2005, and the final version of the NSDP used in the assessment is the version that has been endorsed by the Council of Ministers on 27 January 2006.

An overview table of the number of comments / suggestions per category is given below. Please note that it is possible that some comments / suggestions have been incorporated in the NSDP but in such a different wording that the author has not been able to identify it as such. Therefore it is important to stress that the assessment below should only be treated as a "rapid assessment" and not as an "in-depth analysis".

Table 1: Overview of number of NGO Comments and incorporation in NSDP

<b>Category</b>	<b>Nbr. of comments on draft NSDP</b>	<b>Nbr. of comments incorporated</b>
General	2	2
On the core indicators	3	1
Governance	5	0
Environment for the Implementation of the Rectangular Strategy	1	0
Enhancement of the Agricultural Sector	11	5
Forestry Reform	1	0
Environment Conservation	1	1
Land Reforms	2	2
Rehabilitation and Construction of Physical Infrastructure	2	1
Private Sector Development and Employment Generation	2	1
Education	5	1
Health	4	1
Annexe I:2	1	0
<b>TOTAL</b>	<b>40</b>	<b>15</b>

## Overview of NGO suggestions and incorporation in the NSDP

### General

NGO Comment / Suggestion on draft NSDP	Final NSDP
<p>"One problem that stands out is related to the poverty data that were taken as basis for the plan. The lack of disaggregated data makes it impossible to keep a specific focus on the poorest and most vulnerable groups in Cambodian society. Since those groups remain invisible it is difficult to develop an efficient strategy for national development with the main goal of poverty reduction."</p>	<p>The level of disaggregation has not changed but the final version makes specific mention of people with disabilities and indigenous people.</p> <ul style="list-style-type: none"> <li>▪ 4.05 (bullet 5) "Target the most needy and least served people, including those with disabilities and indigenous people, and areas to help rapidly reduce poverty."</li> <li>▪ Annex III (bullet 13) "In addition, the NSDP strategies should recognize the specific needs of minority and indigenous people covering complex interlinkages of economic, social, cultural, legal, political and other issues".</li> </ul>
<p>Suggest that further efforts be made to make the document poverty-focused and to more clearly delineate responsibilities, tasks and timeline. If this can not be done immediately, then suggest that this be done in time for the first update of the NSDP, to be released in June 2006. By then, the two Participatory Poverty Assessments, sectoral plans and sub-national plans would be ready to help improve the poverty focus and operationalisation of the plan"</p>	<p>6.03 "... the full NSDP will be reviewed in June 2006 to take account of various new or additional inputs and data from all sectors and sub-national levels. By then, based on consultations with all stakeholders in early part of 2006, detailed sectoral and sub-national plans would have been prepared along with disaggregated goals, targets and costs, as well as a more detailed roadmap on how the allocated resources would be utilised in the best possible manner.</p>

## On the core indicators<sup>1</sup>

NGO Comment / Suggestion on draft NSDP	NSDP
<p>Table 3.2 provides no indicators for #31 "Accelerate Governance Reforms." However, the joint monitoring indicators agreed between the government and donor community at the Consultative Group meetings are agreed indicators of governance reform, and are updated annually according to progress and circumstances.</p> <p>Suggest that this box, covering 2005 to 2015, simply read "Annually achieve JMIs", with a footnote saying "Joint Monitoring Indicators (JMIs) updated annually by the government and donor community at the Consultative Group meetings."</p>	<p>The suggested addition has not been included.</p> <p>The indicator called "Accelerate Governance Reforms" under the subheading of Governance in table 3.2 (p.31) is marked as "to be developed". Given the comments in section 6.03 of the NSDP it is expected that an indicator on governance reforms will be included in the reviewed version of the NSDP in June 2006.</p>
<p>Table 3.2 provides "no. of titles issued to farmers" as an indicator of land reform (#10). While the number of titles issued is a good input indicator, it gives no information on output. Surveys showing the number of landless farmers exist, and could be updated at least every five years.</p> <p>Suggest that under #10 add an additional indicator "Percent of farmers without land."</p>	<p>The indicator of "% of Total agri. land" has been added to the indicator of "Land titles to farmers".</p>
<p>Table 3.2 lists #27 "Forest cover" as a measure of environmental sustainability. While this is an important indicator, it does not give any information on the quality of forest remaining (which could range from 100% cover to 10% cover).</p> <p>Suggest that under #27 add an additional indicator "Hectares of protected areas". Note, that this is already included in the MDG indicators in the annex.</p>	<p>The suggested addition has not been included.</p>

<sup>1</sup> See the last page of the assessment for an overview of changes in the proposed set of NSDP indicators.

## Governance

NGO Comment / Suggestion on draft NSDP	NSDP
<p>Para. 4.02, first bullet point, describes democracy only in terms of elections.</p> <p>Suggest add "and participation and citizen input to decision-making is encouraged."</p>	<p>The suggested addition has not been included.</p>
<p>Para. 4.02, second bullet point: "Government to ensure maintenance of political stability, rule of law, equity and social order....." does not full encompass the government's commitment to "democracy and protection of human rights" stated in para. 4.01.</p> <p>Suggest add "while also working to ensure that the rule of law and human rights principles are upheld and applied to all."</p>	<p>The suggested addition has not been included.</p>
<p>Para. 4.12 "Legal and judicial reform", first bullet point calls for "strengthening core support institutions like the Supreme Court [sic, should be "Council"] of Magistracy, the Council of Jurists, the Ministry of Justice and the Council for Legal and Judiciary [sic, should be "Judicial"] Reform.</p> <p>Suggest add "Undertake reform of existing institutions such as the Supreme Council of Magistracy, Constitutional Council, National Election Committee, and National Audit Authority" to ensure their independence, transparency and capacity, as well as reinforcing their legal positions in the Constitution and developing effective monitoring systems."</p>	<p>The names of the institutes have been changed as suggested.</p> <p>However the suggested additions have not been included although the NSDP refers to:</p> <p>4.13 (bullet 1, p.36) " Establish and pass basic laws and codes relating to judicial system, viz. law on the establishment of courts, law on the statute for judges and prosecutors, law amending the law on the establishment and functioning of Supreme Council of Magistracy, civil and penal codes and procedures, administrative codes and other regulations in order to ensure the independency of prosecution..</p>

<b>NGO Comment / Suggestion on draft NSDP</b>	<b>NSDP</b>
<p>Para 4.12 "Legal and judicial reform", second last bullet point speaks of establishing "mechanisms to provide legal aid to the poor". In addition this section should include a bullet point on what the government plans to do with respect to the juvenile criminal system. Right now there is no separation between the juvenile and adult criminal system.</p> <ul style="list-style-type: none"> <li>• Suggest add "Establish mechanisms to separate the juvenile and adult criminal systems and ensure that children and youth are treated humanely."</li> </ul>	<p>The suggested addition has not been included.</p>
<p>One aspect of good governance is access to information, to which the RGC has already committed itself in the CG joint monitoring indicators. Thus, this section could also mention improving access to information through the enactment of a Freedom of Information Bill.</p>	<p>The suggested addition has not been included.</p>

**Environment for the Implementation of the Rectangular Strategy**

<b>NGO Comment / Suggestion on draft NSDP</b>	<b>NSDP</b>
<p>Part of the government's plan to enhance "peace, political stability and social order" is to reduce the number of weapons in circulation.</p> <p>Suggest add to the end of para. 4.21 "Efforts to maintain social order and reduce crime shall include implementation of the Cambodian Arms Law, passed by the National Assembly in April 2005, and ongoing efforts to reduce the number of weapons in circulation."</p>	<p>The suggested addition has not been included.</p>

## **Enhancement of the Agricultural Sector**

<b>NGO Comment / Suggestion on draft NSDP</b>	<b>NSDP</b>
Include SRI as a method to increase rice production.	4.42 (last bullet) Vastly increase yields of all crops by use of better inputs (seeds, fertilisers, proper practices), improved and extended water management and crop protection; at the same time, <i>also</i> promote low-input, low-cost methods of increasing agricultural production, including System of Rice Intensification (SRI) as <i>appropriate</i> , so as to enhance farmer profits and to avoid over-use of pesticides.
High yield varieties may be more appropriate for flood recession rice, but should not be widely use by farmers for rain-fed wet season rice. It is important to note around 80 % of Cambodia's rice cultivated area is under rain-fed conditions.	The suggested addition has not been included.  The NSDP <u>does not</u> mention the percentage of Cambodia's rice cultivated area is under rain-fed conditions <u>nor</u> does it notice that high yield varieties may be more appropriate for flood recession rice.
With regard to improved competition of agriculture sector of Cambodia with neighbouring countries, the Ministry of Commerce has been helping to promote organic farm products as a niche export market for Cambodia.	4.43 (last bullet) Continue promotion of export markets for niche products, including especially organic farm exports.
With regard to issues to be analysed and included in the "Agriculture and Water Resource Strategy", an increased understanding of the relationship between traditional land use patterns in upland agriculture and watershed management should be mentioned under 4.43.	The suggested addition has not been included.
With regard to 4.45, second bullet point, which talks about pursuing intensive cropping including multiple seasonal crops on the same land, suggest that this be applied "only where economical for farmers."	The suggested addition has not been included.
With regard to 4.45, third bullet point, suggest to add "or (preferably) promote low-input, low-cost methods of increasing agricultural production, including SRI where appropriate, so as to enhance farmer profits and to avoid the over-use of harmful pesticides."	4.42 (last bullet). Included, see top of this table.

NGO Comment / Suggestion on draft NSDP	NSDP
<p>With regard to 4.46, fourth bullet point, suggest to add “while continuing production of staple food crops to ensure food security in times of economic downturn.”</p>	<p>4.43 (fourth bullet) Encourage cultivation of cash crops, including fruits and vegetables, both as a means to diversify and to ensure income security while continuing production of staple food crops to ensure food security.</p>
<p>Suggest the final sentence in 4.47 be removed until further thought to it is given, as providing poor families a once off grant of HYV rice seeds and fertilizer may trap them into methods of rice production that they can not afford to continue.</p>	<p>The HYV scheme is still included in the NSDP as it is included in a footnote at the second bullet of 4.4. where it is mentioned as a possible support scheme as a direct poverty reducing measure. " 2 One such scheme could be providing a one-off grant of seeds and fertilisers to poor farmers on a selected basis to provide a jump-start to increased production. At US\$ 0.30 cents per kg, 33 kgs of HYV seeds for half ha would cost around US\$ 10; an additional US\$ 10 of NPK fertilisers would take the total per poor family to US\$ 20 as a one off grant. This could be a direct investment in poverty alleviation and would have many multiplier effects."</p>
<p>Under 4.47, last bullet point, suggest to add an additional bullet point as follows: “Continue promotion of export markets for niche products, including especially organic farm products.”</p>	<p>4.43 (last bullet) See third line of this table</p>
<p>Suggest that para. 4.47, second last bullet point be changed to “Initiate ‘one village, one product’ concept to promote exports of high value, through establishing secondary sources of income aimed at export markets in addition to enhancing food security through crop diversification.</p>	<p>Suggestion not included.</p>
<p>In addition, suggest consideration be given to the addition of the following clauses:  <b>1)</b> To improve food security and nutrition, the support of diversified and integrated farming (rice, fish, vegetable, dike cropping, fruit etc) system shall be considered. There is a need to have investment in research and development in these farming systems. Public awareness campaigns on growing and consuming vegetables shall enhance food security.  <b>2)</b> The establishment of community-based agricultural services and input providers, such as piglet, fingerling and seedling producers etc, shall receive increased support. A program to support capacity</p>	<p>The content of these five clauses is not included in the NSDP.</p>

NGO Comment / Suggestion on draft NSDP	NSDP
<p>building, to improve access to capital, and to support the formation of associations of service and input providers shall be commenced.</p> <p><b>3)</b> Increasing numbers of rural youth feel insecure about their prospects for employment, but there are also young people who want to take up a career in the rural areas. A nationwide training program to develop skills of rural youth shall be conducted, especially aimed at those who want to continue their career in rural areas.</p> <p><b>4)</b> It is recommended to support the formation of producer/farmer association/cooperatives throughout Cambodia, but the process should be participatory and bottom-up. Provision of financial incentives to attract farmers to form cooperatives is not recommend as it may not ensure sustainability and ownership of the organization.</p> <p><b>5)</b> For promotion of small rubber cultivation, emphasis should also put on supporting the formation of family rubber planter associations.</p>	

**Forestry Reform**

NGO Comment / Suggestion on draft NSDP	NSDP
<p>Suggest that an additional paragraph be added to this section, such as the following: "The Forest Sector Review, completed in 2004, shall be further referenced as a guide to ongoing reform efforts and as a basis for ongoing donor support to the sector."</p>	<p>The suggested addition has not been included.</p>

## Environment Conservation

NGO Comment / Suggestion on draft NSDP	NSDP
<p>Para. 4.53 notes that "Natural areas are and would be actively promoted as attractive 'tourist destinations' bringing in further benefits to the local communities." However, tourism developments can also lead to environmental destruction and benefits often by-pass local communities, if not designed properly.</p> <p>Suggest adding "through low impact eco-tourism projects, bringing in further benefits to the local communities."</p>	<p>4.49 Furthermore, natural areas are and would be actively promoted as attractive low-impact 'eco-tourist destinations' bringing in further benefits to the local communities.</p>

## Land Reforms

NGO Comment / Suggestion on draft NSDP	NSDP
<p>Suggest to add a bullet point under para 4.54 "The RGC shall approve and implement a National Resettlement Policy in the form of a sub-decree, in order to protect the rights of project-affected people, including adequate compensation to ensure that no-one is worse off as a result of 'development'."</p>	<p>4.58 (bullet 4) "Address in a humane manner resettlement issues of people affected by road construction works"</p>
<p>Suggest to rephrase the second bullet point under 4.54 as follows: "Enhance and speedily implement policies and procedures on registration of the collective immovable property of indigenous communities"</p>	<p>4.50 (p.48, second bullet) "Continue to discuss and develop the required legal framework for effective implementation of the Land Law, including registration of indigenous people's land rights".</p>

## **Rehabilitation and Construction of Physical Infrastructure**

<b>NGO Comment / Suggestion on draft NSDP</b>	<b>NSDP</b>
<p>The plan fails to mention urban poor as target groups for priority attention. Improvement of the lives of urban poor should therefore be included as cross-sectoral issue under the second RS rectangle Rehabilitation and Construction of Physical Infrastructure. Priority strategies and actions to be taken related to urban poor in informal settlements include:</p> <ul style="list-style-type: none"> <li>- Provide tenure security to urban poor people in informal settlements;</li> <li>- Ensure fair and just compensation for evicted households;</li> <li>- Improve sanitation in informal settlements;</li> <li>- Provide access to low cost energy to households in informal settlements.</li> </ul>	<p>The urban poor are not included as target group for priority attention.</p>
<p>Include support for disaster management programmes, focusing especially on strengthening disaster preparedness action plans at village and commune levels where floods may occur.</p>	<p>4.54 (bullet eighth) "Assist in protecting rural areas from natural calamities like floods, droughts, etc., through educating and enabling communities for Disaster Preparedness and Risk Reduction."</p>

## Private Sector Development and Employment Generation

NGO Comment / Suggestion on draft NSDP	NSDP
<p>While the RGC has chosen to pursue a trade policy involving rapid integration with the global trading system, much more work needs to be done to make the trade strategy pro-poor. In particular, there are concerns about the social, economic and environmental impacts of Export Processing Zones that need to be addressed.</p> <p>Suggest that the following be added to the last bullet point of para. 4.83: "The impacts of the proposed EPZs will be further studied to assess and help avoid negative impacts on government revenues, worker conditions and the environment, and to strengthen backward linkages to the Cambodian economy."</p>	<p>Suggestion not included.</p>
<p>It is good to see the ongoing commitment to "Strengthen capacity to promptly investigate and prosecute offenders related to sex tourism, any form of child exploitation and drug trafficking" in the last bullet point under para. 4.84.</p> <p>To this bullet point, suggest adding "and strengthen the provincial Child Safe Tourism commissions."</p>	<p>4.77 (last bullet, page 56) "Strengthen capacity to promptly investigate and prosecute offenders related to sex tourism, any form of child exploitation and drug trafficking, and strengthen the provincial Child Safe Tourism commissions."</p>

## Education

NGO Comment / Suggestion on draft NSDP	NSDP
<p>The first sentence of para. 4.93 contradicts the second sentence, which recognizes the great challenge to enhance the quality of education in Cambodia. According to the statistics, there have been great improvements in access and quantity of education; but quality is still something for the future.</p> <p>Suggest remove the words "both qualitative and quantitative", and replace them with the words "especially in terms of access to education."</p>	<p>Suggestion not included.</p>
<p>Para 4.96 The PAP process has been relatively useful in education in that some money does now get to the schools, whereas it didn't in the past. But they do not get anywhere near what is "budgeted" and they do not get it on time, so planning and quality improvement is still near impossible.</p> <p>To the first sentence of para. 4.96, suggest add the words "though further improvement of the PAP system to improve the timeliness of disbursements is required." The subsequent sentence ending "is likely to reach 20%" should be followed by a date.</p>	<p>Suggestion not included.</p>
<p>In accordance with the long-term objective of equal opportunity for quality education for all children, as stated in para. 4.92, one more bullet point related to children with disabilities should be added to para. 4.97.</p> <p>Suggest adding "working to help children attending primary and secondary education who are made vulnerable because of disabilities."</p>	<p>Suggestion not included.</p>

NGO Comment / Suggestion on draft NSDP	NSDP
<p>In Table 4.4, the targets for #6 survival rate and #7 literacy may not be achievable, given that the children would have to already be in the process, which they are not. While goals are important for motivating and stimulating the vision and commitment of the development community, some re-assessment of achievable targets may be in order. The figures given for the current literacy should also be re-examined.</p> <p>UNESCO figures for functional literacy should be used. (It has been understood that this may already be under consideration).</p>	<p>Some figures have changed in the NSDP. It is likely that the target for the survival rate (grade 1-9) for 2010 has been reduced to 50 percent (from 74 percent) due to the comment made.</p>
<p>Para. 4.99 should also include a bullet point related to teachers with disabilities who are currently facing strong discrimination.</p> <p>Suggest adding “teachers with disabilities should be encouraged and supported to work as teachers in Cambodia”</p>	<p>Suggestion not included.</p>

## **Health**

NGO Comment / Suggestion on draft NSDP	NSDP
<p>Inadequate and erratic disbursement of funds continues to be a major obstacle to improving health services.</p> <p>Under 4.104, first bullet point, to “Accelerate reforms in all areas”, suggest add “including especially improvement in the system of disbursements to the health sector.”</p>	<p>Suggestion not included.</p>
<p>Considering that Cambodia ranked very low on the maternal health issue, the RGC should work to prioritize women’s reproductive health.</p> <p>Suggest adding as part of priority strategy and actions under 4.104: “Improving reproductive health knowledge for women and working for improved maternal health.”</p>	<p>4.95 (9<sup>th</sup> bullet, p. 63) “Improve reproductive health services and information, including maternal child health and birth spacing; address youth sexual and reproductive health issues and services.”</p>

Suggest adding an additional bullet point under 4.110: "Supporting women to understand productive health, mothering and how they should care for themselves before reproduction as well as during and after child birth.	Suggestion not included.
In addition, this section of the NSDP should mention the development of a long-term plan for the disability sector and mainstream these plans into all relevant sectors.	Suggestion not included.

**Annexe I:2**

<b>NGO Comment / Suggestion on draft NSDP</b>	<b>NSDP</b>
<p>Final page, second paragraph below Table 1 states "Cambodia's progress toward the CMDGs is constrained by a number of impediments of which an important one is the chronic shortage of investment funds to meet priority requirements." While this may be true, the government needs to show that it is an efficient user of both donor funds and its own resources.</p> <p>Suggest to add "The RGC also recognizes corruption as a major impediment to achieving the CMDGs and knows that successful anti-corruption measures are a necessary prerequisite to achieving the level of donor and investment support required.</p>	Suggestion not included.

## Overview of changes in proposed NSDP Indicators

<b>Indicators from draft no longer included in NSDP</b>	<b>New indicators included in NSDP</b>
Paddy Production (million tons)	Land Reforms: Land Titles to farmers -- % of Total agri. land
Fishing lots released for family farming (% of total area)	Births attended by skilled health personnel -- %
Fish Catch (000 tons)	Married women using modern birth spacing methods (%)
Rural population wage earners %	% of health facilities providing RH services
Investment levels: FDI (million US\$), domestic	6-14 years out of school (%)
Output (billion riels)	Access to safe water source -- % of urban population
Employment (1,000): men/women	Access to improved sanitation -- % or urban population
Employment in garment industry (1,000): men/women	Female share of wage employment -- agriculture, industry, services (%)
	Level of awareness that violence against women is a crime (%)