

**Kingdom of Cambodia
Nation Religion King**



Ministry of Mine and energy



**Preliminary Assessment Statement
Draft Sub-Degree on exploration license management
And mineral resources business industry license.**

Prepared by
Project implement agency regulatory impact assessment
Of ministry of mine and energy by commented from
Executive working group regulatory impact assessment
Of Economic, social and cultural council of OCM

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Contact

Unit: Project implement agency regulatory impact assessment of ministry of mine and energy.

In Charge: Mis. Yem Kannika

Role: Chief of RIA working group and legislation department.

Address: Building 79-89 St. Paster (51) Sgkat Psatmey 3 Kann donpenh, Phnom Penh.

Mobile: (855) 12 85 08 56

Email: kannikayem@gmail.com

Website: www.mme.gov.kh

Unit or infected file institution

1. Guideline of ministry leader to do impact assessment on this draft sub-degree.
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A brief description of the proposal

Mineral sector in Cambodia will be the main basic for develop Cambodia all level includ domestic using, industry process and exporting for economic development. Study from geology and observation on mineral resources found that the Cambodia have potential in the mineral resources sector as gold, iron, Bauxite, manganese, limestone, phosphate, sapphires, rubies, coal, construction materials and other mineral resources. But the actual numbers of those mineral resources not yet assessed, development and business. In order to implement legal mineral resources in Cambodia natural persons or legislator have to proposal other license through requirement of law. There are 6 types of Mineral resources license in Cambodia which includes handicraft mineral resources license, wells mineral and stone quarries license, coal price business, innovation mineral resources, mineral business industry and exploration license. Until now there are 91 companies that come from Australia, China, Thailand and some domestic companies got the exploration license total 139. The preliminary result of the exploration showed that have positive result for 17 licenses among 139. That includes 13 companies among 91 got the licenses for making business on 5 types of mineral resources are: gold mineral have 4 licenses, iron mineral have 1 license, and coal have 1, limestone 5 and phosphate 1.

Challenge to be address:

Meanwhile have legal mineral resources business and also have anarchy business. in some area in Cambodia. Those illegal business are cause negative impact to people, animals and so much impact to environment. Moreover these illegal activities lost a lot of national income due to those illegal traders not proposed other licenses, royalties and tax. The other main problem is lack of law on mineral resources management and business that approved sine 2001 and other regulations.

Objective:

Exploration licesne management and mineral business industry aim to enhance effectiveness, efficiency, transparency and environment responsibility and social in mineral implement. In order to insure that:

- Transparency management for income form mineral in Cambodia and long term economic development of Cambodia.
- Sustainable development in basic community of mineral business industry area.
- Correctly assessment for environmental impact and action beforehand in order to avoid other negative impact.

- mineral implement in cambodia able to avoid the dispute between residents and mineral companies or between residents with companies or government with companies or companies with companies.
- honesty competition for mineral explroation implementation and mineral business industry in Cambodia.

Options

This prliminary impact assessment will study on two options are:

Option 1: status Quo by take the law on mineral management and business,

Praksa on registration and condition of providing the delays continue and copyright transfer of mineral license, and circular on revocation and suspend mineral license for management on other mineral implement or public investment and nationalize mineral sector or education and training or do not mineral business in present.

Option 2: prepare draft sub-degree on exploration license management and mineral business industry for mineral resources in Cambodia.

Impact Analysis:

in order to found the other impact that able to occur and whether making draft sub-degree on exploration license management and mineral business industry can get benefit or what impact to the benefit of Cambodia some point as below are considered:

1. Other obligation cost of government that can be occur preparing this drat sub-degree.
2. Other obligation cost of private institution that making mineral business in Cambodia that occur when this sub-degree approved.
3. Other benefit related to environmental, social and economic unit that related to the residents health environmental protection of Cambodia for mineral development.

Options:

After analysed on other impact for government private and benefit country economic sector we observed that option 2 is the better option that able to insure maximum country benefit for Cambodia. The decision taken this option by reasons that (1) the regulations where applicable there are a lot of gaps and not enough for making mineral management to have effectiveness yet.(2) action implementation illegal mineral has been increased as very worried in Cambodia,(3) reduce residents health impact that caused other chemical substance using of illegal mineral explorer, (4) enhance competitive capacity in exploration and mineral business in Cambodia, (5) make effectiveness for mineral resources in Cambodia.

Consultation:

Because this sub-degree enormous impact and important so that's why this preliminary impact assessment consulted whit some stakeholders are:

- 1) Cambodia exploration community: this community is block of companies that exploration in Cambodia.
- 2) Mineral resources sector related officer.
- 3) The report that studied from the mineral implement area for other impact to domestic residents.

Conclusion:

Mineral resources business is the complex action so require for high heed on plan of mineral business project count from the stage of studying, research, exploration mineral resources business and its activity finished closing. Other negative impact that can be occur form those actions can be serious as impact to people live, animal, environmental, anarchy problem in exploration, lost national income by tax evasion. And not pay royalties. These problem require every institution especially ministry of mine and energy be proactive for effectiveness.

After studied about other impact that occurred and can be occur preparing sub-degree on exploration license management and mineral resources business industry is option 2 that a best method for insure that impact on people live, animal, environment that caused from chemical substance using and other poisons for mineral exploration will be reduced. In addition exploration problem and illegal mineral business in Cambodia will be reduced or reaches elimination. Tax evasion and royalties from mineral resources business will able to maximum reduced that increase some national income.

Implementation and Evaluation:

In order to insure that offences and other problem related to mineral sector reduce the ministry of mine and energy set out the main method is monitoring working group establishment. and research study action inspection mineral business and construction in a whole Cambodia referring to reduce offences related to mineral sector in Cambodia. In additional regulatory impact assessment working group of ministry of mine and energy will be assessment again on this sub-degree in 3 years in order to study about impact that arising out this sub-degree implementation in order to find out the point should revise and collaborate with related unit, department under the ministry in order to monitor whether decrease or increase the offence related mineral sector, concessionaire behavior, mineral implement effectiveness management and other problem related to mineral resources sector after implemented this sub-degree.

1. Problem identification

1.1 Problem related to mineral resources implementation

1.1.1 Public health and safety

Because of mineral implementation especially some gold sifts actions that no permits and use chemical substance or acid or other tools that impact to natural environment and animal or people lives too. According to media of Radio Free Asia (RFA) issue on 18 December 2014 said that today gold sifts actions occurred in Romdang village, Romtom commune, Preah Vihear province. Those Gold sifting another key experience used acid and chemical that will impact to around environment other animal and people life of residents in the local area. The residents and some of Roveang commune council officer Preah Vihear province worry that acid and chemical that gold sift dumping on land are polluting environment and could be danger some of people and animal.

Moreover there are some mineral exploration actions caused impact to water resources of residents in the local area too. Indigenous in Oyadav district Ratanakiri province confirm that mineral research study of Meas Angkor Gold in their community impacted to stream water that daily use community. Mr. Kry Ratha indigenous in Peak village, Yatung commune, Oyadav district, Ratanakiri province said that Meas Angkor Gold company had sewage piped and chemical into stream water that daily use community. He said that this time stream became translucent the residents difficult for using and drinking. He worry that water could be impact to health and lost fish in the stream. Mr. Sev Chin village chief said the same that mineral exploration of this company make translucent stream and impact to residents that go to farm and use this water.

1.1.2 Environmental protection and conservation

mineral resources implementation impact to environment and other natural resources because action in the mineral resources implementation must act on river, tonle and forestry region. The China company is doing gold sifts business by no permit in the Sakong river near Cambodia border and Lao in Steng Trang province. This business actions had impacted to environmental natural resources in the river and livelihood residents health.

In additional indigenous residents in Ratanakiri province confirm that a foreign company is doing mineral pumps actions from Sasan river in order to find gold opposite the guideline of authority. Villagers calling proposal the authority stop this actions urgently due to this business impact to natural resources and living of residents.

1.1.3 Competitive

when this sub-degree was approved will make the number of individual and legislators that would like to proposal the exploration license and mineral resources business industry reduced due to this sub-degree writings much condition the concessionaire have to complete maximum obligation and other obligations. This proposal regulation also has impact to competitive due to this sub-degree require to provide enough information for the concessionaire that want to make mineral industry business in Cambodia in order to get the exploration license, individual or legislators have to put exploration license proposal by attached with result of preliminary assessment study or information and data reports of that proposal area to minister. In additional the concessionaire need to have capacity, technical, finance and enough business registration and correct in Cambodia. Every receiving

exploration license proposal must have registration and record receive date and announce in the ministry of mine and energy website. Individual or legislators that completed from the about require condition first have priority receive providing exploration license on proposal area.

These Prakas are prepared for objective in order to get investors that have potential by reason that previously require conditions that the concessionaire have to complete in exploration and mineral resources business does not have enough condition yet.

1.1.4 Community Development

As the policy the concessionaire have mineral license require local community development. However the effect regulation some lack for community development guideline. Although mineral investment agreement between ministry of mine and energy with the concessionaire also stated local community development obligations but the real implement the concessionaire not yet completed correctly on the require condition agreement. This could be impact to local residents mineral development.

1.1.5 Digging mineral without permits

There are some individual or legislators act the illegal mineral implement in the Cambodia. Dig gold chemical flour beat actions and pump gold occurred at free land 502 and Otakheav area Ondong Barang, Phnom Bak in Romtom commune Veang district, Preah Vihear province chemical flour beat merchant make business on the mountain dig and pump gold. the report said that over the period take opportunity group drill mountain land and ambient the mountain take gold, chemical flour beat destroy the natural resources, mineral gold pump business dig mountain land that opposite from authority guideline.

Excavation action sapphire exploration in stat rubber farm land in Ratanakiri province still occur despite competence group cracking down and furniture confiscate from the perpetrators. residents group are former solidarity group and that area rubber farm investment companies representative has proposed competence officer to monitoring. Anarchy miners as group 20 to 30 persons they had excavations again after competence Borkaev in the past district had evicted 100 persons.

1.2 Lack of regulation for mineral implementation management

Mineral sector is the potential sector especially mineral industry business that have big format and much impact to social, environment as well as residents health in the targeted area. So in order to insure that mineral industry business are high effectiveness and efficiency for country as well as insurance about sustainable development in local community, natural protection are require to have a regulatory that stated detail procedure to insure better mineral management. Please note that among 6 types of mineral license are only mineral business industry license is the large-scale economic that very important related to country development. However the regulatory for this sector management are lack.

1.2.1 Law on mineral resources management and business

The law on mineral resources management and business not stated about the detail procedure to issuing the exploration license as well as the method for mineral resources implementation in Cambodia. In additional the article 11 of this law require to have the procedure of issuing exploration and mineral resources business industry license must identify by sub-degree. Moreover mineral resources business industry license can provide only for the

concessionaire that have exploration license therefore required preparing the regulatory for correct management the exploration and mineral resources business industry license.

1.2.2 Sub-degree on setting investment all kinds of mineral issued on 31 Jan 2005

For the sub-degree on settings investment all kinds of mineral just require every research study and mineral business must crossing one window service at the council for the development of Cambodia (CDC). But this sub-degree not stated the procedure or form for management on mineral implement action.

1.2.3 Prakas on registration and condition of providing, continuing, transfer rights of mineral resources license

Separately for Prakas on registration and condition of providing, continuing, transfer rights of mineral license not stated about the procedure of providing the mineral business license. This Prakas only stressed on form and registration condition of the delay continue and exploration license rights transferring.

1.2.4 Inter ministries Prakas on proposal registration pricing (license price) delay continue, rights transferring of mineral license annual land wage of concession area for exploration and mineral business issued on 27 March 2009

Inter ministries Prakas on proposal registration pricing (license price) delay continue, rights transferring of mineral license annual land wage of concession area for exploration and mineral business had stated only procedure for pricing into other tax payment related to the mineral section in the registration, delay continuing, rights transferring license, land wage.etc.

Overall the regulatories that now aday manage on mineral business in Cambodia except law on mineral resources management and business are form as Prakas that less potential regulations. Moreover Prakas and circular are prepared in the former ministry of industry mine and energy. But in the 5 legislature of assembly the government of Cambodia decided to break this ministry as two are ministry of mine and energy and ministry of industry and handicraft. This Prakas is could be cause difficult to manage the mineral industry business that are the lage-scale economic. Moreover despite we revise on the Prakas that recently using but are not response to mineral industry business that has the lage-scale economic so require high regulation also in order to insure the high effectiveness mineral management in Cambodia.

2. Objective and Scopes

2.1 Objective

This sub-degree have objective to manage the exploration and mineral business industry license in order to enhancement effectiveness, effeciency, transparency and social and environmental responcebility in the mineral implementation. and in order to insure that:

- Transparency management for mineral income in Cambodia and in order to insure long term economic development in Cambodia.
- Sustainable development in the local community of mineral business industry area.
- Correctly assessment for invironmental impact and action beforehand in order to avoid the other negative impact.

- Dispute related to mineral implement between residents and mineral companies or between residents with companies or government with companies or between companies and companies in Cambodia had maximum reduced.
- Honestly competitive for mineral industry business in Cambodia.

2.2 Scopes

This sub-degree have the cover scopes on every exploration action and mineral resources industry business under exploration and mineral resources industry business license in Cambodia. This sub-degree haven't implement scopes on other 4 mineral license that are: mineral resources handicraft license, mine wells and stone quarries license, mineral gemstones business license mineral innovation license.

3. Options

There are 2 options are considered for this impact assessment studying.

Option 1:

Status quo

By law on management and mineral business, Prakas on registration and condition of providing delay continuing and right transferring mineral license and Circular on confiscate and suspend mineral license for management on mineral implement or public investment and doing nationalize mineral sector or education and training or not make mineral business in the present.

Currently there are anarchy mineral implement action in some area in Cambodia and this action has continued increase. that action cause some negative impact to Cambodia as:

- There are abrasion other minerals are national property that occur from illegal digging or no correct permit.
- Impact cause to people health, animal and environment that occur from minerals digging that used other chemical.
- Lost a section national income from illegal actions in minerals resources sector.

Public investment and nationalize

Investment on minerals industry sector by state company. But this option could be high risk for government due to we lack fund and expert in minerals sector. It's risking for government that invest finance, expert and time itself when the expected results not reality. Moreover despite the government invest itself but sure that government need to rely foreign expert due to limited human resources of minerals section.

Education and training

We still lack of regulatory for management related to mineral industry sector it cause to make difficult to change company behavior and public and national benefit protection.

Not done present minerals business

if we not making present minerals business it will lost economic development opportunity and could not use the existing resources for human resources development in Cambodia and strengthening basic economic section for residents next generation.

However procedure form of license providing minerals implement action management in present was conducted according to law on management and minerals resources business that approved sine 2001 and Prakas or circular was conducted on behalf of former ministry of industry mine and energy. Those regulations are a lot of defects and need to update some point in order to accord with nationalize. In additional public investment and nationalize in minerals sector or education and training or don't present minerals business are the option that not suitable with our present social condition that we hungry the economic development, human resources and also environmental impact reducibility.

Option 2: Prepare draft sub-degree on exploration management and minerals resources business industry license for minerals resources management. This sub-degree referred to exploration management and minerals resources business industry in Cambodia for legal features, transparency, development insure sustainable in local community and could be reduced anarchy of illegal minerals digging in Cambodia that occurring.

Due to the regulations for manage on minerals sector in Cambodia are low level as Prakas and circular cause difficult for implementation and there are a lot of lack point so need the high level regulations are the high potential. Preparing the draft sub-degree that is high regulatory will could be provide much benefit for response to anarchy problem related to minerals sector. In addition this sub-degree could be the important basic for minerals sector management by effectiveness and transparency in the future.

4. Impact Analysis

4.1. Impact on business

Option 1: Status Quo

In the present condition individual or natural persons that implement mineral resources in Cambodia need some expense related to proposal, participation, other report preparation for provide to ministry of mine and energy. However no need training to technical officer in the private sector in order to know about the regulations related to the minerals of Cambodia. In the opposite we saw that business sector need to proposal the minerals resources license, other data security, and expense for cooperate with inspectors team, other investigation of police officer in order to follow the requirement of the regulatory related to the minerals sector. The status quo require individual and natural persons that implement minerals resources in Cambodia has a little cost and not significant if compare with the national benefit.

Option 2: Prepare draft sub-degree on exploration management and minerals resources business industry license

Individual or natural persons that implement mineral resources in Cambodia no require for cost on preparing draft or working group for participate preparation. In the same way individual or natural persons that implement mineral resources in Cambodia there are no obligation in the cost related to other services and equipment buying and other documents filing for implement follow the regulations.

In case that sub-degree on exploration management and minerals resources business industry license was approved Individual or natural persons that implement mineral resources in Cambodia have to make cost on education and training to itself officer proposed permit in order to get license cost on land wage during of research study obligation to participate in community health development, environmental restoration community fund and other admin costs that are requirement of regulations and law.

4.2 Impact on government

Option 1: Status Quo

In the present condition ministry of mine and energy need to make some expense related to working group preparation for monitor on license proposal and the obligation expense related to public advertisement related to the regulatory on mineral resources sector expense for making consultation with stakeholders. Ministry of mine and energy conduct the training to its officers related to knowledge on mineral resources sector. In order to get the exploration or mineral business industry license are require the individual or

natural person propose to ministry of mine and energy. The ministry able to allow to issue the license unless the propose party attached enough documents. To control the correctly of documents need the officer that have enough capacity for control. Other equipment purchasing for monitoring, management and approve of other regulatory are the necessary need. Meanwhile ministry of mine and energy need to publish and advertisement the mandatory of regulation related to mineral sector management too. Also ministry of mine and energy will prepare the dissemination workshop post the other information. The status quo is cause impact on environmental, social and economic.

Impact on economic

Anarchy mineral digging action has happened in some area in Cambodia especially Mondolkiri, Rotanakiri and Compong Cham province too.

Impact on environmental and social

Mineral exploration group used other tools and especially chemical to get other mineral are the case negative impact to the resident. Those negative impact as impact to resident health and more serious is the people died. Some mineral digging action it cause impact to plants, forestry, water pollution that case local resident meet the issue require for solution.

5. Consultation

Mineral resources business are very important for country development. But this action can also provide the negative impact if that action not correct or not enough study. So this preliminary assessment has consulted and study on three important party are private sector related skill officers and the resident at the community.

5.1 Cambodian Association for mining and exploration companies (CAMEC)

CAMEC: this association is a lot of companies that make mine business in Cambodia. This association has participated comment at the first time related to the process of preparing this sub-degree. This association has preferred for this draft sub-degree that detail the procedure transparency mechanism and favored to investor aim to open the mineral business in kingdom of Cambodia. However this association has proposed to the ministry help the companies to hastening the procedure for propose the mineral license.

5.2 The officers related to the mineral sector

Because this sub-degree is complicate and technical feature so working group has met skill officer two time. The first time met with Mr. Beng Navuth deputy director of mineral department. He said that this sub-degree so important for mineral implement management in kingdom of Cambodia. when this sub-degree approved the criminal related to the mineral sector will be reduce and also increase national income. The working group also met with Mr. Chhrea Vichet director of mineral management department of ministry of mine and energy about this sub-degree meaning. He said that this sub-degree is important power to manage the mineral implement and exploration and mineral business industry license and also can be attractive the investor come to Cambodia in the future. When this sub-degree

was approved that time have only the potential investors that could be invest on mineral sector in Cambodia.

5.3 Local resident of mineral resources implement area

The regulatory impact assessment working group studied on resident comment in some local area of mialeral resources implement area. the aim of this study are want to know the other impacet that occured or impact to resident by those mialeral implement. Moreover the study also want to know about need of those people in the local area as well as to find some mechanism to avoid the impact or repara other impact between resident.

Because of last time used to have case study counducted by NGO around impact for mineral implement so the regulatory impact assessment working group of ministry of mine and energy decided take those case study to combine into this assessment.

There are two case study conducted by transparency and mineral development organization in Cambodia are considered. Case one is impact created by OZ Minerals company to resident in the Okhvav community Mondolkiri province and case two is impact created by BHP Billiton company to resident in the Mondolkiri province.

Case 1: OZ Minerals company

OZ Minerals group head quarter at Melbon Australia and registered at international stock market. This company had strated mineral exploration in the north of Cambodia in 2006 under 4 project in Mondolkiri province. Among those projects the project in the Okhvav commune that found gold mineral. But this company has transfered its share to Renaissance Minerals company. During exploration implement company had mad some impact positive and negative to community.

The positive we saw that some local resident have job for exploration implement of company by \$50 a day. Meanwhile also have some negative impact. The people 95 families are faced to eviction from their living area due to not correct permit.

Case 2: BHP Billiton company

BHP Billiton company is a big company that much product as aluminum, copper, coal, iron and uranium. This company based at Malbon Australia and share registered and London, Johannesburg and New Yourk. BHP Billiton company and Mitsubishi corporation had signed agreement for mineral resources exploration with government of Cambodia in 2006 to digging Bauxite mine on land 100,000 hectare at Mondolkiri province. The resident and authority in local area of mine exploration worried that it could be have other impact as environmental, resident animal feet, relocation and resident health due to the company used the other chemical in the process of mine exploration.

Research study of transparency and mineral resources development organization in Cambodia issued some recommendation to company and government to improve working condition minimum impact to environmental, social from mineral resources implementation.

Companies

1. Openness the information that impact to resident and give notice about other expenses to the government.
2. The company should respect resident right and try to solve with resident that suffer the impact.
3. Create local development program for impact community.
4. Respect to international good practice standard.

Government

1. Approve on other regulation for mineral management and well regulatory implementation.
2. Provide concession related to mineral resources in other protection and forestry
3. To Compile enough data, other information related to the mineral sector before allow the companies invest in order to insure the sustainable and other impact minimum reducing.
4. Create national policy for environmental and social protection in order to respond to other impact that occur from mineral resources implementation.

6. Conclusion

Through describing and about study analysis we saw that the option 2 is preparing the sub-degree on licene management and mineral resources business industry is the better option for respond to other problem related to the mine sector that occurring in Cambodia despite this option adding the significant expense to business. Conversely the option 2 could be insure the minimum benefit to the national reduce the impact on resident health and also environment. Decision to choose this option depend on some base case: (1) the approved regulations are much lack and not enough condition for effectiveness mineral management yet.(2) Action of anarchy mine implementation had increasing.(3) reduce the resident health impact that cause from anarchy mine implementation.(4) increase competitive capacity for exploration and mine business in Cambodia.(5) mine effectiveness management in Cambodia.

(6) create local job for Khmer people and local community development and (7) increase investment trust to honest and potential investors.

7. Evaluations and Implementation

Because ministry of mine and energy had created research and regulatory impact assesement office into its organizational so this office will be colselly cooperate mineral resources departement of ministry of mine and energy to implement this sub-degree. those cooperate works are sharing each other about data related to mine sector, sharing quarter, semester and annual reports that mineral companies sent to ministry of mine and energy.

7.1. Implementation

Effectiveness regulatory implementation are the present chellange in Cambodia. In order to insure the effectiveness in this sub-degree some of porcedure has considered as below:

- iminstry of mine and energy has created monitoring working group and inspection the research study actions, mine business and construction mine as 3 groups, mine monitoring and crime crackdown responsibility in whole Cambodia lead by secretary of ministry of mine and energy and participated form chief of provincial mine and energy departement, military police support surface and other related officer.

- Regulatory impact assessment of ministry of mine and enery will be assessment on the impact of this sub-degree again in three years after this sub-degree was apporved in order to found that what negative and positive impact on goverment, people, private sector and other stakeholder and which point need to revise to get minimum benefit from mineral resources implement in Cambodia.

7.2. Evaluations

Moreover research and regulatory impact assessment office of ministry of mine and energy will be make assessment on some other point as follow:

- Number of exploration proposal and mineral resources business industry license when sub-degree was approved whether reduce or increase.
- Other negative and positive impact that occur from implement this sub-degree in order to check out whether before and after implement this sub-degree which one provide more than positive benefit.
- Criminal or illegal related to mine sector reduce or increase.

Process	Name	Position	Contact
Prepared by MME-RIA Team			
Commented by ECOSOCC/ORIA	H.E Pech Sokha	RIA Manager	012 698 999
	Her.E Seang Sophalla	Chief Training and coordination Team 2	012 665 201
	Mr. Kong Virak	Member T 2	089 899 584
Assistant	Mr. Rom Phallis	Admin Staff	078 235 078
Entered into database			