

Environmental Code Comment Tracking

No.	Date Submitted	Submitted by	Issue(s)	Code Draft No.	STWG No.	Assigned to	Review Date	Outcome
01	6-Apr-16	All participants	Numerous comments on different issues provided. See 6-APR-16 Workshop Report.	Draft 1	All	BR/MB	30-Apr-16	Selected comments inserted; other comments subject to further clarification, detail and discussion.
02	6-Apr-16	Raphael Deau	Numerous comments on different issues provided. See comment form.	Draft 1	STWG 6			Selected comments adopted; some comments noted for future reference.
03	7-Apr-16	Sao Sotheary	Definition of Precautionary Principle.	Draft 1	STWG 1		30-Apr-16	Code amended per comments from Sarah Brook also.
04	20-Apr-16	Andeol Cadin	Numerous comments on different sections of the Code provided. See comment form.	Draft 1	STWG 1	BR	29-Apr-16	Substantial elements of comments incorporated. General comments to be further considered.
05	20-Apr-16	Conservation NGOs (CI, WCS, WWF, BirdLife, FFI, Wildlife Alliance)	Wildlife farming.	Draft 1	STWG 3/5	MB	25-Apr-16	A note has been made in the Code to say that this is under discussion. The Secretariat is responding to the commenter for further development of the recommendation.
06	20-Apr-16	Sarah Brook	Definition of the Precautionary Principle.	Draft 1	STWG 3/5	MB	25-Apr-16	Code amended.
07	20-Apr-16	Neth Vibol	Conservation Trust Fund/Trust Law.	Draft 1	STWG 3/5	MB	25-Apr-16	Now referenced in the Code.
08	20-Apr-16	Teng Rithiny	Recommendations on wording revisions. "Establishment of the national One Map process". "Draft NEP to be prepared with public participation" should mention in Book 3. The Book Public participation should deal with all the actions from planning to implementation. Book 26 should change to Environmental Incentive, Fees and Charges.	Draft 1	STWG 7	MB BR	25-Apr-16	Amendments made to the Code.
09	20-Apr-16	Sally Ting	Scope of the Code.	Draft 1	STWG 6	BR	30-Apr-16	Issues noted in comment section, and subject to further discussion.
10	21-Apr-16	Meas Sophal	Issues related to trans-boundary protection and rangers for protected areas, including funding.	Draft 1	STWG 3/5	BR	30-Apr-16	Comments considered and inserted in part; further clarification and detail requested on some points.

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11	21-Apr-16	M. Ramasamy	Book 4: Environmental Impact Assessment, Book6, Book 17- Waste Management and Pollution control, Book 22: Sustainable Energy, Book no.23 & Book 24, Book 26, Book29, Radio Active Emissions.	Draft 1	STWG 6	MB	25-Apr-16	Some comments incorporated; others subject to further consideration.
12	23-Apr-16	Karina Watkins (WWF)	Recommendation for revisions of wording for various books.	Draft 1	STWG 1	BR	29-Apr-16	Comments inserted.
13	5-May-16	Peter Buchsbaum	Recommendation to add the Principle of Equality before the Law.	Draft 2	STWG 2	BR, MQ	13-Jun-16	Suggested new principle beyond the scope of the Environmental Code.
14	7-May-16	Ngoung Pheakdey (RUPP)	Formatting and technical editing; defintions recommended.	Draft 2	STWG 7	BR, MQ	13-Jun-16	UK English noted. Terms to be defined inserted. Additional defintions to be inserted. Comments on structure and formated duly noted and taken into consideration.
15	11-May-16	WWF	Biodiversity conservation and management and protected areas.	Draft 2	STWG 3/5	BR, MQ	13-Jun-16	The Secretariat is responding to the commenter for further development of the recmmendation.
16	15-May-16	Ngoung Pheakdey (RUPP) Chhun Delux	Assessment of sustainable options for forest financing .	Draft 2	STWG 1	BR, MQ	13-Jun-16	The Secretariat is responding to the commenter for further development of the recmmendation.
17	16-May-16	Sarah Brook, WCS	Wildlife trafficking.	Draft 2	STWG 3/5	BR, MQ	13-Jun-16	The Secretariat is responding to the commenter for further development of the recmmendation.
18	16-May-16	Teng Rithiny	Organisation of Jurisdictional Institutions/Jurisdictional Issues Endangered species Wildlife trafficking offences Role and knowledge of IPs and local communities Overlapping Books	Draft 2	STWG 1, 3/5, 4, 7	BR, MQ	13-Jun-16	The Secretariat is responding to the commenter for further development of the recmmendation.

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19	18-May-16	Thol Chanthan	Hazardous substances and waste management.	Draft 2	STWG 2	BR, MQ	13-Jun-16	The Secretariat is responding to the commenter for further development of the recommendation.
20	18-May-16	Mark Barrash, US DOI	Comments on Draft 2 regarding Book 1 General Provisions: Objective, Principles, General Duty to Avoid Environmental Harm and Book 5 Making of National, Sub-National and Local Environmental and Natural Resources Plans.	Draft 2	STWG 3/5	BR, MQ	13-Jun-16	Comment considered and incorporated in part. Further development when expert is in Cambodia.
21	18-May-16	Chloe Hill, Altus Impact	Purpose of the code, comments on "guarantee", scope of code, ELCs reference, green infrastructure language, Green Growth, suggested new book titles, SMEs.	Draft 2	STWG 3/5	BR, MQ		Sustainable cities and GHG reduction and Green Growth comments need to be further developed. The Secretariat is responding to the commenter for further development of the recommendation. Other comments noted.
22	19-May-16	Norman Sheridan	Management of chemical substances.	Draft 2	STWG 2	BR, MQ	13-Jun-16	Comment on draft hazardous substances law adopted. Further collaboration with STWG 2 on the draft law and other topical issues under the STWG's mandate recommended.
23	19-May-16	Dian Turnheim	Management of chemical substances.	Draft 2	STWG 2	BR, MQ	13-Jun-16	Comments on "green" substances adopted.
24	19-May-16	Maylis Desrousseaux	The structure of the Code is not very clear to me. For instance, climate change seems to be equally treated with fisheries management. The numerous books bring confusion and maybe a hierarchy would make the Code more practical.	Draft 2	STWG 2	BR, MQ	13-Jun-16	The general intent of the comment has been adopted in the revised structure of the code, which was issued to all stakeholders on 2 June 2016.

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25	20-May-16	Anonymous	Suggestions to Book 1.	Draft 2	STWG 2	BR, MQ	13-Jun-16	Comments on consistency adopted. Comments on international agreements taken under consideration to be explored further. Suggestion for international agreements adopted.
26	20-May-16	Teng Rithiny	The protection of Critically Endangered Species (Giant Ibis and Vulture) and its habitats. The key threat to the species is forest loss, driven primarily by clearing of land in order to develop industrial agriculture (Economic Land Concessions), small scale agricultural encroachment and infrastructure developments.	Draft 2	STWG 3/5	BR, MQ	13-Jun-16	The Secretariat is responding to the commenter for further development of the recommendation.
27	25-May-16	Maylis Desrousseaux	Soil protection.	Draft 2	STWG 2	BR, MQ	13-Jun-16	Recommendation for including soil protection and management is supported (land use and land management). Agree with suggestion regarding new word usage for clean up. The Secretariat is responding to the commenter for further development of the recommendation on contaminated land.
28	14-Jun-16	Miriam Stark	Cultural Resources Management and Impact Assessment.	Draft 2 Reordering	STWG 4	BR, MQ	15-Jun-16	Agree with recommendation for Cultural Impact Assessment. The Secretariat is responding to the commenter for further development of the recommendation.
29	26-May-16	Paul A. Barresi	Unnecessary conceptual complexity created in Book 4 by a lack of clarity in the scope of the activities for which EIA is required.	Draft 2	STWG 1	MQ, NE	22-Jun-16	Will address and further develop the recommendation when expert is in-country.

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30	26-May-16	Paul A. Barresi	EIA for existing projects .	Draft 2	STWG 1	MQ, NE	22-Jun-16	Will address and further develop the recommendation when expert is in-country.
31	26-May-16	Paul A. Barresi	Unnecessary conceptual complexity created in Book 4 by a less than fully comprehensive concept of the term environment, and the lack of a definition of the term.	Draft 2	STWG 1	MQ, NE	22-Jun-16	Will address and further develop the recommendation when expert is in-country.
32	26-May-16	Paul A. Barresi	A lack of clarity in Book 4 about the scope of the impacts that EIA must cover.	Draft 2	STWG 1	MQ, NE	22-Jun-16	Will address and further develop the recommendation when expert is in-country.
33	26-May-16	Paul A. Barresi	Artificial distinction between “Environmental Impact Assessment” and “Strategic Environmental Assessment” .	Draft 2	STWG 1	MQ, NE	22-Jun-16	Will address and further develop the recommendation when expert is in-country.
34	26-May-16	Paul A. Barresi	Placement of all pollution control issues in a single chapter .	Draft 2	STWG 2	MQ, NE	22-Jun-16	Will address and further develop the recommendation when expert is in-country.
35	3-Jun-16	Joanne Fox-Przeworski	General comment on the revised structure.	Draft 2 Reordering	STWG 7	MQ, NE	23-Jun-16	Incorporated comments on mandatory reporting, "high priority violators", environmental monitoring, eco-labeling, and partnerships for research. Other comments responding for further development
36	3-Jun-16	Fiona Dickson	The structure of the revised Code omits any reference to sustainable consumption and production, the application of circular economy principles and producer responsibility in the context of manufacturing processes and products.	Draft 2 Reordering	STWG 2	MQ, NE	23-Jun-16	Comment partially addressed through existing chapters and articles; secretariat responding for further development

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37	3-Jun-16	Fiona Dickson	The structure of the revised Code omits any reference to environmental permitting of industrial processes, including power generation, textile manufacturing, organic solvent use (e.g. common in light industrial processes) etc.	Draft 2 Reordering	STWG 2	MQ, NE	23-Jun-16	Recommendation on permitting for energy production incorporated; other recommendations to be further considered for interaction with EIA.
38	3-Jun-16	Fiona Dickson	The revised Code does not specifically mention the important topic of Ecosystem Services.	Draft 2 Reordering	STWG 2	MQ, NE	23-Jun-16	Addressed/already incorporated.
39	6-Jun-16	Michael Mahoney	Recommend the Code have a specific substantive section on air quality in Book 3.	Draft 2 Reordering	STWG 1, 6	MQ, NE	23-Jun-16	Incorporated comments on air quality standards.
40	9-Jun-16	Thomas Gray	Insufficient prominence of Protected Areas, and their effective management, within the current draft of the Environmental Code.	Draft 2 Reordering	STWG 3/5, 7	MQ, NE	23-Jun-16	Will be addressed in the next draft of the code.
41	18-Jun-16	Carlos Linares	Recommendation to improve the structure and contents of Book 3 (Public Participation and Access to Environmental Information) and Book 4 (EIA) of the Draft Environmental Code (Version of May 2, 2016).	Draft 2	STWG 1, 7	MQ, NE	23-Jun-16	Recommendation for Social Impact Assessment already adopted; others under consideration.
42	19-Jun-16	Department of Solid Waste Management (STWG 2)	Recommendations for Code structure/sections for waste management.	Draft 2	STWG 2	MQ, NE	23-Jun-16	Recommendations on household waste separation guidelines and education and regulations on incinerators adopted; others will be addressed with STWG.
43	19-Jun-16	Department of Air Quality and Noise Management (STWG 2)	Recommendation for Code structure/sections for air pollution, noise and vibration, and ozone layer.	Draft 2	STWG 2			Will be addressed in the next draft of the code.
44	19-Jun-16	Chea Sina (STWG 2)	Recommendation for Code structure/sections for environmental pollution check and inspection.	Draft 2	STWG 2			Will be addressed in the next draft of the code.
45	19-Jun-16	Department of Water Quality Management (STWG 2)	Recommendation for Code structure/sections for water pollution.	Draft 2	STWG 2			Will be addressed in the next draft of the code.
46	19-Jun-16	Department of Water Quality Management (STWG 2)	Recommendation for Code structure/sections for marine pollution.	Draft 2	STWG 2			Will be addressed in the next draft of the code.
47	19-Jun-16	Department of Water Quality Management (STWG 2)	Recommendation for Code structure/sections for sewage system and sewage treatment system management.	Draft 2	STWG 2			Will be addressed in the next draft of the code.

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48	21-Jun-16	Dian Turnheim	Reference should be made to SAICM (UN Strategic Approach to International Chemicals Management and its overarching policy strategy (which can be downloaded from the SAICM website). Best practices and policy overview are covered by this document.	Draft 2	STWG 2			Will be addressed in the next draft of the code.