

# Human Rights and the World Bank Safeguards Review

Lessons from Cambodia: Forced Evictions and the Limits of World Bank Accountability



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## **Background**

Land tenure insecurity, land conflict and forced displacement have become a disturbing feature of Cambodia's post-conflict landscape. This state of affairs is a manifestation of radical political, social and economic transformations that have swept the country during the past half-century.

Nearly the entire population was uprooted during the 1970s, at first by a US bombing campaign during the final years of the Vietnam War and then by the Khmer Rouge revolution that followed the withdrawal of American forces and the collapse of the US-backed Lon Nol regime. The Khmer Rouge presided over a reign of terror from 1975-1979. Cities and towns were forcibly evacuated and private property was abolished as the Maoist-inspired regime set about turning the country into a massive agrarian labor camp. An estimated 1.7 million Cambodians perished during this period as result of forced population transfers, forced labor, starvation, torture and extermination.<sup>1</sup>

The Vietnamese military toppled the Khmer Rouge regime in 1979 and began a decade-long occupation of Cambodia, setting off a civil war that led hundreds of thousands of Cambodians to flee to refugee camps along the Thai border. During the 1980s, the Hanoi-backed administration in Cambodia reordered the economy based on the Vietnamese model of socialism, with the State maintaining ownership over all land and granting people use rights, at first on collectivized farms, and then on an individual household basis.<sup>2</sup>

Following the withdrawal of the Vietnamese administration, the 1991 Paris Peace Accords ushered in a new era of rapid economic liberalization aimed at attracting investment and fostering growth. Private property ownership was restored in the 1993 Constitution and Cambodia declared itself open for business. The impressive pace of investment and capital flows during the ensuing years, however, was not accompanied by corresponding improvements in governance and rule of law.

The result has been the rampant exploitation for private profit of the country's most valuable natural assets - including land, forests and minerals - by the victors of the power struggle of the 80s and 90s. As of December 2012, approximately 2.6 million hectares of land - a size equivalent to approximately 75 percent of Cambodia's total arable land mass - had been granted to private companies as "economic land concessions" for agro-industrial development.<sup>3</sup> This sell-off has resulted in severe land tenure insecurity for urban and rural households living on desirable land and a dramatic erosion in the enjoyment of human rights by a significant segment of the population that has endured forced evictions and reduced access to farming, grazing and forest land and water resources at the hands of private investors. Human rights monitoring organizations have recorded the cases of at least 700,000 people across the country who have been dispossessed of their land as a result of economic land concessions.<sup>4</sup> In the capital, Phnom Penh, it is estimated that between 1990 and 2011 more than 130,000 people, or over ten percent of the city's population, were displaced by development, with the vast majority experiencing displacement since 2000.<sup>5</sup>

## **The Land Management and Administration Project**

By the late 1990s, the immense challenge of addressing the informal and insecure nature of Cambodia's property rights regime was high on the agenda of the Government's donors, which perceived secure property rights as a key determinant for attracting further investment. While the World Bank recognized at the time that land reform was "a risky undertaking", with the sector "bedeviled by corruption", it regarded it to be "an essential undertaking if Cambodia was to establish the administrative infrastructure of land management that would provide the essential bedrock foundation for future economic development."<sup>6</sup>

Following the passage of the 2001 Land Law, the World Bank, along with other donors, partnered with the Royal Government of Cambodia (RGC), to initiate the Land Administration and Management Project (LMAP).<sup>7</sup> The project commenced in 2002 as the first phase of a projected 15-year land reform program with the objectives of strengthening land tenure security and land markets, preventing and resolving land disputes, managing land and natural resources in an equitable, sustainable and efficient manner, and promoting equitable land distribution.<sup>8</sup> LMAP intended to focus on five key components: the development of the legal and regulatory framework; institutional development; land titling and registration; strengthening land dispute resolution mechanisms; and land management.<sup>9</sup>

The cornerstone of LMAP was the mapping and registration of land plots and their owners in a central modernized cadastral database. Ownership was to be determined based on provisions in the 2001 Land Law, which recognizes “legal possession” of households whose occupation of land meets a number of criteria and commenced before the cut off date, or who purchased the land from a household that met the criteria.<sup>10</sup> Many of the expected beneficiaries of LMAP were “poor and vulnerable to being dislodged from land where they live[d] and farm[ed].”<sup>11</sup> It was assumed that many such households would be provided “with secure titles [which] would sharply reduce the risks of dispossession that they...face[d].”<sup>12</sup> During the life of LMAP more than a million titles were issued to Cambodian households, in many cases providing much needed clarity and legal security.

The project’s strengths and benefits were, however, marred by a number of significant flaws and omissions in project design and implementation. These shortcomings ultimately meant that the project failed to secure the rights of some of the most vulnerable households in the country, including many eligible for title, and protect them against forced eviction.<sup>13</sup> During the selection of communes to be targeted by the project and the land adjudication process itself, some areas were *de jure* or *de facto* declared by authorities to be State land. In some cases these claims to land by the State were inconsistent with legal definitions of State property.<sup>14</sup> Contrary private claims were effectively barred after the State laid claim to the areas in question, regardless of the legitimacy of the State’s right to those lands. Families residing in these areas were exposed to accusations of being illegal squatters on State property and their vulnerability to forced eviction was exacerbated.<sup>15</sup>

The designers of LMAP had envisioned that State land classification, in accordance with legal definitions, would occur in conjunction with registration of privately held land.<sup>16</sup> A key component of the project was to clarify procedures for defining different types of land and to create land classification maps for all project provinces.<sup>17</sup> During implementation of the project, however, no coordinated and transparent land management system emerged. The World Bank recognized this serious problem and associated risk of manipulation of LMAP in a 2009 Enhanced Review Mission Report, which described the failure as a:

...real source of concern for those under threat of eviction because absent these maps, the relevant municipal [or provincial] authority can exclude from titling any portion of land surveyed and proposed for adjudication by the cadastre team and therefore titling it, implicitly, in the name of State. In fact, the absence of State land mapping is identified as an important shortcoming that needs to be addressed for LMAP to succeed and help solve land conflicts and security of tenure.<sup>18</sup>

Despite this clear acknowledgment by the Bank, by this time there were few incentives on the Cambodian government to begin transparently classifying State property in accordance with legal definitions and procedures, given the opportunity for significant profit for officials at national, provincial and district levels that the status quo provided. The World Bank’s Implementation Completion Report for LMAP commented: “Dealing in the ambiguities around the classification

and use of state land provides significant opportunities for corruption.”<sup>19</sup> As described in the report, “[p]owerful forces are at work that prosper in this penumbra of asymmetrical information and influence.”<sup>20</sup>

## The Case of Boeung Kak

In 2008, the estimated 20,000 residents of the lakeside villages in Phnom Penh’s Boeung Kak neighborhood found themselves at risk of forced eviction after having been denied the opportunity to claim their legal rights to their land under LMAP. Many of these households had been recognized as having rights akin to ownership by local authorities since the 1990s through the “informal” system that governed local land tenure arrangements prior to LMAP.<sup>21</sup> In March 2006 the commune of Sras Chok, including the area surrounding Boeung Kak lake, was declared an adjudication area for the purposes of systematic land registration.<sup>22</sup> Under the project, all households with claims to possession rights should have had the opportunity to have their rights to the land assessed, and if their claims were found to be valid, land titles recognizing their legal ownership should have been issued. Where conflicting claims to the land emerged, these should have been addressed during the adjudication process, and if this was not possible, the dispute should have been referred to the Cadastral Commission, mandated under the Land Law to deal with contested claims to untitled land. None of this occurred for the households surrounding Boeung Kak lake. Instead, residents say, their requests to have their land claims adjudicated were flatly denied on the grounds that they were living inside a “development zone.”

Without the land claims of Boeung Kak residents ever being assessed, the cadastral map was posted for public display in January 2007 with ownership of all plots within the “development zone” listed as “unknown.”<sup>23</sup> Although there appears to have been no formal registration of the land to the State, the adjudication process resulted in a *de facto* determination of the status of the land as State-owned. This was confirmed the following month when the Municipality of Phnom Penh signed an agreement to lease the lake and surrounding land to Shukaku Inc., a company owned by Cambodian Senator and tycoon Lao Meng Khim. The 133 hectare land-lease was granted for a mere USD 79 million, a fraction of the estimated \$2.66 billion value of the property. Meanwhile, more than 4000 households had been denied, en masse, access to a fair process of adjudication of their claims to land that many had previously considered themselves to own.

One former resident of Boeung Kak, Soy Kolab, told Inclusive Development International:

I heard that the World Bank had provided money for land registration in [my] commune in order to help the people... But the government didn’t make land titles for us... they evicted us instead.<sup>24</sup>

In June 2008 World Bank staff undertook a routine supervision mission of LMAP. The Bank was informed that the Municipality of Phnom Penh claimed that the Boeung Kak area was State public property and, as a result, the households in the area were ineligible for titles.<sup>25</sup> The Bank staff did not query this determination despite the fact that many of the houses were on land around the lake without visible characteristics that would justify a classification as State property according to legal definitions.\* By this time Cambodian media reports of the threat of forced eviction of residents of Boeung Kak were ubiquitous.

In the months that followed, as the company began filling in the lake to create “new” prime real estate, causing severe flooding of the surrounding homes, the lakeside families faced an

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\* The Lake itself is State public property as defined by article 15 of the Land Law 2001 and article 4 of the Sub-decree No. 118 on State

onslaught of intimidation to leave the area. A small compensation and resettlement package was offered by the Municipality, but most residents regarded the offer as insufficient to compensate them for their homes, land and other losses, or to restart their lives elsewhere.

Between 2008 and 2011, 3,500 households, or approximately 15,000 people, bowed to the intense pressure, took the compensation and left their inner-city homes. Many evicted families are now facing severe hardships, including impoverishment, as a result of the eviction.

Soy Kolab, told Inclusive Development International:

When I moved to the new place, I had no livelihood. I face difficulty living far away from the city, 20 kilometers. ...unless we hire a motor-dop, which costs 30,000 or 40,000 [riel (approx. US\$ 8-10)] for both back and forth, we are unable to go to Phnom Penh. And my children study, they all now study at higher grades. Now, one of the children doesn't get to study because we don't have a business to earn money. We lost our livelihood. We have no livelihood, no business to earn money daily... My living situation is becoming worse and worse... It's ruined the children's future.<sup>26</sup>

While the case of Boeung Kak lake has come to embody the flaws of LMAP, many other households and communities have faced the same pattern of exclusion and denial of due process throughout the provinces in which the project was implemented. An independent review of LMAP was carried out between November 2005 and January 2006, investigating all eleven provinces where systematic land titling was underway. While the report was never accepted by the RGC<sup>27</sup> nor publicly disclosed, key parts are quoted in World Bank documents. The review found that:

“[n]o information on the possible rights and entitlements to claim property (particularly State property) through contesting the States' claim to land was provided [to households], the lack of which appears to be ('significantly' and) adversely affecting at least a fifth (19.6%) of all households.”<sup>28</sup>

The report stated that, “findings of this nature were found in 13 of the 19 district adjudication areas visited.”<sup>29</sup>

### LMAP and the Involuntary Resettlement Policy

Despite the fact that LMAP had a critical impact on people's tenure security – both positive and negative - throughout the country, in practice, no safeguards were put in place to protect people from displacement should their claims to the land be wrongly ignored or dismissed, or indeed, legitimately assessed and rejected.

Viewing land registration as a technical process, the Bank stated in project appraisal documentation that, “no eviction, involuntary resettlement or land acquisition was anticipated under the project.”<sup>30</sup> Nonetheless, “reflecting new thinking within the Bank at the time regarding the proper application of the Bank's safeguards,”<sup>31</sup> project preparation documentation did indicate that the involuntary resettlement policy applied to protect people who may be adversely impacted by the project.<sup>32</sup> A Resettlement Policy Framework (RPF) was prepared, which identified three situations in which people may be negatively affected, including most pertinently: eviction from State land of individuals who occupied it prior to the legal cut off date following titling of such land in the name of the State.<sup>33</sup>

In practice, however, no attention was paid to clarifying amongst development partners, and particularly with the RGC, how the RPF would apply to people threatened with eviction from land

claimed by the State. The Bank acknowledged much later that “a lack of specificity in the Project documents and the apparent absence of detailed discussions of the reach of the RPF, either during design or implementation, may have contributed to Government’s [mis]understanding of its obligations.”<sup>34</sup> Given the complex political economy in which LMAP was to be operationalized, including an environment rife with land grabbing and forced evictions carried out by, or with the complicity of, various arms of the State, this omission is striking. The failure to clarify the application of the RPF and the Government’s attendant responsibilities, as well as the subsequent disregard of the RPF by the Bank during project supervision resulted in non-compliance with the involuntary resettlement policy to the severe detriment of displaced households.<sup>35</sup>

Efforts to clarify the application of the RPF amongst development partners during project preparation, at a time when relations with the Cambodian Government were constructive, coupled with strong safeguard supervision, could have helped ensure the project complied with the involuntary resettlement policy. Timely address of the issue could have also provided a crucial opening to place the adoption of a national resettlement policy on the development agenda. By 2009, when the Bank finally raised the application of the RPF with the Government, its remediation efforts were ineffectual in the context of escalating land grabbing, consolidation of ruling party power and a severe deterioration of relations between the Bank and the Government.

### **The Limits of World Bank Accountability**

After an Enhanced Review Mission (March-April 2009) and a subsequent Safeguards Review Supplemental Supervision Mission (August 2009), by mid-2009 Bank Management confirmed that, by its assessment, under the terms of the credit agreement the RPF should have been triggered in the case of Boeung Kak lake households. Between April and August 2009, the Bank made a number of genuine attempts to convince the RGC to assist displaced families in a manner consistent with the RPF and to ensure that any future resettlement would benefit from a resettlement policy that would meet “appropriate standards.”<sup>36</sup> The Cambodian Government disagreed with the Bank’s interpretation of the credit agreement, contending that since the Boeung Kak development zone was never titled to the State it did not apply.<sup>37</sup> It rejected the entreaties of the Bank to provide financing to support evicted families despite evidence of their difficult circumstances. Rather than working with the Bank to provide assistance to displaced households and develop a national resettlement policy, on September 4, 2009, the Government informed the Bank of its decision to cancel the project and reject remaining loan disbursements from the Bank.<sup>38†</sup>

Immediately after the RGC moved to cancel the project, a complaint was submitted to the World Bank Inspection Panel on behalf of Boeung Kak families, contending, inter alia, non-compliance with operational policies and back procedures on involuntary resettlement and supervision.<sup>39</sup> In its response, Bank Management conceded many of the points raised in the complaint letter, including that the RPF should have applied.<sup>40</sup> The Panel presented its Investigation Report to the Board of Executive Directors in March 2011. In an impressive act of accountability, in the face of continuing recalcitrance of the Cambodian Government, the World Bank suspended all new lending to Cambodia until an agreement was reached between the Boeung Kak community and the Government.<sup>41</sup>

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† LMAP was due to end in December 2009 and approximately 70 percent of Bank loan disbursements had been made.

In August 2011, within weeks after the news of the suspension became public, Prime Minister Hen Sun issued Sub-decree No. 183, granting the families still living around the lake 12.44 hectares of land on the planned development site.<sup>42</sup> Within the next six months, approximately 630 households were finally granted legal titles to their plots of land, more than five years after the LMAP adjudication process in the area had commenced.

However, around 70 families still living at Boeung Kak were excluded from the terms of the sub-decree, ostensibly because they were living on land required for entry roads into the planned development zone. Eight of these households were the victims of a violent forced eviction on 16 September 2011, during which one man was left unconscious after being beaten by police.<sup>43</sup> The families have since rebuilt their homes onsite, refusing to accept their exclusion from the Prime Minister's sub-decree.

Moreover the approximately 3500 households already displaced remain without support, with some struggling to meet basic family needs.

While the Government remains unwilling to agree to terms of engagement that would facilitate the provision of support to excluded and displaced families, the World Bank is unable to remedy harms done due to non-compliance with its operational policies. The Bank claims that it is not equipped with an appropriate mechanism that allows for the unilateral provision of a remedy to people who have been harmed in connection with Bank-supported projects.

## **Policy Lessons**

In its Implementation Completion and Results Report for LMAP, the Bank notes:

As originally drafted, the RPF focused only on potential displacement associated with civil works and ROW extension. It was only shortly before the Safeguards Meeting in September 2001 that reference to evictions from State land following titling was added. The addition of this language reflected evolving thinking within the Bank at that time as advanced drafts of what is now OP 4.12 were being discussed. Up to that time, land titling was not explicitly considered in Bank policy or practice as an activity that might result in or contribute to involuntary resettlement. By contrast, in discussions surrounding the drafting of OP 4.12, the potential for displacement associated with land titling was addressed. A decision was made to distinguish between the effects of conflicting claims of private parties over private land, to which the policy would not apply, and conflicts involving claims from private parties residing on State land, in which case the policy would apply. The LMAP RPF was the first such Bank document to reflect this approach."<sup>44</sup>

The recognition by the Bank in 2001 of the potential for displacement associated with land titling and the new thinking that led to the expansion of the scope of the RPF to evictions from State land, were proven correct and prudent in the Cambodian LMAP case. The experience highlights the crucial importance of the application of the involuntary resettlement policy with respect to projects that affect people's tenure arrangements and their access to and control over land. This need is heightened where the project is operationalized in complex political economy environments in which rule of law is weak, rights and interests of the poor are routinely trampled, and patterns of elite capture over resources are evident.

The Completion Report identifies a number of lessons to be drawn from the LMAP experience that are "important to any future Bank involvement in Cambodia and have broad relevance for land administration projects in general, particular those in high-risk environments."<sup>45</sup> One of these lessons is the following:

**Safeguards requirements should be clear and supported by an explicit supervision plan.**

The LMAP safeguards instruments needed to be clearer in terms of their applicability, and should have provided a more specific definition of the roles and responsibilities of key actors, including Management, the client, project-affected people and civil society. The use of safeguards frameworks... entails ensuring that counterparts have adequate capacity to screen sub-projects as well as to prepare the safeguards instruments when required during project implementation. In addition, a comprehensive and detailed safeguards supervision plan for the project should have been prepared during appraisal, commensurate with the potential risks and the nature of the investment. [Emphasis in original.]<sup>46</sup>

The implications of these lessons for the Bank are that operational policies and bank procedures require strengthening to ensure that measures are taken from the point of project preparation to clarify roles and responsibilities with respect to safeguard policies; to support the government's capacity to fulfill its responsibilities; and to put in place a comprehensive safeguards supervision system.

The Bank's experience with respect to the Boeung Kak community underscores the limitations of the Bank's ability to act in an accountable manner and remedy harms when governments are unwilling to cooperate. In such cases, the Bank is not equipped with an appropriate mechanism to follow through with a process of accountability for Requesters to the Inspection Panel should their claims of policy non-compliance and harm be confirmed. This accountability deficit should be addressed, through, for example, the establishment of a trust fund facility that would ensure those suffering serious harm in connection with Bank-supported projects are able to receive reparations. Such a mechanism is necessary as a last resort in cases in which borrower governments refuse to cooperate with the Bank to remedy harm done. While suspension of the project, and in some cases the entire country portfolio, may well be warranted in such circumstances, alone it is a blunt tool for achieving Bank accountability to people affected by its projects.

## **Recommendations**

- 1) The revised involuntary resettlement policy should clarify that it applies to all projects that have direct implications for existing land tenure arrangements and could lead to, or contribute to, displacement or loss of access to, use of and control over land.
- 2) The revised operational policies and bank procedures should be strengthened to ensure that all necessary measures are taken to clarify roles and responsibilities with respect to safeguard policies; to support government capacity to fulfill its responsibilities; and to put in place a stronger Bank supervision policy and implementation system.
- 3) The revised involuntary resettlement policy should require that independent, accessible and transparent grievance mechanisms are established at the local level for every project that induces involuntary resettlement.
- 4) The revised safeguards framework should guarantee the right to an effective remedy for people who have suffered harm as a result of a Bank operation. The right to an effective remedy should be stipulated in legal agreements with all borrowers.
- 5) A new mechanism should be established by which the Bank can, under certain conditions and as a last resort, directly and unilaterally remedy human rights violations and other harms



suffered by affected people as a result of non-compliance with the involuntary resettlement policy under Bank-financed Projects.

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- <sup>1</sup> See, Ben Kiernan (1999), "The Pol Pot Regime: Race, Power, and Genocide in Cambodia under the Khmer Rouge, 1975-79," Silkworm
- <sup>2</sup> See, Evan Gottesman (2004), "Cambodia: After the Khmer Rouge," Silkworm Books.
- <sup>3</sup> ADHOC, "A Turning Point? Land, Housing and Natural Resource Rights in Cambodia in 2012," February 2013, p. 1.
- <sup>4</sup> Vrieze, P. & Naren, K. "Carving up Cambodia, one concession at a time – A Joint LICADHO/Cambodia Daily Analysis," The Cambodia Daily. 10-11 March 2011, p. 7. Available at: <http://www.licadho-cambodia.org/land2012/>.
- <sup>5</sup> STT, Facts and Figures 19 (May 2011): Displaced Families: Phnom Penh 1990 -2011.
- <sup>6</sup> World Bank, LMAP Implementation Completion Report, September 27, 2011, para 2.1.8.
- <sup>7</sup> The project's primary donors were the World Bank (pledging \$24.3 million), GTZ (\$3.5 million in technical assistance), and the Government of Finland (\$3.5 million in technical assistance). The Canadian International Development Agency (CIDA) joined the project in 2005 committing more than CN\$10 million in both funding and technical assistance through to 2013. (Development Credit Agreement (Land Management and Administration Project) between Kingdom of Cambodia and International Development Association (DCA for LMAP), March 27, 2002; and CIDA Website, *Cambodia: CIDA funded projects*, <http://www.acdi-cida.gc.ca/CIDAWEB/cpo.nsf/vWebCSAZEn/2B96C9225B68A368852571400058DB9E> (accessed July 23, 2012).)
- <sup>8</sup> World Bank, Project Appraisal Document (PAD), Cambodia LMAP, 2002, p. 2.
- <sup>9</sup> Ibid, p. 8.
- <sup>10</sup> Land Law 2001, Article 30.
- <sup>11</sup> PAD, op. cit., p. 10.
- <sup>12</sup> Ibid.
- <sup>13</sup> See, The Inspection Panel, "Investigation Report, Cambodia: Land Management and Administration Project" (Inspection Panel Investigation Report), November 32, 2010, p. xxvi.
- <sup>14</sup> Land Law 2001, Article 15; and Sub-decree No. 118 on State Land Management (2005), Article 4.
- <sup>15</sup> For an in depth analysis see Natalie Bugalski, "A Human Rights Approach to Development of Cambodia's Land Sector: A Discussion Paper," Heinrich Boll Foundation and Equitable Cambodia, April 2012.
- <sup>16</sup> PAD, op. cit., p. 38.
- <sup>17</sup> Ibid.
- <sup>18</sup> World Bank, "Cambodia Land Management and Administration Project: Enhanced Review Report," July 13, 2009, p. 6.
- <sup>19</sup> LMAP Implementation Completion Report, op. cit., Section F.
- <sup>20</sup> Ibid, para. 3.2.7.
- <sup>21</sup> Inspection Panel Investigation Report, op. cit., p. xxvi.
- <sup>22</sup> Ibid, p. 28.
- <sup>23</sup> Ibid.
- <sup>24</sup> Inclusive Development International interviews, Phnom Penh, Cambodia, January 23, 2013.
- <sup>25</sup> World Bank, "Management Response to the Request for an Inspection Panel Review of the Cambodia Land Management and Administration Project" (Management Response to Request for Inspection), December 2009, Annex 4.
- <sup>26</sup> Inclusive Development International interviews, Phnom Penh, Cambodia, January 23, 2013.
- <sup>27</sup> LMAP Implementation Completion Report, op. cit., para. 3.2.6.
- <sup>28</sup> Inspection Panel Investigation Report, op. cit., p. xxviii (citing unpublished independent review report).
- <sup>29</sup> Ibid.
- <sup>30</sup> PAD, op. cit., p. 20.
- <sup>31</sup> Inspection Panel Investigation Report, op. cit., p. xxiii.
- <sup>32</sup> PAD, op. cit., p. 22. (The applicable policy was OD 4.30 as LMAP was approved just before OP 41.2 came into force.)
- <sup>33</sup> Inspection Panel Investigation Report, op. cit., pp. 52-53.
- <sup>34</sup> Management Response to Request for Inspection, op. cit., para. 52.
- <sup>35</sup> Inspection Panel Investigation Report, op. cit., pp. 53-61.
- <sup>36</sup> Management Response to the Request for Inspection, op. cit., p. 24.
- <sup>37</sup> Inspection Panel Investigation Report, op. cit., p. 54.
- <sup>38</sup> Management Response to the Request for Inspection, op. cit., Annex 4.
- <sup>39</sup> COHRE, "Request for Inspection to the World Bank Inspection Panel," 4 September 2009.
- <sup>40</sup> Management Response to the Request for Inspection, op. cit.,
- <sup>41</sup> Peter Zsombor and Phorn Bopha, "World Bank Halts Funds over Evictions" The Cambodia Daily, August 9, 2011, page 1; BBC, "World Bank blocks Cambodia loans amid Boeung Kak row," BBC News Asia-Pacific, 9 August 2011, <http://www.bbc.co.uk/news/world-asia-pacific-14457573>
- <sup>42</sup> See Sahnakum Teang Tnaut, Outside the Lines: Households excluded from the 12.44Ha Boeung Kak concession, June 2012.
- <sup>43</sup> Khouth Sopakchakrya, "Prayers for retribution at lakeside," Phnom Penh Post, September 19, 2011.
- <sup>44</sup> LMAP Implementation Completion Report, op. cit., para 2.1.17
- <sup>45</sup> Ibid, para 6.1.1
- <sup>46</sup> Ibid, 6.1.1 (5)