



**Comments received by Verra outside of the public comment period of the Southern
Cardamom REDD+ Project ID 1748**

Published 21 November 2024

Comment 1

Date: 04 October 2024

Sent by:

Organization:

Country:

- Hundreds of people have been forcibly displaced from in and around the Samkos REDD+ project this year. This included burning of structures identified as homes, seizure and confiscation of property, and physical violence. Some people say they are now suffering from food insecurity. Some who submitted grievances through the available Facebook page did not appear to receive responses. In one example, officials in Anlong Reab commune in Pursat province identified more than 300 families with long-term ties to the area who reported losing farms they had relied on. Besides those families, many of the people displaced from areas in and around the Samkos REDD+ project throughout these provinces have longstanding ties to the land according to village leaders, commune officials and the Battambang Provincial Department of Environment. Project documents submitted to Verra said there will be no relocations or disruptions to livelihood associated with this project.
- Farmers in Kampong Lpov commune (ខេត្តបាត់ដំបង / ស្រុកសំឡូត / ឃុំកំពង់ឆ្នាំង) on the border of the Samkos REDD+ project with decades-long ties to the land according to local and provincial authorities are being displaced as part of a Ministry of Environment and Wildlife Alliance tree-planting initiative. Some, but not all, may be eligible for compensation in the future though they are already unable to farm on their land, which farmers and local authorities said they relied on for their livelihoods. Project documents submitted to Verra have stated “the Project does not require involuntary removal or relocation of communities or any activities important for their livelihood and culture.” (i.e. Samkos REDD+ project 1st monitoring report p. 27)
- The boundaries for the Samkos REDD+ project overlap with a significant amount (more than 40%) of previously mapped traditional lands of the ethnic minority Por group, an Indigenous community living in the village of Phnom Rei located in Battambang province. (ខេត្តបាត់ដំបង / ស្រុកសំឡូត / ឃុំតាតោក / ភ្នំរឿង). Villagers in Phnom Rei reported being displaced from their farmlands, detained, having their huts burned, their crops trampled and signs on their farms warning of imprisonment in recent months. The German development agency GIZ confirmed to me they helped the villagers of Phnom Rei prepare a map of their lands, including existing farmlands, around 2012 as part of the village’s preparation for an Indigenous Communal Land Title. Por leaders stated they are now being pressured by the Samkos REDD+ project to withdraw land overlapping land claims. Battambang Provincial Department of Environment states that Wildlife Alliance told him not to grant the villagers of Phnom Rei ownership of their land claims overlapping with the Samkos REDD+ project, whose boundaries Wildlife Alliance led efforts to map.



- Chong farmers in the Areng Valley continue to be arrested and have also said they continue to have their property destroyed by Wildlife Alliance ranger patrols. When a villager whose property was destroyed raised concerns about these issues at an FPIC meeting in Thma Doun Pov commune in June 2024, Wildlife Alliance staff denied ranger patrols had ever burned or confiscated villagers' property.
 - The FPIC meetings at Thma Doun Pov, Pralay and Chumnoab communes, which I attended, appeared to contain misinformation and coercion. In one example, a local authority told community members right before they voted: "This project is a project to raise funds for local development... It is not a forest protection project." He also implied Chong and local villagers would not be able to receive ownership of their farmlands if they did not vote in support of the project. There was also no real opportunity at these meetings for villagers to contest project boundaries despite concerns raised by community members over its impact on their farmlands.
 - Dr. Suwanna Gauntlett's open letter states: "We will provide formal human rights training to all Cambodian government rangers and WA staff, and this will be done with the assistance of the OHCHR. Training will follow the UN Guiding Principles on Business and Human Rights. We also want to ensure that staff are trained regarding the importance of human rights due diligence and how such due diligence should be conducted." I contacted the UN OHCHR on August 11 and they stated they have no agreement to do this with Wildlife Alliance or the Ministry of Environment and were never approached by either party.
 - Community members and local farmers in other locations throughout the project reported being evicted as a result of Wildlife Alliance-led activities which have been cited in project documents submitted to Verra and used to certify projects. For example, residents in the village of Prolean (ជ្រលាត) in Kandaol commune in Botum Sakor District in Koh Kong province say they were forced off their farmland in the early 2000s to make way for the creation of Sovanna Baitong and that the vast majority of those affected by this did not receive compensation.
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