

Briefing note

Senate Region 8

Community Land Registration and Economic Land Concessions in Mondulkiri Province

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1. Introduction

Cambodia is a predominantly agriculture country making land the most valuable resource for Cambodians. Approximately 80% of the population resides in the rural areas.¹ Total arable land stands at 4,100,000 hectares or about 23% of the total land area.² The agriculture sector creates 51% of the total employment in the country and contributes 30% to the Gross Domestic Product (GDP).³

To promote the agriculture sector, especially agro-industry, the government of Cambodia has rolled out various mechanisms. The granting of Economic Land Concessions or ELCs to private company is one of them. Article 3 of the Sub Decree on ELCs specifies the objectives of ELCs: *"To increase employment in the rural areas within a framework of intensification and diversification of livelihood opportunities and within a framework of natural resource management based on appropriate ecological system."* However, a few negative impacts have arisen from the implementation of ELCs, the main one being conflict between concessionaires and the local communities. In some cases, failure of people in the local communities to properly register their land could be seen as a contributing factor to land conflicts in concession areas.

This briefing note reviews the legal procedures for community land registration, issues related to ELCs in Mondulkiri province and the conflicts with the local communities. This briefing note is informative rather than analytical.

2. Process of Land Registration of Indigenous Communities Collective Title

The 2001 Land Law and the Sub-decree No.83 on the Procedures of Registration of Land of Indigenous Communities are the two key legal instruments protecting indigenous people's rights to land in Cambodia. The 2001 Land Law recognizes the rights for indigenous communities to register their land and to obtain a collective land title.⁴ The 2009 Sub-decree No.83 sets out the procedure for indigenous land titling and registration.⁵

There are three main processes involved in indigenous community collective land titling: 1) identification and recognition of indigenous people and their

¹ World Bank data <http://data.worldbank.org/country/cambodia> (accessed 27 July 2015).

² *Ibid.*

³ *Ibid.*

⁴ Land Law 2011, Article 26.

⁵ Sub-decree No.83 on the Procedures of Registration of Land of Indigenous Communities, ANK/BK, (9 June 2009), <http://bit.ly/17FKSZV>

communities; 2) registration as a legal entity; and 3) registration of collective land titles.⁶

Article 8 of the Sub-decree No.83 requires the Chairman of the community committee or traditional authority of each indigenous community to apply for registration of community land as collective title at the Municipal/District Office of Land Management, Urban Planning, Construction and Cadastral. The application forms for land registration shall include a certification of the commune/Sangkat chief that the community that applies for land registration is truly located within his/her commune/Sangkat.⁷ There are also numerous required documents that shall be enclosed with the application forms for registration. They are the following:

- Application form with fingerprint of the chairman of the community committee or traditional authority;
- Delegating letter to a member of the community committee to be a representative of the community in the process of providing information and filling out application forms for registration of the community land according to the procedures in force, if the chairman of the community committee or traditional authority cannot participate ;
- Community's statute and list of community members with certification of the commune/sangkat chief;
- Community's internal rule related to the system of collective land use and management;
- Notification of the approval of the community registration by the Ministry of Interior;
- Decision of the commune/sangkat council on the appointment of the community committee; and
- All documents related to the land applying for registration if there are any.⁸

Three ministries manage the process. Firstly, the Ministry of Rural Development (MRD) is charged with identifying and issuing the legal identity of indigenous people and their communities. At that stage, each indigenous community is required to carry out two procedures: self-identification and registration for recognition by MRD. Secondly, the Ministry of Interior (MoI) is responsible for approving the legal entity bylaws of indigenous communities. In this process, indigenous communities are required to review their bylaws or statutes, involving all members of the community. Finally, registration of collective land titling of indigenous communities is the responsibility of the Ministry of Land Management, Urban Planning, and Construction.⁹

The Municipal/District Office of Land Management, Urban Planning, and Construction, after receiving an application for land registration, and if the location, size and boundary of land of the indigenous community are agreed to by the neighbors and the administrative authority and without any dispute, or in the event of a dispute that has been settled, the office shall make a proposal to

⁶ *Ibid.*, Article 5.

⁷ *Ibid.*, Article 8.

⁸ *Ibid.*

⁹ Men, Prachvuthy. *Impacts of Economic Land Concessions on the Livelihoods of Indigenous Communities in Northeast Provinces of Cambodia*, March 2011, pp. .16-17.

the Municipal/District Governor to issue a public notification at least 20 days prior to the date of boundary demarcation, surveying, and adjudication. The notification shall be publicly displayed at visible places such as the village hall, the commune/sangkat hall, urban areas and at the site of the community land.¹⁰

After boundary demarcation and surveying takes place, the collected data shall be publicly displayed for 30 days in the community, to be more specific, at the commune/sangkat hall where the community is located. After the public display period and resolution of complaints - if any - takes place, the Cadastral Administration undertakes the land registration and issues a collective title certificate to the community according to the procedure as described in article 11 of the Sub Decree.¹¹

13 steps for indigenous community collective land titling registration (pilot)¹²

The following steps are a summary of the registration process that is described above in Section 2.

1. Representative(s) of indigenous communities are required to apply for registration of Participatory Land Use Planning (PLUP)¹³ and claim for community immovable property at Commune Council.
2. Commune council includes PLUP in annual commune plans and forwards application to district cadastral administration (DCA).
3. District Cadastral Administration (DCA) checks application for PLUP registration and records it in its system.
4. DCA develops PLUP committee: setting up internal rules and regulations and negotiating boundaries with neighboring communities.
5. Indigenous community applies for recognition as a legal entity to process collective land titling at CC and provincial governor's office.
6. Provincial governor's office establishes a provincial working group (PWG) for pilot land titling.
7. PWG works with, and supports, DCA in demarcation, measurement and adjudication.

¹⁰ *Ibid.*, Article 9.

¹¹Article 11: *The Cadastral Administration shall establish a separate land register for registration of the land of the indigenous communities. The Municipal/District Cadastral Administration shall register the land of the communities which have applied for collective title on the land register based on the collected data as described in article 9 of this Sub Decree or based on the results of official land identification and mapping as described in article 10 of this Sub Decree. Registration of community land shall register all parcels of the land of a community on a single cadastral map even though the parcels of the land are located in different villages and communes. Based on the single cadastral map, the Cadastral Administration shall issue a certificate of collective title to the community according to the actual state of each parcel of land by specifying the name and location of the community, reference number to the single cadastral map indicating the location, size, boundary, coordinates of the piece of land collectively owned and certification of the type of land use and other notes. The model of the certificate of the collective title has a form as described in annex 2 of this Sub-Decree.*

¹² LMAP (2004).

¹³ For more details about the process for PLUP, please see the link:

<http://www.mekonginfo.org/assets/midocs/0002909-planning-cadastre-participatory-land-use-planning-in-cambodia-main-report-and-annexes-proceedings-of-the-introductory-workshop-14-15-sep-1999.pdf>

8. DCA requests technical support from National Department of Geography and Cadastre to conduct global positioning system (GPS) survey and documents possible land disputes in the community area.
9. Investigation of all available evidence concerning rights of community land to be registered is carried out.
10. DCA prepares adjudication documents consisting of the record of land and survey form, map of community land, confirmation letter of status of indigenous community to be registered and approval of community bylaws (public display for 30 days).
11. During public display, any conflicting parties claiming the community land being registered are allowed to file a complaint to DCA.
12. After expiration of public display, DCA prepares the sporadic index map¹⁴ and forwards all documents to the provincial cadastral administration (PCA).
13. PCA verifies completeness of documents and sends them to the Central Cadastral Administration for registration.

3. Economic Land Concessions (ELCs)

3.1. Objectives of ELCs

According to the National Strategic Development Plan (NSDP), because agriculture is the main source of employment and the core of the rural economy, it is essential to develop the sector in order to build and sustain economic growth and to accelerate poverty reduction.¹⁵ The government of Cambodia is currently encouraging diversification in crops and increasing productivity. ELCs are seen as a key tool for achieving these objectives.¹⁶ The Sub Decree on Economic Land Concessions defines the ELC initiative as: "...a mechanism for the government to grant private state land through a specific economic land concession contract to a concessionaire to use for agricultural and industrial-agricultural exploitation."¹⁷ Article 2 further defines "industrial-agricultural exploitation" as:

- Cultivation of food crops or industrial crops including tree planting to establish a tree plantation;
- Raising of animals and aquaculture;
- Construction such as a plant or factory and facilities for the processing of domestic agricultural raw materials; or

¹⁴ Sub-decree No. 48 on Sporadic Land Registration, 2002, Article 15: ".....The sporadic index map is a cadastral map, which shows location, number and boundaries of all parcels that have been registered already and the one of which the registration is requested after the adjudication documents have been displayed and after the conciliation and resolution of the dispute."

¹⁵ Royal Government of Cambodia. National Strategic Development Plan Update 2009-2013. p. 121.

¹⁶ Open Development of Cambodia, "Economic Land Concessions (ELCs)". <http://www.opendevelopmentcambodia.net/briefing/economic-land-concessions-elcs/>. (accessed 24 July 2015).

¹⁷ Art. 2 of Sub Decree on Economic Land Concession, Royal Government of Cambodia, No. 146 ANK/BK, 27.12.2005.

- A combination of some or all of the above activities.

According to the sub-decree, the main purposes of this policy are as follows: to develop an intensive agricultural base and to promote a high level of initial capital investment in industrial-agricultural activities; to increase employment opportunities in rural areas within a framework on intensification of livelihood opportunities and of natural resource management based on appropriate ecological systems; and to generate state, provincial or commune revenue from concession use fees, taxation and other service charges.¹⁸

3.2 Legal framework

The Land Law of 2001 and the Sub Decree on Economic Land Concessions issued in 2005 both govern the granting of land concessions. While the 2001 Land Law sets forth general provisions relevant for all land concessions, including those for social and economic purposes (Art. 48-62), the Sub Decree on Economic Land Concessions lays out the legal requirements for granting an ELC.¹⁹ According to Article 5 of Sub-Decree 146, the evaluation of ELC proposals shall be based on the following criteria: (1) increase in agricultural and industrial-agricultural production by using modern technology; (2) creation of employment; (3) promotion of living standards of the people; (4) perpetual environmental protection and natural resources management; (5) avoidance or minimizing of adverse social impacts; (6) any linkages and mutual support between social land concessions and economic land concessions; and (7) processing of raw agricultural materials.

The authority to grant an ELC lies with the Ministry of Agriculture, Forestry and Fisheries (MAFF).²⁰ Previously it was possible for sub-national authorities to grant smaller ELCs up to 1,000 ha,²¹ but this option was terminated in 2008.²²

The maximum size of an ELC is 10,000 ha,²³ and the maximum duration of the ELC is 99 years.²⁴ Details need to be established by a concession contract between the concessionaire and the contracting authority.²⁵ It is revocable

¹⁸Men, Prachvuthy. *Impacts of Economic Land Concessions on the Livelihoods of Indigenous Communities in Northeast Provinces of Cambodia*. March 2011. p. 19.

¹⁹Oldenburg, Christoph and Neef, Adreas, "Competing Frameworks and Perspectives on Land Property in Cambodia," Paper prepared for the 2013 Law and Development Conference, Legal and Development Implications of International Land Acquisitions, Kyoto, Japan, 30-31 May 2013. p. 5.

²⁰ Art 29 of Sub Decree on Economic Land Concession, Royal Government of Cambodia, No. 146 ANK/BK, 27.12.2005.

²¹ *Ibid.*

²² Art 1 of Sub Decree on Modification of the Sub Decree on Economic Land Concession 2008.

²³ Art. 59 of Land Law.

²⁴ The Ministry of Environment announced on 28 July 2015 that the length of ELCs was limited to 50 years. See also Art. 61 of Land Law.

²⁵ *Ibid.*, Art. 53.

through a governmental decision or can be cancelled by the courts when its legal requirements are not complied with.²⁶ An ELC can be acquired by foreign entities or Cambodian entities which are 100% foreign owned.²⁷ Concessions can be awarded in three forms: economic (for agro-industrial use); social (for residential and subsistence use); and others (such as mining or industrial developments). ELCs and Social Land Concessions (SLCs) have the following in common: they can only be granted after state public land has been converted into state private land.²⁸

3.3 The moratorium on the granting of new ELCs

On 7 May 2012, Prime Minister Hun Sen announced that he had signed a directive instituting a moratorium on the granting of new ELCs and enforcing the so-called “leopard-skin” policy²⁹ with regard to existing ELCs, in order to exclude inhabited areas from the concessions and mitigate the latter’s encroachment on farmers’ and communities’ land.³⁰ Directive 001 also called for a review of all existing concessions in order to check their compliance with relevant laws and regulations. It reaffirmed that concessions found to breach legal and contractual provisions would be cancelled.³¹

According to the MAFF annual report 2014, by the end of 2014, “due to inactivity on their investment plans”, 69 concessionaires with a total granted land area of 587,580 hectares have had their contracts cancelled by the government. Among them were 61 concessionaires of more than 1,000 hectares with combined area of 580,667 hectares, and the other eight of less than 1,000 hectares with combined area of 6,913 hectares.³²

3.4. ELCs: varying figures

As mentioned above, the authority to grant ELC lies with MAFF. However, in reality, ELCs can be granted by other institutions, such as the Ministry of

²⁶ *Ibid.*, Art. 55.

²⁷ Art. 8 of Sub Decree on ELC.

²⁸ Neefad, Andreas and Touch, Siphath, “Land Grabbing in Cambodia: Narratives, Mechanisms, Resistance.” Land Deal Politics Initiative. Global Land Grabbing II, October 17-19, 2012.

²⁹The “leopard skin” policy allows the authorities to cut out the overlapped areas from ELC concessionaires for the local communities.

³⁰ ADHOC, A Turning Point? Land, Housing and Natural Resources – Rights in Cambodia in 2012, February 2013, p. 34.

³¹*Ibid.*, p. 34.

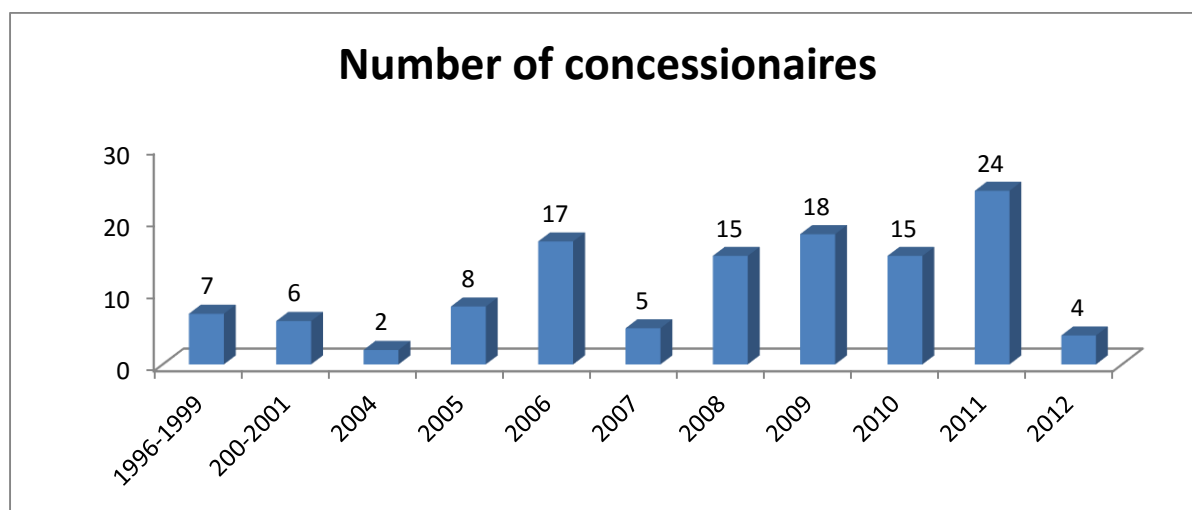
³²MAFF Annual Report 2014, p. 25. <http://www.maff.gov.kh/reports/68-annualreport/1268-2015-05-28-07-02-59.html> (accessed 27 July 2015).

Environment (MoE).³³ This has led to very inconsistent figures of the number of concessionaires as well as of the total granted area. Data from the MAFF shows that, by 08 June 2012, 121 companies had received ELC with a total area of 1,204,750 hectares.³⁴ The MAFF annual report 2014 puts the number of concessionaires at 121 across 18 provinces, with a total land area of 1,315,482.³⁵ As it will be laid down in the following paragraph, NGOs working on land issues have differing figures regarding ELCs.

According to the Cambodian Human Rights and Development Association (ADHOC)'s report, "as of late December 2012, the government had reserved or granted at least 2,657,470 hectares of land to private companies under the ELC scheme."³⁶ The report adds that "in 2012 alone, the government issued 66 sub-decrees reserving 381,121 hectares of land for ELCs, including 33 after the announcement of a moratorium on the granting of ELCs (7 May 2012)."³⁷ According to the latest data from another human rights organization, the Cambodian League for the Promotion and Defense of Human Rights (LICADHO), ELCs covered 2,119,082 ha.³⁸

Data from MAFF shows that granting of ELCS peaked in 2011, with 24 companies receiving ELCs with a total land area of 184,576 hectares. However, the majority of the ELCs was granted between 2000 and 2001, and totalled 408,404 hectares.

Figure 1: Number of Concessionaires Granted ELCs, 1996 - 2012



³³Protected Area Law, 2008.

³⁴ The figure from the website puts it at 117 companies and 1,181,522 hectares. However, according to the author's calculation based on the same list, the number of concessionaires is 12 with a total land area of 1,204,750 hectares. <http://www.maff.gov.kh/> (accessed 24 July 2015)

³⁵MAFF Annual Report 2014, p. 25. <http://www.maff.gov.kh/reports/68-annualreport/1268-2015-05-28-07-02-59.html> (accessed 27 July 2015).

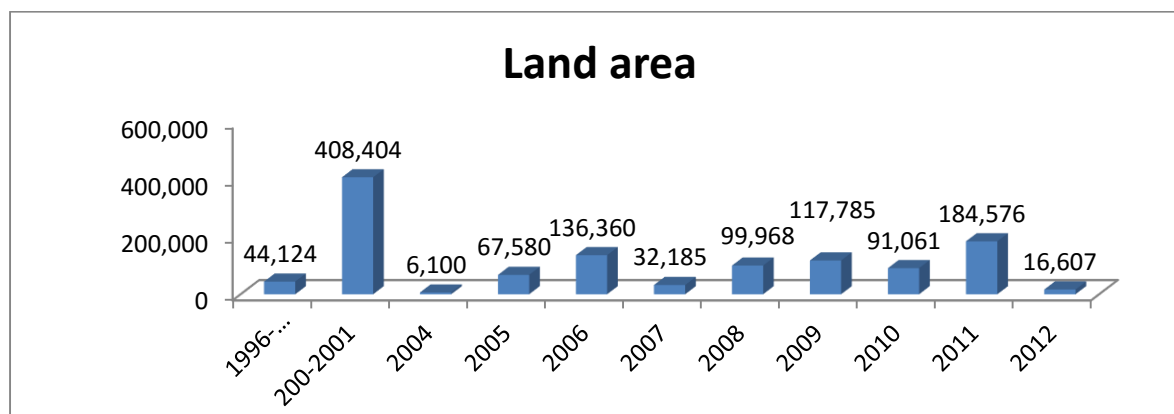
³⁶ ADHOC, A Turning Point? Land, Housing and Natural Resources – Rights in Cambodia in 2012, February 2013, p. 9.

³⁷*Ibid.*, p. 9.

³⁸http://www.licadho-cambodia.org/land_concessions/maps/map-overview-small.jpg (accessed 24 July 2015).

Source: Ministry of Agriculture, Forestry and Fisheries (MAFF)

Figure 2: Total Granted Land Area (in hectares)



Source: Ministry of Agriculture, Forestry and Fisheries (MAFF)

3.5. ELCs in Mondulakiri province

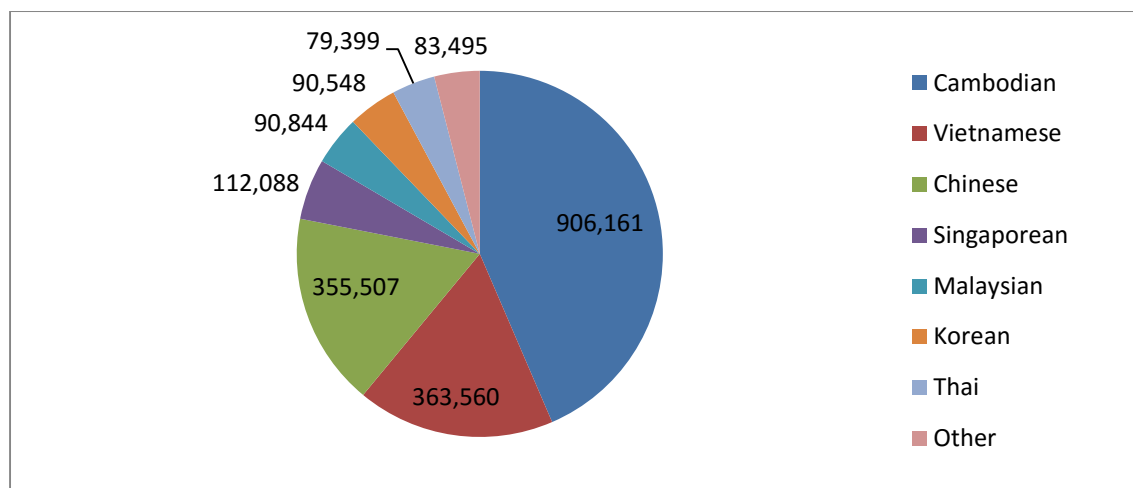
According to data from MAFF, as of 08 June 2012, 14 companies (Appendix 1) received ELCs from the government with a total land area of 101,036 hectares. Most of the land is used for rubber plantations, while the rest is used for other agro-industry crops such as acacia, jatropha and pine. No data is available on the production, exports, employment and workers' salaries. None of the 14 concessionaires has a website.

Just like the national level data, the data on ELCs for Mondulakiri province varies greatly. While the MAFF puts the number of concessionaires at 14 and a total granted area of 101,036 hectares, data from the Open Development of Cambodia shows that 31 companies (Appendix 2) were granted ELCs in Mondulakiri province with a total granted area of 208,510 hectares, three of those companies having received less than 1,000 hectares.

As mentioned above, details about granted ELCs are rather imprecise. Data from LICADHO shows that nearly 50% of the total ELCs area are granted to Cambodian-owned concessionaires (906,161 ha), followed by Vietnamese-owned concessionaires (363,560 ha), Chinese-owned concessionaires come in third at 355,503 ha. The fourth and fifth spots are occupied by Singapore and Malaysia at 112,088 ha and 90,844 ha respectively.³⁹

³⁹ *Ibid.*

Figure 3: Ownership of ELCs



Source: LICADHO (http://www.licadho-cambodia.org/land_concessions/maps/map-ownership-small.jpg). Accessed 31 July 2015.

4. Land Conflict in Mondulkiri Province

According to the NGO Forum on Cambodia, land disputes occur over different types of land such as agricultural land (farmland and rice fields), residential land and forest land. The majority of disputes occur over agricultural land.⁴⁰ Many factors cause land disputes, including infrastructure development projects in urban and rural areas, ELCs, other concessions operated by national and international companies and land grabbing by individuals.⁴¹

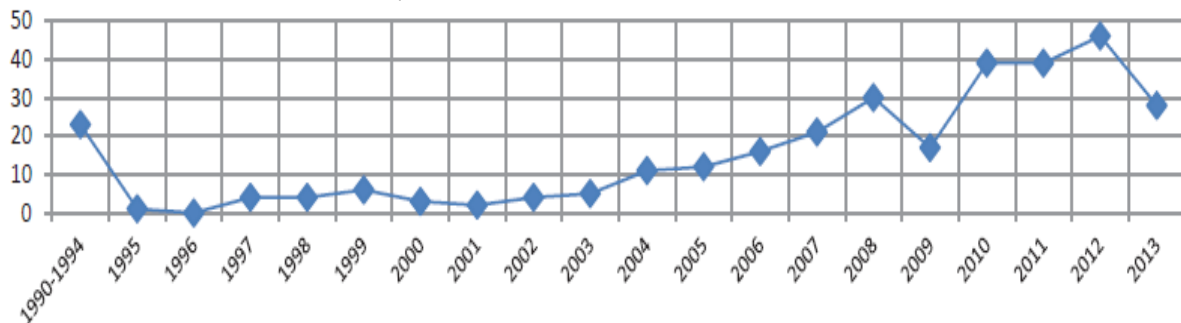
As Figure 4 shows, land disputes are not a new phenomenon in Cambodia. Twenty eight new land disputes were recorded in 2013. This number is lower

⁴⁰ NGO Forum on Cambodia, Statistical Analysis on Land Disputes in Cambodia, 2010. Phnom Penh, June 2011. p. 4.

⁴¹ NGO Forum on Cambodia, Statistical Analysis on Land Disputes in Cambodia, 2013. Phnom Penh, September 2014, p. 1.

compared to the cases that emerged during the years 2010, 2011, and 2012, with 39, 39 and 46 new disputes respectively.⁴²

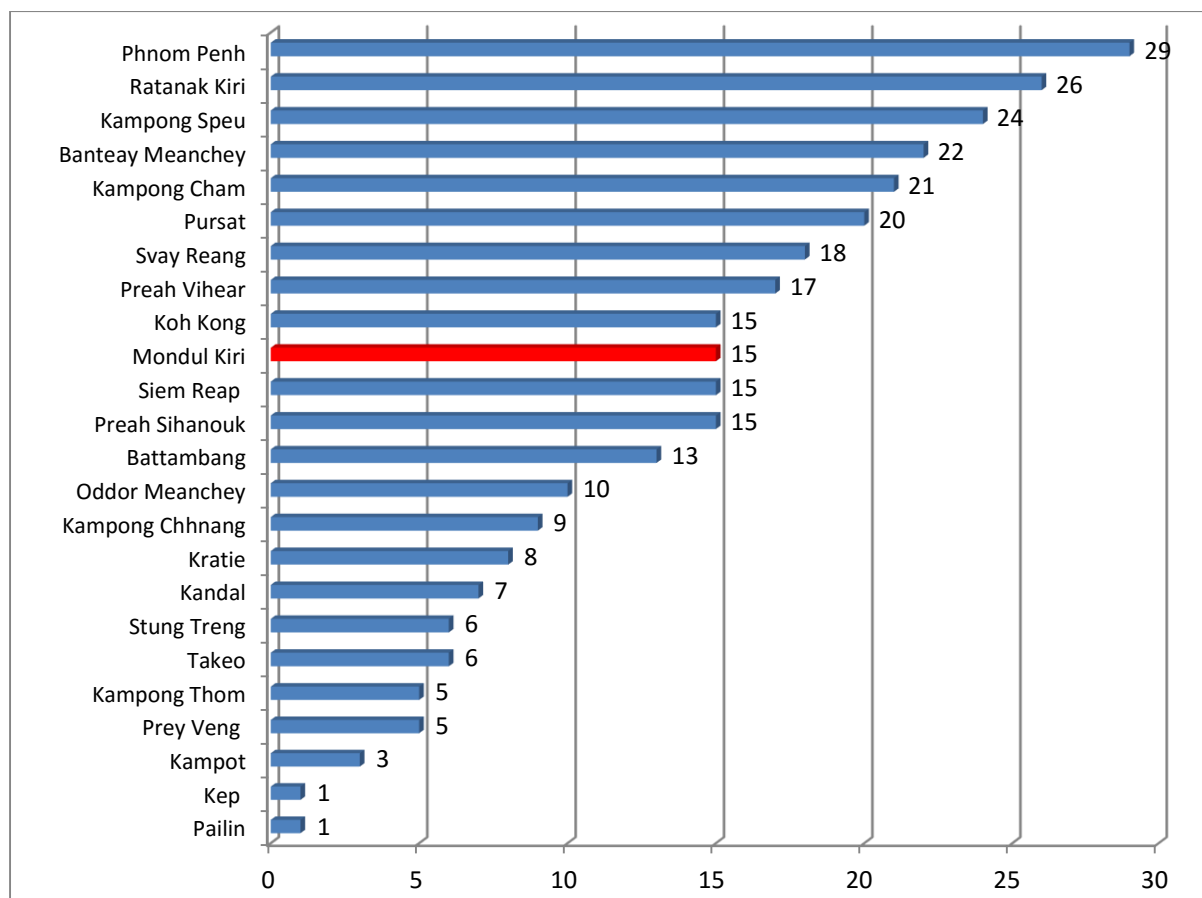
Figure 4: Land Dispute Trends – New Land Dispute Per Year



Source: NGO Forum on Cambodia

Broken down by province (see Figure 4), Phnom Penh has the most land disputes with 29 cases, while Pailin and Kep provinces have only one case each. Fifteen cases were recorded in Mondul Kiri province. Those 15 cases affected 3,232 households.⁴³

Figure 5: Number of Land Dispute Cases by Province



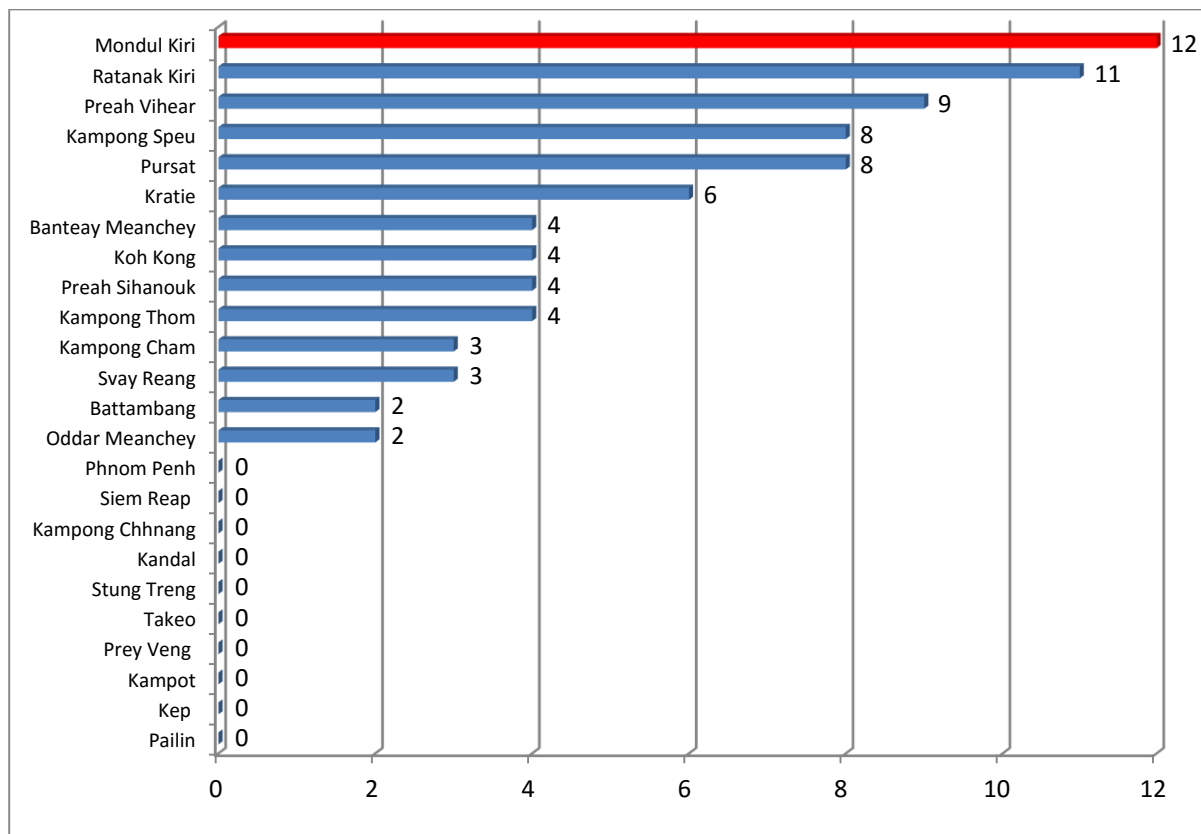
⁴²*Ibid.*, p. 7.

⁴³*Ibid.*, p. 16.

Source: NGO Forum on Cambodia

As mentioned above, amongst other factors, ELCs have been pinpointed as a reason causing land disputes. Surprisingly, out of the 15 land disputes recorded in Mondul Kiri province, 12 cases have been caused by ELCs.⁴⁴ In this regard, Mondul Kiri has the most land disputes caused by ELCs. The author could not find information on how many of those 15 land disputes have been resolved.

Figure 6: Land Disputes Caused by ELCs



Source: NGO Forum on Cambodia

5. Conclusion

Cambodia is a predominantly agriculture country making land the most valuable resource for Cambodians. Creation of employment at the local level and

⁴⁴*Ibid.*, p. 22.

development of the agro-industry were the two main reasons behind the granting of ELCs. However, a few adverse effects have arisen from this. While land disputes are not a new phenomenon in Cambodia, the number of land disputes has risen in relation to the granting of ELCs. In some cases, concessionaires are pitted against the local indigenous communities. Having their land properly registered would undoubtedly mitigate or reduce these conflicts. However, the registration process itself is rather complicated for local communities.

ELCs related data provided by the MAFF is inconsistent with those provided by the NGOs working on land issues. This inconsistency makes it even more difficult to assess both the positive and negative impacts of ELCs such as the number of workers employed and their salary, planted areas and crop yields. Most, if not all, of the concessionaires do not possess any homepage.

The Land Law of 2001 and the Sub Decree on Economic Land Concessions issued in 2005 both govern the granting of land concessions in Cambodia. However, there are a few loopholes which are open to various interpretations that require clarification. The moratorium on the granting of new ELCs or Directive 001 - which reaffirms that concessions found to breach legal and contractual provisions be cancelled - rectifies some of the loopholes. A more systematic monitoring and evaluation mechanism on the implementation of the existing ELCs should be introduced. Improved monitoring is required to ensure that ELCs are being developed in accordance with the laws and regulations and produce the desired positive economic impacts for the local communities and the country as a whole.

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World Bank data <http://data.worldbank.org/country/cambodia> (accessed 27 July 2015).

Appendices

Appendix 1: Economic Land Concessions in MondulKiri Province

No	Concessionaire name	Location (district)	Area (hectares)	Type of crop	Date of contract
1	Covyphama Co., Ltd.	PichChreada	5,345	rubber	17.02.2008
2	DakLakMondulKiri Rubber Development	PichChreada, OuReang, KohNhek	4,162	rubber	04.07.2008
3	KhaouChuly Development (KCD)	PichChreada	2,346	rubber	08.10.2008
4	Seang Long Green Land Investment (Cambodia) Co., Ltd.	KeoSeyma, PichChreada	7,000	rubber and acacia	08.12.2008
5	Land & Developing (Cambodia)	KeoSeyma, PichChreada	7,000	rubber and acacia	08.12.2008
6	Unigreen Resources Co, Ltd.	KohNhek	8,000	rubber	03.04.2009
7	DCT Group	KohNhek	4,000	rubber	18.03.2009
8	Mo Hy Pa MasuOrn Cambodia JV	KeoSeyma	7,800	rubber and jatropa	29.01.2010
9	Huor Ling (Cambodia) International	OuReang, SenMonorom	8,400	pine	05.05.2010
10	Pacific Lotus Joint-Stock Company Limited	KohNhek	9,014	rubber	09.09.2011
11	Pacific Pearl Joint-Stock Company Limited	KohNhek	9,614	rubber	09.09.2011
12	Pacific Grand Joint-Stock Company Limited	KohNhek	9,656	rubber	09.09.2011
13	Pacific Pride Joint-Stock Company Limited	KohNhek	9,773	rubber	09.09.2011
14	BenhHoeurkKratie Rubber 1 Company Limited	KeoSeyma	8,926	rubber	24.01.2011
Total			101,036		

Source: Ministry of Agriculture, Forestry and Fisheries (MAFF) <http://www.maff.gov.kh/> (accessed 24 July 2015).

Appendix 2: Economic Land Concessions in MondulKiri Province

N o.	Concessionaire name	Location	Area	Investment intention	Investor country	Direct or nationality	Contract date
1	Covyphama Co., Ltd.	PichChre ada	5,345	rubber	Cambodia	Cambodian	17.02.2008
2	DakLakMondulkiriAphivat hCaouthcouch	PichChre ada, OuReang , KohNhek	4,162	rubber	Not found	Not found	04.07.2008
3	Varanasi (KhaouChuly Development)	PichChre ada	2,346	rubber	Not found	Not found	08.10.2008
4	Seang Long Green Land Investment (Cambodia) Co., Ltd.	PichChre ada, KeoSey ma	7,000	rubber and acacia	China	Chinese	Not found
5	Land & Developing (Cambodia)	Pich Chre ada and KeoSey ma	7,000	rubber and acacia	China	Chinese	08.12.08
6	Unigreen Resource	KohNhek	8,000	rubber	China	Chinese	03.04.2009
7	D.T.C (Group)	PichChre ada	4,000	rubber	Cambodia	Cambodian	18.03.2009
8	Mo Hy Pa MasuOrn Kampuchea Co., Ltd.	KeoSey ma	7,800	rubber	Not found	Malaysian	29.01.2010
9	Hour Ling (Cambodia) International Insurance	OuReang , SenMonorom	8,400	pine	China	Chinese	05.05.2010
10	Pacific Lotus Joint-Stock Company Limited	KohNhek	9,014	rubber	Not found	Not found	09.09.2011
11	Pacific Pearl Joint-Stock Company Limited	KohNhek	9,614	rubber	Not found	Not found	09.09.2011
12	Pacific Grand Joint-Stock Company Limited	KohNhek	9,656	rubber	Vietnam	Not found	09.09.2011
13	Pacific Pride Joint-Stock Company Limited	KohNhek	9,773	rubber	Vietnam	Not found	09.09.2011
14	BenhHoeurkKratie Rubber 1 Company Limited	KeoSey ma	8,926	rubber	Vietnam	Vietnamese	24.10.2011
15	Eastern Rubber (Cambodia)	KeoSey ma	10,000		Not found	Not found	24.10.2011
16	HengHeanSiv Chan Tour Trading Co., Ltd.	PichChre ada, SenMonorom, OuReang	4,000	rubber and other crops	Not found	Not found	Not found
17	Investment and Development Dai Nam (Cambodia) J.S.C Ltd.	KeoSey ma	8,685	agro-industry crops	Not found	Not found	Not found
18	Investment and Development Dai Thanh (Cambodia) J.S.C Ltd.	Not found	8,708	Not found	Not found	Not found	Not found
1	Kasekam Khmer Angkor	Not	9,160	agro-	Camb	Not	Not

9	Co., Ltd.	found		industry crops and rubber	odia	found	found
20	L K I construction Co., Ltd.	Not found	5,559	agro- industry crops	Not found	Not found	Not found
21	Lim Royal Joint Stock Company Limited	Not found	9,068	agro- industry crops	Cambodia	Not found	Not found
22	Master K Son Co., Ltd.	Not found	9,892	rubber	Not found	Not found	Not found
23	Mega First Corporation Berhad (MFCB)	Not found	9,477	Agro- industry ecotourism and SEZ	Malaysia	Not found	Not found
24	MondulAgri-Resource Co., Ltd.	KohNhek	9,100	rubber	Not found	Cambodian	25.09.2009
25	RetthyKiriSeyma Cp., Ltd.	KeoSeyma	5,000	rubber and agro- industry	Not found	Not found	Not found
26	Sethikula Co., Ltd.	PichChreada	4,273	rubber	Cambodia	Not found	Not found
27	Veranasi (KhaouChuly Development)	PichChreada	2,705	rubber	France	Not found	Not found
28	Wuzhishan L.S Group	OuReang, SenMonorom	10,000	processi ng factory	China	Chinese	30.12.2005
29	K Peace Investment (Cambodia) Co., Ltd.	Not found	500	agro- industry crops and rubber	Not found	Not found	Not found
30	Sitthi Agriculture Plantation Co., Ltd.	PichChreada	522	Rubber	Not found	Not found	Not found
31	Villa Development Co., Ltd.	PichChreada	825	Not found	Not found	Not found	Not found
Total			208,510				

Source: Open Development Cambodia

<http://www.opendevdevelopmentcambodia.net/company-profiles/economic-land-concessions/> (accessed 28 July 2015).