INSTITUTIONAL ARCHITECTURE FOR FOOD SECURITY POLICY CHANGE: CAMBODIA
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ACRONYMS

ASEAN - Association for South East Asian Nations
ASDP - Agriculture Strategic Development Plan
AMO - Agriculture Marketing Office
ASO - Agriculture Statistics Office
BFS - Bureau for Food Security
CARD - Council for Agriculture and Rural Development
CARDI - Cambodian Agriculture Research and Development Institute
CCC - Cooperation Committee for Cambodia
CDC - Council for Development in Cambodia
CDFC - Cambodia Development Cooperation Forum
CDRI - Cambodia Development Resource Institute
CRDB - Cambodia Rehabilitation and Development Board
CSO - Civil Society Organization
DAE - Department of Agricultural Extension
DPs - development partners
FAO - Food and Agriculture Organization
FSNIS - Food Security and Nutrition Information System
G-PSF - Government-Private Sector Forum
GDCC - Government-Development Partner Coordination Committee
GDP - Gross Domestic Product
IFPRI - International Food Policy Research Institute
JMI - Joint Monitoring Indicators
MAFF - Ministry of Agriculture, Forestry, and Fisheries
MAFF-DPS - MAFF Department of Planning and Statistics
MAFF-TWG - MAFF International Technical Working Group
MOWRAM - Ministry of Water Resources and Meteorology
M&E - Monitoring and Evaluation
NCDD - National Committee for Democratization and Decentralization
**EXECUTIVE SUMMARY**

There is a well-developed and comprehensive system for the development and coordination of agriculture and food security policy in Cambodia. A strong policy framework supports agriculture and food security, and there is a growing sense of ownership of the process from within the government. Policy analysis and coordination is provided through the Technical Working Groups, with secretariat support provided by the Council for Agriculture and Rural Development (CARD). This system is far more sophisticated than most other Feed the Future countries studied\(^1\) and bears similarity to Bangladesh, a strong performer in terms of effective policy coordination and analysis.\(^2\) Policy development is particularly strong at the sub-sector level where development partners (DPs) are providing the technical support to a government led process.

Despite this strong structure, there remains a persistent gap between policy development and policy implementation. Due to limited government funding, implementation is almost entirely dependent on external project funding. However, in addition to the resource gap, there are a number of other factors limiting the effectiveness of implementation, including insufficient coordination mechanisms for implementation, poor human resource capacity development, and weak monitoring and evaluation.

**Lack of coordination body for implementation:** Implementation of projects by line ministries and DPs is largely uncoordinated, leading to weak complementary among programs. DPs have been coordinating with various technical departments and provincial offices, often without central planning from MAFF. Line ministries are responsible for implementing the National Strategy for Food Security and Nutrition

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\(^1\) In Nepal, for example, the policy analysis unit responsible for coordinating policy within the Ministry of Agriculture was found to have three full time analysts, while in Uganda the policy analysis unit was found to have two.

\(^2\) In Bangladesh, the Food Policy Monitoring Unit serves in a similar capacity to CARD, and provides coordination and administrative support for the formulation of food security policy.
(NSFSN), but there is no central coordination body for implementation. CARD has made it apparent that they do not play a role in implementation.

**Human resource capacity management:** The challenge of insufficient technical capacity with CARD and MAFF is well documented and receives the attention of a number of DPs. Yet while there are clear capacity gaps, particularly in project management, MAFF also suffers from underutilization of existing capacity and human resource skills. MAFF has benefited from numerous capacity building exercises, including overseas training and placements. However, staff members are often not given the scope or opportunities to put their skills into practice. Each technical department should have its own plan for capacity building, but there is no centralized strategy for this within MAFF. There is a need for a clear approach to assess the human resources capacity within line ministries and a strategic plan to support human resource capacity development.

**Monitoring and evaluation (M&E):** The current M&E systems within MAFF are not sufficient to provide an effective feedback loop on policy and project implementation. The new requirements for MAFF to switch to program based budgeting offers a window of opportunity to assess and reform monitoring and evaluation capabilities. At the moment, MAFF has instructed all technical departments of the need to switch to project based evaluation, but a systemic plan to address this has not been developed.
INTRODUCTION AND METHODOLOGY

The path and trajectory of policy change is a complex, non-linear process that is often unique to a particular country. While no two countries share precisely the same process, effective policy changes can and do share similar features: predictable, transparent, inclusive, and evidence-based policy making. A core concern and commitment of partner countries is to establish an enabling environment for the implementation of national agricultural investment plans. In support of this goal and recognizing the critical importance of the quality of the policy change process, the United States Agency for International Development’s (USAID) Bureau for Food Security (BFS) is emphasizing the need for an understanding of the Institutional Architecture for Food Security Policy Change.\(^3\)

Institutional architecture provides a framework for analyzing a country’s capacity to undertake food security policy change.\(^4\) This is accomplished by identifying implementation barriers, designing policy options, and coordinating actions across public and private institutions. This assessment examines the components of the policy making process, providing USAID, local policymakers, and other key stakeholders with information on possible constraints that could stymie effective policy change. This work will help inform USAID as it explores new approaches for technical assistance to improve the capacity and performance of the policy change process.

Part I: Overview of Institutional Architecture for Policy Change

The first part in this process maps out the key actors that influence food security policy development. This involves identifying and mapping the key institutions that hold primary responsibility for implementation; inter-ministerial coordination mechanisms; private and civil society organizations; as well as think tanks and research organizations that impact and influence the food security policy change process. These factors are examined in the context of the broader economic and social dynamics that impact the policy change environment.

Part II: Capacity of Food Security Policy Change

The second part of this assessment involves an analysis of a country’s capacity to undertake transparent, inclusive, predictable, and evidence-based policy change. The country is examined through the following six components of the policy formation process to determine its ‘readiness for policy change’:

- Policy Element 1: Guiding Policy Framework
- Policy Element 2: Policy Development and Coordination

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\(^3\) Institutional architecture is defined as the set of partner-country procedures and processes for data collection and analysis, consultation and dialogue, policy proposal, feedback, approval, implementation, and enforcement.

\(^4\) Food Security is defined by Feed the Future as “when all people at all times have access to safe and sufficient food to meet their dietary needs for a productive and healthy life. There are four main components: availability, accessibility, utilization, and stability of food.”
• Policy Element 3: Inclusivity and Stakeholder Consultation
• Policy Element 4: Evidence-based Analysis
• Policy Element 5: Policy Implementation
• Policy Element 6: Mutual Accountability

Each of these components is analyzed through a set of indicators that determine the capacity and effectiveness of the overall policy change process. Each indicator is assessed using a three-tier rating system, which highlights the level of attention needed to improve the effectiveness of the component. A green rating means the component is realized to a sufficient degree, and additional attention is not required. A yellow rating means that the conditions required to achieve the purpose underlying the component are partially achieved, but additional attention is required. A red rating means that significant attention is needed to ensure the component is achieved. Indicators will be accompanied with a narrative analysis of key gaps and constraints to the policy change process.

AGRICULTURE AND FOOD SECURITY IN CAMBODIA

The Cambodian economy has registered strong and consistent growth over the past two decades, underpinned by stable economic management. The national poverty rate has dropped from 53 percent in 2004 to 20 percent in 2014 (CDRI, 2014), although around 2.8 million people remain trapped in poverty and 90 percent of these depend on agriculture as the main source of income. Agriculture is one of the key drivers of growth in the Cambodian economy, contributing an estimated 37 percent to gross domestic product (GDP) in 2012 and employing around 67 percent of the total labor force (FAO, 2014). Agricultural GDP growth has averaged 4-5 percent over the past decade, lagging behind national growth of 7-8 percent (CDRI, 2014).

Rice production has been the biggest contributor to self-sufficiency of food grains. Of the 3.7 million hectares of available agricultural land, 75 percent of production is dedicated to rice. In 2013, a record harvest of 9.3 million tons was achieved and 1.2 million tons of rice was exported, representing 3 percent of global rice exports (FAO, 2014). In addition to rice, most farmers grow cash crops such as cassava, maize, beans, and cashew, as well as poultry and livestock. However, a number of challenges remain to smallholder growth, including: insecure land tenure, high production costs, traditional farming techniques, and insufficient irrigation infrastructure. Insufficient water is also major constraint, with 70 percent of irrigation structures in need of rehabilitation (IFPRI, 2013). After rice, the fisheries subsector is viewed as the second most important contributor to self-sufficiency, as fish contributes 77 percent of the national protein diet (IFPRI, 2013). However, these resources are increasingly threatened by ecosystem degradation.

Agriculture and food security priorities for the government include increasing productivity and diversification of production, marketing, improved use and utilization of food to lower child and maternal malnutrition, and improved social protection of vulnerable populations to increase the stability of food supply (CARD, 2014).
PART I: OVERVIEW OF THE INSTITUTIONAL FRAMEWORK

There is a complex institutional architecture in place for agriculture and food security in Cambodia. The Ministry of Agriculture, Forestry, and Fisheries (MAFF) holds primary responsibility to establish agriculture policies and to coordinate, monitor, and evaluate the implementation of projects. This includes crop production and marketing, research and extension, support for irrigated agriculture, fisheries development, and forest catchment. MAFF underwent major organizational reform in 2008, introducing a five-division structure aligning technical and functional areas. The General Secretariat is the administrative division for the ministries and includes departments for planning and statistics, agricultural legislation, international cooperation, and agricultural information and documentation. The other four divisions represent each of the technical areas: General Directorate of Agriculture, General Directorate of Rubber, Forestry Administration, and Fisheries Administration. The Department of Planning and Statistics (MAFF-DPS) is responsible for policy planning, public investment, official development assistance, agricultural statistics, monitoring and evaluation, and agricultural marketing. Responsibilities for the agricultural sector are also dispersed across at least five other ministries, including: the Ministry of Water Resources and Meteorology (MOWRAM); the Ministry of Land Management, Urban Planning, and Construction; Ministry of Rural Development; Ministry of Planning, and the Ministry of Commerce.

There are four supreme councils: Supreme National Economic Council (SNEC), National Committee for Democratization and Decentralization (NCDD), Council for Administrative Reform, and the Council for Agriculture and Rural Development (CARD). CARD, chaired by a Deputy Prime Minister, is the lead organization for coordinating food security and nutrition. CARD has seven departments: Administration and Finance Department; Planning and International Cooperation Department; Health, Food Security and Nutrition Department; Rural Development Department; Water Resources Department; and Public Work Department. Under the Planning and International Cooperation Department, there are units for policy coordination, training and research, statistics, and international cooperation.

The Technical Working Group for Agriculture and Water (TWGAW) is co-chaired by MAFF and MOWRAM, facilitated by the Food and Agriculture Organization (FAO), and is comprised of 48 representatives from government, development partners (DPs), and civil society. TWGAW is responsible for coordinating and implementing policies related to agriculture and irrigation. The Technical Working Group for Social Protection, Food Security and Nutrition (WG-SP&FSN) is co-chaired by CARD and the Ministry of Planning, and co-facilitated by the World Food Programme (WFP) and UNICEF. It is responsible for coordinating, formulating, and implementing policies across the areas of food security, nutrition, as well as social protection between government, civil society, and development partners (DPs).
PART II: CAPACITY FOR FOOD SECURITY POLICY CHANGE

POLICY ELEMENT 1: THE GUIDING POLICY FRAMEWORK

The policy framework to support agriculture and food security is well defined and consistent with national development strategies, but there is a lack of clarity among stakeholders as to how the National Strategy for Food Security and Nutrition relates to sector strategies.

OVERVIEW

Food security and nutrition are prioritized and reflected in all national policy frameworks. The Cambodian government defines food security as “physical and economic access to sufficient, safe, and nutritious food at all times, to meet their dietary needs and food preferences and optimize the utilization of this food for an active and healthy life”. The Rectangular Strategy Phase III (2014-2018) outlines the guiding policy directions for national policy, identifying four policy priorities in the areas of agricultural intensification and diversification, land reform, sustainable natural resources, and enhancing health and nutrition. The National Strategic Development Plan (NSDP, 2014-2018) presents an action plan to align programs and projects of all line ministries and agencies to implement the priorities of the Rectangular Strategy.

Food security policy is articulated through the National Strategy for Food Security and Nutrition (NSFSN, 2014-2018), which was adopted in August 2014. The NSFSN has three primary objectives: 1) increased access to nutritious food through more productive and diversified agriculture and livestock production and sustainable use of fisheries and forestry resources; 2) reduced child and maternal malnutrition through scaling up of nutrition services, improved water supply, and fortified food; and 3) improved stability of the food supply through social protection instruments and enhancing the capacity of vulnerable households.

Each line ministry is guided by a sector strategy. The Strategy on Agriculture and Water (SAW, 2006-10 and updated 2010-2013) outlines the joint policy priorities for MAFF and MOWRAM. MAFF is currently

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5 NSFSN is the follow on to the Strategic Framework for Food Security and Nutrition in Cambodia (2008-2013).
drafting the Agriculture Strategic Development Plan (ASDP, 2014-2018) to elaborate the objectives, outcomes, outputs, and activities of the MAFF. The Ministry of Health has developed the National Nutrition Program (2009-2015) for nutrition related interventions to improve the nutritional status of women and children and to reduce morbidity and mortality. The National Social Protection Strategy (2011-2015) was developed jointly by CARD, line ministries, and DPs to outline a legal basis for providing social services to the poor and vulnerable.

In addition, rice is given specific strategic priority through the Policy Document on the Promotion of Paddy Rice and Production and Export of Milled Rice (2010). This strategy was developed by the Supreme National Economic Council, which focuses on infrastructure, marketing, finance, and export. Cambodia is also a member of the Association for South East Asian Nations (ASEAN) Integrated Food Security Framework, which provides a joint scope for cooperation in addressing long-term food security issues in the ASEAN region.

CAPACITY FOR POLICY CHANGE INDICATORS

a. Clearly Defined and Consistent Policy Framework
   Status: Yellow
   Cambodia has a clearly defined policy framework, which is consistently enforced from year to year (FAO, 2014). Priorities are articulated at the national level through the Rectangular Strategy III and the NSDP, and all sector strategies should be aligned to these documents. However, in practice there are challenges in aligning sector strategies, as line ministries often operated as independent silos. This is particularly evident for the NSFSN. The NSFSN was developed by CARD and sets out to provide a clear strategic framework to coordinate and implement food security policy. However, CARD has no authority to implement the strategy and it is not clear how NSFSN relates to the sector strategies. Some government and DPs interviewed view the NSFSN as the primary document to coordinate and guide the line ministries on food security, nutrition, and social protection. Other stakeholders view the NSFSN as a compliment to sector strategies, providing an opportunity to fill in the gaps of the existing strategy, particularly as it related to smallholder farmers.

b. Predictability and Transparency of the Policy Making Process
   Status: Red
   Government commitments to agriculture and food security are clearly articulated and addressed in national policy documents. However, Cambodia suffers from a high level of corruption in public governance. In an effort to curb this problem, Cambodia introduced an anti-corruption law in April 2010 and established Anti-Corruption Units to monitor corruption. Despite this initiative, Cambodia remains 160 out of 177 country in transparency of governance (Transparency International, 2013). Transparency on public financial allocation, management, and expenditure is also lacking, with no public access to financial information from the Ministry of Economy and
Finance and the line ministries. The Open Budget Survey (2013) found that Cambodia scored worse than every ASEAN country, with the exception of Burma, in budgetary transparency and the availability of budgetary and financial information. The National Assembly has a website where information on laws and activities are posted. However, the information accessible is thin and lacks detailed descriptions of draft laws or financial expenditures (Transparency International, 2014).

c. **Clear and Functional Legislative System**  
   **Status: Green**  
   In 1993, Cambodia adopted a constitutional monarchy, with the Prime Minister serving as the head of government and the King as the head of state. The National Assembly votes and appoints the Prime Minister, while the Royal Council chooses the King. There is a clear process for legislative drafting in Cambodia and the legal framework provides for independence and accountability. Ministries are responsible for the formulation of policies and laws, and each ministry has a legislation department. The Council of Ministers is responsible for endorsing draft laws before sending to the Parliament and Senate for promulgation. The Constitutional Council then reviews all approved laws by before submitting to the King to be signed into law. The National Assembly has a website where information on laws and activities are posted.

d. **Appropriate Dispute Resolution Process/Judicial Framework**  
   **Status: Red**  
   Cambodia’s judicial system is regarded as the weakest and most corrupt state institution. Political interference, understaffing, inadequate training, and limited financial resources undermine effective functioning. In addition, while the Constitution guarantees separation of power between the Executive and Judiciary, in practice the Executive exerts heavy influence through the provision of resources and judicial appointments. Nearly all stakeholders interviewed noted the influence of powerful government officials and rich business individuals. As a result, agricultural land disputes and land grabbing pose major challenges to effective food security policy. There are also ineffective judicial frameworks to address business disputes related to agriculture. In 2013, the National Arbitration Centre began operating to provide a credible avenue for commercial dispute resolution, although its effectiveness will remain constrained by the ineffective judiciary.

e. **Clearly Defined Institutional Responsibilities**  
   **Status: Yellow**  
   Cambodia has clearly defined roles and responsibilities for food security at the policy level. CARD is working to bridge gaps between line ministries and to reduce parallel structures for food

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6 Transparency International Cambodia, 2014, Corruption and Cambodia’s Governance System: The Need for Reform

7 Transparency International Cambodia, 2014, Corruption and Cambodia’s Governance System: The Need for Reform
security, nutrition, and social protection. It has increased coordination at the central level, but in practice, tasks and responsibilities remain overlapping. Both MAFF and MOWRAM, for example, have responsibilities for agricultural irrigation, but do not effectively coordinate on the TWGAW. Additionally, ministries and DPs tend to operate in silos, leading to weak complementarity among programs. Limited funding often leads to strong competition for resources. There are also challenges with ministries receiving conflicting instructions from the Ministry of Planning and the Ministry of Finance, both of whom considered themselves central to the planning process. To resolve this issue, a Working Group for Budget Preparation was formed, and a three-year, rolling-budget strategic plan, and a one-year, annual-budget plan was introduced.

CONCLUSIONS
The government has a strong commitment to improve agriculture and food security and Cambodia has developed many policies and strategies to improve rural food security and livelihood in recent years. The NSFSN sets out to provide a clear strategic framework to coordinate and implement food security policy, however it is not clear how NSFSN relates to sector strategies. Some government and DPs interviewed view the NSFSN as the primary document to coordinate and guide the line ministries on food security, nutrition, and social protection. Other stakeholders view the NSFSN as a complement to sector strategies, providing an opportunity to fill gaps in the existing strategy, particularly as it relates to smallholder farmers. This lack of clarity is likely to cause implementation challenges, and this is discussed further throughout the report.

POLICY ELEMENT 2: POLICY DEVELOPMENT AND COORDINATION

Cambodia has a well-developed and comprehensive system for the development and coordination of agriculture and food security policy. There has been a greater willingness from the government to drive the policy agenda, but most sector strategies remain primarily driven by development partners, while inter-ministerial coordination is a continuing challenge.

OVERVIEW
While power remains heavily concentrated with the Prime Minister, policy development in Cambodia has been shifting from a top-down approach to a more inclusive process involving multiple stakeholders across government, DPs, and civil society. The General Directorate of Planning within the Ministry of Planning is responsible for national policy planning and coordination, but there are no specific rules or regulations regarding the policy development process at the ministerial level. All policies need to be approved by the Council of Ministers, first at a technical level, then at the inter-ministerial level.

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8 For farms less than 200 hectares, MAFF is responsible, but for larger farms MOWRAM assumes responsibility.
For food security, **CARD** is responsible for providing policy guidance, effective coordination, and monitoring and evaluation. CARD has a very inclusive approach to policy development, utilizing the **Technical Working Group for Social Protection, Food Security, and Nutrition (TWG-SP&FSN)** as the primary vehicle for policy making. TWG-SP&FSN comprises 48 government, DP, and civil society organizations, and is chaired by CARD. During the development of the NSFSN, TWG-SP&FSN took the lead in deciding the key objectives of the strategy. A **Core Group** of 20 members was chosen to draft the policy with the help of an international consultant. The findings of the report were then shared with TWG-SP&FSN and the **National Food Security Forum**, a monthly meeting of a broad base of civil society, DPs, and government officials.

Within MAFF, there is an extensive system for policy development and coordination. **MAFF-DPS** is responsible for agricultural policy formulation and monitoring. MAFF-DPS is currently in the process of developing the ASDP. In drafting this strategy, MAFF-DPS formed an **MAFF Internal Technical Working Group (MAFF-TWG)** comprising representatives from the MAFF departments and chaired by the Under Secretary of State. MAFF-TWG first underwent a thorough review of existing national strategies and an evaluation of previous agricultural projects and programs. An extensive consultation process with technical departments and at the province level was also conducted, and workshops were held to seek feedback on programs, program indicators, and financial costs. Once the draft strategy is completed, the draft will be circulated to the government-donor **Technical Working Group on Agriculture and Water (TWGAW)** for feedback. After review by the TWGAW, there will be consultations with private sector and civil society, as well as other ministries.

For sub-sectoral agricultural policies, the **Policy Advisory Committee**, comprising the heads of all technical departments and chaired by the Secretary of State, sets overall policy direction. The relevant technical departments take the lead on drafting policies, and each technical department has a planning unit. Due to capacity constraints, MAFF will usually ask DPs for technical assistance in supporting the development process. For example, in the draft Agricultural Extension Policy, the **General Directorate of Agriculture** established a core team to provide technical support. The Core Team has been taking the lead in preparing the policy in an inclusive process supported by the USAID HARVEST project.

If there is a requirement to draft a corresponding law, it is the responsibility of the technical departments to draft the strategy. The **MAFF Department of Agricultural Legislation** is available to support the process, but limits its responsibility to supporting the review of drafts.

**CAPACITY FOR POLICY CHANGE INDICATORS**

a. **Approved Food Security Strategy/Investment Plan**  
   **Status: Yellow**  
   The Prime Minister approved the NSFSN in August 2014. A matrix of major food security and nutrition programs and projects was included in the strategy, and CARD is now seeking additional information from line ministries and DPs to update the matrix. However, there is currently no investment plan included in the strategy, and uncertainty about the financial resources required to implement the strategy remains.
b. **Predictable Policy Agenda and Priorities Developed**

*Status: Yellow*

A clear policy agenda is provided in the NSFSN, which is aligned with the Rectangular Strategy III and the NSDP 2014-2018. The NSFSN contains three objectives, priority areas under each objective, and associated priority actions. MAFF is currently in the process of drafting the ASDP, and it is unclear how line ministry priorities will align to the NSFSN. There is also a disconnect between policy priorities, which are based on CARD and line ministries needs, and implementation priorities, which are based on the availability of finance.

c. **Annual Work Plans**

*Status: Red*

For food security and nutrition, there are currently no completed annual work plans developed for implementation of the NSFSN, although the Prime Minister has prioritized their development. Line ministries are responsible for the drafting sector action plans, which will then be submitted to CARD to consolidate into an annual work plan coordination framework. The annual plan will be developed on the basis of two sources of budget allocations: the national budget to sectoral ministries, approved by parliament, and the DP budget allocations. However, there is currently no indication of the funding requirements of NFSNP, and it is unclear what the funding gaps are and what DPs will be expected to support. The Ministry of Health is currently bringing in an international consultant to do an action and investment plan for nutrition, supported by UNDP, but there is a need to develop investment plans for each of the other ministries.

d. **Functioning Coordination Process**

*Status: Yellow*

CARD serves as the primary agency responsible for coordinating policy development for food security and nutrition policy, social protection, and the One Village One Product initiative. CARD has well developed mechanisms for inter-ministerial coordination through the Core Group and the TWG-SP&FSN and the high-level support of the Deputy Prime Minister who chairs CARD. However, the impact of this coordination is severely limited by unclear roles and responsibilities between CARD and line ministries, and a lack of political enforcement power within CARD. CARD does not have a role or budget for implementation and thus no incentives to offer line ministries to engage in policy coordination. As a result, it serves more as a stocktaking agency than a coordination body.

e. **Secretariat/Administrative Support Function**

*Status: Yellow*

CARD acts at the secretariat for the coordination of food security and nutrition activities, including the TWG-SP&FSN, the Core Group, and the National Food Security Forum. Within the

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9 An initiative to promote local products and services, generate rural employment opportunities, and boost incomes, by selling products to cities and regional markets.
agricultural sector, TWGAW has its own secretariat and acts at the coordination body for MAFF and MOWRAM. TWGAW was regarded as functioning effectively, but a change in government co-chairs as a result of the 2013 election and a loss in financial support for the working group secretariat led to operational difficulties. The EU will now be providing support through a national expert, which will sit in the secretariat.

f. Technical Capacity
Status: Yellow
Staff capacity is a major challenge for both CARD and the line ministries, particularly in the area of nutrition. The technical capacity for policy planning and development is limited and relies heavily on external technical assistance. Within CARD there are around 30 staff members, which works out to only two to three staff per unit. CARD also has difficulty in hiring qualified staff that are fully competent in English, with staff preferring to work for the line ministries where there are clearer promotion opportunities. The capacity within MAFF-DPS for policy development and coordination is stronger. MAFF-DPS was able to draft the ASDP with limited external assistance. There are also planning officers in each of the MAFF technical departments who have received training and skills development through numerous DP projects. The internal TWG, chaired by MAFF-DPS, effectively played the role of coordination body for technical departments to develop the ASDP. However, the technical capacity within the departments to draft legislation is limited, which results in substantial delays. As a result, there are currently a number of key laws pending, including the Plant Protection and Sanitary and Phytosanitary Law and the Quality and Safety of Agricultural Products Law. Capacity gaps are discussed further in Policy Component 5 – Policy Implementation.

g. Political Support and Approval
Status: Green
The Food Security Policy of Cambodia has been strongly supported by high levels of government officials such as the Prime Minister and Deputy Prime Minister who chairs CARD. In August 2014, the Prime Minister put his strong support behind food security when launching the NSFSN and has even provided his own recommendations to support implementation.

h. Engagement of Parliament/Legislative Body
Status: Red
Power in Cambodia is heavily centralized with the Prime Minister and a lack of legislative capacity means that, in practice, drafting power has been almost exclusively delegated to the Executive (Transparency International, 2014). As a result, the Executive is able to formulate and carry through any particular act of legislation quickly and without much negotiation with the legislative.
CONCLUSIONS
There is a well-developed system for the development and coordination of food security and nutrition policy in Cambodia. Effective policy analysis and cross-ministerial coordination is achieved through the TWG-SP&FSN, the Core Team, and the National Food Security Forum, while secretariat support is provided by CARD. This system is far more sophisticated than most other Feed the Future countries studied, and bears similarity with Bangladesh, which has strong systems for effective policy coordination and analysis. Policy development is particularly robust at the sub-sector level, where DPs are providing technical support to a MAFF led process.

However, despite the strong institutional structures, substantial gaps in the policy making process remain. Large sector strategies, such as SAW and NSFSN, are largely driven by the needs of DPs. There are also poor linkages between policy formulation and development. While CARD provides an inter-ministerial coordination mechanism, the line ministries retain a high degree of autonomy. As a result, CARD has little political power for enforcement and serves more as a stocktaking agency. Under the current process, line ministries will develop action plans to support implementation, and CARD will combine these action plans into a single document. However, each ministry will promote its own agenda, which is largely based on the availability of funding from DPs. Additionally, this process does not provide for a transparent discussion about resourcing. There is no system for estimating the resource commitments needed for the implementation of NSFSN, the current funding commitments from ministries and DPs, or the remaining funding gaps.

RECOMMENDATIONS
1. **Develop investment plan for the NSFSN and prioritize activities:** The NSFSN currently includes a matrix of programs and projects related to food security and nutrition that are currently being implemented, but there is no clear indication of the government commitments or the total financial cost in implementing the strategy. The Ministry of Health is currently bringing in an international consultant to do an investment plan for nutrition, but there is a need to develop an investment plan for each of the ministries. An overall investment plan needs to be developed for the NSFSN that outlines existing and DP resources, and the remaining funding gaps.

2. **Build the authority of CARD by strengthening its capacity to support line ministries:** CARD’s ability to enforce coordination between line ministries is limited by an inability to offer line ministries any incentive to engage in the process. The authority of CARD is constrained by its resources, but if CARD received support from the DPs to offer capacity building, such as skilled training and assistance in developing monitoring and evaluation frameworks, line ministries would have more incentive to coordinate within the CARD structure.

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10 In Nepal, for example, the policy analysis unit responsible for coordinating policy within the Ministry of Agriculture was found to have three full time analysts, while in Uganda the policy analysis unit was found to have two.

11 In Bangladesh, the Food Policy Monitoring Unit serves in a similar capacity to CARD, providing coordination and administrative support for the formulation of food security policy.
POLICY ELEMENT 3: INCLUSIVITY AND STAKEHOLDER CONSULTATION

There are numerous forums in operation for consultation with the private sector and civil society, and a growing openness on behalf of government to engage in open policy dialogue. Civil society has been effective in engaging in the policy development process through consultative groups such as the NGO Forum. In comparison, the private sectors’ role remains limited by a lack of capacity.

OVERVIEW

While there is no one central private sector umbrella association for agriculture and food security, there are a number of sector specific associations in operation. These include the Cambodia Farmers Association, the Federation of Agricultural Producers, the Cambodia Rice Exporters Association, the Cambodian Organic Agriculture Association, and the Cambodian Federation of Employers and Business Associations.

The Government-Private Sector Forum (G-PSF) is the primary public-private consultation mechanism in Cambodia. The G-PSF was established in 1999 to provide consistent and reliable dialogue, build trust, and encourage private sector investment. There are two primary levels of dialogue within the G-PSF. Private Sector-only Working Group (PSWG) meetings are open to business associations and private companies and are held once a month to agree on issues to raise with government counterparts. Joint government-private sector working group meetings are held on request to discuss problems and recommendations for solutions. There is a dedicated Working Group on Agriculture and Agro-industry. A bi-annual ‘Forum’ meeting with 600 government officials, business leaders, and DPs is also held, where issues still pending can be discussed. Decisions by the Prime Minister at this forum are binding (IFC, 2009). The Council for Development in Cambodia (CDC) acts at the Secretariat, and an IFC and Cambodian Chamber of Commerce supported Coordinating Bureau provides secretariat and coordinating functions across the eight Working Groups.

There are an 1,350 active civil society organizations (CSOs) in Cambodia, with total annual expenditure by international and local NGOs in Cambodia estimated at $600-700 million, which is comparable to current government expenditure on social services (CCC, 2013). A number of umbrella organizations are engaged in policy advocacy for agriculture and food security. The Cooperation Committee for Cambodia (CCC) is the oldest and largest member-based organization, which supports CSO governance, organizational strengthening, research, and policy advocacy. The NGO Forum is a network of CSOs that conducts policy analysis, monitoring, and advocacy. It has four project areas: aid effectiveness, national development strategies, economic development, and national budget. The NGO Forum also runs the Cambodian National Budget website that collects all publically available budget information.

CAPACITY FOR POLICY CHANGE INDICATORS

a. Inclusive Participation within the Policy Coordination Management Entity
Status: Yellow
There are mechanisms in place for consultation with the private sector and CSOs at the national level through the G-PSF and the NGO-Consultative Forum. For food security policy, CSOs are included in policy coordination with CARD through their representation on the TWGs. The private sector is not represented in either of these bodies.

b. Outreach and Communications
Status: Green
The National Food Security Forum serves as the primary mechanism for interacting with stakeholders and sharing information on food security policy.

c. Private Sector Participation – Opportunity/Space
Status: Yellow
The G-PSF plays a key role in fostering intra-governmental coordination and information exchange on private sector development challenges and has received high marks for organizational effectiveness and impact during independent evaluations (IFC, 2009). However, for agriculture and food security policy development, the private sector noted that it was never contacted directly by the government to provide feedback during the consultation process and was often asked for facilitation fees if they wanted to talk to high-level government officials. MAFF has indicated that it will organize a private sector roundtable during the consultation process on ASDP, which will be the first time they have done so. The private sector noted much stronger cooperation with DPs. DuPont, for example, is currently in discussions with USAID to co-implement extension services across a number of districts.

d. Private Sector Participation – Capacity to Participate
Status: Red
Private agribusinesses noted that agricultural associations lack sufficient financial and human resources to effectively articulate policy stances or to provide evidence-based research to propose constructive solutions.

e. Participation of CSOs – Opportunity/Space
Status: Yellow
CSOs are broadly represented in a number of forum including the Cambodian Development Coordination Forum, as well as on most of the 19 Technical Working Groups (discussed in Policy Element 6). CSO relations with the government are generally characterized by mistrust and suspicion, although the relationship is stronger in the field of agriculture and food security. While there are no legal constraints on the operations of CSOs, civil society views the registration and

12 www.camfeba.com/en/gpsf.htm
operation procedures as complex and onerous (CCC, 2013). In addition to registration, CSOs are required to sign agreements with a government ministry, resulting from different interpretations of processes and unofficial fees needed to move the process along. There is currently a pending draft law on NGOs, designed to simplify the processes for forming and operating a CSO. However, concerns have been raised by civil society that this law could restrict freedom of expression (CCC, 2013).

f. Participation of CSOs – Capacity to Participate

Status: Yellow

The NGO Forum serves as the primary CSO representative body for policy discussions with the government, and stakeholders reported mixed capacity. Some NGOs interviewed were happy with the capacity of the NGO Forum to articulate and communicate policy positions, and to provide evidence-based analysis to support their viewpoints. However, other stakeholders noted a poor response rate when policy drafts have been sent for their contribution. It was reported, for example, that the draft Extension Policy has been sent to the NGO Forum but no response has been articulated.

CONCLUSIONS

There are numerous forums in operation for consultation with the private sector and civil society, and an expression of growing desire by government to engage in open policy dialogue. Civil society has been effective in engaging in the policy dialogue, although concerns remain about the capacity of the NGO Forum to serve as the primary representative group on agriculture and food security issues. The level of CSO representation within the TWGs is much greater than in most other Feed the Future countries studied.

On the other hand, the overall capacity of the private sector to constructively engage in the policy process remains limited. There is no umbrella organization serving as the collective voice for agribusiness, and the capacity of the sector associations to engage in policy advocacy is virtually non-existent.

RECOMMENDATIONS

1. **Provide capacity building and training to associations:** In line with the intention of MAFF to seek greater private sector participation in the development of an ASDP, associations require capacity building to better articulate their policy positions, to generate some level of evidence-based analysis to support their views, and to offer constructive recommendations for reform.

2. **Host roundtables with private sector associations to establish a coordination system for shared policy priorities:** There is currently no forum for regular coordination between sector

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13 The rules governing the registration and operation of CSOs are outlined in primarily by the Civil Code of Cambodia 2007, but also supplemented by a variety of additional laws and regulations.
associations on policy priorities and advocacy. A meeting of sector associations should be convened to determine the best mechanism for coordination, and if needed, capacity building or financial support should be provided to set up a secretariat to support administrative functions.
POLICY ELEMENT 4: EVIDENCE-BASED ANALYSIS

Access to, and availability of, agricultural data is critical to effective policy formulation. Considerable achievements have been made in strengthening information and knowledge management systems for agriculture and food security. However, a number of considerable gaps remain in terms of linkages between institutions, the use of information by policy makers, and the financial support for maintaining the existing systems.

OVERVIEW

Food security and nutrition information is recognized as a key element in achieving the food security objectives of the NSFSN. There are numerous agencies involved in data collection, and the infrastructure for evidence-based analysis to support agriculture and food security policy has been strengthened considerably over the past decade (CARD, 2014). CARD plays a leading role in strengthening national food security and nutrition systems. In 2004, the Food Security and Nutrition Information System (FSNIS) was established within CARD to provide a single government platform for food security and nutrition. The mandate of FSNIS is to support improved policy formulation and analysis by disseminating existing food security and nutrition information, facilitating the exchange of information among stakeholders, and providing a repository for relevant documents. In 2006, the Food Security and Nutrition Information Task Force was created under the TWG-FSN (now the TWG-SP&FSN) with the goal of enhancing coordination on food security information and establishing core indicators for food security and nutrition. Under this task force, a Food Security and Nutrition Data Analysis Team was charged with regular analysis of the national food security situation and publishing a quarterly Food Security and Nutrition Quarterly Bulletin. The goal of the bulletin is to provide policy makers with regular evidence-based analysis on trends and threats related to food security and nutrition. In addition, a number of additional food security analysis systems have been created by DPs in partnership with government agencies, including the Cambodian Food Security Atlas implemented by the World Food Programme (WFP) and the Integrated Food Security Phase Classification by WFP and FAO (CARD, 2014).

For agriculture, the Agricultural Statistics Office (ASO) under MAFF-DPS is responsible for the collection and dissemination of agricultural statistics and agricultural surveys. Field data is collected through local MAFF offices (provincial departments of agriculture and district agricultural offices), organized at the department level, then sent to ASO. Data collection is primarily focused on crops areas, yields, and production; pest and insect damage; the use of fertilizer, pesticides, and seeds; agricultural machinery in operation; numbers and types of livestock; fish caught and processed; and wood and

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14 Comprising CARD, MAFF, MOWRAM, MOP, MOH, and NCDM
15 In a collaboration between multiple government agencies including CARD, MAFF, MoWRAM, MoH, and NIS, with technical and financial support from WFP, UNICEF, FAO and the WHO
rubber utilization and export. ASO produces weekly crop production and rainfall updates, yearly yield and production reports, as well as specialized surveys carried out on request by MAFF. The Agricultural Marketing Office (AMO) under MAFF-DPS is responsible for the collection and dissemination of wholesale and retail prices in agricultural markets, formulating policies and strategies for the development of agricultural marketing systems, and monitoring food and nutrition information. AMO collects wholesale price information on 160 commodities across 24 provinces three times per week and retail price information in 22 major markets once a week. The price information is disseminated through bulletins, online, radio, and by SMS.

Cambodian Agriculture Research and Development Institute (CARDI) is a semi-autonomous body that serves as the primary agricultural research body in Cambodia. CARDI is independent in terms of its personnel and financial management, but reports through MAFF channels in a similar capacity to technical departments. CARDI conducts research in six practice areas: plant breeding, plant protection, soil and water sciences, agro-engineering, socio-economic sciences, and agronomy and farming systems. CARDI has an number of collaborations within international research institutions, including: the Australian Center for International Agricultural Research, International Rice Research Institute, Japanese International Cooperation Agency, Korean International Cooperation Agency, University of Kingston, University of Western Australia, and the FAO.

CAPACITY FOR POLICY CHANGE INDICATORS

a. **Economic and Financial Analysis Completed as a Component of Planning:**

   **Status:** Red

   The NSFSN was based on an extensive review of past strategies and involved multiple reviews by ministries, DPs, and civil society. However, the strategy lacks any financial analysis of the cost of the strategy, or the funding gap required for implementation.

b. **Performance Monitoring Measures and Targets Developed**

   **Status:** Yellow

   The NSFSN contains a set of indicators for each of the three objectives of the strategy. The indicators are based on the previous Strategic Framework for Food Security and Nutrition in Cambodia (2008-2013), with additional indicators included for nutrition. These indicators, however, are not aligned with the performance indicators of the line ministries. As a result, there is little complementarity between the NSFSN and sector strategies (discussed further in Policy Element 5 – Policy Implementation). Provisional indicators are also included to monitor institutional arrangements for implementation, although the strategy notes that these targets still need to be updated and refined.

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c. **Quality Data Exists for Policy Monitoring**  
*Status: Yellow*

Stakeholders regard the quality of agriculture and food security data as sufficient to promote informed policy making. Numerous institutions are involved in data collection and there is a comprehensive system for food security data collection through FSNIS. For agriculture, however, MAFF does not have an adequate system for regular data collection and relies heavily on the sub-national departments and offices to provide agriculture data, leading to data reliability issues. In 2013, the National Institute of Statistics and the ASO conducted the first agricultural census, with support from FAO, USAID, and Australian AID. In line with the census, it was also agreed to create additional capacity within the National Institute of Statistics and MAFF-DPS to conduct agriculture surveys to keep the information updated.\(^{18}\)

For agricultural research, CARDI has a strong strategic framework. This was developed with support from Australian AID, but this funding was removed in 2010. An ADB loan to the government was supposed to supplement this funding, but the government commitment never materialized. As a result, CARDI suffers from a number of constraints including limited research facilities, limited numbers of qualified staff, and a small research budget.

d. **Quality Data Available for Policy Making**  
*Status: Red*

Despite the strong information and knowledge management systems for agriculture and food security, quality data is not always readily available. This is due to weak linkages between the various systems and a poor culture of information sharing among institutions. While the Food Security and Nutrition Quarterly Bulletin is regarded by stakeholders as a successful dissemination tool, as of September 2014, the FSNIS web portal was offline due to the closure of the FAO project supporting the system. Similarly, within MAFF there is no clear mechanism for the dissemination or sharing of information. The MAFF website is poorly functioning and the document center is inactive.

e. **Inclusion of Analysis in the Policy Development Process**  
*Status: Yellow*

There is a growing acceptance within government of the importance of evidence-based analysis for agriculture and food security, which has been largely achieved through the support and leadership of CARD. However, decision making remains largely top-down and the absence of adequate monitoring and evaluation systems results in a lack of performance based review for further policy development (see Policy Element 5 – Policy Implementation).

\(^{18}\) Further information on the census is available here: [http://coin.fao.org/coin-static/cms/media/15/13617866689400/agriculture_census_.pdf](http://coin.fao.org/coin-static/cms/media/15/13617866689400/agriculture_census_.pdf)
f. **Annual Performance Measurement Report Produced and Reviewed**
   
   *Status: Green*

   Annually, the Deputy Prime Minister responsible for CARD has presided over the Annual National Food Security Conference. Monthly or bi-monthly meetings are carried out to track progress and there is an annual review meeting to discuss progress.

g. **Independent Analysis Capacity Exists**
   
   *Status: Green*

   There is a strong capacity for independent agriculture and food security policy analysis. Several institutes are involved in policy research; including the Cambodia Development Resource Institute (CDRI) and the Royal University of Agriculture. International research institutes such as the International Food Policy Research Institute (IFPRI) and Michigan State University also provide policy analysis support.

**CONCLUSIONS**

Considerable achievements have been made to strengthen information and knowledge management for agriculture and food security. Under the leadership of CARD, with technical support from the TWG-SP&FSN, national food security documents are conducted on the basis of detailed economic analysis and extensive consultations. However, a number of considerable gaps remain in terms of linkages between institutions, the use of information by policy makers, and the financial support for maintaining the existing systems. These gaps are identified as priority areas within the NSFSN and the TWG-SP&FSN has been recognized as the primary mechanism to support improved coordination and dissemination. Proposed actions include: strengthening the integration and harmonization of TWG-SP&FSN information and knowledge management systems, strengthening the capacities within TWG-SP&FSN for data analysis, and improved content management through FSNIS.

**RECOMMENDATIONS**

1. **Support the redevelopment of the FSNIS**: FSNIS has been identified in the NSFSN as a key tool for planning and decision making. However, FSNIS is currently offline and there is no clear indication of where continued funding will come from. Support should be provided to redevelop the website within the framework of the NSFSN. Included in this system should be an improved data management system to track metrics on users of the website. This would provide information on the effectiveness and use of the information available on the website.
POLICY ELEMENT 5: POLICY IMPLEMENTATION

Despite a strong policy framework, policy implementation is limited by a lack of resources, insufficient coordination mechanisms, poor human resource capacity development, and weak monitoring and evaluation.

OVERVIEW
Policy implementation for agriculture and food security in Cambodia depends largely on external financial and technical resources support, with the majority of projects implemented by DPs. Overall, the Council for Development of Cambodia is responsible for coordinating and monitoring donors, CSOs, and private sector implementation through the TWGs. The Ministry of Planning is responsible for implementing the NSDP and should play a coordinating role to ensure that the line ministries implement their national strategies and policies in line with the Rectangular Strategy III and the NSDP, although this role in limited in practice. For the implementation of the NSFSN, CARD is the primary coordination agency but does not have any mandate for implementation. Authority for implementation lies with the relevant line ministries and DPs.

Within MAFF, the responsibility for implementing agricultural projects lies with the technical line departments and sub-national departments and offices (provinces, districts, and communes), with management and coordination oversight provided by MAFF-DPS. Government funded project activities are usually designed by the technical line departments, who first draft a project proposal. This proposal will be sent to the relevant directorate for review (for example the General Directorate of Agriculture). If the directorate approves, then the draft is sent to the Secretary General’s Office, who will coordinate the Department of Accounting and Finance on the budget and the MAFF-DPS for how the project will align with the overall sector strategy. Once endorsed by the Secretary General’s Office, the proposal is sent to the relevant Secretary of State for approval. Once approved, the technical line department will begin responsibility for implementing, and will coordinate with the provincial level as required. Annual reporting of results is conducted by the technical line departments, and sent to MAFF-DPS for collection and analysis.

Given the severe budgetary and human resource constraints at the technical departments, most projects related to agriculture and food security are implemented by DPs, civil society, or the private sector. Implementation of these activities is very siloed, with partners often working directly with technical or provincial departments without coordinating with the central MAFF structure. However, recently MAFF has announced that all DP and CSO activities must go through the Department of International Cooperation first for approval.

CAPACITY FOR POLICY CHANGE INDICATORS
a. Implementation Plans Developed
   Status: Red
Within MAFF, each technical department has to develop two work plans: 1) an annual work plan and 2) a three-year, rolling plan. All activities in the three-year, rolling plan are indicative activities, while the annual work plan activities are more predictive with adjustments based on lessons learnt from the previous year. However, these work plans are developed on the basis of sectoral strategies, not the NSFSN, and are not tied to activity budgets. Recently, the Ministry of Economy and Finance has requested that ten ministries change from the existing chapter budgeting system to a new program-based budget plan modality. MAFF, as well as CARD, will be required to switch to this system, which will serve to more closely tie funding to activities, however it is not clear yet whether MAFF has the capacity to adopt this new system.

b. System in Place to Analyze Implementation Capacity Constraints
   Status: Red
   For CARD, there is a bottom up and multi-sector approach, which starts with the line ministries and National Food Security Forum and works its way up through the Core Team to the WG-SP&FSN. However, as CARD is just a coordination body, its capacity to analyze and act on implementation constraints is limited. Within MAFF, the Office of Monitoring and Evaluation (M&E) in MAFF-DPS is responsible for collecting and analyzing implementation constraints, although it’s capacity is limited and it relies on self-reporting from the technical departments.

c. Food Security Policy Priorities Aligned with Line Ministries Work Plans
   Status: Yellow
   Food security policy priorities, as outlined in the NSFSN, should be aligned with the work plans of the line ministries, as the strategy was developed through an inclusive process involving all six line ministries. However, while CARD views NSFSN as a guiding strategy document, line ministries and some DPs view it as a complimentary strategy. As mentioned above, the line ministries have been instructed to develop their annual work plans, and it is not yet clear how both strategies will relate to each other.

d. Policy Implementation Budget Committed by Host Country
   Status: Red
   Given the current chapter-based budgeting system within line ministries and the lack of an investment plan for the NSFSN, there is a lack of financial transparency over the current government commitments to the policy. Based on the National Annual Budget Law 2014 approved by Parliament, MAFF has received national annual budget allocations of approximately US$44 million to support both national and sub-national levels. This budget allocation breaks down into $3 million for MAFF administration, $40 million for sectoral system support, and $1 million for provincial agriculture departments.

e. Supplemental Implementation Funds Secured
   Status: Yellow
DPs contribute around $30 million annually to support smallholder agriculture farming techniques, private sector development through market innovation, climate change, extension, dissemination of new technologies, and agricultural research, although funding shortfalls continue to exist.

f. **Administrative and Technical Capacity of Staff to Implement Policy Change**
   
   **Status: Red**
   
   Insufficient capacity within CARD and MAFF is frequently cited as a key constraint to policy implementation. This is evident within CARD, where a lack of resources means the organization has no administrative and technical capacity to implement policy change. Instead it relies on the line ministries and DPs for implementation. Clear capacity gaps can be found across all technical departments within MAFF, particularly in the areas of project management, budgetary planning, and performance monitoring. As the majority of projects are implemented by DPs and civil society independently from the technical departments, there is a limited skills transfer.

   Low government salaries across government create challenges in attracting and retaining qualified staff. However, in addition to a capacity gap, there is also an issue of underutilized capacity. Through government and DP support, MAFF staff has benefited from domestic and international training and capacity building initiatives. The Cambodia Agriculture Productivity Improvement Project\(^\text{19}\), for example, sent over 100 MAFF employees on international placements. The challenge is that these gained skills are not fully utilized within the MAFF system. Trained staff are not given opportunities to apply their skills, with incentives and promotions more closely tied to political connections than performance. As a result, they are often attracted to higher paid jobs with the private sectors and donors.

g. **Monitoring and Evaluation (M&E)**
   
   **Status: Red**
   
   The department of M&E within CARD is responsible for tracking progress against strategic indicators and activities stated in the NSFSN and is reported at the TWG-SP&FSN on a monthly, quarterly, bi-annual, and annual basis. CARD has limited capacity to conduct M&E and relies exclusively on reporting from the line ministries. Within MAFF, there is a dedicated M&E unit within MAFF-DPS. This unit collects M&E data from the technical departments, provides M&E support to DP projects when invited\(^\text{20}\), and prepares a report on the TWGAW performance and progress towards the Joint Monitoring Indicators (see Section 6 – Mutual Accountability). MAFF produces an annual performance review each March, and conducts a workshop to discuss findings and the Deputy Prime Minister in charge for CARD presides over the annual national conference. Despite this framework, there is no systematic approach to M&E across government,

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\(^{19}\) Implemented by the International Fund for Agricultural Development

\(^{20}\) DPS provided M&E support to three JICA projects in 2013-2014
and no effective feedback loop for feeding the results of project implementation into the policy development process. The existing budgetary reporting system also does not provide any financial transparency related to tracking project activities.

**CONCLUSIONS**

Great progress has been made in laying the foundation for agricultural growth in Cambodia. There is a strong policy framework to support agriculture and food security, and a growing sense of ownership of the process within the government. However, there remains a persistent gap between policy development and policy implementation. Due to limited government funding, implementation is almost entirely dependent on external project funding. However, in addition to the resource gap, there are a number of other factors limiting the effectiveness of implementation. These include insufficient coordination mechanisms, inadequate policy implementation skills, poor human resource capacity development and management, and weak monitoring and evaluation.

*Lack of a coordination body for implementation:* Project implementation by line ministries and DPs is largely uncoordinated, leading to overlapping and weak complementary among programs. Within MAFF, DPs and CSOs have been coordinating with various technical departments and provincial offices, often without central planning from MAFF. It is also not clear who is responsible for ensuring implementation of the NSFSN, with CARD very clear that they do not play a role in implementation. The TWG-SP&FSN may have the best holistic picture of implementation, but does not have the political strength to hold line ministries accountable.

*Project implementation skills:* The challenge of insufficient technical capacity with CARD and MAFF is well documented and receives the attention of a number of DPs. However, while CARD and MAFF have been receiving support in policy analysis and development, but there is currently no support for project implementation, particularly at the level of the technical departments who are the primarily implementers of MAFF projects. There is a need to support technical departments with training in project management, including proposal writing, budgetary management, and performance monitoring.

*Human resource capacity development:* While there are clear capacity gaps and inadequate financial incentives for government staff, MAFF also suffers from an issue of underutilization of existing capacity and resource skills. MAFF has benefited from numerous capacity building exercises, with staff receiving overseas training and placements. However, staff are often not given the scope or opportunities to put their skills into practice. Each technical department should have its own plan for capacity building and utilization, but there is no centralized strategy within the MAFF Department of Human Resources Development and Personnel. There is a need for a clear approach to assess the human resources capacity within line ministries and a strategic plan to support human resource capacity development.

*Monitoring and evaluation:* The current M&E systems within MAFF are not sufficient to monitor technical departments and provide an effective feedback loop on both policy and project implementation. The new requirements for MAFF to switch to program based budgeting offers a window of opportunity to
assess and reform monitoring and evaluation capabilities within MAFF. At the moment, MAFF has instructed all technical departments of the need to switch to project based evaluation, but there has been no joint systemic plan developed from MAFF-DPS and Department of Accounting.

RECOMMENDATIONS

1. **Provide support to the MAFF Department of Human Resources to develop a Human Resource Capacity Development Plan:** This support can be provided in the form of technical assistance and should include: 1) needs assessment, 2) review of existing capacity, 3) review of capacity gaps, 4) prioritization of training needs, implementation strategy, and budget.

2. **Provide training to departments on effective project management:** Training is needed to address the lack of technical capacity within the departments responsible for project implementation. Training needs to be tailored to each technical department, in line with the Human Resource Capacity Development Plan, but should include project management, proposal writing, budgetary management, and performance monitoring.

3. **Reform monitoring and evaluation capabilities within MAFF to support new project based budgeting requirements by the government:** The new requirements for MAFF to switch to program based budgeting offers a window of opportunity to assess and reform monitoring and evaluation capabilities within MAFF. Technical support should be provided to support both MAFF-DPS and the Department of Accounting to develop a comprehensive reform strategy for M&E.
POLICY ELEMENT 6: MUTUAL ACCOUNTABILITY

Cambodia has a strong mutual accountability framework for agriculture and food security and a capacity and sense of purpose from the government. However, the different experiences of the working group related to agriculture and water and, that of food security and nutrition, demonstrate how important the commitment of the co-chairs is in ensuring the effective operation of the system.

OVERVIEW

Cambodia is a major recipient of development assistance. Development cooperation has reached more than $1 billion annually, accounting for approximately 10 percent of gross domestic product (Cambodian Rehabilitation and Development Board, 2013). Cambodia actively participates in initiatives to increase harmonization and aid efficiency. Cambodia signed the Declaration of Aid Effectiveness in Cambodia in 2006, adopting the principles agreed in the 2005 Paris Declaration on Aid Effectiveness and the 2008 Accra Agenda for Action.

The Cambodian Rehabilitation and Development Board/Council for the Development of Cambodia (CRDB/CDC) is the lead agency for resource mobilization and development coordination. CRDB/CDC is responsible for working with DPs, managing resource mobilization and management, and monitoring performance indicators. In 2013, CRDB/CDC produced the Development Cooperation and Partnerships Strategy (2014-18), which supports the objective of promoting development effectiveness that supports the implementation of the NSDP.

A number of active coordination mechanisms have been introduced. As a result, coordination between the government and DPs has been increasing, particularly in the formulation and implementation of agriculture and food security projects. The Cambodia Development Cooperation Forum (CDCF) provides an opportunity for high-level dialogue between the government, DPs, private sector, and civil society. The forum met in 2007, 2008, and 2010, but was subsequently suspended until 2014. The CDCF will transition into the Cambodia Development Forum and include greater representation from national stakeholders.

The Government-Development Partner Coordination Committee (GDCC) provides national policy dialogue and coordinates the activity of the TWGs. By 2012, the committee had met 19 times. The GDCC meets annually to review progress towards national priority issues. At the technical level, government-DP Technical Working Groups align DP support with national development priorities, policies, and strategies, and enhance the effectiveness of government and DP resources. TWGs are accountable to their host ministries and agencies, and are chaired by the lead government representative, who holds primary decision making authority. The TWGAW is co-chaired by MAFF and MOWRAM, facilitated by the FAO, and comprises 48 representatives from government, DPs, and civil society. TWGAW is

21 Replaces the 2006-2010 Strategic Framework for Development Cooperation Management
responsible for coordinating and implementing policies related to agriculture, irrigation, and water resource management. The **TWG-SP&FSN** is co-chaired by CARD and MOP, and co-facilitated by UNICEF and WFP. It is responsible for coordinating, formulating, and implementing policies across the areas of food security, nutrition, and social protection between government and DPs.

**CAPACITY FOR POLICY CHANGE INDICATORS**

a. **A Forum Exists for Regularly Scheduled Donor-Government Meetings**

*Status: Green*

There are three levels of dialogue between the government and DPs. High-level dialogue is provided at the Cambodia Development Forum, policy dialogue and policy review is provided by the GDCC, while technical discussion and information sharing is provided by the TWGs. The TWG-SP&FSN is regarded by stakeholders as functioning well, owing to the role played by CARD as secretariat in leading the process and the high-level support provided by the Deputy Prime Minister as chair of CARD. The TWGAW has been less successful for a number of reasons. Firstly, there is poor coordination between the two co-chairs of MAFF and MOWRAM. Secondly, the working group does not possess a clear mandate and terms of reference, particularly related to irrigation and water resource management. Thirdly, a change in government in 2013 led to the temporary loss of both co-chairs and a change in secretariat staff. Finally, there was a loss of financial support for the secretariat. At the moment, with EU support, the working group will review a full-time technical expert to support the secretariat, but there is growing pressure from some DPs to separate the agriculture and water into separate working groups.

b. **Joint Policy Priorities Developed**

*Status: Yellow*

Overall objectives, principles, and tools for development cooperation are laid out in the Development Cooperation and Partnerships Strategy 2014-2018. Each of the TWGs is responsible for setting out an annual work plan and agenda to support the achievement of the Rectangular Strategy and the NSDP. For TWG-SP&FSN, the NSFSN provides joint priorities for the working group. For TWGAG, the SAW was designed to provide the joint priorities for the working group. However, SAW was donor-driven, and MAFF or MOWRAM remained solely committed to their sector strategies. Given that the ASDP draft has yet to be circulated to TWGAG, and will not focus on water issues, it is unclear how much alignment there will be.

c. **Monitoring System Exists**

*Status: Green*

Each TWG has a results framework that links the NSDP with sector programs and external funds. Joint Monitoring Indicators (JMIs) are used to support the implementation of the Development Cooperation and Partnerships Strategy. The JMIs were established in 2012 and are currently undergoing a review and selection process. Each TWG should undergo annual progress reviews as part of their work program (Cambodian Rehabilitation and Development Board, 2013).
d. **Donor Coordination – Alignment and Harmonization**  
*Status: Yellow*

Under the Development Cooperation and Partnerships Strategy DPs are required to ensure consistency between the JMIs and their own project results framework. The Cambodia Overseas Development Assistance Database, established in 2005, provides information of all projects funded by DPs and civil society. The database is searchable by sector, partner, project duration and implementation status, and implementing partner.

In addition to the TWG, DPs also organize their own meetings. Some stakeholders raised concerns over the harmonization of DPs priorities and activities. They raised the example of recent disagreements over the utility of SAW. DPs supported the development of SAW in a collaborative and inclusive process. However, now some stakeholders report that the DPs who are not involved in water activities have recently been pushing for the ASDP, when they would prefer for the SAW to be updated.

e. **Private Sector Accountability**  
*Status: Red*

Dialogue between the government and private sector is provided through the annual Government-Private Sector Forum. However, there is no private sector representation in the GDCC and TWGs, and no effective mechanism for dialogue on agriculture and food security issues (See Policy Element 3 – Inclusivity and Stakeholder Engagement).

f. **CSO Sector Accountability**  
*Status: Green*

Dialogue between the government and civil society is primarily provided through the annual Government-NGO Consultation Meeting. For food security, the National Food Security Forum provides an opportunity for government, donors, and CSOs to share lessons learning from ongoing programs on a monthly basis. CSOs are also members of a number of the TWGs. While there is still room for improvement, this system is far more inclusive than most other Feed the Future countries.

**CONCLUSIONS**

In general, there is a positive working relationship between the government and the DPs, and the mutual accountability framework in Cambodia is strong. The TWGs serve as the primary donor-DP forum for policy development, joint priorities are outlined in the Development Cooperation and Partnerships Strategy 2014-2018, and the JMIs provide a mechanism for joint monitoring. This structure can be seen as functioning better than similar Asian Feed the Future countries studied as part of this assessment.
series. However, the different experiences of the TWGAW and TWG-SP&FSN demonstrate how key the commitment of the co-chairs is in ensuring the effective operation of the system.

It is also worth putting the mutual accountability framework in context. As Cambodia moves toward lower middle-income status, DPs will begin to scale down their financial commitments. At the same time, there is increasing capacity and confidence within the government and a clear sense of purpose related to the direction of the TWGs. As a result, it is likely that there will be a need to redesign the mutual accountability framework over the next five years.

RECOMMENDATIONS

1. **Develop technical level working groups as part of the TWGAW:** There is growing pressure among certain DPs to separate agriculture and water in different TWGs. One potential solution would be to create technical sub-groups for agriculture, irrigation, and water resource management within the TWGAW to provide for greater technical discussion on these issues.

2. **Ensure sustainability of the TWGAW and TWG-SP&FSN:** For future sustainability, the TWGs need to be more inclusive (particularly with private sector representation) and the resource support for the secretariats needs to be institutionalized.

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22 In Nepal, while there is a mutual accountability system, there is no dedicated mutual accountability forum for regular dialogue and priority setting between government and DPs. In Bangladesh, the government largely views the mutual accountability system as a forum for securing donor funding and meetings are held irregularly.
ANNEX 1: AGRICULTURE & FOOD SECURITY

Guiding Policy Framework

(Food Security and Nutrition) Council of Ministers MAFF
CARD Planning and International Cooperation Department
TWG-SP&FSN Core Team National Food Security Forum
TWG-SP&FSN

(Agricultural Policy) MAFF Advisory Committee (Sector Strategy) MAFF-DPS (Sub-Sector Strategy)
MAFF Internal Working Group Technical Department
Technical Departments Core Team DPs Regional Workshops TWGAW

Policy Development and Coordination

Cambodia Farmers Association Federation of Agricultural Producers Cambodia Rice Exporters Association Cambodian Organic Ag Association
Cambodian Federation of Employers and Business Association

Government-Private Sector Forum Private Sector only Working Groups Working Group on Agriculture and Agro-Industry
Private Sector

Civil Society

Inclusivity and Stakeholder Consultation

Cooperation Committee for Cambodia NGO Forum
Government-NGO Consultation Meeting Government-Development Partner Coordination Committee
Technical Working Groups
POLICY CHANGE INSTITUTIONAL MAP
**ANNEX II: CAPACITY FOR POLICY CHANGE INDICATORS**

- **Red:** Requires significant attention to ensure the component is achieved.
- **Yellow:** Progress is mixed. The conditions required to achieve the component are partially achieved, but additional attention is required.
- **Green:** The component is realized to a sufficient degree, and additional attention to this area is not required at this time.

<table>
<thead>
<tr>
<th>Capacity of Policy Change Indicators</th>
<th>Status</th>
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<tbody>
<tr>
<td><strong>Policy Element 1:</strong> Predictability of the Guiding Policy Framework</td>
<td></td>
</tr>
<tr>
<td>Clearly Defined and Consistent Policy Framework: The policy framework impacting food security policy making is clearly defined, and consistently applied and enforced from year to year.</td>
<td>![Yellow]</td>
</tr>
<tr>
<td>Predictability and Transparency of the Policy Making Process: The policy development process is transparent in accordance with the rules contained within the country’s constitution, basic law, and elsewhere in the formal legal framework.</td>
<td>![Red]</td>
</tr>
<tr>
<td>Clear and Functional Legislative System: There is a legislative capacity to deal with food security policy change, and the legislative requirements are clearly defined and predictable.</td>
<td>![Green]</td>
</tr>
<tr>
<td>Appropriate Dispute Resolution Process/Judicial Framework: The judicial system is perceived as fair and effective, and there is an appropriate system for dispute resolution where conflicts arise relating to food security policy.</td>
<td>![Red]</td>
</tr>
<tr>
<td>Clearly Defined Institutional Responsibilities: Institutional responsibilities are clearly defined, consistently applied, and predictable from year to year.</td>
<td>![Yellow]</td>
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</table>

**Policy Element 2:** Policy Development & Coordination

Approved Food Security Strategy/Investment Plan: There is an approved/official multi-sectoral, multi-year food security plan developed, which specifies priorities and objectives, and addresses the roles of various contributors, including across government, the private sector, and CSOs. The vision and strategy to improve food security is clear. | ![Yellow] |
<table>
<thead>
<tr>
<th>Capacity of Policy Change Indicators</th>
<th>Status</th>
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<tbody>
<tr>
<td><strong>Predictable Policy Agenda and Priorities Developed:</strong> The policy items required to achieve the national food strategy have been identified and documented, i.e., specific policy objectives exist.</td>
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<tr>
<td><strong>Work Plans:</strong> There is an annual work plan that identifies objectives and activities in regard to policy development.</td>
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<tr>
<td><strong>Coordination Process:</strong> There is an entity, such as a coordination unit or task force, that has defined membership and meets regularly to discuss, develop, and coordinate food security policy development (and oversee cross-sector coordination).</td>
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</tr>
<tr>
<td><strong>Secretariat/Administrative Support Function:</strong> There is an adequate staff capability to perform required support processes, including coordination, meeting management, communication, and document management. This may be a stand-alone secretariat, or a responsibility within an existing entity.</td>
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</tr>
<tr>
<td><strong>Technical Capacity:</strong> There are work groups, or technical committees, that have the authority and capacity to perform the following functions: identify policy and technical challenges/issues; develop sector- or project-specific policies/strategies; consult within the sector; and draft funding proposals. There should be active participation by the private sector and CSOs on the technical work groups (as appropriate).</td>
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<tr>
<td><strong>Political Support and Approval:</strong> There is a line of authority/participation by high-level decision makers above the ministerial level so as to enable efficient political support for the passage and development of new policies, e.g. involvement of prime minister’s office (especially for policies that cut across sectors, e.g. trade and agriculture).</td>
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<tr>
<td><strong>Engagement of Parliament/Legislative Body:</strong> There is engagement from the country’s legislative entity to debate and engage on food security issues, and to sponsor and advocate for the required legal/policy changes.</td>
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</table>

**Policy Element 3: Inclusivity and Stakeholder Consultation**

| **Inclusive Participation within the Policy Coordination Management Entity:** The main coordination entity has: a) clear goals and participation from key government ministries (beyond just Ministry of Agriculture) and; b) some representation from non-government entities, particularly from donors. |        |
| **Outreach and Communications:** There is a process for interacting with stakeholders and sharing information. This could include regular public “forums,” a website of key information, and other mechanisms. |        |
### Capacity of Policy Change Indicators

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<tr>
<th>Indicator</th>
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<tbody>
<tr>
<td><strong>Private Sector Participation – Opportunity/Space:</strong> The private sector is provided meaningful opportunity to participate in policy formulation and strategy discussions. This could be through participation in the management/steering committee, in technical work groups and/or through other forums. Communications and interactions should be two-way, and access to key information should be readily available.</td>
<td><img src="green.png" alt="Green" /> <img src="green.png" alt="Green" /> <img src="green.png" alt="Green" /></td>
</tr>
<tr>
<td><strong>Private Sector Participation – Capacity to Participate:</strong> Some organizations representing the private sector have the capacity to participate in government-led discussions on food security policy. This is to say they are able to represent their members, they are able to articulate and communicate policy positions, and they are able to provide some level of evidence-based analysis to support their viewpoints.</td>
<td><img src="red.png" alt="Red" /> <img src="yellow.png" alt="Yellow" /> <img src="green.png" alt="Green" /></td>
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<tr>
<td><strong>Participation of CSOs – Opportunity/Space:</strong> The CSO sector, including representation from women’s associations and farmers associations, is provided meaningful opportunity to participate in policy formulation and strategy discussions. This could be through participation in the management/steering committee, in technical work groups and/or through other forums. Communications and interactions should be two-way, and access to key information should be readily available.</td>
<td><img src="green.png" alt="Green" /> <img src="green.png" alt="Green" /> <img src="green.png" alt="Green" /></td>
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<tr>
<td><strong>Participation of CSOs – Capacity to Participate:</strong> Some organizations representing civil society, including representation from women’s associations and farmers associations, have the capacity to participate in government-led discussions on food security policy. This is to say they are able to represent their members, they are able to articulate and communicate policy positions, and they are able to provide some level of evidence-based analysis to support their viewpoints.</td>
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### Policy Element 4: Evidence-based Analysis

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<th>Indicator</th>
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<tr>
<td><strong>Economic and Financial Analysis Completed as a Component of Planning:</strong> National food security priority policy initiatives/investment plans are based on economic and financial analysis, including independent policy analysis. The analysis is available for public review.</td>
<td><img src="red.png" alt="Red" /> <img src="yellow.png" alt="Yellow" /> <img src="green.png" alt="Green" /></td>
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<tr>
<td><strong>Performance Monitoring Measures and Targets Developed:</strong> The national food security policies/plans include specific objectives, performance indicators, and targets exist to monitor the accomplishment of the objectives.</td>
<td><img src="yellow.png" alt="Yellow" /> <img src="green.png" alt="Green" /> <img src="green.png" alt="Green" /></td>
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<tr>
<td><strong>Quality Data Exists for Policy Monitoring:</strong> There is a database of quality statistics that is used to routinely report and analyze progress in achieving</td>
<td><img src="green.png" alt="Green" /> <img src="green.png" alt="Green" /> <img src="green.png" alt="Green" /></td>
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<td>Capacity of Policy Change Indicators</td>
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<tr>
<td>objectives. (Analysis to be conducted by USDA – and not as part of this assessment framework.)</td>
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<tr>
<td><strong>Quality Data is Available for Policy Making:</strong> Data on the performance of the agriculture sector and the food security are publically available and shared in a timely manner. This information is available for others to use and analyze.</td>
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<tr>
<td><strong>Inclusion of Analysis in the Policy Development Process:</strong> Evidence-based analysis is considered and used to develop policy priorities/policy proposals.</td>
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<tr>
<td><strong>Annual Performance Measurement Report Produced and Reviewed:</strong> Evidence-based analysis is produced to review policy effectiveness (for implemented policies). A formal review session is held, and includes key development partners (including principal donors and multilateral partners, such as FAO and IFPRI). Recommendations are developed as a result of the review and incorporated into subsequent plans.</td>
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<tr>
<td><strong>Independent Analysis Capacity Exists:</strong> There exists an independent capacity to analyze food security data and use the analysis to make policy recommendations and engage in policy discussion and advocacy. Such an analysis could be conducted by a research institute, university or similar non-governmental/objective organization. This capacity should be engaged in the government’s policy development and review process as, for example, through papers, forums, or participation introduced in official policy review and discussion meetings.</td>
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<tr>
<td><strong>Policy Element 5: Policy Implementation</strong></td>
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<tr>
<td><strong>Implementation Plans Developed:</strong> The overall food security strategy has been broken down into programs and projects that have: a) a sufficient level of detail to permit implementation; b) have been “packaged” into priority projects that can be managed by ministerial units; and 3) “packaged” priorities can be translated into funding proposals to gain support for projects/programs from development partners (to address financing gaps).</td>
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<tr>
<td><strong>System in Place to Analyze Implementation Capacity Constraints:</strong> An analysis of institutional, workforce, system and financial constraints is conducted. Critical implementation constraints are identified; a work plan is developed to address constraints; and implementation actions are moved forward (and periodically reviewed).</td>
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<td>Capacity of Policy Change Indicators</td>
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<tr>
<td><strong>Food Security Policy Priorities Aligned with Work Plans of Line Ministries:</strong> The priority policy and associated objectives of the national food security strategy are broken down into specific programs and projects (with a sufficient level of detail) so that line ministries can implement policy actions. The plans of individual ministries, and units within ministries, align with overall national strategy and its policy objectives.</td>
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</tr>
<tr>
<td><strong>Policy Implementation Budget Committed by Host Country:</strong> Resources are committed by the host country to implement the identified policy agenda. Over time, the country’s budget is adjusted to provide adequate financing for the implementation of actions required to implement policy priorities. Budget documents, including budget proposals, are released fully and in a timely manner.</td>
<td></td>
</tr>
<tr>
<td><strong>Supplemental Implementation Funds Secured:</strong> Proposals can be submitted, and funds secured, to address financing gaps. Funds may come from multilateral funds (such as GAFSP), regional organizations, bilateral donors and the private sector.</td>
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</tr>
<tr>
<td><strong>Administrative and Technical Capacity of Staff to Implement Policy Change:</strong> Administrative and technical capacity exists within the government to effectively manage the implementation process. There is a system to coordinate implementation across departments.</td>
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</tr>
<tr>
<td><strong>Monitoring and Evaluation:</strong> Capacity exists within the public sector, private sector, or civil society to review the effectiveness and impact of policy changes. Sector reviews are performed and other research evidence is collected. There is a system to share, store, and access the findings from these reviews.</td>
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<tr>
<td><strong>Policy Element 6: Mutual Accountability</strong></td>
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</tr>
<tr>
<td><strong>A Forum Exists for Regularly Scheduled Donor-Government Meetings:</strong> These meetings discuss policy and programs and set priorities. Meetings may include, for example, Joint Sector Reviews, sector working groups, or other similar arrangements.</td>
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</tr>
<tr>
<td><strong>Joint Policy Priorities Developed:</strong> A document exists that articulates the shared policy objectives between the government and the donor community.</td>
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<tr>
<td><strong>Monitoring System Exists:</strong> Performance measures exist (for the performance commitments of the government and for the performance commitments of the donors). There is a schedule for reviewing and documenting progress – at least on an annual basis.</td>
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<tr>
<td>Capacity of Policy Change Indicators</td>
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<tr>
<td><strong>Donor Coordination – Alignment and Harmonization:</strong> There is a process for donor participation in the food security policy process and for aligning government and donor objectives and priorities. Donor programs should contribute directly to host country strategies, plans, and objectives. This may include the signing of cooperation frameworks that indicate a joint commitment to specific policy change goals.</td>
<td><img src="image" alt="Yellow" /></td>
</tr>
<tr>
<td><strong>Private Sector Accountability:</strong> The government provides feedback to the private sector on the performance of the food security program (including the private sector’s role) and provides an opportunity for dialogue on the program and its performance.</td>
<td><img src="image" alt="Red" /></td>
</tr>
<tr>
<td><strong>CSO Sector Accountability:</strong> The government provides feedback to the CSO sector on the performance of the food security program (including the role of CSOs) and provides an opportunity for dialogue on the program and its performance.</td>
<td><img src="image" alt="Green" /></td>
</tr>
</tbody>
</table>
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