

Statistical Analysis of Economic Land Concession in Cambodia, 2015

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Acronyms

ADHOC	Cambodian Human Rights and Development Association
CDC	Council for the Development of Cambodia
CEPA	Culture and Environment Preservation Association
CF	Community Forestry
CLEC	Community Legal Education Center
CNRO	Cambodian National Research Organization
EIA	Environmental Impact Assessment
ELC	Economic Land Concession
FA	Forestry Administration
HH	Household
LICADHO	Cambodian League for the Promotion and Defense of Human Rights
MAFF	Ministry of Agriculture, Forestry and Fisheries
MoE	Ministry of Environment
NGOF	The NGO Forum on Cambodia
RACC	Research Advocacy and Communication Centre
RFA	Radio Free Asia
RGC	Royal Government of Cambodia

Table of Contents

Introduction	1
What is Economic Land Concession?	2
General conditions for granting ELCs	2
Methodology	4
Source of information	4
Results of the data analysis	5
1- ELC trends	5
2- ELCs granted by authorized bodies	6
3- ELCs by provinces	7
4. ELC mapping	10
4.1. ELCs by province	10
4.2 ELC Vs forest cover	11
4.3. ELCs Vs protected area and protected forest	12
5. ELCs with different types of plantation (crop)	14
6. ELCs and Land disputes	15
7. Resolution on Land disputes	17
8. Comparison of ELC size and administrative land size by province	18
9. Evaluated ELCs	18
10. Downsized ELCs	19
11. Summary	20
Appendices	22
Appendix A: List of the ELCs Downsized by provinces in 2015	22
Appendix B: List of the ELCs Evaluated in 2015	26
Appendix C: List of the ELCs cancelled by Province in 2010	32
Appendix D: List of ELCs been cancelled by the RGC in 2010	33
References	36

Introduction

The Research Advocacy and Communication Centre (RACC) is a unique project of the NGO Forum on Cambodia. It supports, and works closely with, the Land and Livelihoods Program (LLP). The Centre was established in 2006 to collect information related to land and natural resource issues, and to document all land and forest cases. The RACC was created in response to a lack of available data and information about land disputes, sustainable use of natural resources and dispute resolution processes.

The Statistical Analysis of Economic Land Concessions (ELCs) Report (“the Report”) will play a very important role in advocating for policy change around irregularities in implementing national laws and regulations. Land dispute cases, deforestation, and the environmental impacts resulting from granting ELCs have been critical issues in Cambodia in recent years, and have been highlighted in local and international media. ELCs are considered instruments for economic development. However, in many cases, especially in some of Cambodia’s northern provinces, such as Kratie, Mondulkiri, Rattanakiri, Kampong Thom and Preah Vihear, the granting of ELCs has ignored the rights of indigenous people, their customs and traditions. The development and poverty reduction strategies of ELCs appear not to meet the demands of indigenous people and their livelihoods; people living near the concession areas report a reduction in their living conditions and livelihoods.

In most cases, ELCs have led to land disputes and forced evictions. These negative impacts have been reported by local and international media, and to government authorities, development partners, NGOs and civil society as a whole. The high level of interest in the issues has seen many measures and approaches made by various institutions¹, including the design of national legal frameworks² and directives from other relevant authorities³. However, it is difficult to measure the results of these efforts due to constraining factors, including a lack of legal implementation, such as public consultation (Sub-decree on Economic Land Concessions, 2005) and resolution processes.

1. (a) Ministry of Agriculture, Forestry and Fishery; (b) Ministry of Environment; (c) Ministry of Rural Development and Ministry of Interior for the IP issue.

2. (a) Sub-Decree 146 on ELCs; (b) Land Law, August 30, 2001; (c) Law on Protected Areas; (d) Sub-Decree 72 on Process of EIA.

3. Orders from Prime Minister’s cabinet to the provincial authorities to take action. Or written from the President of the National Assembly and Senate to provincial authorities to take action to solve the problem.

The Report will help display ELC trends in Cambodia over recent years and back up the concerns of stakeholders.

The core aims of the Report are to: (a) highlight the number of ELCs and land dispute cases arising from them, (b) create impetus to improve the implementation of legal frameworks related to ELCs, (c) contribute to improving the livelihoods of local communities, and (d) support poverty reduction mechanisms of the government.

What is an Economic Land Concession?

According to Article 2 of the Sub-Decree on Economic Land Concessions issued by the Government in 2005, ELC refers to the granting of private state land through a specific economic land concession contract to a concessionaire, to be used for agricultural and industrial-agricultural exploitation. It gives the right to occupy private state land for agricultural and industrial-agricultural exploitation, serving economic purposes (Sub-decree on Economic Land Concessions, 2005). Article 2 defines ‘industrial-agricultural exploitation’ as:

- Cultivation of food crops or industrial crops, including tree planting to be tree plantation
- Raising of animals and aquaculture
- Construction, such as a plant or factory and facilities for the processing of domestic agriculture
- Raw materials
- A combination of some or all of the above activities.

General conditions for granting ELCs

The “Sub-Decree on Economic Land Concessions” lays out the legal requirements for granting an ELC:

Article 4: An ELC may be granted only on land that meets all of the following five criteria:

1. The land has been registered and classified as state private land in accordance with the Sub-Decree on State Land Management and the Sub-Decree on Procedures for Establishing Cadastral Maps and Land Register or the Sub-Decree on Sporadic Registration.

2. A land-use plan for the land has been adopted by the Provincial-Municipal State Land Management Committee and the Land Use is consistent with the plan.
3. Environmental and Social Impact Assessments have been completed with respect to the land use and development plan for ELC projects.
4. Land that has solutions for Resettlement Issues in accordance with the existing legal framework and procedure. The Contracting Authority shall ensure that there will not be involuntary resettlement by lawful land holders and that access to private land shall be respected.
5. Land for which there have been public consultations, with regard to ELC projects or proposals, with territorial authorities and residents of the locality.

The maximum size of an ELC is 10,000 hectares (ha) (Law on Land, 2001) and the maximum duration of an ELC is 99 years (Law on Land, 2001). It needs to be established by a concession contract between the concessionaire and the contracting authority (Law on Land, 2001) and (Sub-decree on Economic Land Concessions, 2005). A land concession shall have conditions, and must comply with the provisions of the Land Law (Law on Land, 2001). It is revocable through governmental decision or can be cancelled by the courts when its legal requirements are not complied with (Law on Land, 2001). Article 8 of the Sub-Decree on ELCs states permissible ways to initiate an ELC project. The Contracting Authority can also propose a project for solicitation of proposals from investors.

Article 58 of the Land Law states that: “The land concession may not violate roadways, transportation ways or sidewalks, or their borders and the ground necessary for their maintenance, nor waterways, pools, ponds and water reserves used by the people in their daily lives.” According to available concession contracts, it appears that the Contracting Authority protects the interests of local people, not allowing companies to acquire lands that are lawfully owned by the people and lands that are under family agricultural production, and encouraging joint land development between the people and companies if mutually agreed (Sophal, 2012). For example, the concession contract states, “... and lands that are being used for family agricultural production must be deducted from the granted ELC”.

Methodology

The statistical data records ELCs that are smaller than 1,000 ha and bigger than 1,000 ha granted by the Ministry of Agriculture, Forestry and Fisheries (MAFF) and the Ministry of Environment (MoE) (Sub-decree on Economic Land Concessions, 2005).

The ELC data provided in the Report is compiled from data received from previous sources and recorded from more than 100 ELCs on the NGOF ELC database. Since early 2008, the RACC team has collected, recorded and updated ELC data each calendar year (ELC data collection starts in August annually), in close cooperation with NGOF network members based in provinces, and provincial authorities and communities.

- Until now, 267 ELCs have been confirmed and classified by the provincial network as valid for the ELC database after a full screening and updating process. Each ELC status was closely monitored via various means, including (a) working in cooperation with NGO network members, (b) media review on a daily basis such as Koh Santepheap, Reaksmeay Kampuchea, the Cambodia Daily and Phnom Penh Post, the Radio Free Asia (RFA) website, (c) communicating and cross checking with all RGC provincial authorities for statistics in each province, and (d) monitoring information on the granting of new ELCs or their termination by checking MAFF, sithi.org, local and international media and Royal Gazette Books.

Source of information

- MAFF website (<http://www.maff.gov.kh/>)
- sithi.org (<http://www.sithi.org>)
- RGC Provincial Hall
- Field Investigations
- NGO Network Provincial base
- Media (Phnom Penh Post, Cambodia Daily)
- Royal Gazette Books

Results of the data analysis

The following results were generated by analyzing the 267 ELCs in the RACC database.

1. ELC trends

This line graph shows the Government's trends in granting ELCs from 1995 to 2015 (indicated on the X-axis). The Y-axis indicates the ELC percentage for each year, from 0-50 percent.

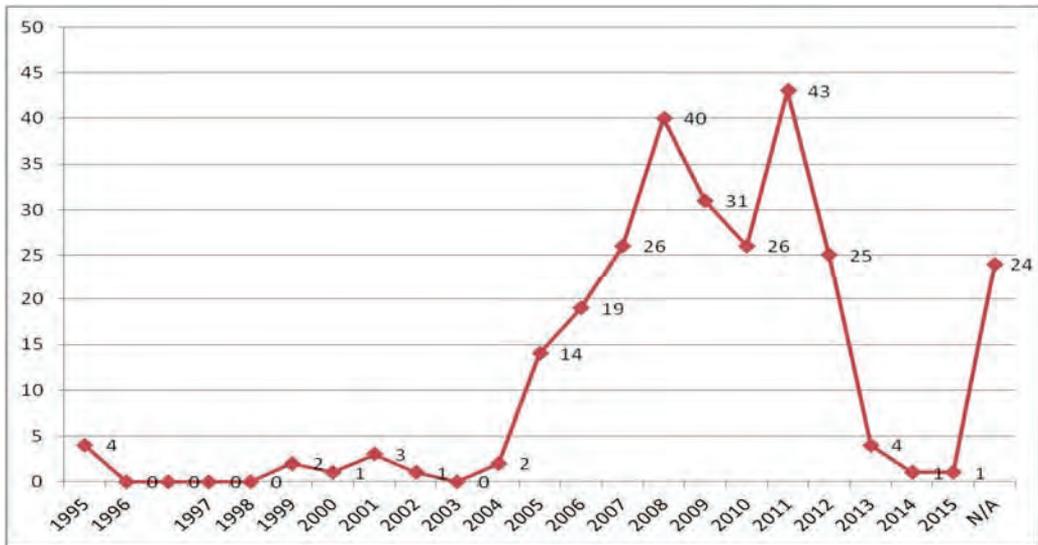


Figure 1: ELC Trends in Cambodia

The solid line shows that four ELCs were initially offered in 1995, with nothing being offered between 1996 and 1998. There were two ELCs offered in 1999, three in 2002, one in 2003 and two in 2005, which is lower than the starting point. There was a marked increase in 2006, with 14 ELCs, while there were 26 in 2007 and 40 in 2008 (Menghion, 2010), around four times the 2006 figure. From 2009 to 2010, the number of ELCs decreased slightly, by around 10 percent, then gradually increased in 2011 to 43. Conversely, the number of ELCs decreased sharply, from 25 in 2012 to one⁴ in 2015.

⁴ The one ELC granted in 2015 was simply a change, from community development, agriculture and tourism to a new type of ELC, but it is located in the same place (Ou Svay Aphivat).

It is likely that the significant decrease of ELCs between 2012 and 2015 was the result of the Government issuing Directive 01, *Prakas* and other measures taken at this time.

Due to the inability of all stakeholders to collect data, there is no information on 24 ELCs.

2. ELCs granted by authorized bodies

The bar chart below shows the authorization bodies (Sub-decree on Economic Land Concessions, 2005) which granted ELCs, as indicated on the Y-axis. The X-axis indicates the number ELCs from each authorized body, from 0-160.

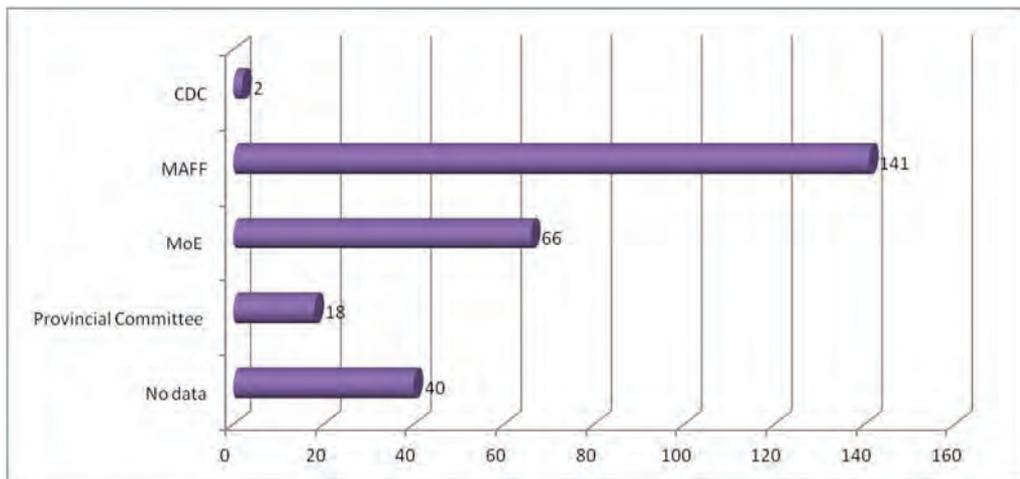


Figure 2: ELCs granted by authorized

The chart shows four bodies are authorized to grant ELCs, with MAFF granting 141 (VOD, 2015), or 52.8 percent of ELCs granted⁵, and MoE granting 66, or 24.7 percent of ELCs. There were only two ELCs granted by the Council for the Development of Cambodia (CDC) and 18 ELCs granted by provincial committees. Due to limitations in data collection, there is no detailed information on 40 ELCs and the contracting authority remains unclear.

⁵ NGO records show 23 out of 141 ELCs were granted with joint authorization from MoE/MEF/Council of Ministers.

ELCs which have been cancelled by the RGC, and some ELCs for which no data are available, can be seen in a list in the Appendix. They were not subject to analysis and do not appear in the above statistics.

3. ELCs by province

Across the whole country 1,532,783.65 ha of land, stretching across 18 provinces, have been granted to 267 ELC⁶ companies (see the table below). Kratie is the province with the highest number of ELCs, at 54, or 20.2 percent of total ELCs. These ELCs cover 277,600.44 ha of land, while Kampong Thom and Mondulhiri provinces each have 28 ELCs covering 101,108.71 ha and 177,745.13 ha of land respectively. Rubber is commonly grown here.

One ELC covering Kampong Chhnang and Pursat provinces, namely the **Phea Phimex Co., Ltd.**, covers 233,523.00 ha of land, which is almost equal to the total size of all 54 ELCs in Kratie. This ELC covers 315,028.00 ha alone in parts of both provinces⁷.

Another company, **Think Biotech (Cambodia) Co., Ltd.**, holds ELCs covering more than 30,000 ha in Stung Treng and Kratie provinces, located in the Prey Lang area. Based on the latest version of the Prey Lang draft sub-decree, about 300,000 ha have been demarcated as Protected Forest, although the first draft of the sub-decree proposed that more than 600,000 hectares be protected. This company is



Meeting to discuss the impact of **Think Biotech (Cambodia) Co., Ltd.** installing a boundary pole. The ELC overlapped on residential land, rice fields and crop land in four villages in Kompong Cham commune, Sambou district, Kratie province.

Photo by: Mr. NAN Ony

⁶ NGO records show that 267 ELCs cover 1,534,688.65 ha, but for 18 of these 267 ELCs there is no detailed information on land size.

⁷ According to the Royal Gazette Books on ELC downsizing, the Phea Phimex Co., Ltd., located in Kampong Chhnang and Pursat provinces, has had its land size cut by 81,491.00 ha.

in conflict with local people living around the ELC areas⁸, a conflict which affects 556 households (HHs) or 2,353 people. Most of these are **Bunong** and **Kui** indigenous people.



Checking the boundary pole of the **Think Biotech (Cambodia) Co., Ltd.**, to see if there was overlap with local people's land.

Photo by: Mr. NAN Ony

By far the fewest ELCs can be found in Battambang, where only two were recorded; however, these two companies are also in conflict with 2,128 HHs. Kampong Cham province recorded three ELCs.

Thirty-four ELCs (13 percent of total ELCs), covering a total of 210,068.97 ha or 14 percent of land covered by ELCs, were granted to companies located in Kratie,

⁸ The Think Biotech (Cambodia) Co., Ltd. case was considered by 12 NGOs working to protect natural resources in Prey Lang. The working group comprised Danmission, Community Economic Development (CED), Organization to Promote Kui Culture (OPKC), Winrock International (WI), Prey Lang Community Network (PLCN), Environment and Health Education Organization (EHEO), Conservation International (CI), Community Peace-Building Network (CPN), Cambodian Youth Network (CYN), Action for Development (AFD) and Peace Bridge Organization (PBO).

Kampong Thom, Rattanakiri, Preah Vihear and Oddar Meanchey provinces. They were granted to Vietnamese companies, and it is worth noting that 25 Vietnamese companies are in conflict with local people. Eight cases have been resolved.

No.	Province	Granted ELC	ELC land size (ha)
1	Banteay Meanchey	6	12,165.09
2	Battambang	2	4,615.75
3	Kampong Cham	3	10,545.00
4	Kampong Speu	18	83,015.27
5	Kampong Thom	28	101,108.71
6	Kampot	4	20,904.40
7	Koh Kong	10	46,383.00
8	Kratie	54	277,600.44
9	Mondul Kiri	28	177,745.13
10	Oddar Meanchey	15	56,585.90
11	Preah Vihear	23	143,811.08
12	Pursat	4	244,032.00
13	Ratanakiri	27	139,571.92
14	Siem Reap	10	49,439.08
15	Sihanoukville	6	14,682.00
16	Stung Treng	18	116,536.97
17	Svay Rieng	4	14,760.91
18	Tboung Khmom	7	19,281.00
Total		267	1,532,783.65

Table 1: ELCs by province

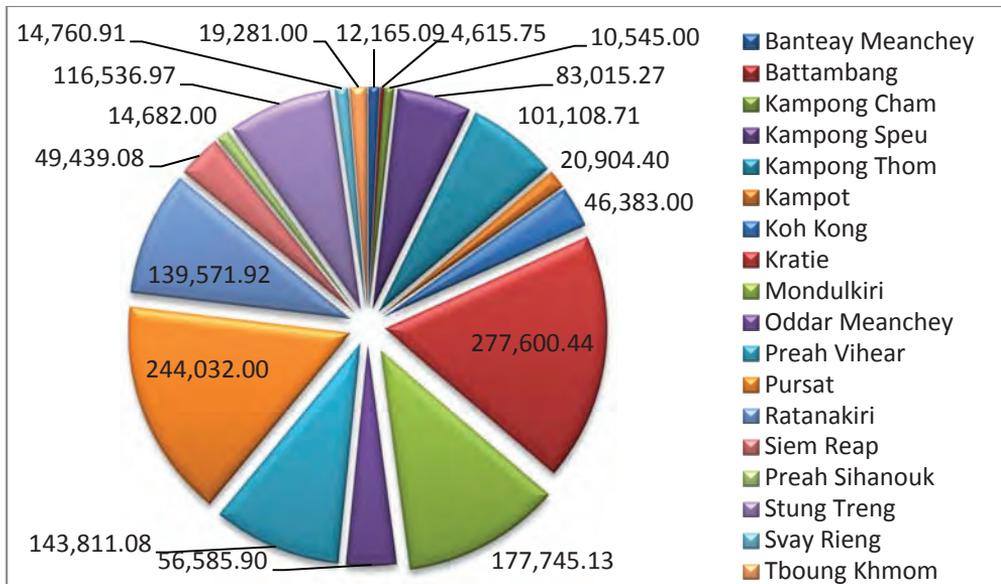


Figure 3: ELC land size by province

4. ELC Mapping

4.1. ELCs by province

While ELCs have been granted in 18 provinces, they have not been granted in the provinces of Kampong Chhnang⁹, Kandal, Kep, Takeo, Prey Veng, Pailin and Phnom Penh, as illustrated in the map in Figure 4¹⁰.

⁹ There is one ELC, Phear Pimech, which covers the two provinces of Pursat and Kampong Chhnang. Currently, part of the ELC land area covered in Kampong Chhnang has been cancelled. (Information updated by the NGO/LAHRi network).

¹⁰ Currently the land area of ELCs is changing, so NGO/LAHRi cannot display everything on the map.

It was found that 128 ELCs, or 48 percent of ELCs granted, overlapped with evergreen forests or semi-evergreen forests in the country¹¹. By comparing the forest cover in 2010 with ELCs overlapping with evergreen or semi-evergreen forests, it can be predicted that forest cover will continue to reduce in future (see map).

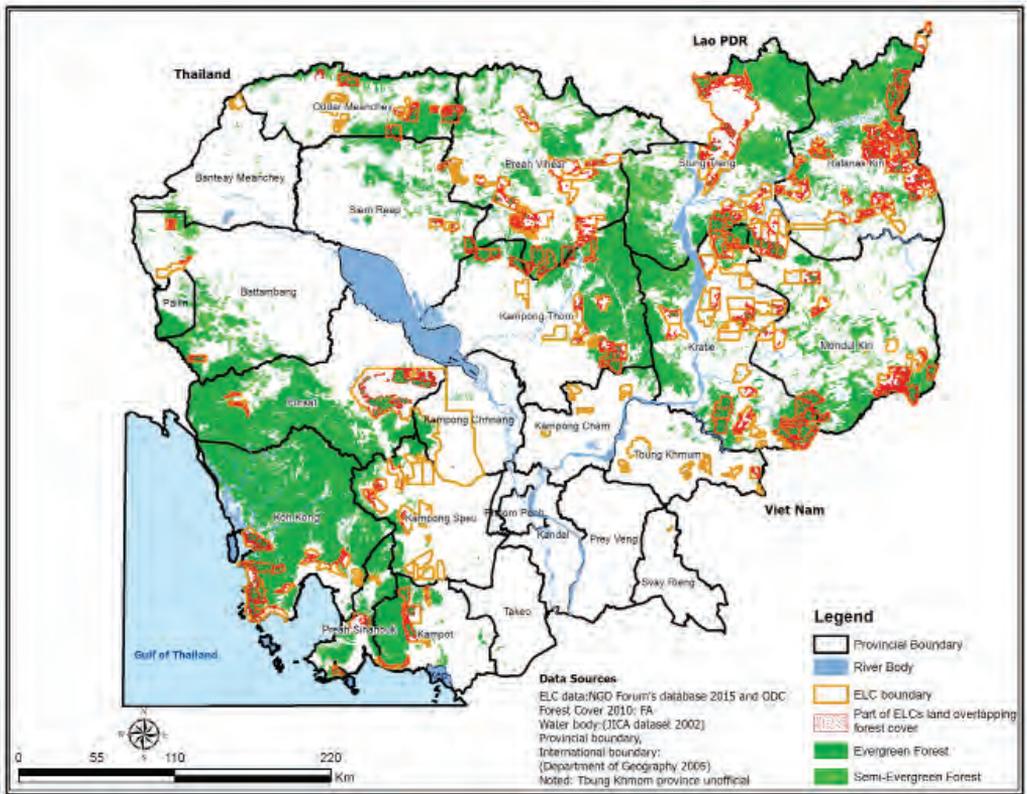


Figure 5: Map of ELCs vs Forest Cover 2010

4.3. ELCs vs protected areas and protected forests

Some 72 ELCs were found to be overlapping with protected areas and protected forests. However, there is no measurement as to the size of each ELC or whether all 72 ELCs overlap protected areas or forests. Records also show that the Beng Per Wildlife Sanctuary has the highest number of ELCs granted, with 13 ELCs covering 66,252.37 ha of land areas. Eight of these are rubber plantations. The amount of

¹¹ If the conditions of selected areas of evergreen or semi-evergreen forests bigger than 500 hectares is not considered, then the overlapping of ELCs in evergreen/semi-evergreen forests adds up to 190.

ID	Protected area and protected forest	Name	Status	# ELC granted	ECL size (ha)
1	PA	Kulen Prom Tep	Wildlife Sanctuary	11	50,509.81
2	PA	Phnom Somkos	Wildlife Sanctuary	1	500.00
3	PA	Snoul	Wildlife Sanctuary	9	40,938.34
4	PA	Beng Per	Wildlife Sanctuary	13	66,252.37
5	PA	Phnom Numlyr	Wildlife Sanctuary	5	15,749.28
6	PA	Aural	Wildlife Sanctuary	7	50,331.90
7	PA	Roniem Doun Sam	Wildlife Sanctuary	1	2,115.75
8	PA	Lomphat	Wildlife Sanctuary	4	36,050.00
9	PA	Phnom Prech	Wildlife Sanctuary	6	77,107.71
10	PA	Banteay Chhma	Protected Landscape	2	3,114.00
11	PF	Mondulkiri	Protected Forest	2	6,312.66
12	PA	Botum Sakar	National Park	5	12,280.00
13	PA	Bokor	National Park	2	1,000.00
14	PA	Ream	National Park	1	N/A
15	PA	Krirom	National Park	1	N/A
16	PA	Virakchey	National Park	2	19,866.00
Total				72	382,127.82

Table 4: Protected Area and Protected Forest have been granted part of its land to ELCs

5. ELCs with different types of plantation (crops)

The ELCs have been used differently by different grantees, however, they have all been used to plant agro-industrial crops. Rubber seems to be the lead crop, with 162 ELCs being used for rubber plantations. A further 27 ELCs are used for Acacia, while 24 ELCs are used for cassava, beans, corn and apples. These appear to be unpopular crops, as very few ELCs cultivate them.

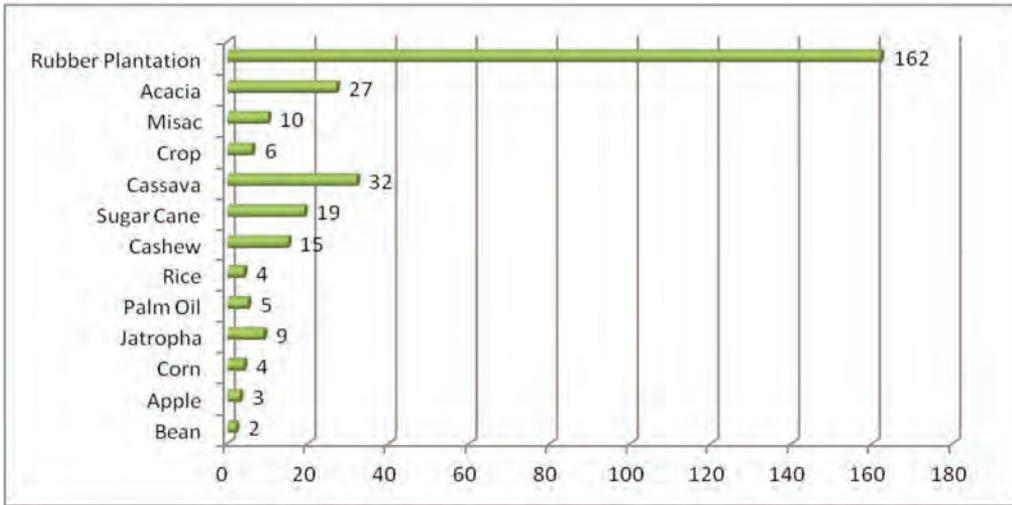


Figure 7: Types of plantation (crops) invested by grantees

6. ELCs and land disputes

As recorded, 158 ELCs have caused land disputes in 18 provinces. Rattanakiri, Mondulkiri and Kampong Thom are the provinces with the most recorded land dispute cases, with 22, 21 and 20 cases respectively. Provinces such as Banteay Meanchey, Kampot, Preah Sihanouk and Tboung Khmom recorded one ELC per province as causing a land dispute.

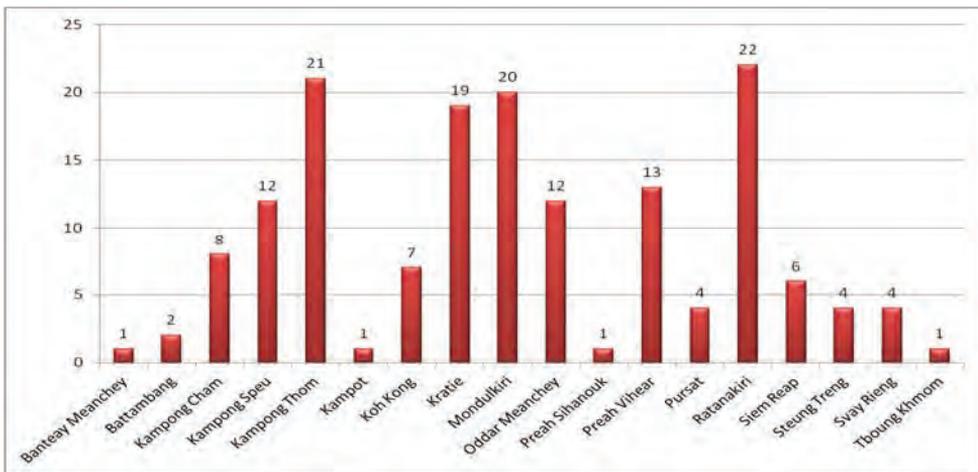


Figure 8: ELCs involved in land disputes by province

The 158 ELCs involved in land disputes affect 35,604 HHs¹³. Oddar Meanchey has the highest number of HHs affected, with 9,520, however, all but one of these issues were resolved at end of last year. Mondulkiri has the second highest number of HHs disputing ELCs, with 4,562. Only three cases have been fully resolved, while 17 cases are still awaiting a solution. People affected by the ELC dispute are keen to reach a resolution. Preah Sihanouk has the lowest number of HHs affected, with 42.

The ELCs which led to land disputes were on many types of land, such as residential land, rice fields, *chamkar*, community forests and state land, and affected 134,309.38 ha.

ID	Province	# Land disputes	HHs affected	Land size affected
1	Banteay Meanchey	1	542	1,680
2	Battambang	2	2,128	2,400
3	Kampong Cham	8	1,168	1,294
4	Kampong Speu	12	1,452	3,707
5	Kampong Thom	21	4,048	35,965
6	Kampot	1	446	892
7	Koh Kong	7	837	5,907
8	Kratie	19	547	10,255
9	Mondulkiri	20	4,562	15,204
10	Oddar Meanchey	12	9,520	34,849
15	Preah Sihanouk	1	42	270
11	Preah Vihear	13	1,036	2,757
12	Pursat	4	1,827	5,403
13	Ratanakiri	22	3,679	2,265
14	Siem Reap	6	1,241	6,421
16	Steung Treng	4	838	2,022
17	Svay Rieng	4	1,167	2,990
18	Tboung Khmom	1	524	28
Total		158	35,604	134,309

Table 5: Land dispute led by ELCs

¹³ Based on the NGOF database, 29 out of 157 ELCs led to land disputes. There is no detailed information of HHs affected.

7. Resolution on land disputes

As mentioned, there are 267 ELCs in 18 provinces of Cambodia, with 158 of these causing land disputes. Communities affected by these disputes have sent complaint letters to many authorities and institutions to seek resolution, as shown in Table 6, below. Of these land dispute cases, 42, or 26.58 percent, have been completely resolved, while 50 cases, or 31.84 percent, are partly resolved, and 54 cases, or 43.39 percent, have not been resolved.

Province	Land Dispute Situation				Total
	Partly Resolved	Resolved	Unresolved	Unknown	
Banteay Meanchey	0	1	0	0	1
Battambang	2	0	0	0	2
Kampong Cham	3	4	1	0	8
Kampong Speu	6	0	6	0	12
Kampong Thom	0	15	2	4	21
Kampot	1	0	0	0	1
Koh Kong	4	0	2	1	7
Kratie	7	5	2	5	19
Mondulkiri	9	3	7	1	20
Oddar Meanchey	2	9	1	0	12
Preah Vihear	1	1	11	0	13
Pursat	4	0	19	0	23
Ratanakiri	3	0	0	0	3
Siem Reap	3	2	1	0	6
Preah Sihanouk	1	0	0	0	1
Steung Treng	1	1	1	1	4
Svay Rieng	2	1	1	0	4
Tboung Khmom	1	0	0	0	1
Total	50	42	54	12	158

Table 6: Land dispute resolution situation

8. Comparison of ELC size and administrative land size by province

On average, ELCs take up 9.56 percent of the whole administration land size. Kratie and Pursat appear to have the highest ELC coverage, with 23 percent and 21 percent of their administration land size, respectively. This is followed by Monduliri, where ELCs make up 12 percent of its administration land size.

Name	# of ELC	ELC land size (Ha)	Admin land size (Ha)	Percentage (%)	Name	# of ELC	ELC land size (Ha)	Admin land size (Ha)	Percentage (%)
Banteay Meanchey	6	12,165	614,812	2	Oddar Meanchey	15	56,586	663,136	9
Battambang	2	4,616	1,187,166	0	Preah Vihear	23	143,811	1,403,161	10
Kampong Cham	3	10,545	456,457	2	Preah Sihanouk	6	14,682	258,514	6
Kampong Speu	18	83,015	696,463	12	Pursat	4	244,032	1,158,561	21
Kampong Thom	28	10,110,871	1,244,559	12	Ratanakiri	28	139,572	1,178,546	12
Kampot	4	20,904	471,936	4	Siem Reap	10	49,439	1,054,469	5
Koh Kong	10	46,383	1,104,338	4	Steung Treng	18	116,537	1,201,669	10
Kratie	53	277,600	1,198,058	23	Svay Rieng	4	14,761	286,820	5
Monduliri	28	177,745	1,366,898	13	Tboung Khmom	7	19,281	491,274	4
Total						267	1534688.7	16,036,837	10

Source:

- ELC land size: *NGOF database 2015*
- Administrative land size: *Spatial data (Department of Geography 2005)* Note: The calculation area of Kampong Cham province and Tboung Khmom is unofficial, as these two provincial boundaries have not yet been publicly announced.

9. Evaluated ELCs

After the signing of the Inter-Ministerial Proclamation/*Prakas* on Strengthening ELC Management by the Minister of MAFF, H.E. Ouk Rabun, and the Minister of Environment, H.E. Dr. Say Samal, on 09 May, 2014, some ELCs and land concessions (LC) were cancelled or had their land area reduced in some provinces (23 ELCs/LCs covering 90,682 ha were fully cancelled, three ELCs/LCs covering 25,855 ha were voluntarily given back to the state, and the other two ELCs/LCs had their land reduced by MoE. Furthermore, 12 ELCs/LCs covering around 24,000 hectares were cancelled by MAFF¹⁴. This was a positive sign for reducing land disputes caused by ELCs/LCs.

¹⁴ See 08_01_15_MoE__ELCs_Revised.pdf and RFA 21 Jan 2015 and www.postkhmer.com (29 12 2014).

In 2015, 162 companies were the subject of inter-ministerial evaluation. Some of them had their land area reduced, and had to provide a specific time line for resuming procedures based on a company master plan, and arrange a new contract with the Government. Others were cancelled.

Statistics show that 138 out of 162 ELCs evaluated by MoE and MAFF were allowed to continue their activities, by providing a specific time line for resuming their procedures, based on a company master plan to arrange a new contract.

Kratie province has highest number of ELCs; 35 companies were evaluated but only 30 companies were allowed to continue activities. This was followed by Mondulkiri province with 20 ELCs evaluated; all companies were allowed to continue their activities.

No	Province	#ELCs Evaluated
1	Banteay Meanchey	2
2	Battambang	1
3	Kampong Cham	0
4	Kampong Speu	11
5	Kampong Thom	19
6	Kampot	4
7	Koh Kong	6
8	Kratie	30
9	Mondul Kiri	20
10	Otdar Meanchey	7
11	Preah Vihear	3
12	Pursat	1
13	Ratanak Kiri	21
14	Siem Reap	3
15	Sihanoukville	5
16	Stung Treng	5
17	Svay Rieng	0
18	Tboung Khmom	0
Total		138

Through ELC evaluation in 2015, three companies with 18,144 hectares of land in Oddar Meanchey province were requested to return the ELC land area to the RGC. Those companies were **Tonle Sugar Cane Co. Ltd., Angkor Sugar Co. Ltd. and (Cambodia) Cane and Sugar Valley Co. Ltd.** In Kratie province, there were four ELCs with 36,794 hectares of land cancelled. Those companies were **IPD INSTAN PRO TRADING Co. Ltd., Hamony Plantation Investment, C I V Development Agro-industry and Hout Sambath.** There is currently no information on how the land will now be used, whether new ELCs will be granted or whether the land will be kept to regenerate forest cover.

10. Downsized ELCs

Of the 267 ELCs recorded by NGOF, 78 companies in 15 provinces reduced their land area by 204,656.38 ha. Preah Vihear and Ratanakiri provinces have 12 ELCs

each, and these ELCs had their land area reduced most¹⁵. In Preah Vihear province, 21,007.82 ha of ELC land area was reduced, and in Ratanakiri province, 21,650.57 ha of ELCs land area was reduced. This was followed by Kratie province where 10 ELCs had land reduced by 17,259.52 ha. Most reclaimed land was used for local people, who had occupied and used the land before to grow crops to support their daily livelihood. Some reduced land areas were used for granting ELCs to other companies.

ID	Province	# ELCs downsized	Land area (Ha)
1	Banteay Meanchey	1	538.91
2	Battambang	1	1,979.25
3	Kampong Speu	6	7,126.73
4	Kampong Thom	5	9,155.29
5	Kampot	4	8,022.60
6	Koh Kong	1	131.80
7	Kratie	10	17,259.52
8	Mondulkiri	8	3,058.01
9	Oddar Meanchey	6	23,948.83
10	Preah Vihear	12	21,007.82
11	Pursat	2	82,384.69
12	Ratanakiri	12	21,650.58
13	Siem Reap	3	2,824.84
14	Steung Treng	6	5,448.42
15	Svay Rieng	1	119.09
Total		78	204,656.38

11. Summary

The statistical analysis of the RACC ELC database revealed the following trends:

- Number of ELCs granted: 267 ELCs have been granted since 1995.
- The institutions that granted ELCs: MAFF has granted the most ELCs, followed by MoE.
- There are ELCs in 18 provinces. On average, ELCs cover up to 9.56 percent of the whole administration land size of these 18 provinces.

¹⁵ According to NGOF data, 12 ELCs in Preah Vihear reduced their land area by 21,007.82 ha and 12 ELCs in Ratanakiri reduced their land area by 21,650.57 ha.

- ELCs that overlap land areas: Some ELCs overlap evergreen forests and semi-evergreen forests. There were 128 cases where ELCs overlapped protected areas and 72 cases where ELCs overlapped protected forests.
- ELCs that led to land disputes: There were 158 ELCs that caused land disputes in 18 provinces and affected 35,604 HHs. Only 42 of these ELCs have been resolved.
- ELC evaluation: 162 ELCs in 17 provinces were evaluated in 2015. Of these, 138 were allowed to continue their activities, after providing a specific time line for resuming procedures, based on a company master plan to arrange a new contract. A further 78 ELCs had their land size reduced.

Appendicec

Appendix A:

List of ELCs downsized by province, 2015

No	Company
A. Banteay Meanchey	
1	TADA INVESTMENT
B. Battambang	
2	SUONMEAN SAMBATH
C. Kampong Speu	
3	GREAT FIELD
4	MASTER INTERNATIONAL COOPERATION GROUP Co., Ltd.
5	SOVANNVIVATH TRADING Co., Ltd.
6	HLH AGRICULTURE COMPANY
7	UK KHUN INDUSTRIAL PLANTS and OTHER DEVELOPMENT
8	FORTUNA PLANTATION
D. Kampong Thom	
9	B N A (CAM) CORP
10	CAOUTCHOUC MEKONG Co., Ltd.
11	C R C K RUBBER DEVELOPMENT Co., Ltd. 2
12	PHOUC HOA KAMPONG THOM APHIVATH CAOUTHOUK Co., Ltd.
13	GOLD FOISON (CAMBODIA) A/C IMPORT EXPORT & CONSTRUCTION
E. Kampot	
14	FIRST BIO-TECH AGRICULTURAL (CAMBODIA) Co., Ltd. (Joined Ruchi Soya Industries Limited)
15	WORLD TRISTAR ENTERTAINMENT (CAMBODIA) Co., Ltd.
16	CAMTREE CORPORTATION
17	VIRTUS GREEN PLANTATION (Cambodia) PTE, Ltd.
F. Koh Kong	
18	GREEN RICH GROUP Co., Ltd.

G. Kratie	
19	TTY
20	SOVAN RACHSY
21	TRACH NIEM HAN DOU DAOV TU PHAT TRIEN DAYNAM KAMPOCHEA
22	C H P B DEVELOPMENT
23	TIMAS RESOURCES
24	DAU THIENG (Cambodia) Rubber Development Co., Ltd.
25	PHURIENG KRATIE APHIVATH CAOUTCH/Ltd. DOTY SAIGON-BINH PHOUC (SBK)
26	MEGA STAR INVESTMENT and FORESTRY DEVELOPMENT
27	HAI YONG INVESTMENT AGRO-INDUSTRY COMPANY
28	CHAN SOPHEA
H. Mondulhiri	
29	MASTER K SON Ltd.
30	K PEACE INVESTMENT CAMBODIA Co., Ltd.
31	RITHY KIRISEIMA/TAY NAM BPM Co., Ltd.
32	SOVANN REACHSY Co. Ltd.
33	D.T.C (Group)
34	DAK LAK MONDULKIRI APHIVATH
35	SETHIKULA Co. Ltd.
36	VARANACY (previously Khaov Chhealy Development)
I. Oddar Meanchey	
37	KHUN SEAR IMPORT EXPORT
38	LUN AGRITECH INVESTMENT Ltd.
39	NATURE PLANTATION (K.H) Co., Ltd.
40	TUMRING RUBBER
41	DATA RUBBER (Cambodia) Co., Ltd.
42	BEST ROYAL (K) Co., Ltd.
J. Preah Vihear	

43	AM PHAL FOCUS (Cambodia)
44	LAN FENG (Cambodia) INTERNATIONAL COMPANY LIMITED.
45	HENG RUY CAMBODIA INTERNATIONAL COMPANY LIMITED
46	HENG NONG (Cambodia) INTERNATIONAL COMPANY LIMITED
47	KIM CHEA THOUN GROUP Co., Ltd.
48	HENG YOU (Cambodia) INTERNATIONAL COMPANY Ltd.
49	RUY FENG
50	FP MALAYSIA (Cambodia) PLANTATION Co., Ltd.
51	DISTINCT HARVEST CAMBODIA Co., Ltd.
52	EMINENT ELITE (Cambodia) Co., Ltd.
53	GREEN CHOICE (Cambodia) LIMITED
54	CHINA GREAT CAUSE (Cambodia) INVESTMENT
K. Pursat	
55	MDS IMPORT EXPORT (MDS I, MDS II)
56	PHEAR PHIMEX Co., Ltd.
L. Ratanakiri	
57	HOANG ANH OYADAV Co., Ltd.
58	HOLLEY ECO-INDUSRIAL (CAMBODIA) Co., Ltd.
59	CHING ZOUNG RI
60	S K PLANTATION
61	CAOUTCHOUC EV LEV
62	7 MAKARA PHARY
63	HONG AN MANG YANG K RUBBER DEVELOPMENT
64	CHUANG LI (INVESTMENT) Co., Ltd.
65	HONG ANH LOMPHAT/DAUN PENH AGRICO Co., Ltd.
66	KRONG BOK RATANAKIRI RUBBER DEVELOPMENT
67	VEASNA INVESTMENT
68	HONG ANH YALAY
69	SIEM REAP

70	LY CHHOUNG CONSTRUCTION AND IMPORT EXPORT
71	EXCEL CAOUTCHIU PLANTATION Co. Ltd.
72	SEREY MONY TRANSPORTATION & CONSTRUCTION Co., Ltd.
M. Stung Treng	
73	BANARITA STEUNG TRENG
74	GG WORLD GROUP (CAMBODIA) DEVELOPMENT Co., Ltd.
75	GREEN SEA AGRICULTURE Co., Ltd.
76	SAL SOPHEA PEANICH Co., Ltd.
77	SIV GUEK INVESTMENT Co., Ltd.
78	SOPHEAK NIKA Investment Agro-Industrial Plants Co., Ltd.
N. Svay Rieng	
78	N K VENTURE (Cambodia) LIMITED

Appendix B:

List of ELCs evaluated in 2015

Province	ELC Name English	Situation (Cancelled, Continuing, V-Returned)
A. Banteay Meanchey		
1	LENG BOU CONSTRUCTION CO., LTD	Cancelled
2	CHEAT APHIVAT Co., Ltd.	Continuing
3	CHHUN LIM GROUP Co., Ltd.	Continuing
B. Battambang		
4	BSC IMPORT EXPORT CO., LTD	Cancelled
5	SOUN MEAN SAMBATH Co., Ltd.	Continuing
C. Kampong Speu		
6	NEW COSMOST DEVELOPMETN (CAMBODIA) COMPANY LIMITED	Cancelled
7	JIANKING (CAMBODIA) INTERNATIONAL INVESTMENT Co., Ltd.	Cancelled
8	KIRI ROM ECO TOURISM Investment	Continuing
9	SOK KONG A HARON NIHARON	Continuing
10	99 APHIVATH KASEKAM Co., Ltd.	Continuing
11	KAMPONG SPEU SUGAR	Continuing
12	GREAT FIELD (CAMBODIA) INTERNATIONAL LIMITED	Continuing
13	HLH AGRICULTURE CAMBODIA Co., Ltd.	Continuing
14	A2A TOWN (CAMBODIA) Co., Ltd.	Continuing
15	YELLOW FIELD (CAMBODIA) INTERNATIONAL LIMITED	Continuing
16	MASTER INTERNATIONAL CORPORATION GROUP Co., Ltd.	Continuing
17	SOVANNVIVATH TRADING Co., Ltd.	Continuing
18	SANAN AGRICULTURE DEVELOPMENT & LOGISTIC	Continuing
19	APHIVAT DAMNAM ASAHKAM OUK KHUN	Cancelled
D. Kampong Thom		
20	RAM NA VINIYORK Co., Ltd.	Continuing
21	SAL SOPHEA PEANICH GROUP Co., Ltd.	Continuing
22	C A D I Co., Ltd.	Continuing
23	C.R.C.K.2 APHIVATH CAOUTCHOUC Co., Ltd.	Continuing

24	C R C K 2 APHIVAT	Continuing
25	BIEN HEAK INVESTMENT	Continuing
26	BIEN HEAK INVESTMENT Co., Ltd.	Continuing
27	CAOUTCHOUC MEKONG Co., Ltd.	Continuing
28	SAMBATH PLATINEOM	Continuing
29	POU KHOUCH GROUP Co., Ltd.	Continuing
30	TEPI AGRO INVESTMENT Co., Ltd.	Continuing
31	AN MADY GROUP Co., Ltd.	Continuing
32	B N A (CAM) CORP	Continuing
33	KOL VEASNA INVESTMENT	Continuing
34	TAN BIEN KAMPONG THOM APHIVATH CAOUTCHOUC Co., Ltd.	Continuing
35	PARIER KAMPONGTHOM APHIVAT	Continuing
36	PHOU HOA KAMPONG THOM APHIVATH CAOUTCHOUC Co., Ltd.	Continuing
37	RITHYMONY SAMNANGLEANGLEAP Co., Ltd.	Continuing
38	C C V Co., Ltd.	Continuing
39	CRCK APHIVATH CAOUTCHOUC Co., Ltd.	Continuing
40	GOAL FASHION (CAMBODIA) A/C IMPORT and CONSTRUCTION	Continuing
41	SREY PANHA APIVAT Co., Ltd.	Cancelled
E. Kampot		
42	FIRST BIO TECH AGRICULTURE (CAMBODIA) Co., Ltd.	Continuing
43	WORLD TRISTAS INTERNATIONAL (CAMBODIA) Co., Ltd.	Continuing
44	VIRTUS GREEN PLANTATION (CAMBODIA) PTE., LTD	Continuing
F. Koh Kong		
45	L Y P Group Co., Ltd.	Continuing
46	LIM LONG Co., Ltd.	Continuing
47	KOH KONH S E Z Co., Ltd.	Continuing
48	GREEN RICH Co., Ltd.	Continuing
49	SINOMEXIM INVESTMENT Co., Ltd.	Continuing
50	J W CAMBODIA ECO HOLIDAYS	Continuing
G. Kratie		
51	PHU REING KRATIE APHIVAT CAOUTCHOUC	Continuing
52	DONG NAI KRATIE APHIVAT CAOUTCHOUC Co., Ltd.1	Continuing

53	DONG NAI KRATIE APHIVAT CAOUTCHOUC Co., Ltd.2	Continuing
54	DONG PHU KRATIE APHIVAT CAOUTCHOUC Co., Ltd.1	Continuing
55	DONG PHU KRATIE APHIVAT CAOUTCHOUC Co., Ltd.3	Continuing
56	P D A (Cambodia)	Continuing
57	KAMADHENU VENTURES (Cambodia)	Continuing
58	C H P B DEVELOPMENT Co., Ltd.	Continuing
59	C & V Group Co., Ltd.	Continuing
60	CHINA DYNAMIC INVESTMENT Co., Ltd.	Continuing
61	N.K AGRI (CAMBODIA) LIMITED	Continuing
62	NEW LINE CAM PTY., LTD.	Continuing
63	DAUTIENG KRATIE RUBBER DEVELOPMENT COMPANY LIMITED (DAKRARUCO)	Continuing
64	DAUTIENG (CAMBODIA) RUBBER DEVELOPMENT COMPANY LIMITED (DAKRARUCO)	Continuing
65	I P D INSTANT PRO TRADING Co., Ltd.	Cancelled
66	HENG HENG SAMBATH CHAMKAR CAOUTCHOUC 1	Continuing
67	HENG HENG SAMBATH CHAMKAR CAOUTCHOUC 2	Continuing
68	SUN KUYTY IMPORT & EXPORT Co., Ltd.	Continuing
69	HAI YONG INVESTMENT AGRO INDUSTRY COMPANY	Continuing
70	THAR VINIYORK	Continuing
71	RATANAK STONE CAMBODIA DEVELOPMENT	Continuing
72	J P E Co., Ltd.	Continuing
73	Co K S M Lin LIMITED	Continuing
74	THI VIN (Cambodia) Ltd.	Continuing
75	C I V DEVELOPMENT AGRO INDUSTRY	Cancelled
76	HAMONI PLANTATION Co., Ltd.	Cancelled
77	TTY APHIVAT DAMNAM KASEKAM Co., Ltd.	Continuing
78	HOUT SAMBAT Co., Ltd.	Cancelled
79	CHAMKAR KAOSOU MEMUT Co., Ltd.	Continuing
80	SOVAN VUTHY Co., Ltd.	Continuing
81	TRACH NHEAM HUHAN DOUTIV FATEIN DAYNAM KAMPUCHEA	Continuing
82	XAY DUNG CAOUTCHOUC DUC DUNG Co., Ltd.	Continuing

83	VIETNAM KAMPUCHIA ECONOMY, TRADE AND INDUSTRY COMPANY LIMITED (VKETI) Co., Ltd.	Continuing
84	SOVAN REACHSEY	Continuing
85	SAMNANG ANGKOR DEVELOPMENT LTD	Continuing
86	E-INVESTMENT (Cambodia) Co., Ltd.	Continuing
H. Mondulkiri		
87	WUZHISHAN LS GROUP	Continuing
88	HUA LIN (Cambodia) INTERNATIONAL INSURANCE Co., Ltd.	Continuing
89	VARANASI Co.Ltd.	Continuing
90	COVIPHAMA Co., Ltd.	Continuing
91	KASEKAM KHMER ANGKOR Co., Ltd.	Cancelled
92	LKL CONSTRUCTION Co., Ltd.	Cancelled
93	RITHY KIRI SEIMA	Cancelled
94	PACIFIC PEARL JOINT STOCK COMPANY LIMITED	Continuing
95	PACIFIC LOTUS JOINT STOCK COMPANY LIMITED	Continuing
96	PACIFIC GRAND JOINT STOCK COMPANY LIMITED	Continuing
97	PACIFIC PRIDE JOINT STOCK COMPANY LIMITED	Continuing
98	K PEACE INVESTMENT (CAMBODIA) Co., Ltd.	Continuing
99	SETHIKULA Co., Ltd.	Continuing
100	VILA DEVELOPMENT Co., Ltd.	Continuing
101	INVESTMENT and DEVELOPMENT DAI THANH (CAMBODIA) J S C LTD	Continuing
102	LIM ROYAL JOINT STOCK COMPANY LIMITED	Continuing
103	DAK LAK MONDULKIRI APHIVATH	Continuing
104	D T C GROUP Co., Ltd.	Continuing
105	TOUCHWOOD (CAMBODIA) Co., Ltd.	Continuing
106	UNIGREEN RESOURCES Co., Ltd.	Continuing
107	SENG LONG GREEN LAND INVESTMENT (CAMBODIA) Co., Ltd.	Continuing
108	LAND & DEVELOPMENT (CAMBODIA) Co., Ltd.	Continuing
109	MUHIKBAH MASTERON CAMBODIA J V LTD	Continuing
110	BEINH HOUCK KRATIE RABBER 1 COMPANY LIMITED	Continuing
111	MEGA FIRST CORPORATION BERHAD (MFCB)	Continuing
112	NOUPHEAP SOPHY INVESTMENT Co., Ltd.	Continuing
113	SRUN SOVNNAPHOUM INVESTMENT Co., Ltd.	Continuing
I. Oddar Meanchey		

114	KHUN SEAR IMPORT EXPORT	Cancelled
115	CAM AG IMPORT EXPORT Co., Ltd.	Continuing
116	(CAMBODIA) CANE & SUGAR VALLEI	V-RETURNED
117	SAMRONG RUBBER INDUSTRY PTE Ltd.	Continuing
118	MENG LI HENG	Continuing
119	DATA RUBBER (CAMBODIA) CO., LTD	Continuing
120	LUN AGRITECH INVESTMENT COMPANY Ltd.	Continuing
121	NATURE PLANTATION (K.H) Co., Ltd.	Continuing
122	SE HONG PLANTATION COMPANY LIMITED	Continuing
J. Preah Sihanouk		
123	HONG KONG ASIA RESEARCH INVESMENT AND DEVELOPMENT CONSTRUCTION GROUP Co., Ltd.	
124	MONG RETHTHY GROUP Co., Ltd.	Continuing
125	Y SENG Co., Ltd.	Continuing
126	MONG RETHTHY OIL PALM INVESTMENT CAMBODIA	Continuing
127	MONG RETHTHY CASSAVA INVESTMENT CAMBODIA	Continuing
K. Preah Vihear		
128	CAMBODIA DAWN PLANTATION	Continuing
129	METRY PHEAP KASE OSAHAKAM	Continuing
130	SOVANNAPHUM VINIYORK KASE OSAHAKAM	Continuing
L. Pursat		
131	M D S IMPORT EXPORT Co., Ltd.	Continuing
M. Ratanakiri		
132	KRONG BOK APHIVAT	Continuing
133	HONG ANH MANG YANG K APHIVAT CAOUTCHOUC Co., Ltd.	Continuing
134	KIRI APHIVAT Co., Ltd.	Continuing
135	HENG BROTHER	Continuing
136	D M Group.,LTD	Continuing
137	KAUSU EAHLEO BM JIONT STOCK Co., Ltd.	Continuing
138	C R D Co., Ltd.	Continuing
139	CHUANG LI (INVESTMENT) Co., Ltd.	Continuing
140	HOLLEY ECOINDUSTRIAL (CAMBODIA) Co., Ltd.	Continuing
141	7 MAKARA PHARY Co., Ltd.	Continuing
142	VEASNA INVESTMENT Co., Ltd.	Continuing
143	HOANG ANH OYADAV Co., Ltd.	Continuing

144	CHEA CHANRITH APHIVAT	Continuing
145	GLOBALTECH Sdn Bhd	Continuing
146	HENG HEAP INVESTMENT	Continuing
147	HOANG ANH ANDONG MEAS Co., Ltd.	Continuing
148	HOANG ANH LUMPAT Co., Ltd.	Continuing
149	DAUN PENH AGRICO Co., Ltd.	Continuing
150	MAKOD PECH APHIVAT-INDUSTRIAL	Continuing
151	MASTER K SON Co., Ltd.	Continuing
152	ROTH SOKHORN INCORPORATION	Continuing
N. Siem Reap/Preah Vihear		
153	LI CHHOUNG SAMNORNG & AHAROND NIHAROUND	Continuing
154	EXCEL CATOR PLATATION Co., Ltd.	Continuing
155	SEREY MONY TRANSPORTATION & CONSTRUCTION	Continuing
O. Stueng Treng		
156	(CAMBODIA) RESEARCH MINING DEVELOPMENT	Cancelled
157	BONARITA STUNG TRENG	Continuing
158	SOK HENG COMPANY LIMITED	Cancelled
159	UN-INTER TRADING & DEVELOPMENT GROUP (CAMBODIA) Co., Ltd.	Cancelled
160	GREEN SEA INDUSTRY Co., Ltd.	Continuing
161	DAMLONG MI POWDER	Continuing
162	GG WORLD GROUP (CAMBODIA) DEVELOPMENT Ltd.	Continuing

Appendix C:

List of ELCs cancelled by province in 2010

No.	Province	Cancelled ELCs, NGOF database
1	Battambang	2
2	Kampong Cham	3
3	Kampot	5
4	Mondulhiri	50
5	Koh Kong	6
6	Kampong Thom	2
7	Kampong Speu	13
8	Kratie	1
9	Pursat	1
10	Rattanakiri	1
11	Takeo	2
	Total	86

Appendix D:

List of ELCs cancelled by the RGC in 2010

N°	Company
A. Battambang province - 2 ELCs	
1	NACO RICE
2	LY SENG IMPORT EXPORT
B. Kampong Cham 3 ELCs	
1	ASIA GOLDEN DRAGON
2	KC GECIN ENTERPRISE
3	AGRICULTURAL DEVELOPMENT ASSOCIATION
C. Kampong Speu 13 ELCs	
1	CHEC JADAN (C. J. Cambodia)
2	UN BORIN TRADE AGRICULTURE DEVELOPMENT
3	MACA PLANTATION
4	ANGKOR AGRO-INDUSTRIAL DEVELOPMENT PLANTATION
5	SAR UTH
E. Kampong Thom 2 ELCs	
1	VATH VANNY
2	CAMBO CAME Co., Ltd.
F. Kampot 5 ELCs	
1	SHING YUE COMMERCIAL
2	SIN TAHI KAMPOT
3	YEAN JAN TRADING Co., Ltd. or CAMBODIA TAPIOCA COOPERATION LIMITED
4	CAMBODIAN TAPIOCA ENTERPRISE
5	CHINA EVERGREEN
G. Koh Kong 6 ELCs	
1	The Green Rich Co., Ltd.
2	CHINA CAMBODIA STATE FARM INTERNATIONAL
3	TANAM PLANTATION HOLDING SND BHD
4	CHUNG SHIN CABODIA
5	CHUNG THAI INVESMENT
6	CAMBODIA SHAN SHOE
H. Kratie 1 ELC	
1	TAY NAM (K) Co., Ltd.
I. Pursat 1 ELC	
1	SOUR KEAT Co., Ltd.

J. Rattanakiri 1 ELC	
1	KS CHAMROEUN APIWATH
K. Takeo 2 ELCs	
1	LIM KRY AGRICULTURE DEVELOPMENT
2	CAMBODIA PALM OIL PTY Co., Ltd.
K. Mondulkiri 50 ELCs "Cancelled by Provincial Governor on January 04, 2010"	
1	THONG HORD
2	LONG SIN INDUSTRIAL
3	TRY PHEAP
4	KHMER INTERNATIONAL
5	SANMENG
6	DIC
7	DTC
8	MINDA FOTVER
9	GOOD LUCK
10	SONANY ANGKOR
11	MEGA STAR CONSTRUCTION
12	REALESTATE Co., Ltd.
13	MEGA STAR PRODUL
14	RATTANAK STONE CAMBODIA DEVELOPMENT
15	TANIMEX Co., LTD
16	SHANG SUN COOPERATION
17	MEAN SAROEUN
18	MING ZHANG COMPANY LIMITED
19	LAY UDDOM
20	MEGAR STAR INVESTMENT CONSTRUCTION Co LTD.
21	VISION HIGHLAND
22	KIM KUY CONSTRUCTION TRADING Co LTD
23	RITHY MEXCO
24	JAPAN CAMBODIA, FARMING COOPERATION
25	KHMER BERK BO (B.K.K)
26	MEGA STAR PRODUL
27	LOCK NINH RUBBER PLANTATION
28	ANHONG MINH JOIN STOCK Co., LTD
29	TOCHHIDAYA Co., LTD
30	BEST AGRICULTURE INVESTMENT Co LTD
31	MING ZHANG C.P.C
32	K.K.P GROUP

33	MUNY SINAMIC
34	BIN LONG
35	LOCK MIN
36	DAK MORUCO
37	DONG PU
38	YIN CHHANG GROUP (Cambodia) Development Co., Ltd.
39	KRECH COMPANY
40	GWANG CHHANG GROUP
41	NAB PAK
42	WO CHHANG GROUP (Cambodia) Development Co., Ltd.
43	DOLY PRIYOUM
44	DAILY SHI GROUP Cambodia Development Co Ltd.
45	DONG DOUNG
46	LIM KUY
47	LEAK BANG
48	MEGA STAR EN
49	MINH DOCK TOURIST TRADING INVESTMENT JOIN STOCK Co., LTD
50	YATIN International Trust and Investment (Cambodia) Co., Ltd. and Ocean Space Investment (Cambodia) Co., Ltd.

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