Observation Report: Voter Registration and List Verification 2011









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NICFEC Monitors 2011 Voter Registration and List Verification Final Report

I. Acknowledgements

The Neutral and Impartial Committee for Free and Fair Elections in Cambodia (NICFEC) would like to thank the National Democratic Institute for International Affairs (NDI) and the United States Agency for International Development (USAID) for financial and technical support on this project.

Special thanks to the Center for Advanced Study (CAS) for drawing the statistic sample of communes for observation.

NICFEC would also like to acknowledge the National Election Committee and Provincial Election Committees for cooperation with NICFEC's head office and observers in the field.

NICFEC is very grateful to all volunteer observers who devoted their valuable time participating in the observation of voters' list verification and voter registration in 2011. NICFEC also thanks its head office staff and provincial coordinators who helped the project run smoothly.

NICFEC hopes this report will provide helpful information in order to improve the voter registration process in the future.

II. Introduction

With technical assistance from the National Democratic Institute for International Affairs (NDI), The Neutral and Impartial Committee for Free and Fair Elections in Cambodia (NICFEC) implemented a voter registration/list verification monitoring program for the 2011 registration period.

Prior to registration, multistage random sampling was used to statistically select 300 communes for observation out of Cambodia's 1,621 communes. NICFEC, with NDI's assistance, trained 318 observers and 20 provincial coordinators from 22 provinces and Phnom Penh municipality, equipping them with guidelines, checklists, and reporting schedules. Observers were deployed on September 1, the first day of registration, and monitored 30 out of the total 42 days during which registration took place at the commune council offices. Observers stayed at the commune office the entire day, from opening until closing. Observers' daily checklists included questions pertaining to compliance with NEC schedules and regulations, acceptance of appropriate documents of identification, use of the new Statement of Identity form, and presence of unauthorized individuals in the registration office. Data was compiled and analyzed at NICFEC headquarters.

In addition to following a precise and rigorous methodology, NICFEC implemented several safeguards to ensure the quality of its observers and data. NICFEC's provincial coordinators

regularly monitored observers and cross-checked their daily reports. NICFEC's head office staff also conducted regular spot checks on the data, following up on any unusual reports and critical incident forms. NDI audited the data and observed the monitoring of voter registration in select communes.

This report describes the methodology NICFEC employed for its monitoring effort, the results of observation, and some initial analysis. Because NICFEC used a statistical sample for observation, these findings can be used to draw conclusions about the entire country, not only the communes where monitoring took place.

III. Background

Cambodia's upcoming Commune Council and National Assembly elections, scheduled for June 2012 and July 2013 respectively, will be critical tests for the country's democracy. The country has held four parliamentary elections and two commune elections since the signing of the Paris Peace Accords in 1991. While many of the problems from previous elections such as election-related violence have improved, challenges remain. There continues to be a lack of confidence in the impartiality of the election administration and in the complaints resolution process among elections stakeholders. In the last election, observers reported widespread use of state resources, government property and vehicles, for political purposes and distribution of gifts by political contenders. In addition, problems with the voters' list, including false deletions, have disenfranchised voters. Finally, unequal access to media has significantly contributed to an unlevel political playing field.²

The voter registration process, in particular, continues to be cumbersome and problematic, placing a large burden on voters in a country with large mobility due to migrant and seasonal workers. Cambodia maintains a continuous, annual voter registration and verification system, which requires voters to renew their participation every year. Voters who fail to verify their names during the set registration period risk having their names deleted from the list and finding themselves unable to exercise their franchise in elections. This verification must take place in the commune where they have residency and no accommodations are made for overseas or migrant workers who often do not have the time or money to return to their home communes.

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¹ The country has a four-level structure to administer elections, headed by the National Election Committee (NEC). The NEC does not have constitutional status. Its nine members are nominated by the Ministry of Interior and appointed by Royal Decree after approval from the majority of the National Assembly.

² For further information, see: Committee for Free and Fair Elections in Cambodia (COMFREL), *Final Assessment and Report on 2008 National Assembly Elections*, 2008; Committee for Free and Fair Elections in Cambodia (COMFREL), *Final Assessment and Report on 2007 Commune Council Elections*, 2007; Cambodia Development Resource Institute (CDRI)'s Conflict Prevention in Cambodian Elections (COPCEL), *Commune Council Election Report*, 2007; National Democratic Institute for International Affairs (NDI), *Cambodian Elections: Lessons Learned and Future Directions, A Post-Election Conference Report*, 2004; United Nations Development Programme (UNDP), *Electoral Dispute Resolution in Cambodia's National Assembly Elections*, by Consultant Jaye Sitton, 2008; European Union (EU), *Final Report: Election Observation Mission Cambodia*, 2008; United Nations Development Programme (UNDP), *Report on the 2007 Commune Council Elections in Cambodia*, 2007; National Democratic Institute for International Affairs (NDI), Neutral and Impartial Committee for Free and Fair Elections in Cambodia (NICFEC), Center for Advanced Study (CAS), Committee for Free and Fair Elections in Cambodia (COMFREL), *Report on Voter Registration Audit (VRA) in Cambodia*, 2007.

Moreover, with registration held in the middle of rainy season, transportation complications are multiplied, further creating obstacles for citizens to exercise their rights.

Citizens without ID cards need to understand the multiple combinations of other forms or documents required for registration that satisfy four requirements (nationality, age, residency, and photo). Because proof of residency is required, homeless or evicted people are denied the right to vote. Recent changes in registration procedures in 2011, including extended dates for registration and complaint filing, acceptance of expired national identification (ID) cards for registration purposes, and discontinuation of form 1018 (a temporary ID card) have been enacted to ease the process but were not well disseminated to the general public or all commune offices.

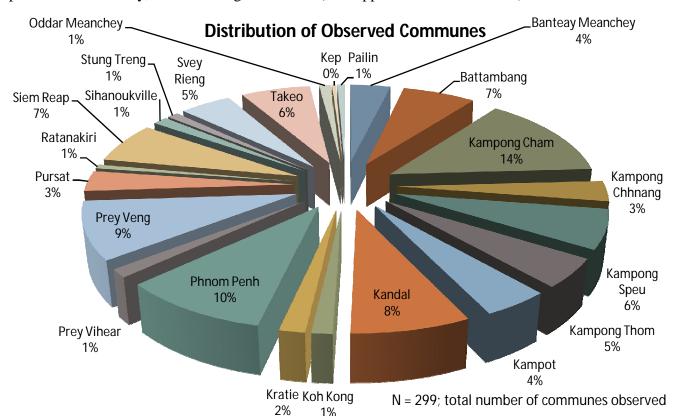
Finally, as the National Election Committee (NEC) delegates registration duties to the very commune councils facing election next June, inherent conflicts of interest exist, presenting opportunities for abuse and bias.

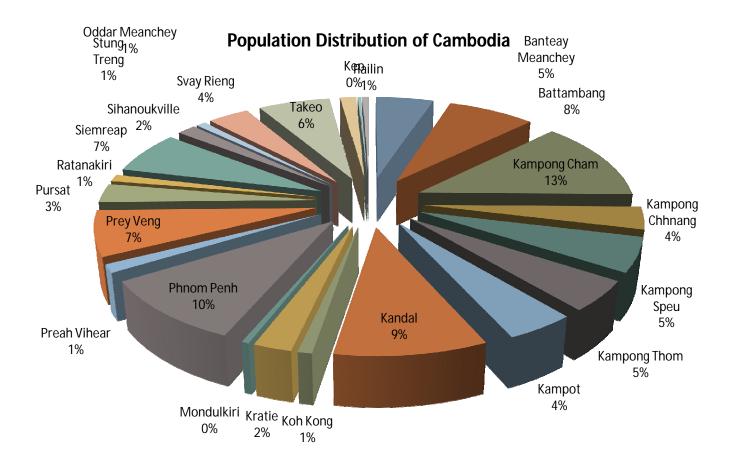
NICFEC believes that a credible election needs to meet international standards of integrity and transparency beginning with the registration process. By observing the process, NICFEC can play a critical role in providing impartial information and analysis, with the aim to enhance future registration exercises.

IV. Methodology

1. Commune Selection

To systematically select communes for observation, NICFEC cooperated with Centre for Advanced Studies (CAS) to draw a multistage random sample of 300 communes. The decision to use a statistical sample was to enable NICFEC to draw conclusions about the voter registration process in its entirety, within a margin of error. (See Appendix A for locations.) ³





Total communes observed

No.	Province	No. of Communes	No.	Province	No. of Communes
1	Banteay Meanchey	11	13	Prey Veng	28
2	Battambang	20	14	Pursat	10
3	Kampong Cham	41	15	Ratanakiri	2
4	Kampong Chhnang	10	16	Siem Reap	20
5	Kampong Speu	19	17	Sihanoukville	4
6	Kampong Thom	14	18	Stung Treng	3
7	Kampot	13	19	Svey Rieng	14
8	Kandal	23	20	Takeo	19
9	Koh Kong	4	21	Oddar Meanchey	3
10	Kratie	5	22	Kep	1
11	Phnom Penh	29	23	Pailin	2
12	Prey Vihear	4		Total	299

2. Selection of provincial coordinators and observers

In August 2011, NICFEC selected 20 provincial coordinators, all of whom had helped oversee past NICFEC monitoring programs, to undertake the role of master trainers and supervisors for observation. Each provincial coordinator then recruited observers, interviewing all candidates and conducting background checks to ensure neutrality and impartiality. This process took one week, and 318 observers were selected, many who had experience monitoring with NICFEC before. An extra 18 observers were recruited to serve as back-up.

3. Material production

NDI and NICFEC developed the following materials:

Strategies Developed	Trainer Materials	Observer Materials (also used in training of PCs)
Goals and Objectives of VRM	Registration Process Presentation	Checklist
Observer Recruitment Guidelines	Trainer Guidelines	Critical Incident Form
Timeline	Registration Simulation	Summary Reporting Form
Reporting Procedures	Reporting Guidelines	Address Sticker for Sending Reports
Agenda and Modules for Training	Material List	Observer Guidelines
	Observer Post Test Answer Key	Reporting Guidelines
	Provincial Coordinator Agenda	Checklist Simulation
	Provincial Coordinator Training Agenda	Observer Post Test
	Provincial Coordinator Post Test	Observer Agenda
		Code of Conduct
		Observer Pledge

4. Training

NICFEC utilized a two-tiered training system in which provincial coordinators participated in a two-day training workshop in Phnom Penh before dispersing to eight provinces to facilitate provincial trainings.

NICFEC organized the Phnom Penh session on August 23 and 24 to prepare provincial coordinators to train observers and supervise registration observation across 23 provinces. The training provided instruction on NEC guidelines on voter registration, observation checklists (see Appendix B), observer reporting procedures, and the responsibility of provincial coordinators. Each provincial coordinator completed two simulation exercises and a final test in order to measure their comprehension of the materials. In addition, each provincial coordinator signed a pledge promising impartiality in their observation. Out of 20 provincial coordinators participating in the training, 16 were selected based on their test score to be master trainers.

For the second stage of the training strategy, NICFEC deployed these provincial coordinators in pairs to eight provinces to train 318 observers (40% women) in one-day and two-day training sessions on August 28 and 29. The observers learned about NEC guidelines, how to observe, how to fill out their observation checklists, reporting procedures, and the importance of impartiality.

The training was divided into two different days in some provinces because the combined numbers of observers exceeded 40 people. The schedule was as follows:

- 1. Kampong Speu with participants from Preah Sihanouk and Koh Kong province. (Training on 28 August 2011)
- 2. Kampong Chnang with participants from Pursat province. (Training on 28 August 2011)
- 3. Battambang with participants from Pailin and Banteay Meanchey province. (Training on 28 August 2011)
- 4. Siem Reap with participants from Kampong Thom, Preah Vihear, and Odar Meanchey province. (Training on 28 29 August 2011)
- 5. Kampot with participants from Kep and Takeo province. (Training on 28 August 2011)
- 6. Phnom Penh with participants from Kandal. (Training on 28 29 August 2011)
- 7. Kampong Cham with participants from Kratie, Stung Treng, and Rattanakiri province. (Training on 28 29 August 2011)
- 8. Prey Veng with participants from Svay Reang province. (Training on 28 29 August 2011)

5. Deployment Plan

The monitoring period was 30 days and was divided into three stages:

- 1. September 1-10, 2011
- 2. September 16-20, 2011
- 3. October 1-15, 2011

Monitors were required to observe the full day of registration from 7.00am to 5.00pm. They arrived prior to the opening of the commune office and stayed until after its closing.

The NEC extended the registration period by three days in 367 of the communes due to extensive flooding. Of those 367 communes, NICFEC was observing 56 communes and continued for the additional three days. For consistency NICFEC asked the relevant volunteer observer to stay on an extra three days, which all of them accepted to do. (See Appendix C for list of extended communes.)

NICFEC ensured there were many safeguards in place to guarantee the quality of observation. Provincial coordinators rotated among sample communes to observe NICFEC monitors, provide support as needed, and double check reporting forms. NICFEC staff from Phnom Penh also conducted spot checks on the coordinators and observers to check compliance with regulations and procedures. NICFEC staff also traveled to areas where problems occurred to provide support and help with reporting. In Poi Pet, Banteay Meanchey, for example, one observer was absent so NICFEC immediately called on one of its trained 18 alternates to take the observer's place. NDI conducted spot checking in select communes in Pursat, Battambang, and Banteay Meanchey to observe NICFEC monitors and ensure protocol was being followed.

6. Documentation and data collection

Observers completed an observation checklist for each day of observation. The checklist asked 10 binary questions and seven multiple choice questions. The questions were factual seeking to determine if NEC staff where implementing voter registration procedures consistently. Observers were also required to complete a critical incident form only when a critical incident took place. NICFEC defined critical incident as something that happens to significantly impact the ability of multiple voters to register fairly. In addition critical incident forms were required to be filled in if the responses to the observation checklist were pre-determined to have an impact on registration. Monitors sent their reports to NICFEC headquarters every five days, corresponding to the NEC's reporting schedule, to be entered into the master database, designed by NICFEC and supported by NDI. Results from each data enterer were consolidated daily into a master matrix for data analysis.

NDI provided one day of training to nine data enterers on September 5, 2011. The purpose was to brief them on the objectives of the project, the various observer forms, and how to enter data into the database. During the training, NICFEC and NDI tested them on their abilities through mock forms.

To ensure the accuracy of the data, NICFEC's master trainers/provincial coordinators conducted spot checks on observers and responded to circumstances when observers had difficulty reporting. NICFEC's headquarters also conducted audits in target areas in order to double check the data of provincial coordinators and observers. NICFEC continually verified the information provided in the critical incident forms to ensure the data was valid and entered correctly.

7. Logistical Challenges to Early Observation

Due to a mix of poor weather and some isolated confusion on the behalf of commune clerks, some observers did not begin observing on September 1st.

- Two observers, one in Kralanh district and another in Sot Nikum district of Siem Reap province, were not allowed to observe the first three days of voter registration because NEC cards were not delivered on time. They observed from outside the office.
- One commune, Prek Chrey commune, Koh Thom district of Kandal province, could not be observed at all due to flooding.
- Two observers (in Kralanh and Soutr Nikum districts of Siem Reap province) with NEC and NICFEC cards were not welcomed by the authorized officers for the first few days and were not allowed to observe near the registration desk.
- Three observers (in Chomnoab, Thmar Bang district, Koh Kong province; Ya Tung, O Yadav district, Rattanakiri province; and Phnom Kravanh district, Pursat province) were late in sending their documents due to difficulties in transportation (bad road conditions, lack of taxi services, flooding) and lack of phone coverage.

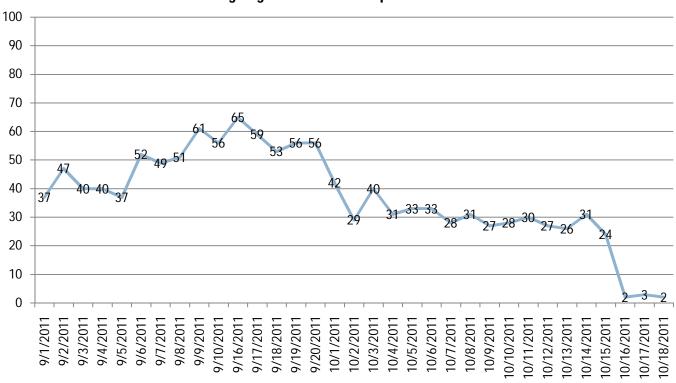
V. Findings

Based on the aggregated data from 9,136 daily reports submitted by observers, NICFEC has made a number of conclusions about the voter registration period and local compliance with NEC regulations.

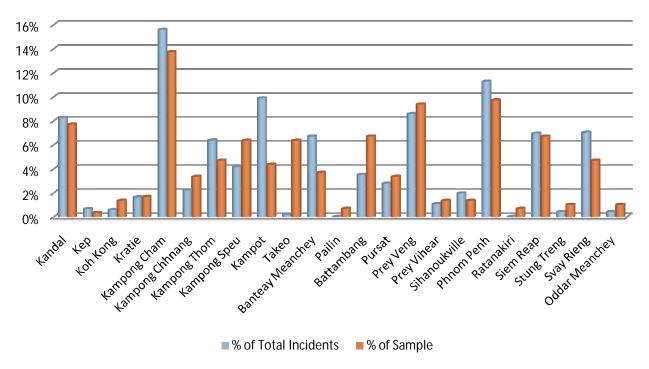
1. Registration without presence

The most common irregularity observed by NICFEC was the registration of an applicant who did not appear in person despite the legal requirement for applicants to be present (part V of guidelines on review of voters' list and voter registration). More than half of the communes observed (151 out of 299) registered at least one applicant who did not come to the office in person. This violation was reported in 1,226 daily checklists (13.4%), each of which indicated the approximate number of people who were illegally registered. In 17 of these checklists involving 11 communes, commune clerks registered more than 10 people in a single day without appearing in person. When tracking the data over time, this problem occurred less frequently toward the end of the registration period. This violation was most prevalent in Kampong Cham, Kampot, and Svay Rieng.

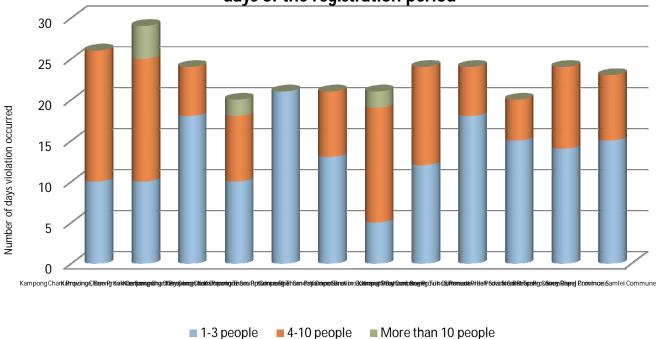
Communes Allowing Registration without presence



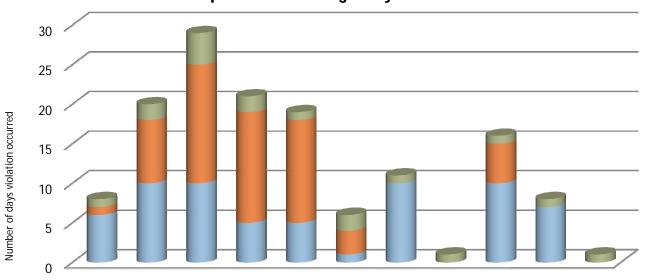
Distribution of registration without presence



Communes that registered applicants without presence on at least 20 days of the registration period



Communes reporting more than 10 people registering without presence in a single day



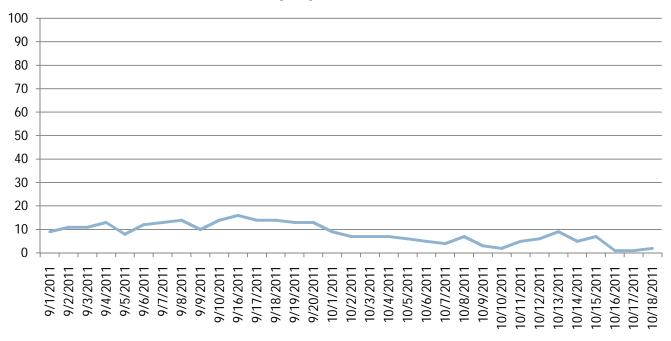
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■ 1-3 people ■ 4-10 people ■ More than 10 people

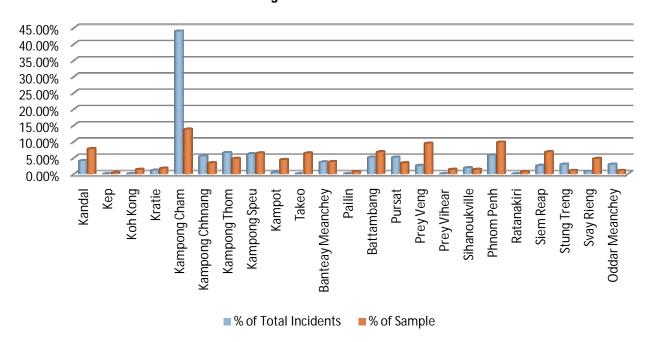
2. Registration without documentation

A total of 69 out of 299 communes (23.1%) allowed the registration of at least one applicant without any documents of identification. In three communes, commune clerks registered more than 10 applicants in a single day without documentation. Applicants are required to present documents that provide their age, commune of residency, proof of citizenship, and an ID photo. This problem disproportionately occurred in Kampong Cham province, with 44% of incidents taking place there and but only 14% of communes observed there. This problem remained consistent throughout registration, although it decreased slightly toward the end.

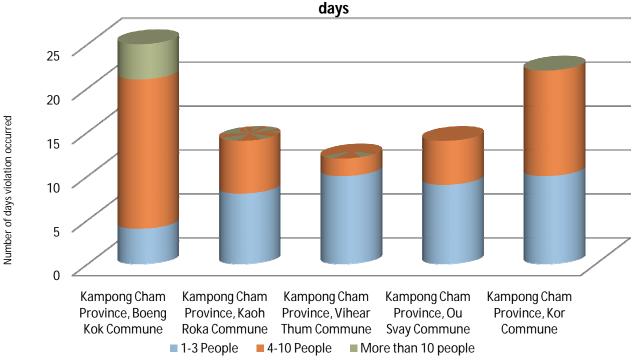
Communes allowing registration without documentation



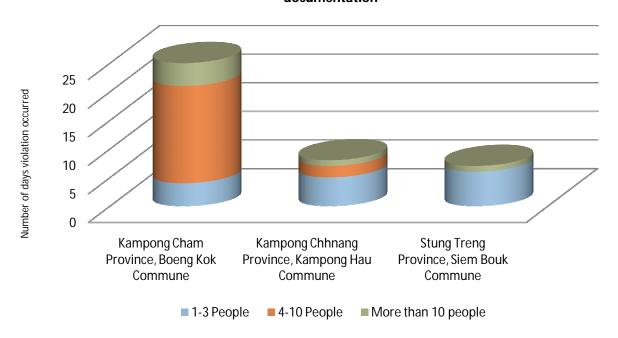
Distribution of registration without documentation



Communes in which applicants registered without documentation on at least 10 days



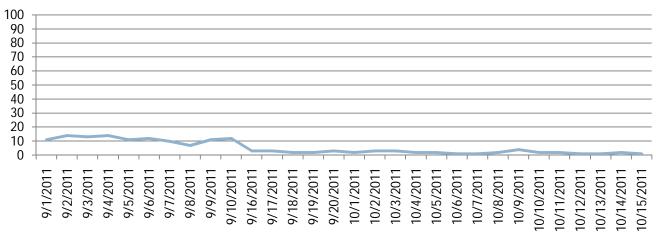
Communes in which more than 10 people in a single day registered without documentation



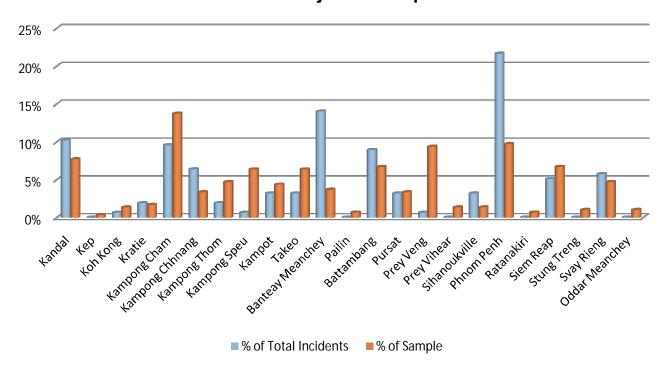
3. Prevented from registering with expired ID

NICFEC found that the new NEC regulation allowing the use of expired national ID cards to register and vote through the end of 2013 was not universally enforced. These violations were reported in 55 out of 299 communes (18.4%). This information does <u>not</u> include the use of ID cards from the State of Cambodia, which could be rightfully rejected. The problem occurred disproportionately in Phnom Penh.

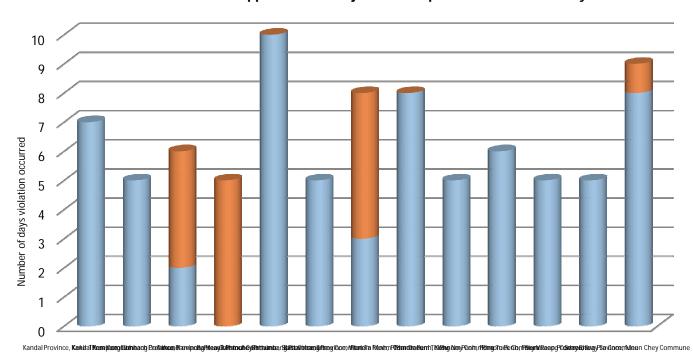
Communes rejecting expired IDs



Distribution of rejection of expired IDs



Communes in which applicants were rejected for expired IDs on at least 5 days

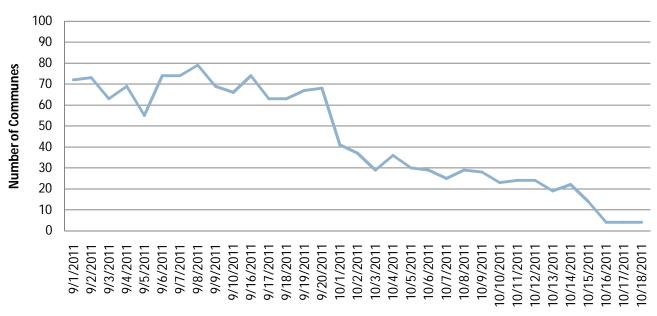


■ 1-3 People ■ 4-10 People

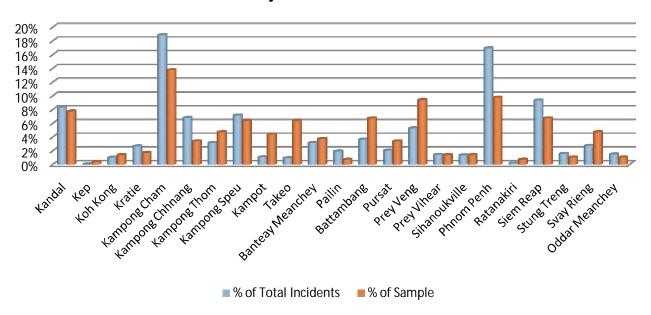
4. Prevented from registering due to insufficient documentation

Observers reported that applicants were rejected for insufficient documents in 185 communes (62%). They were not asked to judge the validity of this rejection; therefore, this information could include applicants who were rejected correctly or incorrectly. Even if correctly not allowed to register, the data does demonstrate the difficulties citizens continue to face in understanding the necessary documentation for registration. These incidents decreased during the registration period, perhaps indicating a greater understanding over time of necessary paperwork for registration.

Communes in which applicants were rejected for insufficient documents



Distribution of rejection for insufficient documents



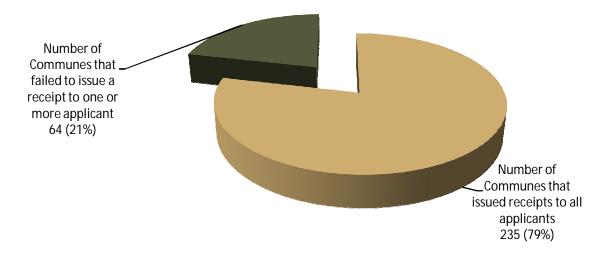
5. Non-compliance with office hours

NICFEC observers found that many communes did not consistently comply with regulated hours of operation. Although observers reported that offices opened more than 15 minutes late in only 6% of cases, in 31.5% of cases the registration office did not close on time, including 195 communes in which the registration office did not close on time on at least one day. By closing the registration early the ability for applicants to register to vote was limited.

6. Issuance of Registration Receipts

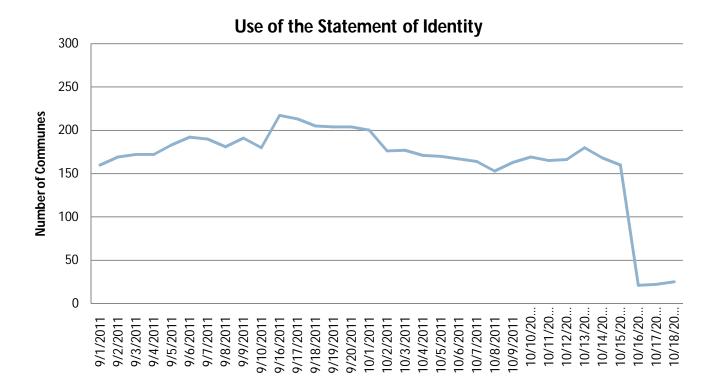
In 64 communes, commune clerks failed to issue receipts to at least one successful applicant. In 36 of these communes, commune clerks committed this violation on more than one occasion.

Issuance of Registration Receipts

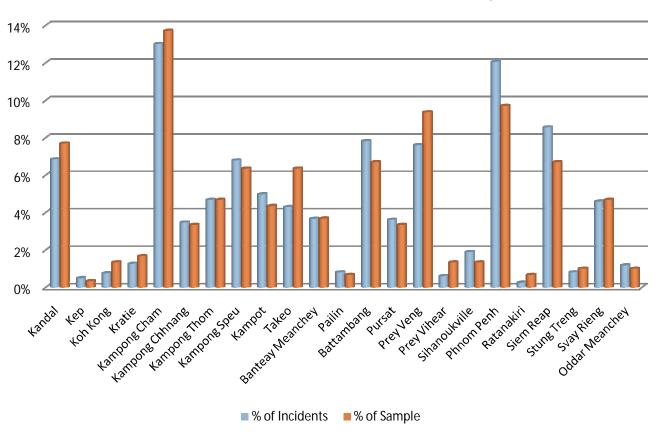


7. Use of the Statement of Identity for Electoral Purposes

Observers monitored the use of the Statement of Identity for Electoral Purposes in order to track the distribution and administration of the new form. During the monitoring period, applicants used the form in 278 communes (93%), with the forms being used in an average of 165 communes per day. Based on the data, a minimum of 20,654 applicants in the 299 communes used the new Statement of Identity for Electoral Purposes to register to vote. The number of applicants who utilized the Statement of Identity for Electoral Purposes, 20,654 was determined by using the lower end estimate in the checklists. For example if an observer noted that between 1-3 people used the form, we used '1', and if an observer noted that more than 10 had used the form we used '10.'



Distribution of the use of the Statement of Identity



8. Intimidation and political activity

Intimidation of applicants was rare. In only five out of 299 communes (1.7%) did observers report they had witnessed any intimidation. Intimidation observed included the use of strong language by party activists against applicants, the presence of police officers next to the center, the collection of data on party membership by village chiefs, and the questioning of suspected foreign applicants by party activists, among other examples.

Political activity around the registration centers was limited. In only 11 out of 299 communes (3.7%) did observers report party or campaign activities near or in the registration center, half of which involved commune officials, party activists, or applicants wearing party apparel. The commune clerks did a sufficient job of ensuring that the registration centers were free from violence, intimidation, or political activity.

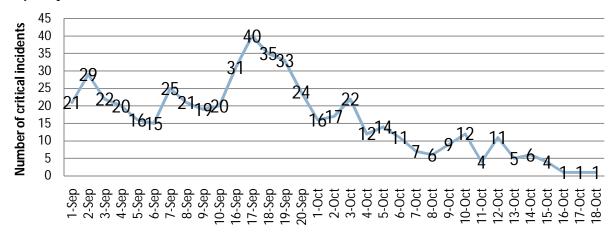
9. Critical Incidents

NICFEC asked observers to submit additional documents whenever a critical incident arose. Critical incidents were defined as any incident involving the following:

- inappropriate closures throughout the day
- intimidation of applicants
- political activity
- the failure of a commune clerk to provide a receipt to more than ten applicants
- the rejection of more than ten applicants for insufficient documents
- the registration of more than ten applicants who did not present documentation or who did not appear in person
- the rejection of more than ten applicants with expired ID cards

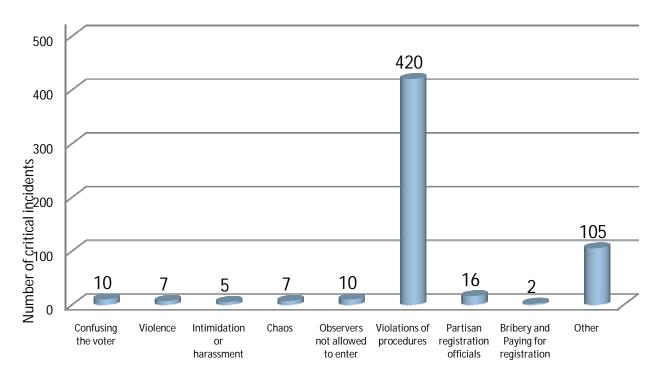
Observers were told not to report incidents that they did not witness themselves. They were asked to provide information on the incident, including the time of the incident, the type of incident, the people involved, and the number of people affected. Based on these explanations, NICFEC can make a several conclusions about the types of irregularities committed during registration.

Frequency of Critical Inicidents

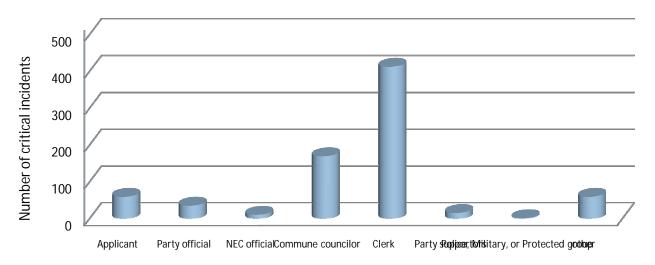


NICFEC found a total of 530 critical irregularities throughout the monitoring period. The majority of these irregularities involved violations of procedure, including inappropriate closures of the registration office. Violations in procedure can include but are not limited to failure to provide receipts to more than 10 applicants, rejection of more than 10 applicants for insufficient documents, and registering on behalf of more than 10 applicants. While NICFEC documented all irregularities it did not reach the level of a 'critical irregularity' unless 10 or more applicants were involved in a single commune on a single day.

Types of Critical Incidents

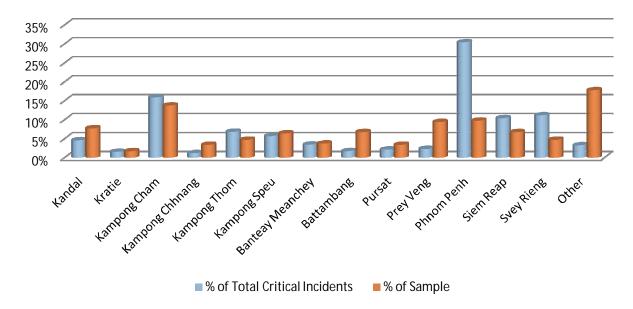


People involved in critical incidents



Observers reported that the commune clerk was involved in 412 of the 530 critical incidents. Critical incidents were distributed evenly, given the distribution of the sample. However, 30% of critical incidents occurred in Phnom Penh, despite the city only occupying 10% of the sample. With 161 critical incidents, Phnom Penh had almost twice as many critical incidents as any other province.

Distribution of Critical Incidents



10. Conclusion

The data from NICFEC's observation demonstrates flaws in the registration/list verification process in 2011. In particular, the most serious violations occurred when applicants were denied registration for using the expired ID card, when applicants were registered without being present, and when applicants were registered despite lacking documents. These were not rare occurrences; in the case of registration without presence, this violation occurred in more than half the communes. Furthermore, the number of applicants who were rejected for insufficient documents poses serious questions as to the strength of registration education efforts. Similarly, the fact that commune clerks neglected basic duties, such as adhering to opening and closing hours and issuing receipts, calls into question the quality of the training and information commune clerks received to administer the process.

Data indicates that violations decreased during later stages of the registration period, perhaps indicative of greater understanding among commune officials or drawn attention to these illegal practices through observer statements. In almost all of the questions examined (expired ID cards, registering without documents, registering in person) violations decreased. In fact the number of communes that allowed individuals to register on behalf of another voter decreased by over 50% from September 1-30 to October 1-15.

Several of the procedural violations that occurred were spread evenly across the country. However, the concentration of violations in Kampong Cham and Phnom Penh is of larger concern. Kampong Cham demonstrated lax enforcement of the registration guidelines by allowing voters to register others without the persons being present. Similarly, Phnom Penh allowed voters to register with no documentation. The number of critical incidents in Phnom Penh was also disproportionately high. Although it remains unclear exactly how many voters registered illegally, the prevalence of violations in these provinces is troubling, and this is after correcting for the large populations and number of observers in these provinces.

Observers were not tasked to speculate whether these violations occurred intentionally or due to lack of information about procedures among commune officials. Anecdotally, NICFEC learned that many clerks were unaware of the new changes in procedures, such as the ability to use an expired ID card, and this is consistent with the information that the NEC faced limitations in its ability to conduct thorough, in-depth training across the country prior to September 1. New voter registration guidelines were not even available until August. Whether purposefully interfering with registration or simply uninformed, commune officials are currently not performing their registration duties in a way that brings confidence in the voters' list or that ensures all eligible voters their franchise.

Because NICFEC used a statistical sample for its observation, conclusions can be made about the entire registration/verification process in 2011, within a margin of error. Therefore, the findings do not apply only to the 299 communes where NICFEC observed, but to the entire country.

VI. Recommendations

The annual registration and list verification process presents a number of unnecessary challenges for Cambodian citizens. Although NICFEC found significant irregularities, it is possible that many were the result of poor communication between NEC and citizens as well as NEC and commune officials. The right to vote is an inalienable right in any democracy. Our recommendations below are in an effort to ensure that more eligible citizens can freely and easily register to vote, and participate in a transparent and fair election.

NICFEC and NDI recommend that the relevant government bodies expedite the process of distributing national ID cards to citizens and establishing a civil registry from which a permanent voter registry can be automatically built, eliminating the necessity of all registration and verification exercises in the future. When a voter turns 18, she or he is automatically on the voters' list and there is no need for any action on his or her part, unless a change of residency occurs.

Until this is accomplished, it is clear improvements must be made to the existing process:

- The NEC should disseminate information on voter registration, particularly changes in procedures, to citizens at least three months in advance. Furthermore the NEC should work with civil society and the international community to dedicated greater resources to voter registration education efforts.
- The NEC should also create and implement a more robust training program for commune clerks. NICFEC found that violations of procedures decreased over the registration period indicating commune officials were learning more about the process as it was happening. The government should ensure that the Committee has the appropriate budget to implement training effectively. NICFEC and NDI found that many clerks did not have up-to-date information about registration procedures, such as the ability to use expired ID cards.
- The NEC should investigate cases of communes incorrectly denying registration or registering people without proper documentation, and take action against any violations of the law and regulations, including sanctioning of commune officials. Investigation should be thorough and go beyond merely contacting the commune officials in question. In particular NEC officials should investigate those areas where the greatest violations were found. NICFEC recommends inviting an outside electoral body to support the investigation effort. NICFEC and NDI are hopeful that the investigation will lead to improved practices for future registration exercises and increased confidence in the process.
- NEC should support an independent audit of the final voters' list involving multiple tests (people-to-list, list-to-people, deletion list-to-people) to measure the list's accuracy, identifying duplicate names and false deletions. If funding is a challenge, the NEC should work with the government and the international community to identify additional funds.
- The NEC should enable people to register and verify their names without returning to their home communes. The burden and cost placed on citizens to return home are unnecessary.

- Residency should not be a requirement for registration. If the applicant is of age, and is a Cambodian citizen, NICFEC believes that should be sufficient for registration. To deny certain people the right to vote based on their economic circumstances or homeless status is a violation of basic human rights and equality.
- The NEC should not delegate registration authority to commune councils, or any <u>elected</u> body, given the conflict of interest that is inherent. Instead NICFEC recommends future registration be administered by a neutral body, in line with electoral practices internationally.
- Registration should not be held during the rainy season. This presents unnecessary complications for material distribution and for voters returning home to register. The voters of Cambodia would be best served with a registration period that was during the dry season.

VII. Appendices

Appendix A (List of 300 communes)

Geocode	Prov_code	Prov_name	Dist_code	District _Name	Com_code	Com_name	Random
1020401	1	Banteay Meanchey	2	Mongkol Borei 4		Kouk Ballangk	1
1021101	1	Banteay Meanchey	2	Mongkol Borei	11	Soea	1
1030204	1	Banteay Meanchey	3	Phnum Srok	2	Poy Char	1
1030301	1	Banteay Meanchey	3	Phnum Srok	3	Ponley	1
1060601	1	Banteay Meanchey	6	Krong Serei Saophoan	6	Phniet	1
1060802	1	Banteay Meanchey	6	Krong Serei Saophoan	8	Tuek Thla	1
1080101	1	Banteay Meanchey	8	Svay Chek	1	Phkoam	1
1080401	1	Banteay Meanchey	8	Svay Chek	4	Svay Chek	1
1090103	1	Banteay Meanchey	9	Malai	1	Boeng Beng	1
1100101	1	Banteay Meanchey	10	Krong Paoy Paet	1	Sangkat Nimit	1
1100203	1	Banteay Meanchey	10	Krong Paoy Paet	2	Sangkat Paoy Paet	1
2010704	2	Battambang	1	Banan	7	Snoeng	1
2020401	2	Battambang	2	Thma Koul	4	Chrey	1
2021003	2	Battambang	2	Thma Koul	10	Rung Chrey	1
2030201	2	Battambang	3	Krong Battambang	2	Preaek Preah Sdach	1
2030701	2	Battambang	3	Krong Battambang	7	Ou Mal	1
2050301	2	Battambang	5	Aek Phnum	3	Preaek Khpob	1
2060301	2	Battambang	6	Moung Ruessei	3	Prey Svay	1
2060602	2	Battambang	6	Moung Ruessei	6	Ta Loas	1
2070204	2	Battambang	7	Rotonak Mondol	2	Andaeuk Haeb	1
2080103	2	Battambang	8	Sangkae	1	Anlong Vil	1
2080302	2	Battambang	8	Sangkae	3	Ta Pun	1
2080402	2	Battambang	8	Sangkae	4	Roka	1
2080701	2	Battambang	8	Sangkae	7	Reang Kesei	1
2081001	2	Battambang	8	Sangkae	10	Vaot Ta Moem	1
2090401	2	Battambang	9	Samlout	4	Sung	1
2090601	2	Battambang	9	Samlout	6	Mean Chey	1
2110101	2	Battambang	11	Phnom Proek	1	Phnom Proek	1
2110201	2	Battambang	11	Phnom Proek	2	Pech Chenda	1
2110504	2	Battambang	11	Phnom Proek	5	Ou Rumduol	1
2120402	2	Battambang	12	Kamrieng	4	Trang	1
3020601	3	Kampong Cham	2	Chamkar Leu	6	Svay Teab	1
3030603	3	Kampong Cham	3	·		Sampong Chey	1
3030801	3	Kampong Cham	3	Cheung Prey	8	Soutip	1
3031003	3	Kampong Cham	3	Cheung Prey	10	Trapeang Kor	1
3040101	3	Kampong Cham	4	Dambae	1	Chong Cheach	1

3040201	3	Kampong Cham	4	Dambae	2	Dambae	1
3040601	3	Kampong Cham	4	Dambae	6	Tuek Chrov	1
3040702	3	Kampong Cham	4 Dambae		7	Trapeang Pring	1
3050101	3	Kampong Cham	5	Krong Kampong Cham	1	Boeng Kok	1
3060602	3	Kampong Cham	6	Kampong Siem	6	Kaoh Roka	1
3060705	3	Kampong Cham	6	Kampong Siem	7	Kaoh Samraong	1
3061001	3	Kampong Cham	6	Kampong Siem	10	Ou Svay	1
3061501	3	Kampong Cham	6	Kampong Siem	15	Vihear Thum	1
3070901	3	Kampong Cham	7	Kang Meas	9	Roka Koy	1
3071001	3	Kampong Cham	7	Kang Meas	10	Sdau	1
3080701	3	Kampong Cham	8	Kaoh Soutin	7	Pongro	1
3080803	3	Kampong Cham	8	Kaoh Soutin	8	Preaek Ta Nong	1
3090103	3	Kampong Cham	9	Krouch Chhmar	1	Chhuk	1
3090303	3	Kampong Cham	9	Krouch Chhmar	3	Kampong Treas	1
3090404	3	Kampong Cham	9	Krouch Chhmar	4	Kaoh Pir	1
3100201	3	Kampong Cham	10	Memot	2	Chaom	1
3100301	3	Kampong Cham	10	Memot	3	Chaom Kravien	1
3101301	3	Kampong Cham	10	Memot	13	Tramung	1
3101601	3	Kampong Cham	10	Memot	16	Kokir	1
3110301	3	Kampong Cham	11	Ou Reang Ov	3	Damril	1
3110501	3	Kampong Cham	11	Ou Reang Ov	5	Mien	1
3110701	3	Kampong Cham	11	Ou Reang Ov	7	Preah Theat	1
3120404	3	Kampong Cham	12	Ponhea Kraek	4	Kandaol Chrum	1
3130501	3	Kampong Cham	13	Prey Chhor	5	Kor	1
3130701	3	Kampong Cham	13	Prey Chhor	7	Lvea	1
3130801	3	Kampong Cham	13	Prey Chhor	8	Mien	1
3131001	3	Kampong Cham	13	Prey Chhor	10	Sour Saen	1
3131505	3	Kampong Cham	13	Prey Chhor	15	Trapeang Preah	1
3140101	3	Kampong Cham	14	Srei Santhor	1	Baray	1
3141101	3	Kampong Cham	14	Srei Santhor	11	Ruessei Srok	1
3141201	3	Kampong Cham	14	Srei Santhor	12	Svay Pou	1
3150401	3	Kampong Cham	15	Stueng Trang	4	Khpob Ta Nguon	1
3150601	3	Kampong Cham	15	Stueng Trang	6	Ou Mlu	1
3151001	3	Kampong Cham	15	Stueng Trang	10	Preak Kak	1
3160502	3	Kampong Cham	16	Thoung Khmum	5	Chirou Ti Muoy	1
3161604	3	Kampong Cham	16	Tboung Khmum	16	Roka Po Pram	1
4010101	4	Kampong Chhnang	1	Baribour	1	Anhchanh Rung	1
4010903	4	Kampong Chhnang	1	Baribour	9	Popel	1
4040201	4	Kampong Chhnang	4	Kampong Leaeng	2	Dar	1
4040301	4	Kampong Chhnang	4	Kampong Leaeng	3	Kampong Hau	1
4060104	4	Kampong Chhnang	6	Rolea B'ier	1	Andoung Snay	1

4060204	4	Kampong Chhnang	6	Rolea B'ier	2	Banteay Preal	1
4060602	4	Kampong Chhnang	6	Rolea B'ier	6	Krang Leav	1
4060804	4	Kampong Chhnang	6	Rolea B'ier	8	Prasnoeb	1
4070801	4	Kampong Chhnang	7	7 Sameakki Mean Chey		Tbaeng Khpos	1
4080201	4	Kampong Chhnang	8	Tuek Phos	2	Chieb	1
5010101	5	Kampong Speu	1	Basedth	1	Basedth	1
5010802	5	Kampong Speu	1	Basedth	8	Pou Chamraeun	1
5011101	5	Kampong Speu	1	Basedth	11	Tuol Ampil	1
5011205	5	Kampong Speu	1	Basedth	12	Tuol Sala	1
5011401	5	Kampong Speu	1	Basedth	14	Svay Rumpear	1
5020201	5	Kampong Speu	2	Krong Chbar Mon	2	Kandaol Dom	1
5030601	5	Kampong Speu	3	Kong Pisei	6	Prey Nheat	1
5040101	5	Kampong Speu	4	Aoral	1	Haong Samnam	1
5040502	5	Kampong Speu	4	Aoral	5	Ta Sal	1
5050101	5	Kampong Speu	5	Odongk	1	Chant Saen	1
5050302	5	Kampong Speu	5	Odongk	3	Chumpu Proeks	1
5051001	5	Kampong Speu	5	Odongk	10	Veal Pong	1
5060403	5	Kampong Speu	6	Phnum Sruoch	4	Kiri Voan	1
5060501	5	Kampong Speu	6	Phnum Sruoch	5	Krang Dei Vay	1
5060901	5	Kampong Speu	6	Phnum Sruoch	9	Prey Kmeng	1
5070901	5	Kampong Speu	7	Samraong Tong	9	Saen Dei	1
5071105	5	Kampong Speu	7	Samraong Tong	11	Tang Krouch	1
5080201	5	Kampong Speu	8	Thpong	2	Monourom	1
5080801	5	Kampong Speu	8	Thpong	8	Yea Angk	1
6010501	6	Kampong Thom	1	Baray	5	Chaeung Daeung	1
6011601	6	Kampong Thom	1	Baray	16	Svay Phleung	1
6011702	6	Kampong Thom	1	Baray	17	Tnaot Chum	1
6020401	6	Kampong Thom	2	Kampong Svay	4	Kampong Svay	1
6020601	6	Kampong Thom	2	Kampong Svay	6	Phat Sanday	1
6020701	6	Kampong Thom	2	Kampong Svay	7	San Kor	1
6020802	6	Kampong Thom	2	Kampong Svay	8	Tbaeng	1
6020901	6	Kampong Thom	2	Kampong Svay	9	Trapeang Ruessei	1
6050104	6	Kampong Thom	5	Prasat Sambour	1	Chhuk	1
6060901	6	Kampong Thom	6	Sandan	9	Tumring	1
6070301	6	Kampong Thom	7	Santuk	3	Kampong Thma	1
6080802	6	Kampong Thom	8	Stoung	8	Popok	1
6081001	6	Kampong Thom	8	Stoung	10	Preah Damrei	1
6081301	6	Kampong Thom	8	Stoung	13	Trea	1
7010201	7	Kampot	1	Angkor Chey	2	Ankor Chey	1
7010403	7	Kampot	1	Angkor Chey	4	Dambouk Khpos	1
7020401	7	Kampot	2	Banteay Meas	4	Samraong Kraom	1
7020901	7	Kampot	2	Banteay Meas	9	Tnoat Chong Srang	1

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7030403	7	Kampot	3	Chhuk	4	Chhuk	1
7030704	7	Kampot	3	Chhuk	8 7		1
7040501	7	Kampot	4	Chum Kiri	Chum Kiri 5 Srae Kno		1
7050401	7	Kampot	5	Dang Tong	4	Khcheay Khang Tboung	1
7050801	7	Kampot	5	Dang Tong	8	Totung	1
7060801	7	Kampot	6	Kampong Trach	8	Kanthaor Khang Kaeut	1
7070101	7	Kampot	7	Tuek Chhou	1	Boeng Tuk	1
7070702	7	Kampot	7	Tuek Chhou	7	Kaoh Touch	1
7070901	7	Kampot	7	Tuek Chhou	9	Makprang	1
8010701	8	Kandal	1	Kandal Stueng	7	Kandaok	1
8011601	8	Kandal	1	Kandal Stueng	16	Preaek Slaeng	1
8020201	8	Kandal	2	Kien Svay	2	Chheu Teal	1
8020604	8	Kandal	2	Kien Svay	6	Kokir	1
8020701	8	Kandal	2	Kien Svay	7	Kokir Thum	1
8021101	8	Kandal	2	Kien Svay	11	Samraong Thum	1
8030701	8	Kandal	3	Khsach Kandal	7	Preaek Ampil	1
8031301	8	Kandal	3	Khsach Kandal	13	Sanlung	1
8040901	8	Kandal	4	Kaoh Thum	9	Preaek Chrey	1
8041003	8	Kandal	4	Kaoh Thum	10	Preaek Sdei	1
8041201	8	Kandal	4	Kaoh Thum	12	Sampov Pun	1
8050603	8	Kandal	5	Leuk Daek	6	Preaek Tonloab	1
8060102	8	Kandal	6	Lvea Aem	1	Akreiy Ksatv	1
8060501	8	Kandal	6	Lvea Aem	5	Kaoh Reah	1
8070301	8	Kandal	7	Mukh Kampul	3	Preaek Anhchanh	1
8070702	8	Kandal	7	Mukh Kampul	7	Roka Kong Ti Muoy	1
8080101	8	Kandal	8	Angk Snuol	1	Baek Chan	1
8080701	8	Kandal	8	Angk Snuol	7	Krang Mkak	1
8080803	8	Kandal	8	Angk Snuol	8	Lumhach	1
8081102	8	Kandal	8	Angk Snuol	11	Peuk	1
8091101	8	Kandal	9	Popnhea Lueu	11	Phsar Daek	1
8110101	8	Kandal	11	Krong Ta Khmau	1	Ta Kdol	1
8110202	8	Kandal	11	Krong Ta Khmau	2	Preaek Ruessei	1
8110301	8	Kandal	11	Krong Ta Khmau	3	Daeum Mien	1
9030301	9	Koh Kong	3	Koh Kong	3	Ta Tai Kraom	1
9050201	9	Koh Kong	5	Mondol Seima	2	Peam Krasaob	1
9060501	9	Koh Kong	6	Srae Ambel	5	Dang Peaeng	1
9070301	9	Koh Kong	7	Thma Bang	3	Chumnoab	1
10010801	10	Kratie	1	Chhloung	8	Preaek Saman	1
10030102	10	Kratie	3	Preaek Prasab	1	Chambak	1
10030501	10	Kratie	3	Preaek Prasab	5	Preaek Prasab	1
10040101	10	Kratie	4	Sambour	1	Boeng Char	1
10060201	10	Kratie	6	Chetr Borei	2	Changkrang	1
12010104	12	Phnom Penh	1	Chamkar Mon	1	Tonle Basak	1

12010303	12	Phnom Penh	1	Chamkar Mon	3	Boeng Keng Kang	1
12010702	12	Phnom Penh	1	Chamkar Mon	7	Pir Tuol Svay Prey Ti Pi	1
12010702	12	Phnom Penh	1			Tumnob Tuek	1
12011204	12	Phnom Penh	1			Phsar Daeum Thkov	1
12020201	12	Phnom Penh	2	Doun Penh	12	Phsar Thmei Ti Pir	1
12020201	12	Phnom Penh	2	Doun Penh	5	Phsar Kandal Ti Muoy	1
12020801	12	Phnom Penh	2	Doun Penh	8	Chey Chummeah	1
12030504	12	Phnom Penh	3	Prampir Meakkakra	5	Monourom	1
12040501	12	Phnom Penh	4	Tuol Kouk	5	Tuek L'ak Ti Pir	1
12040703	12	Phnom Penh	4	Tuol Kouk	7	Boeng Kak Ti Muoy	1
12040801	12	Phnom Penh	4	Tuol Kouk	8	Boeng Kak Ti Pir	1
12040903	12	Phnom Penh	4	Tuol Kouk	9	Phsar Daeum Kor	1
12041001	12	Phnom Penh	4	Tuol Kouk	10	Boeng Salang	1
12050703	12	Phnom Penh	5	Dangkao	7	Pong Tuek	1
12050805	12	Phnom Penh	5	Dangkao	8	Prey Veaeng	1
12051005	12	Phnom Penh	5	Dangkao	10	Prey Sa	1
12051101	12	Phnom Penh	5	Dangkao	11	Krang Thnong	1
12051203	12	Phnom Penh	5	Dangkao	12	Krang Pongro	1
12051301	12	Phnom Penh	5	Dangkao	13	Prateah Lang	1
12051402	12	Phnom Penh	5	Dangkao	14	Sak Sampov	1
12051503	12	Phnom Penh	5	Dangkao	15	Cheung Aek	1
12051601	12	Phnom Penh	5	Dangkao	16	Kong Noy	1
12051904	12	Phnom Penh	5	Dangkao	19	Spean Thma	1
12060501	12	Phnom Penh	6	Mean Chey	5	Chhbar Ampov Ti Pir	1
12060702	12	Phnom Penh	6	Mean Chey	7	Chak Angrae Kraom	1
12061001	12	Phnom Penh	6	Mean Chey	10	Preaek Aeng	1
12070201	12	Phnom Penh	7	Ruessei Kaev	2	Tuol Sangkae	1
12092203	12	Phnom Penh	9	Pour Sensokh	22	Kamboul	1
13040201	13	Preah Vihear	4	Kuleaen	2	Kuleaen Cheung	1
13040401	13	Preah Vihear	4	Kuleaen	4	Phnum Penh	1
13040601	13	Preah Vihear	4	Kuleaen	6	Srayang	1
13051003	13	Preah Vihear	5	Rovieng	10	Rumdaoh	1
14010501	14	Prey Veng	1	Ba Phnum	5	Roung Damrei	1
14010601	14	Prey Veng	1	Ba Phnum	6	Sdau Kaong	1
14020801	14	Prey Veng	2	Kamchay Mear	8	Trabaek	1
14030401	14	Prey Veng	3	Kampong Trabaek	4	Chrey	1
14030501	14	Prey Veng	3	Kampong Trabaek	5	Kansoam Ak	1
14030601	14	Prey Veng	3	Kampong Trabaek	6	Kou Khchak	1
14050101	14	Prey Veng	5	Me Sang	1	Angkor Sar	1
14050201	14	Prey Veng	5	Me Sang	2	Chres	1
14050501	14	Prey Veng	5	Me Sang	5	Prey Rumdeng	1
14050602	14	Prey Veng	5	Me Sang	6	Prey Totueng	1
14060402	14	Prey Veng	6	Peam Chor	4	Kaoh Roka	1
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14060601	14	Prey Veng	6	Peam Chor	6	Krang Ta Yang	1
14060701	14	Prey Veng	6	Peam Chor	7	Preaek Krabau	1
14060801	14	Prey Veng	6	Peam Chor	8	Preaek Sambuor	1
14070302	14	Prey Veng	7	Peam Ro	3	Neak Loeang	1
14070501	14	Prey Veng	7	Peam Ro	5	Peam Ro	1
14070601	14	Prey Veng	7	Peam Ro	6	Preaek Khsay Ka	1
14080501	14	Prey Veng	8	Pea Reang	5	Mesa Prachan	1
14080601	14	Prey Veng	8	Pea Reang	6	Preaek Ta Sar	1
14080802	14	Prey Veng	8	Pea Reang	8	Prey Sniet	1
14090201	14	Prey Veng	9	Preah Sdach	2	Banteay Chakrei	1
14090403	14	Prey Veng	9	Preah Sdach	4	Chey Kampok	1
14090501	14	Prey Veng	9	Preah Sdach	5	Kampong Soeng	1
14090704	14	Prey Veng	9	Preah Sdach	7	Lvea	1
14090801	14	Prey Veng	9	Preah Sdach	8	Preah Sdach	1
14091101	14	Prey Veng	9	Preah Sdach	11	Sena Reach Otdam	1
14110401	14	Prey Veng	11	Kampong Leav	4	Pou Rieng	1
14120902	14	Prey Veng	12	Sithor Kandal	9	Prey Tueng	1
15010401	15	Pursat	1	Bakan	4	Me Tuek	1
15010803	15	Pursat	1	Bakan	8	Svay Doun Kaev	1
15010901	15	Pursat	1	Bakan	9	Ta Lou	1
15020301	15	Pursat	2	Kandieng	3	Kandieng	1
15020404	15	Pursat	2	Kandieng	4	Kanhchor	1
15020903	15	Pursat	2	Kandieng	9	Veal	1
15030201	15	Pursat	3	Krakor	2	Ansa Chambak	1
15031001	15	Pursat	3	Krakor	10	Svay Sa	1
15040601	15	Pursat	4	Phnum Kravanh	6	Santreae	1
15060101	15	Pursat	6	Veal Veaeng	1	Ou Saom	1
16030601	16	Ratanak Kiri	3	Bar Kaev	6	Ting Chak	1
16070701	16	Ratanak Kiri	7	Ou Ya Dav	7	Ya Tung	1
17020201	17	Siemreap	2	Angkor Thum	2	Leang Dai	1
17020401	17	Siemreap	2	Angkor Thum	4	Svay Chek	1
17030101	17	Siemreap	3	Banteay Srei	1	Khnar Sanday	1
17030501	17	Siemreap	3	Banteay Srei	5	Run Ta Aek	1
17040304	17	Siemreap	4	Chi Kraeng	3	Kampong Kdei	1
17040401	17	Siemreap	4	Chi Kraeng	4	Khvav	1
17060102	17	Siemreap	6	Kralanh	1	Chanleas Dai	1
17060301	17	Siemreap	6	Kralanh	3	Kralanh	1
17060801	17	Siemreap	6	Kralanh	8	Snuol	1
17060901	17	Siemreap	6	Kralanh	9	Sranal	1
17070101	17	Siemreap	7	Puok	1	Sasar Sdam	1
17070801	17	Siemreap	7	Puok	8	Mukh Paen	1
17100102	17	Siemreap	10	Krong Siem Reab	1	Sla Kram	1
17100303	17	Siemreap	10	Krong Siem Reab	3	Kouk Chak	1
17101001	17	Siemreap	10	Krong Siem Reab	10	Srangae	1

17110404	17	Siemreap	11	Soutr Nikom	4	Kampong Khleang	1
17110801	17	Siemreap	11	Soutr Nikom	8	Popel	1
17130302	17	Siemreap	13	13 Svay Leu		Khnang Phnum	1
17130401	17	Siemreap	13	13 Svay Leu		Svay Leu	1
17140402	17	Siemreap	14	14 Varin		Svay Sa	1
18010301	18	Preah Sihanouk	1	Krong Preah Sihanouk	3	Sangkat Bei	1
18010402	18	Preah Sihanouk	1	Krong Preah Sihanouk	4	Sangkat Buon	1
18020101	18	Preah Sihanouk	2	Prey Nob	1	Andoung Thma	1
18020301	18	Preah Sihanouk	2	Prey Nob	3	Bet Trang	1
19010401	19	Stung Treng	1	Sesan	4	Samkuoy	1
19020601	19	Stung Treng	2	Siem Bouk	6	Siem Bouk	1
19050102	19	Stung Treng	5	Thala Barivat	1	Anlong Phe	1
20011001	20	Svay Rieng	1	Chantrea	10	Tuol Sdei	1
20020501	20	Svay Rieng	2	Kampong Rou	5	Prey Thum	1
20020601	20	Svay Rieng	2	Kampong Rou	6	Reach Montir	1
20020702	20	Svay Rieng	2	Kampong Rou	7	Samlei	1
20030601	20	Svay Rieng	3	Rumduol	6	Meun Chey	1
20040801	20	Svay Rieng	4	Romeas Haek	8	Kampong Trach	1
20041102	20	Svay Rieng	4	Romeas Haek	11	Mukh Da	1
20041301	20	Svay Rieng	4	Romeas Haek	13	Sambuor	1
20041601	20	Svay Rieng	4	Romeas Haek	16	Tras	1
20050301	20	Svay Rieng	5	Svay Chrum	3	Chambak	1
20051104	20	Svay Rieng	5	Svay Chrum	11	Kruos	1
20051209	20	Svay Rieng	5	Svay Chrum	12	Pouthi Reach	1
20060703	20	Svay Rieng	6	Krong Svay Rieng	7	Sangkhoar	1
20070401	20	Svay Rieng	7	Svay Teab	4	Monourom	1
21010501	21	Takeo	1	Angkor Borei	5	Preaek Phtoul	1
21020102	21	Takeo	2	Bati	1	Chambak	1
21020702	21	Takeo	2	Bati	7	Krang Thnong	1
21021101	21	Takeo	2	Bati	11	Sour Phi	1
21030101	21	Takeo	3	Borei Cholsar	1	Borei Cholsar	1
21030301	21	Takeo	3	Borei Cholsar	3	Doung Khpos	1
21030501	21	Takeo	3	Borei Cholsar	5	Kouk Pou	1
21040104	21	Takeo	4	Kiri Vong	1	Angk Prasat	1
21060701	21	Takeo	6	Prey Kabbas	7	Kdanh	1
21070404	21	Takeo	7	Samraong	4	Chumreah Pen	1
21071002	21	Takeo	7	Samraong	10	Sla	1
21071101	21	Takeo	7	Samraong	11	Trea	1
21090101	21	Takeo	9	Tram Kak	1	Ang Ta Saom	1
21090305	21	Takeo	9	Tram Kak	3	Kus	1
21091002	21	Takeo	9	Tram Kak	10	Samraong	1
21091501	21	Takeo	9	Tram Kak	15	Trapeang Thum Khang	1
21100307	21	Takeo	10	Treang	3	Chi Khma	1

21100601	21	Takeo	10	Treang	6	Angk Kaev	1
21101204	21	Takeo	10	Treang	12	Srangae	1
22010601	22	Oddar Meanchey	1	Anlong Veaeng	6	Lumtong	1
22040102	22	Oddar Meanchey	4	Krong Samraong	1	Bansay Reak	1
22040201	22	Oddar Meanchey	4	Krong Samraong	2	Bos Sbov	1
23020101	23	Kep	2	Krong Kaeb	1	Kaeb	1
24010301	24	Pailin	1	Krong Pailin	3	Tuol Lvea	1
24020205	24	Pailin	2	Sala Krau	2	Stueng Trang	1

Appendix B

NICFEC Voter Registration Observation Form



Regi	Registration Station Identification			Observers Identification		
			G	Time of Arrival		
В.	Province/ Municipality		H.	Time of Departure		
C.	District/ Khan		I.	Observer ID		
D.	Commune		J.	Observer's Name		
E	Mobile or Reg Center		K	Phone 1		
F	Date of Observation		L	Phone 2		

Read the questions very carefully and mark appropriate box. **Answer cautiously. Report your observation not rumors or hearsay.**

Please make sure that you have answered all of the questions before make any report. All the original forms need to be submitted to NICFEC HQ according to the schedule in your Observer Guidelines.

I	Opening of the Registration Center:	Yes	No
1.	Is the 2010 Final Voter List posted outside the Registration Center		
2.	Is the Registration Center Open at 7:00am		
3.	What is the total number of voters on the 2010 List:		

For any "Yes" answers below in Section II, please explain in Critical Incident Form. Answer cautiously. Report your observation not rumors or hearsay.

II	Registration Process:					No
4.	Did the Registration Official close the registration center for more than 1 hour?					
5.	Besides the 1 hour break, was the registration process stopped for any reason between 7am-5pm? Did you witness any intimidation of registration applicants?					
6.						
7.	Did you witness any party or campaign activity in or near the registration center?					
	any 'Many' answers below in Section III, please explain in Crititiously. Report your observation not rumors or hearsay. Registration Process:	None	Few (0-3)	Som (4-10	e l	r Иапу (10+)
8.	How many applicants were unable to register because of insufficient documents?					
9.	How many applicants registered without any identity documents?					
10.	How many applicants were registered for or on behalf of someone else?					
11.	How many applicants were rejected for using an expired National ID Card?					
12.	How many successful applicants did NOT receive a receipt?					
			1			
IV	Registration Process:	None	Few (0-3)	Som (4-10		Many (10+)
13.	How many people used the Statement of Identification for Electoral Purposes Form					
V	End of Day Questions:				Yes	No

15. 3	Was everyone in line at 5pm allowed to register?						
16.	Were there any additional observers present at any point during the day?						
	Were any party observers present? Circle the correct ones.						
17.	CPP SRP HRP FCP NRP Other						
VI	Answer this Question at the end of every day. Your answer should reflect your overall opinion and assessment.	No not at all	Not Well	Yes, Good			
10	Do you believe that the Registration Official (Clerk) understood and						
18.	applied the registration laws fairly and equally throughout the day?						
VII	Counting (This number will be available from Registration Official	every 5 c	lays)		Nui	mber	
19.	How many people are newly registered (Form 1012)						
20.	How many women registered to vote						



Neutrality and Impartial Committee for Free and Fair Elections in Cambodia

NICFEC Critical Incident Forms

Province District Commune Date A. Did you witness the incident/				Observer ID Observer Name Observer Phone N Observer Phone N	lumber 2	
	irregularities?		2. I arrived just after the incident/ irregularity happened3. The incident were reported to me by someone else			
	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	wition.	Data	· /	1	(DD/MM/YYYY)
В	When did the incident/ irregularities happen?		Date: / (DD/MM/YYYY) Start: (in 24 hours format) Finish:			
	- C	1) 0		1	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	
С	Type of incident/ irregularities Choose one that apply	☐ 2) Violence ☐ 3) Intimidation ☐ 4) Chaos		or harassment ot allowed to enter	7) Partisa	ons of procedures n registration officials and Paying for register (please explain)
D.	. Who was involved in the 1) Applican		nt		6) Politica	I party supporter, please
D.	incident?	2) Party Official 3) NEC Official 4) Commune Com		uncil erk (or designator)	explain 7) police / military /protected group 8) Others (please explain)	
E.	In your opinion, how many	1) None			5) Unknow	wn

	this incident?	2) Few (1-10)
		☐ 3) Some (11 – 50)
		A) Many (F1 or mars)
		4) Many (51 or more)
	,	
F	Were any law enforcement/	1. Yes
	police present to follow-up the	2. No
	incident?	
G.	Detailed explanation:	(At least 3 sentences)
	Please provide a brief description of	
	the concrete facts regarding each	
	incident, including who participated	
	(their position and affiliation), what	
	happened (type of incident), how	
	did it happen, and the sequence of	
	events. Indicate other individuals,	
	such as local or international	
	observers or party agents, who also	
	witnessed the incident (and their	
	contact information if possible). Use	
	other side of the form if necessary.	

Appendix C (List of 56 communes extended)

No. of Commune	Name of province	Name of district	Name of commune
1	Banteay Meanchey	Mongkor Borei	Bat Trang
2	Battambang	Ek Phnom	Prek Khpop
3		Mong Reusei	Talos
4	Kampong Cham	Kampong Siem	Koh Samroang
5			Koh Roka
6		Kang Meas	Rokakoy
7			Sdao
8		Stung Trang	Khpop Tagoun
9			Prek Kok
10		Srey Santhor	Baray
11		Koh Sotin	Pong Ror
12			Prek Tanung
13		Krouch Chmar	Kampong Treas
14			Koh Pir
15		Thbong Khmum	Chiro Ti Mouy
16	Kampong Thom	Baray	Chaeung Daeung
17			Thnoat Chum
18		Kampong Svay	Kampong Svay
19			Phat Sanday
20			Sankor
21			Thbaeng
22			Trapaeng Reusey
23		Prasat Sambo	Chouk
24	Kampong Thom	Santuk	Kampong Thmar
25		Stong	Popork
26			Preah Damrey
27			Trea
28	Kandal	Lvea Em	Koh Reah
29			Akrey Ksat
30		Ksach Kandal	Prek Ampil
31		Leuk Dek	Prek Tonloab
32	Kratie	Chlong	Prek Saman
33		Prek Prosap	Prek Prosap
34	Preah Vihear	Kulen	Phnom Penh
35			Kulen Cheung
36			Sra Yang
37	Prey Veng	Peam Chor	Koh Roka
38			Krang Tayong
39			Prek Krabao
40			Prek Sambo
41		Pea Reang	Mesar Prachan
42			Presy Sneat
43			Prek Tasor
44		Kampong Leav	Por Reang

45		Sithor Kandar	Prey Teung
46	Pursat	Bakan	Svay Donkeo
47			Me Teuk
48		Kandeang	Kanchor
49		Kro Kor	Ansa Chambak
50	Siem Reap	Kralanh	Kralanh
51	Takeo	Angkor Borey	Prek Phtoul
52		Borey Chulasa	Borey Chulasa
53			Dong Khpous
54			Kork Por
55	Pailin	Sala Krao	Steung Trang
56	Odar Meanchey	Samrong	Bos Sbov

Appendix D (First Statement on VRM)





PRESS ADVISORY

FOR IMMEDIATE RELEASE October 5, 2011 Phnom Penh, Cambodia

NICFEC and NDI Monitor 2011 Voter Registration Preliminary Statement

With technical assistance from the National Democratic Institute for International Affairs (NDI), The Neutral and Impartial Committee for Free and Fair Elections in Cambodia (NICFEC) implemented a voter registration/list verification monitoring program for the 2011 registration period with the aim of providing impartial information and analysis of the process for future improvement.

Prior to the registration period, random sampling was used to statistically select 300 communes for observation out of Cambodia's total of 1,621 communes. NICFEC, with NDI's assistance, trained 318 observers and 16 provincial coordinators from 22 provinces and Phnom Penh municipality, equipping them with guidelines, checklists, and reporting schedules. Observers were deployed on September 1, the first day of registration, and will monitor 30 days out of the total 42 days at the commune council offices. Observers' daily checklists include questions pertaining to compliance with NEC schedules and regulations, acceptance of appropriate documents of identification, use of the new Statement of Identity form, and presence of unauthorized individuals in the registration office.

NICFEC and NDI staff members have analyzed the compiled data received September 1-10 in order to provide recommendations for the final days of the registration period. The aggregated data includes 2,990 daily reports from 299 communes over a ten day period. NICFEC was not able to observe Preaek Chrey commune in Kandal province as planned due to extensive flooding in the province, bringing the total number of observed communes from 300 to 299.

Based on the reports received to date, NICFEC and NDI have made a number of conclusions about the progression of the voter registration period and local compliance with NEC regulations.

- Reports show that regulated opening hours from 7:00am to 5:00pm were not always observed.
 Although 94.18% of the 2,990 daily reports confirmed that offices opened on time, only 66.24% of reports stated that registration centers closed on time.
- A total of 47 out of 299 communes (15.7%) allowed at least one person to register without any
 documentation. Out of these 47 communes, three communes allowed undocumented registration of
 more than 10 people on a single day. Applicants are required to present documents that provide their
 age, commune of residency, proof of citizenship, and an ID photo.
- A total of 118 communes out of 299 (39.4%) allowed at least one person to be registered without coming to the office in person. Out of these 118 communes, four communes allowed more than 10 people in a single day to be registered without coming to the office in person. Law requires applicants to register in person.
- NICFEC found that a new NEC regulation allowing the use of expired national ID cards through the end of 2013 has not been universally enforced. In 48 out of 299 communes (16.1%), observers witnessed the rejection of at least one person for the use of an expired ID card.

A minimum of 7,393 people registered with the Statement of Identity for Electoral Purposes. In 13% of the daily reports, observers witnessed more than 10 people in a single day using the Statement of Identity form.

Based on these preliminary findings, NICFEC and NDI recommend:

- NEC enhance its education and oversight process for commune clerks as many appear not to understand the registration rules and procedures.
- NEC encourage and aid those citizens whose registration was rejected due to insufficient documentation to return to the council to register again with adequate paperwork.
- The NEC investigate cases of communes incorrectly denying registration or registering people without proper documentation, and take action against any violations of the law and regulations. This includes sanctioning any commune officials who do not fully perform their duties.
- Registration-related disputes be adjudicated in a fair and transparent manner. The NEC should review the complaints process to ensure that it is readily accessible and clearly understood by participants in the process.
- NEC reconsider delegation of registration authority to commune council, or any elected body, given the conflict of interest that is inherent.
- NEC and relevant government bodies expedite the process of establishing a permanent voter registry, based on the civil registry, eliminating the necessity of annual registration and list verification.

NICFEC is a neutral and impartial grassroots network of advocates and volunteers supported by a coalition of seven non-governmental organizations that works on election education, monitoring and advocacy. NICFEC envisions strengthening and expanding democracy supported by free and fair elections, where the rule of law and human rights are recognized and valued. NICFEC's Mission is to encourage people to participate in local development and to exercise their democratic rights for making progress in their social lives.

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The National Democratic Institute is a nonprofit, nonpartisan nongovernmental organization working to support and strengthen democratic institutions worldwide through citizen participation, openness and accountability in government. NDI is supported by generous assistance of the United States Agency for International Development (USAID).

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Appendix E (Second Statement on VRM)





PRESS ADVISORY

FOR IMMEDIATE RELEASE November 2, 2011 Phnom Penh, Cambodia

NICFEC Completes Monitoring of 2011 Voter Registration Final Press Statement

With technical assistance from the National Democratic Institute for International Affairs (NDI), the Neutral and Impartial Committee for Free and Fair Elections in Cambodia (NICFEC) completed a voter registration/list verification monitoring program for the 2011 registration period on October 18, 2011. The observation aimed to provide impartial information and analysis of the process for future improvement.

Prior to the registration period, random sampling was used to statistically select 300 communes for observation out of Cambodia's total of 1,621 communes. NICFEC, with NDI's assistance, trained 318 observers and 16 provincial coordinators from 22 provinces and Phnom Penh municipality, equipping them with guidelines, checklists, and reporting schedules. Observers were deployed on September 1, the first day of registration, and monitored 30 days out of the total 42 days during which registration took place at the commune council offices. Observers remained at the registration centers for the entirety of the scheduled working day, from 7:00am to 5:00pm. Observers' daily checklists included questions pertaining to compliance with NEC schedules and regulations, acceptance of appropriate documents of identification, use of the new Statement of Identity form, and presence of unauthorized individuals in the registration office.

NICFEC extended the observation period by three days in 56 of the 299¹ sample communes that were among the 367 communes to receive registration extensions from the National Election Committee (NEC) due to severe flooding. NICFEC found that in these 56 communes, 1,070 new applicants registered during the three day registration extension.

Based on the aggregated data from 9,136 daily reports submitted by observers, NICFEC and NDI have made a number of conclusions about the voter registration period and local compliance with NEC regulations.

- More than half of the communes observed (151 out of 299) registered at least one applicant who
 did not come to the office in person. Out of these 151 communes, 127 communes committed this
 violation on more than one occasion. Law requires applicants to register in person.
- A total of 69 out of 299 communes (23.1%) allowed the registration of at least one applicant without any documents of identification. Out of these 69 communes, 40 offices committed this violation on more than one occasion. Applicants are required to present documents that provide their age, commune of residency, proof of citizenship, and an ID photo.

¹ NICFEC was not able to observe Preaek Chrey commune in Kandal province as planned due to extensive flooding in the province, bringing the total number of observed communes from 300 to 299.

- NICFEC found that a new NEC regulation allowing the use of expired national ID cards through the end of 2013 was not universally enforced. In 55 out of 299 communes (18.4%), observers witnessed the rejection of at least one person for the use of an expired ID card. Out of the 55 communes, 33 councils committed this violation on more than one occasion.
- Reports show that regulated opening hours from 7:00am to 5:00pm were not always observed.
 Although 94.0% of the daily reports stated that registration centers opened on time, only 68.5% reported that the centers closed on time.
- Intimidation of applicants was rare. In only five out of 299 communes (1.7%) did observers report any intimidation. Intimidation observed included the use of strong language to applicants by party activists, the presence of police officers next to the center, the collection of data on party membership by village chiefs, and the questioning of suspected foreign applicants by party activists.
- Political activity around the registration centers was limited. In only 11 out of 299 communes (3.7%) did observers report party or campaign activities near or in the registration center, half of which involved commune officials, party activists, or applicants wearing party apparel.
- A minimum of 20,654 applicants in the 299 communes used the new Statement of Identity for Electoral Purposes to register to vote. In 11% of reports, more than 10 people in a single day used the Statement of Identity form.

Based on these findings, NICFEC and NDI recommend:

- The NEC disseminate information on voter registration and train officials at least three months in advance of all future voter registration exercises.
- The NEC investigate cases of communes incorrectly denying registration or registering people
 without proper documentation, and take action against any violations of the law and regulations,
 including sanctioning of commune officials. Investigation should be thorough and go beyond
 merely contacting the commune officials in question.
- Registration-related disputes be adjudicated in a fair and transparent manner. The NEC should review the complaints process to ensure that it is readily accessible and clearly understood by participants in the process.
- NEC conduct an audit of the final voters' list as well as support an independent audit involving
 multiple tests (people-to-list, list-to-people, deletion list-to-people) to measure the list's accuracy,
 by identifying duplicate names and false deletions.
- NEC reconsider delegation of registration authority to commune councils, or any elected body, given the conflict of interest that is inherent.

The annual registration and list verification process is cumbersome, complicated, expensive, vulnerable to interference, and unnecessary. In the longer term, the relevant government bodies should expedite the process of distributing ID cards to citizens and establishing a civil registry on which a permanent voter registry can be automatically built, eliminating the necessity of all registration exercises in the future.

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Appendix F (Minute of Report consultation on VRM)



និតឡើច

គណៈកម្មាធិតារអព្យាក្រីត និ១យុគ្គិនទី ដើម្បីការបោះឆ្នោតដោយសេរី និ១ត្រឹមត្រូទនៅកម្ពុជា Neutral and Impartial Committee for Free and Fair Elections in Cambodia Coalition of Non-Governmental Organizations

MINUTES OF THE REPORT CONSULTATION

VOTER REGISTRATION AND LIST VERIFICATION 2011 DECEMBER 7, 2011 AT 2:00P.M-5:00P.M AT HIMAWARI HOTEL

The consultation was held on 7 December 2011 at 2:00-5:00P.M at HIMAWARI Hotel with participation of 44 people from various political parties, NGOs, media agencies, donors and embassy representatives. The purpose of the consultation was to address the findings and discussions on the report regarding the Voter Registration and List Verification 2011.

The Consultation Process:

Welcome Remarks:

The Resident Country Director, NDI in Cambodia, Ms. Laura Thornton briefly spoke on the confidence in the process that five key findings were highlighted and addressed to participants;

- Registration without presence:

This violation was reported in 1,226 daily checklists (13.4%) and was most prevalent in Kampong Cham, Kampot and Svay Rieng provinces.

- Registration Without Documentation

This violation remained consistent throughout registration at least a total of 69 out of 299 communes, 23.1%, was reported.

Prevented from registering with expired ID

The report showed that in 55 out of 299 communes, 18.4%, were happened and the new NEC regulation allowing the use of expired national ID cards to register and vote through the end of 2013 was not universally enforced.

Prevented from registering due to insufficient documentation

In 185 communes, 62%, were rejected for insufficient documents. This violation could include applicants who rejected correctly or incorrectly.

Non-Compliance with office hours

Many communes did not consistently comply with regulated hours of operation, in 31.5% of cases the registration office did not close on time.

Presentation on Methodology

Mr. Hang Puthea, Ph.D, Executive Director to NICFEC did presentation; 1) Commune selections (multistage random sample of 300 communes); 2) Selection of provincial coordinators and observers (20 provincial coordinators and 318 observers); 3) Material production (checklists, critical incident form, address sticker for sending reports, observer guidelines, reporting guidelines, checklist simulation, code of conduct and observer pledge; 4) Training for 318 observers including 40% women and 20 provincial coordinators; 5) Documentation and data collection, observers completed an observation checklist and the results from each data enterer were consolidated daily into master matrix for data analysis.

Opening Remarks

Board director of NICFEC, Dr. Pung Chhiv Kek, briefly stated that with the financial support of NDI and collaboration with Center for Advances Study, CAS, NICFEC had conducted the voter registration and list verification throughout Cambodia and produced the report for consultation and finally she officially opened the consultation.

Presentation on findings

Mr. Mang Sokha, project Officer, conducted presentation on the findings based on the distributed report.

Presentation on Comfrel observation findings

Mr. Kim Chhorn, Senior Program Coordinator, briefly presented the Comfrel observation findings that he address the findings reported from observers were similar to NICFEC. He also said the Comfrel final report will be issued within three months.

Presentation on DHRAC Findings

Mr. Francois Im, Ph.D. Executive Director of DHRAC, briefly stated the voter registration observation findings that NEC could not spread information on voter registration broadly and the voter registration findings of his report were similar to NICFEC report.

· Recommendations

Mr. Hang Puthea, NICFEC Executive Director, read the 8 points of recommendations in the report and encouraged participations for questioning.

Questions, Answers and comments

Ms. Muy Sokhour, SRP parliament, raised her recent experience regarding the election in Egypt that they only used ID cards for voting. The key solutions for voter registration in Cambodia are;

- -Issued National ID eard to every citizen
- -No need voter list any more
- -NEC should be an independent component

Mr. Ho Van, SRP parliament, commented that we need to change NEC members, the government should issue the birth certificate to everyone and we should establish independent election court.

Mr. Mom Sidando, Director of Radio 105, raised two problems; National ID card is still a problem and we often raised this matter to the government but there was no solution. He encouraged donors not to prefer the term "SHOULD" in recommendations, it's just the mild obligation in which the relevant institutions may ignore any time. Donors and NGOs have to put strong obligation in recommendations in order to push the relevant institutions to adhere with regulations and procedures. Previously the term 'should do this, or do that' doesn't make much change, it's just like putting the garland for those ignorers.

Representative of YCC, noted that Information board at the commune office was not installed in proper place, it was wet when raining, many commune offices are located in the same compound with police station and loud speaker used by NEC for voter registration information was not reached to community people because people did not understand the announcement.

Mr. Ouk Suy, Representative of HRP, commented three points that NEC should be Neutral, Impartial and professional. NEC members should be selected from all political parties and currently NEC members should be changed.

NEC Representative, Heu Rong said that people used different ID (like national ID card from the State of Cambodia, or UNTAC ID) for voter registration which is illegal and he denied the problems of registration without documentation and registration without presence.

Conclusion and closing Consultation

Mr. Hang Puthea, Ph.D, thanked to participants and promised to bring and consider comments raised in the consultation for the report and finally officially closed the consultation.