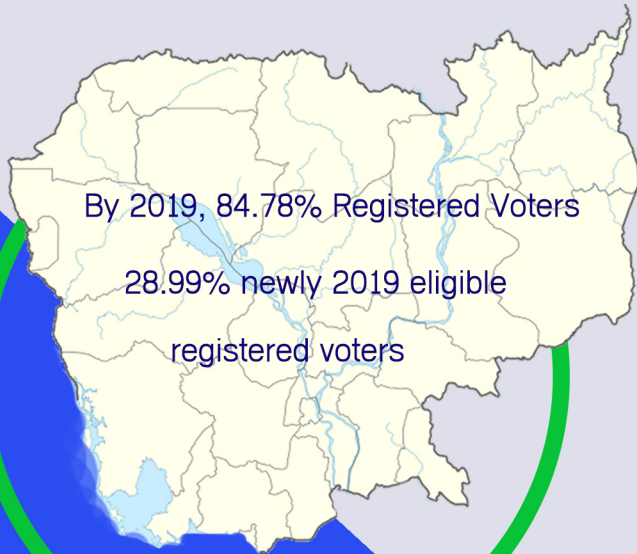




The 2019 Voter Registration Observation and Voter List Audit Report



Feb 2020

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I. Introduction

The 2019 Voter Registration Observation and Voter List Audit Report is an outcome of the 4th annual Voter registration since 2016. For the 2019 registration, COMFREL could only deploy not more observers to monitor the process and to conduct the voter list audit.

Voter registration was newly established with a computerized system in 2016 and it is noted that to compare with the estimation, from 2017 to 2019 the registration rate has continued declining. According to Ministry of Labour and vocational training and Labour related NGOs, there are about two million migrant workers. And COMFREL observed that they have not been registered in voter list yet. Furthermore, the declining of registration rate also results from political tension from dissolving the opposition, CNRP who would mobilize and acknowledge eligible voters to get registered. The absence of oversea registration mechanism for migrant workers also brings the rate to decline.

According to its audit, COMFREL observes that the quality of voter list has steadily improved in duplicated names other irregularities from 2016.

COMFREL continues studying and providing to its recommendations on procedure and registration legislation to resolve the challenges and irregularities in the voter list.

II. Summary of Findings

1. Voter Registration Preparation: The voter registration and voter list update are to take place annually. In 2019, the registration operated for 22 days with 10,178,807 estimated eligible voters allocated to 23,364 estimated polling stations. The registration operation held with 1,646 registration teams. However, migrant eligible voters were not able to get access to the registration at the foreign countries.

2. The establishment of new polling station and eligible voter rate for the registration: the polling stations are newly established annually. In 2019 the NEC established 71 new polling stations for allocating about 372,628 by 2019 eligible voters. COMFREL noted that the registration rate is high on 12th to 15th June when there was a public holiday for the King's birthday. To compare this with the estimation in 2019, the rate is more than 50% in only four provinces including Svay Rieng, Takeo, Palin, and Tboung Khmom.

It is low turnout of the registration. According to the NEC's 2019 registration result, there is only 108,272 new eligible voters who are 18 years old by 2019. It is equal to 28.99% of the estimation. COMFREL was not able to access to information about budget for the registration. Once the Information is available, COMFREL is very consent to discuss with NEC about any alternative registration method for improving the efficiency to save the national budget.

3. 2019 voter list audit: COMFREL found that in the 2019 audit 44 of 8,629,357 voter names have duplicated data. in 2018, there were 89 duplicated voter names. Meaning the number of duplicated voter names has decreased in 2019. It is also noted that according to 2018 audit finding, COMFREL informed those 89 duplicated names to the NEC to possibly clean the voter list; yet those 26 voter name were still found in the 2019 voter list. COMFREL is still committed to discuss the reason for those cases with the NEC.

According to the studying the registration documents including Khmer Identity Card (ID) and Identity Certificate for registration (ICR), 26,169 of about 8,6 million voter names had registered with duplicated ID and ICR number. COMFREL also found that 8,196,034 voters equal to 95% had registered with ID and 433,323 voters equal to 5% had registered with ICR. Among the 8,196,034 voters, 608,641 (7.4%) voters were registered with ID version I, 342,951 (4.2%) voters with ID version II and 7,244,442 (88.4%) voters with ID version III.

Recommendation for Voter List Update and Voter Registration

According to the voter registration monitoring and voter list audit from 2016 to 2019, COMFREL proposes the following recommendations:

- The NEC should continue its effort to create a new mechanism or to propose to the National Assembly to amend the election laws to register migrant eligible voters outside the country.
- The NEC should join effort with Ministry of Interior to foster providing Khmer Identity Card to all eligible citizens or voters.
- The NEC should inform voters registered with ID version I to update their

registry data accordingly their in-hand ID and the NEC should also encourage the MoI update voter's expired ID.

- The NEC should strengthen the component of the registration team in filling and update information of applicants to reduce the unintentional fault as much as possible.

III. Observation and Audit

A. Voter Registration Preparation

The National Elections Committee (NEC) schedules the annual Voter registration and update voter list, which is carried out beyond the election period, for only 22 days from 1st to 22th, June 2019.

For the 2019 registration, the NEC had estimated the voters who are 18 years old (born by June 01, 2001) is about 10,178,807 voters which about 372,628 of them are expected to eligibly register in 2019. Then the polling stations will be expended to 23,470.

The NEC also conducted the outreach registration which people can get registered at the commune and village. Within 22 days for registration, the NEC allocated the first six days for the registration at the commune office and following seven days at villages in the commune and last four days at the commune office again.

A.1 Registration Schedule

The registration (operation at field) was scheduled to take place for 22 days from May 01 until May 22, 2019.

Following the operation, the NEC on June 27, 2019 officially published preliminary voter list along with deleted voter list which is to serve for the national commune election. On July 31, 2019 the NEC officially validated the voter list and published it on its website is www.voterlist.org.kh

The complaint resolve was scheduled by 28 May at the commune council, by 8 June at the NEC and by 24 June at the constitutional council of Cambodia.

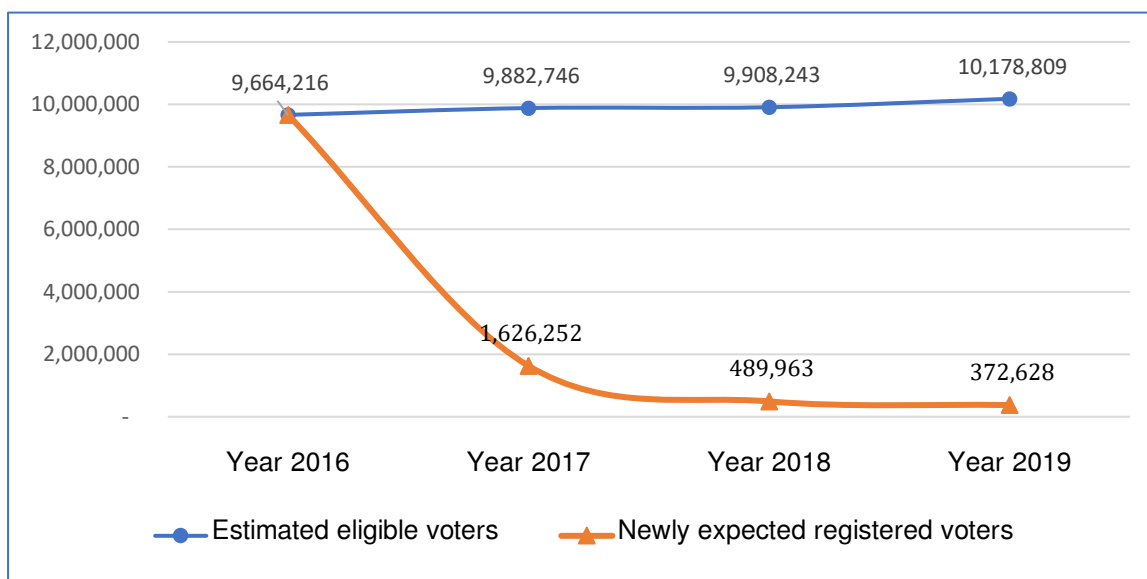
The NEC also recruited officers for the registration at 1,646 communes.

B. Polling Stations Establishment and Estimated Population for Voter Registration

B.1 NEC's estimation on voter registration population

The process of voter registration and update voter list was reformed following the political resolution in 2013. The new voter registration with the biometric and voter's photo system that is an outcome of the reform was first held in 2016.

Graphic 1: Estimated eligible voters and newly expected registered voters

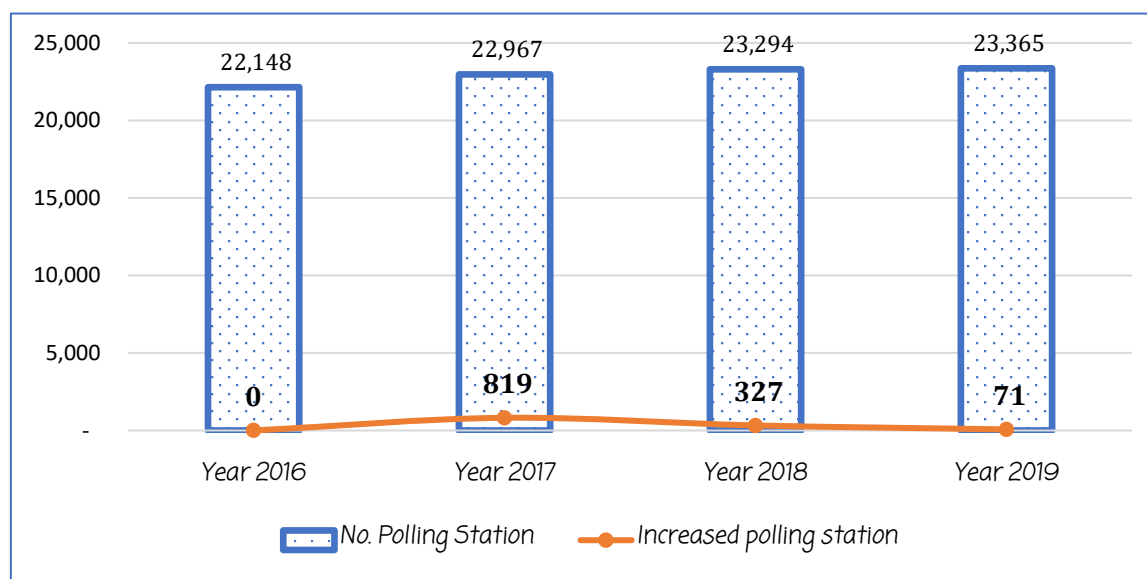


The first voter registration creating a new voter list was held in 2016. For the first registration, the NEC estimated there were 6,964,216 voters in the voter list. In the 2017 voter registration, the NEC estimated that the eligible voter reached to 9.8 million which 1.6 million of them were just get registered in 2017. For 2018 registration, the estimation is about 9.9 million voters which about 480 thousand were eligible voter who are 18 years old by 2018. For the 2019 registration, the registration rate is estimated about 10.1 million voters which 370.2 thousand are 18 years old by the 2019 registration.

B.2 Polling Station Establishment

For the 2019 registration, the NEC increased 71 polling station to allocate voters who just got registered in 2019. By this time, the polling station totally has 23,364.

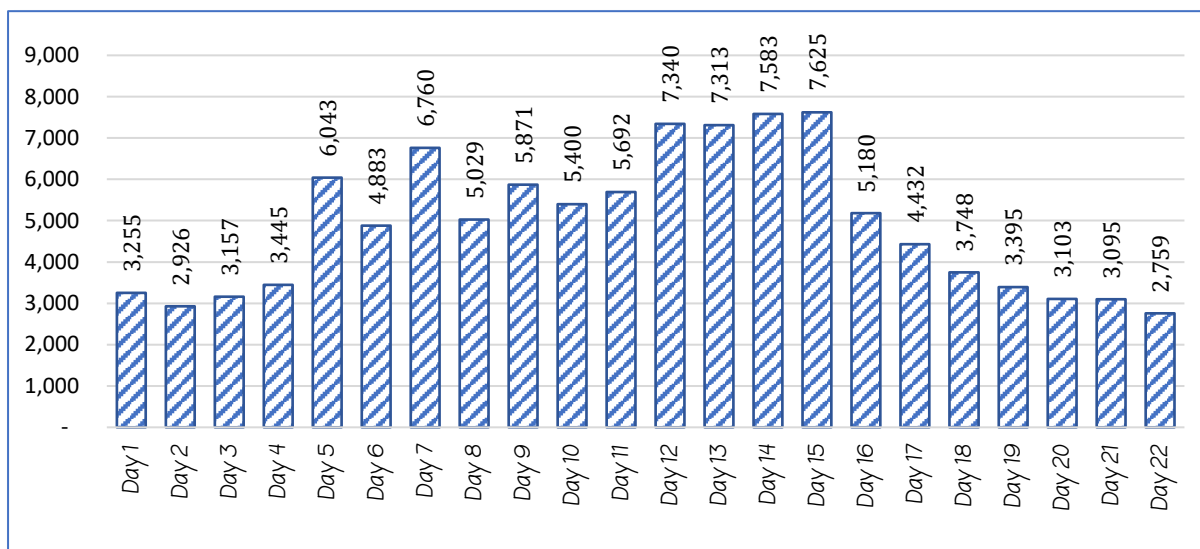
Graph 2: the change in number of polling station from 2016 to 2019



B.3 Voter registration Rate

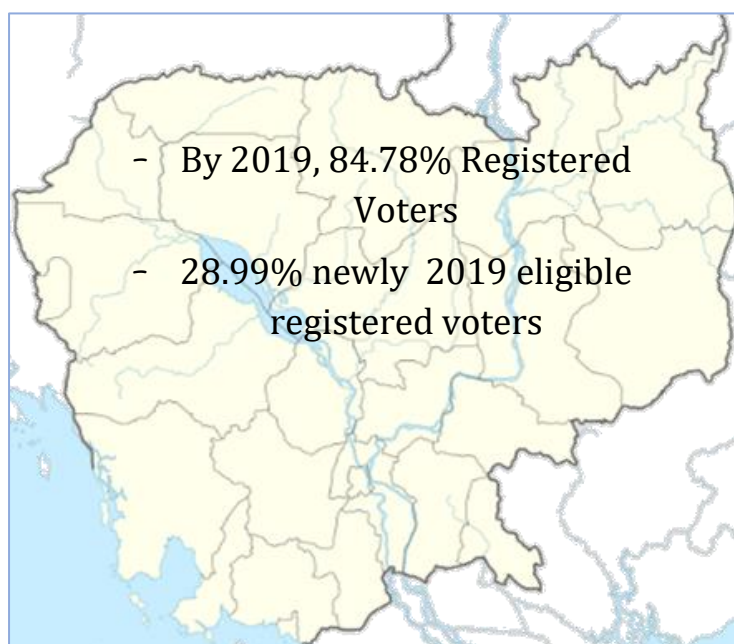
The NECs' estimation on the registration rate in 2019 is about 10,178,809 voters which 732,628 of them are eligible by 2019.

Graph 3: Daily Registration Rate



From the 1st to the 22nd June 2019, the registration rate in average is about 5,000 per day. at the first day of registration, the rate is about 3,939 voters and it is noted from the 5th to 15th, the rate is between about 4 thousand to 7 thousand and then the rate starts to decrease to about 2 thousand voters per day.

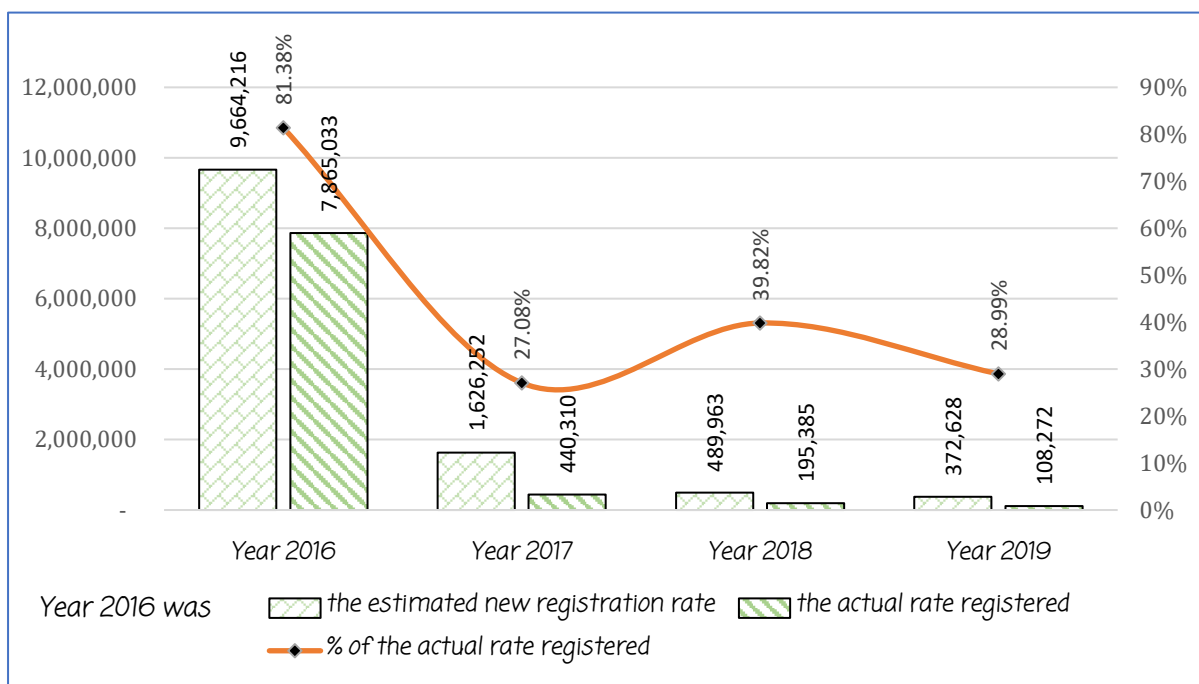
B.3.1 Comparison on Registration Rate



Compared to estimated rate in 2019 by NEC, the registration rate is only 84.78% of 10,178,809 voters.

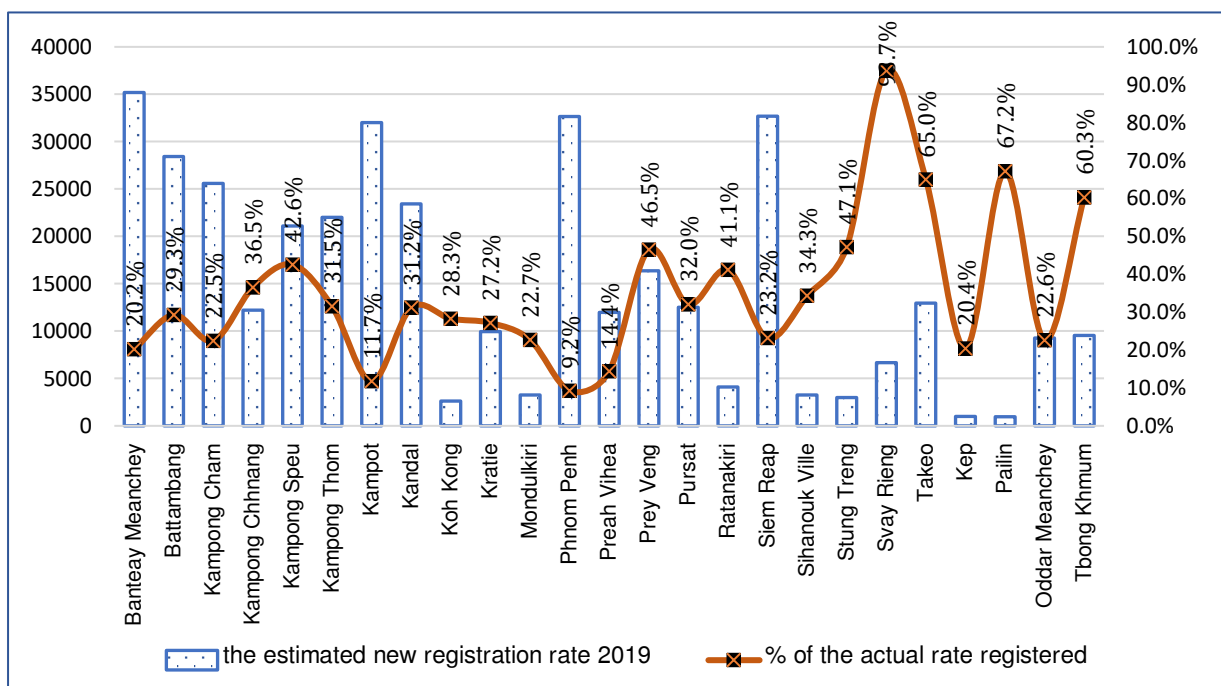
In 2019 the NEC expected to register about 372,628 eligible voters who are 18 years old by 2019, but there are only 108,272 equals to 28.99% voters who have registered in the list.

Graph 4: Percentage of Annual Registration Rate



Voter registration and update voter list is annually conducted starting from 2017. In 2017 the estimated new registration rate was 1,626,252 but the actual rate was only 440.310 voters equal to 27.08%. In 2018 registration, to compare with the 2017, the estimated rate decreased by 489,963; and an actual rate was 195,385 voters which is lower than 2017. In 2019 registration, estimated rate continued to decrease if compared to 2018. The percentage of actual rate in 2018 is higher than in 2017 and 2019.

Graph 5: Registration Rate at Capital and provinces

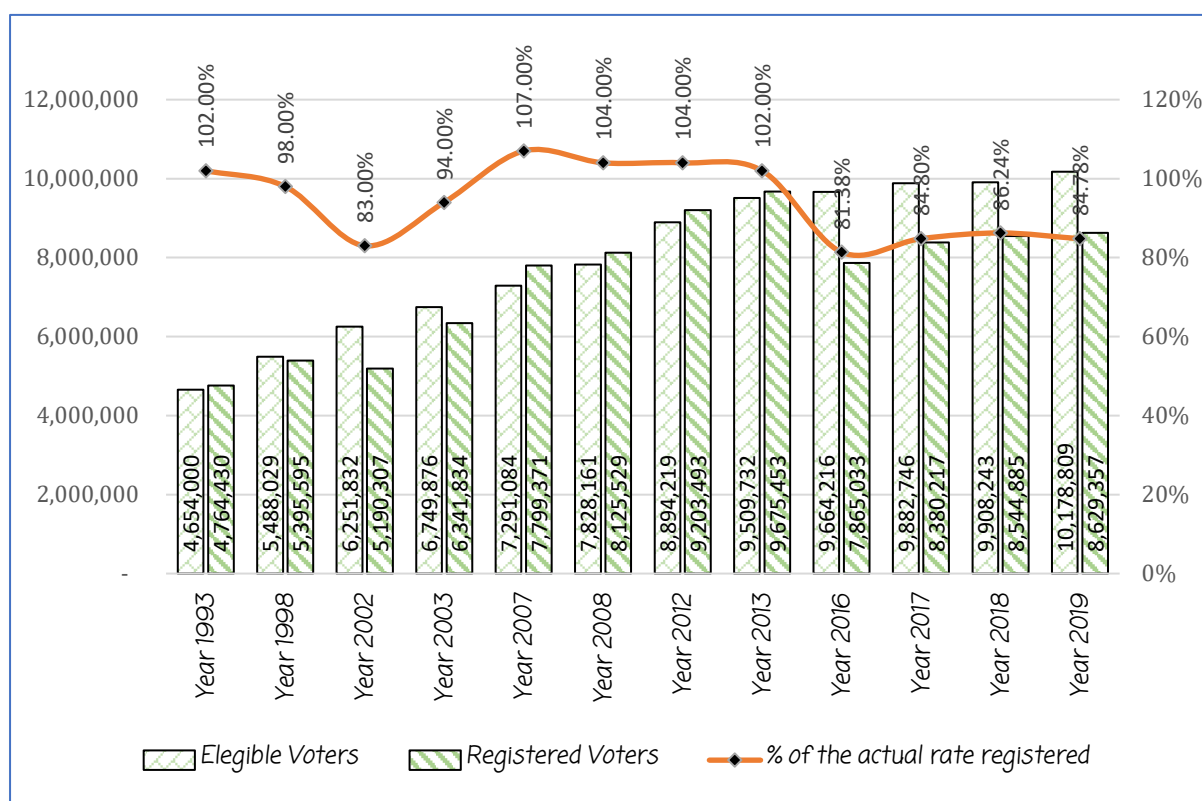


It is noted that for the 2019 registration the NEC estimated registration rate more the 30 thousand voters for each four provinces including Banteay Meanchey, Kampot, Phnom Penh and Siem Reap, while for other provinces, the estimated rate is less than 30 thousand voters. Compared with the estimated rate, the actual rate only for four provinces are higher than 50%. They are Svay Rieng (93.7%), Palin (67.2%), Takeo (65%) and TboungKmom (60.2%).

B.3.2 Annual Estimated Rate and Actual Rate by NEC

From 2016 to 2019, if compared to the estimation the registration rate is below 90%. Within the last three years, it is noted the rate has changed (increased or decreased) around 2%. The voter list, which is the output of voter registration with a new computerized system, receive credibility and COMFREL noted the voter list has not been rejected by any political parties.

Graph 6: Registration Rate from 1993 to 2018



The graph shows that in 1993 the registration rate was 2% higher than the estimation. The estimation continued decreasing from 1998 to 2002 when the registration rate was about 83% only. But it is also noted the for 2003, 2007, 2008, 2012, and 2013 registration, the actual rate was higher than the estimation. Before 2016, the registration was not conducted with the computerized system but was carried out by registration teams. It resulted that quality check on duplicated names and registry documents and deleted names was very undermined.

From 2016 to 2019, the estimation has steadily increased from 9.6 million to 10.1 million voters and the registration rate also has increased from 8.3 million to 8.6 million voters.

In spite of the increase, COMFREL noted that the registration rate in percentage has not increased steadily. The registration rate was 84.8% in 2017, 86.2% in 2018 and 84.73% in 2019.

C. Voter Registration Environment

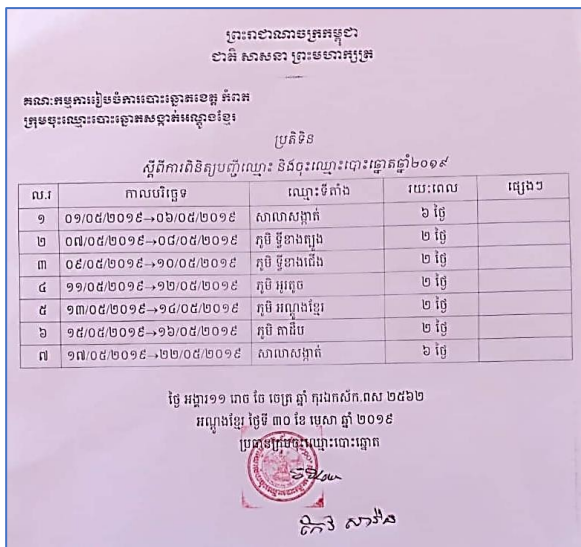
C.1 Registration Location

The registration is basically situated in the commune offices. And according to provision 4.5 of the NEC’s annual registration regulation, it is also allowed to take properly place in the village where electricity can be accessible, and people can access to get administrative services. COMFREL also fund that the registration only regularly operated in some target villages.

The registration allocated the time to operate as below:

- First six days, 1st to 6th June at commune office
- The following 11 days from the 7th to 17th June at target villages in the commune
- And the last five days, from 18th to 22nd June, the registration moved to run at commune office again.

Photo 1: Registration schedule in village



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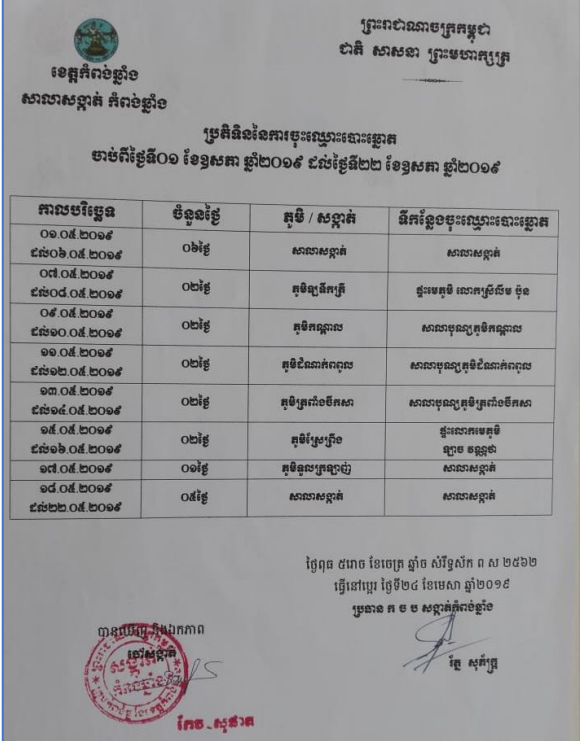
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They are registration schedules at villages in Kampong province and Kampong Chhnang province.

Photo 2: Registration offices at village and in commune office



Registration office at the village in Banteay Meanchey and in the commune office at Kampong Cham

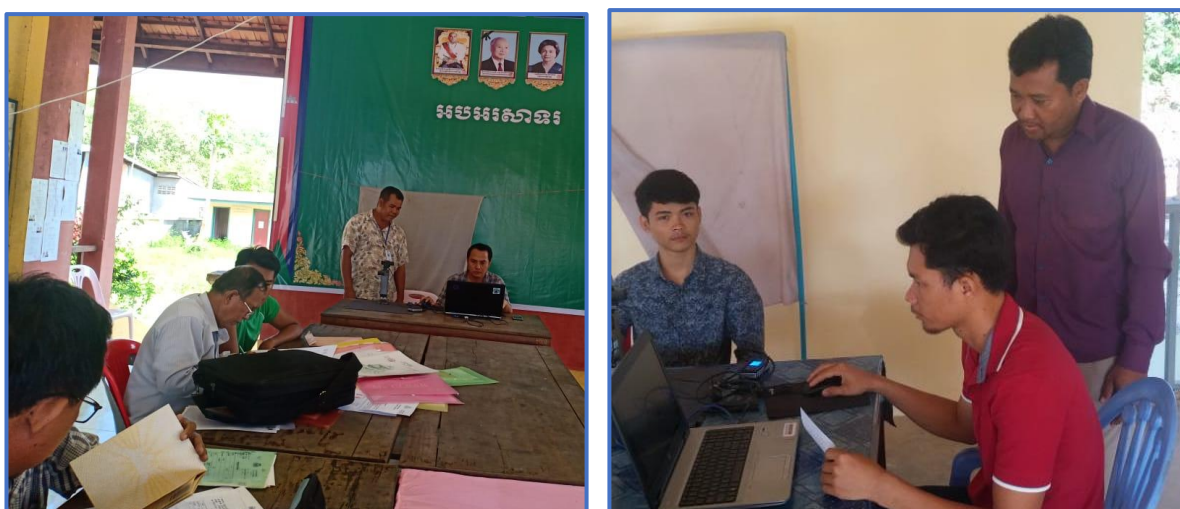
COMFREL also noted the registration office at the villages make it easier for the eligible voters to get registered.

C.2 Civil Society Organizations and Political Parties' Engagement in the Registration

Similar to the 2017 and 2018 registration but quite different to the 2016 registration, the 2019 registration was carried out without active participation of political parties and civil society organizations.

For the 2019 registration, COMFREL did not deploy observers but only eight COMFREL's provincial secretariats at Banteay Meanchey, Kampong Cham, Kampong Chhnang, Kampot, Kandal, Prey Veng, Ratankiri and Siem Riem were tasked to observe the general environment during the registration process.

Photo 3: COMFREL's secretariats observing the registration process



The registration observation at Banteay Meanchey and Prey Veng



The registration observation at Kampot

D. The 2019 Voter List Audit

COMFREL has conducted voter list audit since 2016. For the 2019 registration, COMFREL had audited the official voter list.

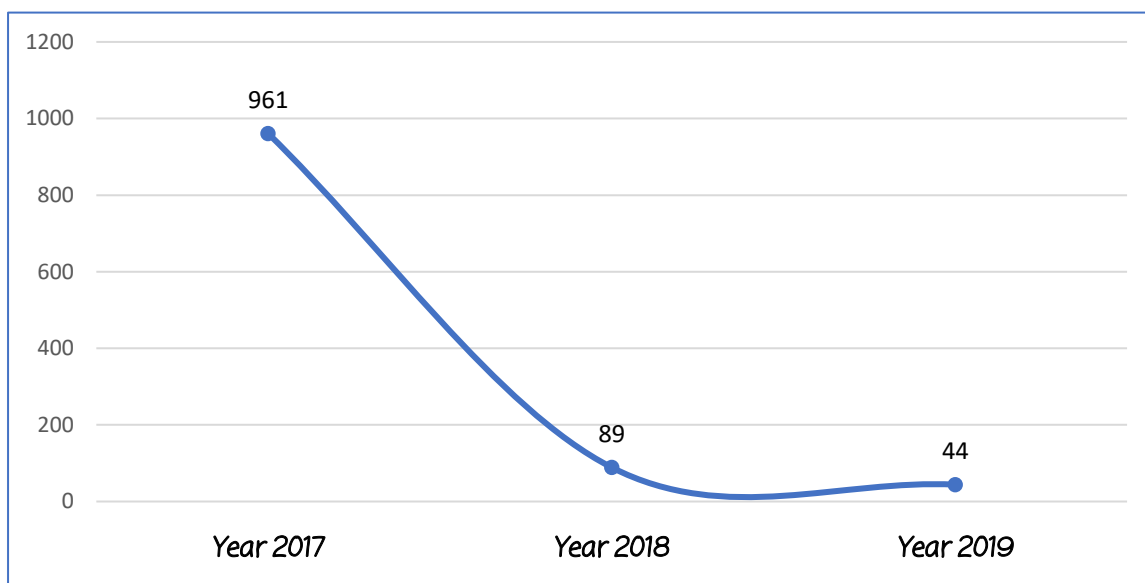
The audit mainly focused on several areas as explained below:

- Finding voters whose name is in the voter list
- Duplicated name in voter list
- Irregularity of registry documents
- Conducting case study on duplicated names in voter list

D.1 Finding Duplicated name and other irregularities in voter list

44 voter's names of 22 voters are found duplicated in the 2019 official voter list carrying about 8,629,357 voter names. Of the 22, 13 voters have duplicated names in the same province while other 8 voters are found to have duplicated name in different provinces. Among the 13 voters having duplicated names in the same province, 8 voters are found to have duplicated name in the same commune and 4 of the 8 voters to have duplicated name in the same station.

Graph 7: Annual Duplicated Voter's Names in the list



According to above graph, the numbers of duplicated names in voter list has annually decreased since 2017. COMFREL conducted voter audit and found 961 duplicated voter's names in 2017, 89 names in 2018 and 44 names in 2019.

Below are photo of voters having duplicated names in voter list

Photo 4: photo matched but duplicated in different province

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បញ្ជីបោះឆ្នោតដូចគ្នាស្រាប់២០១៩

កូដខេត្ត: **២៥** ឈ្មោះខេត្ត: **ត្បូងឃ្មុំ** កូដឃុំ: **០២០** ឈ្មោះឃុំ: **ចាន់មូល**
 ឈ្មោះភូមិ: **ចាន់មូល** លេខកូដការិយាល័យ: **០២៨៣** ឈ្មោះការិយាល័យ: **សាលារៀនភូមិចាន់មូល**

□ ៩	11-089-322		កែវ គុណ្ណា អ.ខ ទី២ : 061040111	ស្រី	01-07-1989	ភូមិ ចាន់មូល
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Photo 5: photo matched but duplicated in different commune


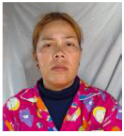

 បញ្ជីបោះឆ្នោតរដ្ឋបាលក្រុងស្ទឹងត្រែង						
ក្រុងខេត្ត: ២៥		ឃុំ: ត្បូងឃ្មុំ		ក្រុងឃុំ: ០៥៥		ឃុំ: គរ
ឃុំ: ទំនប់សែនជ័យ		លេខកូដការិយាល័យ: ១០៦៤		ឃុំ: បឋមសិក្សាហ៊ុន សែនក្បាលអូរ		
ល.រ	អត្តសញ្ញាណ	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	អាសយដ្ឋានបច្ចុប្បន្ន
<input type="checkbox"/> ១៤០	11-446-516		វ៉ាន់ ភួង អ.ខ ទី៣ : 250121408	ស្រី	06-03-1978	ភូមិ ទំនប់សែនជ័យ
 បញ្ជីបោះឆ្នោតរដ្ឋបាលក្រុងស្ទឹងត្រែង						
ក្រុងខេត្ត: ២៥		ឃុំ: ត្បូងឃ្មុំ		ក្រុងឃុំ: ០៥៦		ឃុំ: ល្បឿង
ឃុំ: ភូមិ ៤-១៦		លេខកូដការិយាល័យ: ១០៦៨		ឃុំ: ភូមិ ៤-១៦		
ល.រ	អត្តសញ្ញាណ	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	អាសយដ្ឋានបច្ចុប្បន្ន
<input type="checkbox"/> ១០៧	11-446-511		វ៉ាន់ ភួង អ.ខ ទី៣ : 250121408	ស្រី	06-03-1978	ភូមិ ភូមិ ៤-១៦

Photo 6: voter's data are duplicated in the same list but photo of them are not matched.

 បញ្ជីបោះឆ្នោតរដ្ឋបាលក្រុងស្ទឹងត្រែង						
ក្រុងខេត្ត: ២៥		ឃុំ: ត្បូងឃ្មុំ		ក្រុងឃុំ: ០០៧		ឃុំ: ត្រពាំងត្រឹង
ឃុំ: ស្រែប្រាំង		លេខកូដការិយាល័យ: ០១១៦		ឃុំ: បឋមសិក្សាភូមិស្រែប្រាំង		
ល.រ	អត្តសញ្ញាណ	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	អាសយដ្ឋានបច្ចុប្បន្ន
<input type="checkbox"/> ៤៦៩	11-000-818		អ៊ិន សុខអេង អ.ខ ទី៣ : 060500546	ប្រុស	25-06-1979	ភូមិ ស្រែប្រាំង
<input type="checkbox"/> ៤៧០	11-000-968		អ៊ិន សុខអេង អ.ខ ទី១ : 060500546	ប្រុស	25-06-1979	ភូមិ ស្រែប្រាំង

ទំព័រទី ៤៧ នៃ ៤៩ គណៈកម្មាធិការជាតិរៀបចំការបោះឆ្នោត

D.2 Case Study on Duplicated Voter Name with Voter

- A case of a voter called Keo Kunthea, Female, has duplicated data in voter list of two provinces.



បញ្ជីបោះឆ្នោតឆ្នាំ២០១៩

កូដខេត្ត: **០២** ឈ្មោះខេត្ត: បាត់ដំបង កូដឃុំ: **០៩៦** ឈ្មោះឃុំ: តាក្រី
 ឈ្មោះភូមិ: ផ្លូវប្រាំមួយ លេខកូដការិយាល័យ: **១៥៣៤** ឈ្មោះការិយាល័យ: បឋមសិក្សាសាមសិប

ល.រ	អត្តសេខ	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	អាសយដ្ឋានបច្ចុប្បន្ន
<input type="checkbox"/> ៨	01-387-800		កែវ គុណ្ណ អ.ខ ទី៣ : 061040111	ស្រី	01-07-1989	ផ្ទះ 331 ក្រុម 22



បញ្ជីបោះឆ្នោតឆ្នាំ២០១៩

កូដខេត្ត: **២៥** ឈ្មោះខេត្ត: ត្បូងឃ្មុំ កូដឃុំ: **០២០** ឈ្មោះឃុំ: ចាន់មូល
 ឈ្មោះភូមិ: ចាន់មូល លេខកូដការិយាល័យ: **០២៨៣** ឈ្មោះការិយាល័យ: សាលារៀនភូមិចាន់មូល

ល.រ	អត្តសេខ	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	អាសយដ្ឋានបច្ចុប្បន្ន
<input type="checkbox"/> ៩	11-089-322		កែវ គុណ្ណ អ.ខ ទី២ : 061040111	ស្រី	01-07-1989	ភូមិ ចាន់មូល

➤ A case of a voter called Chrek Chea, Female, has duplicated data, excluding the photo in voter list of two separate provinces.



បញ្ជីបោះឆ្នោតឆ្នាំ២០១៩

កូដខេត្ត: **០៨** ឈ្មោះខេត្ត: កណ្តាល កូដឃុំ: **០៨៣** ឈ្មោះឃុំ: សំបូរ
 ឈ្មោះភូមិ: ព្រែកចាវ លេខកូដការិយាល័យ: **០៨៨៦** ឈ្មោះការិយាល័យ: បឋមសិក្សាព្រែកចាវ (ត្បូង)

ល.រ	អត្តសេខ	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	អាសយដ្ឋានបច្ចុប្បន្ន
<input type="checkbox"/> ៤៨	04-804-043		ប្រឹក ជា អ.ខ ទី៣ : 050147835	ស្រី	12-12-1980	ភូមិ ព្រែកចាវ



បញ្ជីបោះឆ្នោតឆ្នាំ២០១៩


កូដខេត្ត: **១៤** ឈ្មោះខេត្ត: ព្រៃវែង កូដឃុំ: **០៧៨** ឈ្មោះឃុំ: បឹងដោល
 ឈ្មោះភូមិ: អំពិល លេខកូដការិយាល័យ: **១២១០** ឈ្មោះការិយាល័យ: វត្តអំពិល

ល.រ	អត្តសេខ	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	អាសយដ្ឋានបច្ចុប្បន្ន
<input type="checkbox"/> ៦៦	07-754-062		ប្រឹក ជា អ.ខ ទី១ : 050147835	ស្រី	12-12-1980	ភូមិ អំពិល

➤ A case of voter called Phon Phal, Male, has almost duplicated data and duplicated photo in a station.

បញ្ជីបោះឆ្នោតឆ្នាំ២០១៩

កូដខេត្ត: ០៨ ឃុំ: កណ្តាល កូដសង្កាត់: ១៣៨ ឃ្លុះ: ស្វាយរលំ
 ឃុំ: ភូមិលេខ ៥ លេខកូដការិយាល័យ: ១៥៨៨ ឃ្លុះការិយាល័យ: សាលារៀនដើមអង្កោល

ល.រ	អត្តលេខ	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	អាសយដ្ឋានបច្ចុប្បន្ន
<input type="checkbox"/> ២២១	05-137-788		ផ៊ុន ផល អ.ខ ទី៣ : 020869633	ប្រុស	08-04-1994	ភូមិ ភូមិលេខ ៥
<input type="checkbox"/> ២២២	05-137-793		ផ៊ុន ផល អ.ខ ទី២ : 020869633	ប្រុស	08-04-1994	ភូមិ ភូមិលេខ ៥

Attention: it is important to note that 26 of 89 duplicated voter names which COMFREL submitted to the NEC in 2018 for intervention, are still found in the official list in 2019. Below is case of voter name called EAN Sok Eng holding ID #060500546, residence at Thboung Khmom province, Thrangpang Pring commune, station # 0116.

Photo 7: Voter names found to have duplicated data in 2018 still exist in 2019 voter list.

បញ្ជីបោះឆ្នោតឆ្នាំ២០១៩

កូដខេត្ត: ២៥ ឃុំ: ក្បូងឃ្មុំ កូដឃ្លុះ: ០០៧ ឃ្លុះ: ត្រពាំងត្រឹង
 ឃុំ: ព្រៃស្រប្រាំង លេខកូដការិយាល័យ: ០១១៦ ឃ្លុះការិយាល័យ: បរមសិក្សាភូមិព្រៃស្រប្រាំង

ល.រ	អត្តលេខ	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	អាសយដ្ឋានបច្ចុប្បន្ន
<input type="checkbox"/> ៤៦៨	11-000-968		អ៊ិន សុខអេង អ.ខ ទី១ : 060500546	ប្រុស	25-06-1979	ភូមិ ព្រៃស្រប្រាំង
<input type="checkbox"/> ៤៦៩	11-000-818		អ៊ិន សុខអេង អ.ខ ទី៣ : 060500546	ប្រុស	25-06-1979	ភូមិ ព្រៃស្រប្រាំង

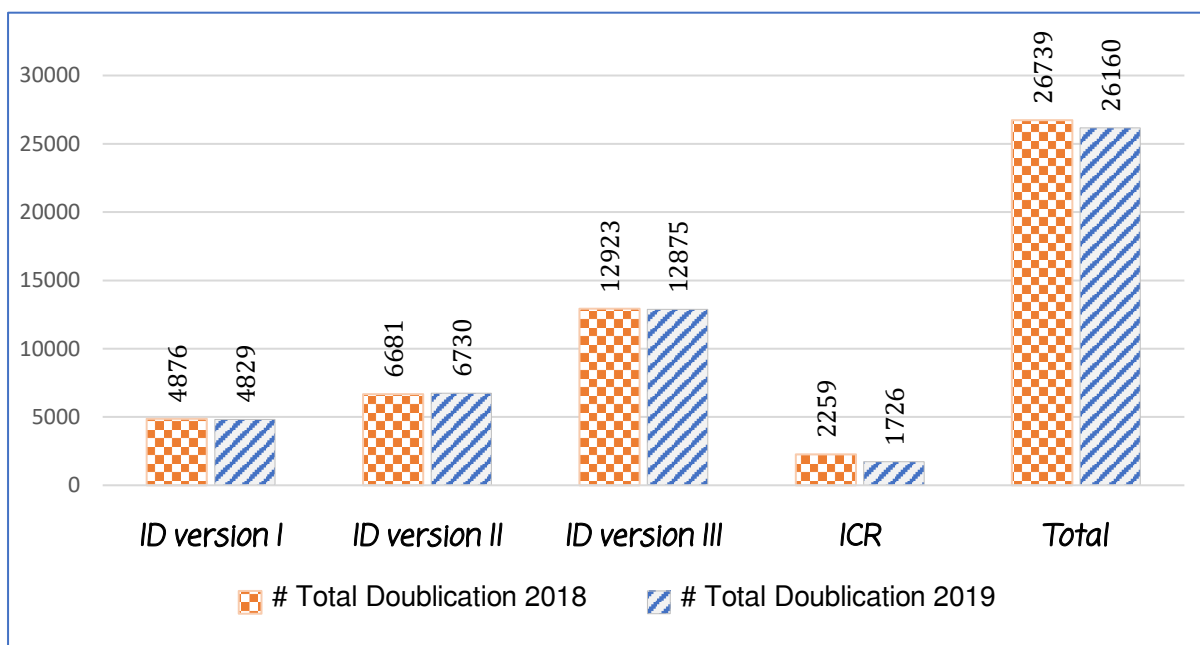
D.3 Duplicated ID number for Registration

There are three versions of Khmer citizen’s Identity (ID) card and they are all recognized as a main registry document. For the third version ID, Cambodian citizen shall have only one ID number. This version is to recode people’s data including photo, biometric fingerprints and other compulsory information and store them to a data base system. Differently, for the first and second version, citizen’s data were not stored in data base system and then their ID number is probably duplicated.

In spite of not having ID, according to the NEC’s registration, eligible voters can apply for identity certificate for registration (ICR) at commune office for registration.

According to the audit, in the 2019 voter list consisting of about 8.6 million voter names, 26,160 voter’s names were found to get registered with duplicated ID number.

Photo 8: Comparison of Duplicated ID number



The number of cases of duplicated ID numbers found in voter list in 2019 has slightly decreased if compared to 2018. It decreased because the case of duplicated ID number from version I and version III ID and ICR was found to go down but the case from version II ID was jumping up.

Table 1: a comparison of registry document having duplicated number

N	Type of Document	# of cases	
		2018	2019
1	ID version I	4876	4829
2	ID version II	6681	6730
3	ID version III	12923	12875
4	Identity Certificate for Registration (ICR)	2259	1726
Total		26739	26160

The table shows that in 2019 voter list, there are 26, 160 cases of duplicated registry number. For example, there is a voter name registered with ID version II #010819207 and there is another voter name registered with ID version III having the same number.

It is noted that there were 4,829 cases of registry number from ID version I, 6, 730 cases from ID version II, 12, 875 cases from ID version III and 1,726 cases from ICR found duplicated on each and other versions and documents.

Table 1.1: The number of cases of registry number duplication to its type

N	Type of document	# Case of duplication to its type	
		2018	2019
1	ID version I	249	243
2	ID version II	350	355
3	ID version III	1433	1405
4	Identity Certificate for Registration (ICR)	961	745
Total		2993	2748

The table shows that in 2019 voter list, there were 2748 cases of registry number duplication to its type. For example, 39 voter names were registered with a duplicated registry number 6883 of ICR. And 03 voter names were registered with a duplicated registry number 030001622 of ID version III.

The number of cases of duplication to it types are categorized as below:

- 243 voter names were registered with ID version I having duplicated registry numbers. It decreased if compared to 2018.
- 355 voter names were registered with ID version II having duplicated registry numbers. It increased if compared to 2018.
- 1405 voter names were registered with ID version III having duplicated registry numbers. It decreased if compared to 2018.
- 745 voter names were registered with ICR having duplicated registry number and it decreased if compared to 2018.

COMFREL found that in 2019 the number of cases which ICR has duplicated number has decreased if compared to 2018. It is also noted by 2019 the NEC though has made a revision for those cases, has not finished yet.

D.4 Irregularity of Identity Certification for Registration (ICR)


Below is a case of irregularity of registration with ICR which is found in the 2018 and 2019 voter list. This is a case of voter named Beng Horn, Female, Date of birth: 01 Jan 1952. In 2018 voter list, she was found to get registered with ICR: 21/16 but in 2019 voter list, her ICR number changed to 0520971.

Photo 8: irregularity of registry number for registration

Case of voter called Baeng Horn in 2018 voter list

បញ្ជីបោះឆ្នោតជំរុញឆ្នាំ២០១៨


កូដខេត្ត: **១៧** ឈ្មោះខេត្ត: **សៀមរាប** កូដឃុំ: **០១៩** ឈ្មោះឃុំ: **ជីកែវ**
 ឈ្មោះភូមិ: **សណ្តាន់** លេខកូដការិយាល័យ: **០២៣២** ឈ្មោះការិយាល័យ: **សាលារៀនវត្តជីកែវ**

ល.រ	ឆ្នាំបញ្ជី	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	អាសយដ្ឋានបច្ចុប្បន្ន
<input type="checkbox"/> ៣០	08-612-407		បេង ហ៊ាន ឯ.អ : 21/16	ស្រី	01-01-1952	ភូមិ សណ្តាន់

Case of voter called Bong Horn in 2019 voter list

បញ្ជីបោះឆ្នោតផ្លូវការឆ្នាំ២០១៩

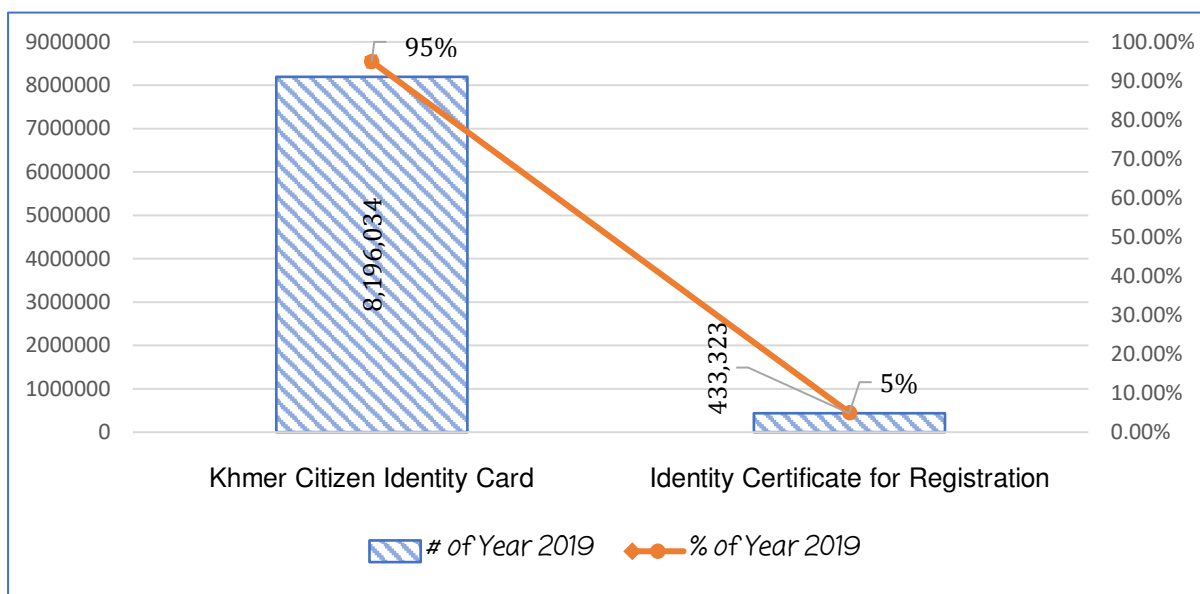
កូដខេត្ត: **១៧** ឈ្មោះខេត្ត: **សៀមរាប** កូដឃុំ: **០១៩** ឈ្មោះឃុំ: **ជីកែវ**
 ឈ្មោះភូមិ: **សណ្តាន់** លេខកូដការិយាល័យ: **០២៣២** ឈ្មោះការិយាល័យ: **សាលារៀនវត្តជីកែវ**

ល.រ	ឆ្នាំបញ្ជី	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	អាសយដ្ឋានបច្ចុប្បន្ន
<input type="checkbox"/> ៣១	08-612-407		បេង ហ៊ាន ឯ.អ : 0520971	ស្រី	01-01-1952	ភូមិ សណ្តាន់

D.5 Khmer Citizen Identity Card for Registration

According to article 34 NEW of the constitution and article 46 of law on Member of the National Assembly Election and provision 6.4.5 of NEC’s Voter Registration’s Regulation, there are five compulsory criteria for an eligible voter to get registered in a voter list. Voters must present their ID as the registry document to the registration team. Furthermore, not only three versions of ID but also ICR are accepted to proof that they are met with the criteria.

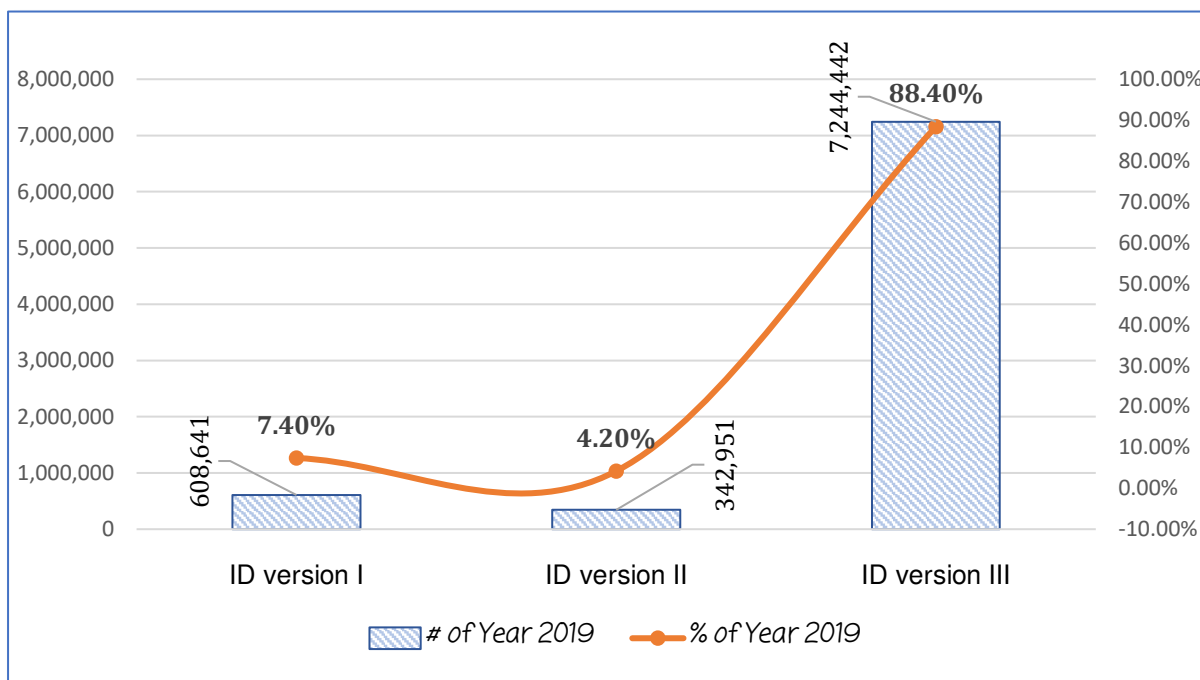
Graph 9: Registry Documents in 2019 Registration



In accordance to an official voter list in 2019, 8,629,357 voters got registered with the following registry documents:

- 8,196,034 voters with ID (Khmer Citizen Identity Card)
- 433,323 voters (equal to 05%) with ICR (Identity Certificate for Registration)

Graph 10: Version of ID for the 2019 Registration



8,196,034 voters got registered with ID of several versions including:

- 608,641 (equal to 7.4%) with version I
- 342,951 (equal to 4.2%) with version II
- 7,244,442 (equal to 88.4%) with version III

Table 2: Comparison of Registry Documents in 2018 and 2019

N	Registry Doc	In 2018		In 2019	
		#	%	#	%
1	All type ID (version I, II and III)	8130493	95.15%	8196034	94.98%
	- ID version I	613,769	7.5%	608,641	7.4%
	- ID version II	342,910	4.2%	342,951	4.2%
	- ID version III	7,173,814	88.2%	7,244,442	88.4%
2	Identity Certificate for Registration (ICR)	414,392	4.8%	433,323	5.0%
Total		8,544,885		8,629,357	


The number of voter names registered with version I ID decreased from 613,796 voters in 2018 to 608,641 voters in 2019, however, voter names registered with version II and III ID increased in 2019.

D.6 Irregularity of registry document number of voters

The audit also found a case of voter getting registered with registry documents having numbered as “000000.....”. It found 46 cases in 2019 voter list for example a case of voter called Keo Sovann, Male, Date of Birth: 06 July 1971 resident: Kampong Speu


Photo 9: Voter registered with registry Doc numbered “000000.....”

a case of voter called Keo Sovann in the 2019 voter list




បញ្ជីបោះឆ្នោតស្តីពីការបោះឆ្នោតឆ្នាំ២០១៩

កូដខេត្ត: **០៥** ឈ្មោះខេត្ត: **កំពង់ស្ពឺ** កូដឃុំ: **០៦៤** ឈ្មោះឃុំ: **តាំងស្បា**
 ឈ្មោះភូមិ: **ក្រែកពង** លេខកូដការិយាល័យ: **១០២៦** ឈ្មោះការិយាល័យ: **រោងបុណ្យភូមិក្រែកពង**

ល.រ	គ្រួសារលេខ	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	អាសយដ្ឋានបច្ចុប្បន្ន
<input type="checkbox"/> ៣	03-065-977		កែវ សុវណ្ណ អ.ខ ទី1 : 000000000	ប្រុស	06-07-1971	ភូមិ ក្រែកពង

a case of voter called Keo Sovann in the 2018 voter list

 បញ្ជីបោះឆ្នោតជំហូរឆ្នាំ២០១៨						
កូដខេត្ត: ០៥ ឈ្មោះខេត្ត: កំពង់ស្ពឺ		កូដឃុំ: ០៦៤ ឈ្មោះឃុំ: តាំងស្សា		ឈ្មោះភូមិ: ក្អែកពង		
លេខកូដការិយាល័យ: ១០២៦		ឈ្មោះការិយាល័យ: រោងបុណ្យភូមិក្អែកពង				
<input type="checkbox"/> ៣	03-065-977		កែវ សុវណ្ណ អ.ខ ទី1 : 000000000	ប្រុស	06-07-1971	ភូមិ ក្អែកពង

a case of voter called Ke Rithy in the 2019 voter list

 បញ្ជីបោះឆ្នោតឆ្នុំវិសាមញ្ញឆ្នាំ២០១៩						
កូដរាជធានី: ១២ ឈ្មោះរាជធានី: ភ្នំពេញ		កូដសង្កាត់: ០៦៨ ឈ្មោះសង្កាត់: គីឡូម៉ែត្រលេខ ៦		ឈ្មោះភូមិ: ក្រោលគោ		
លេខកូដការិយាល័យ: ១១៤៥		ឈ្មោះការិយាល័យ: វត្តទួលសន្តិវ័ន្ត				
ល.រ	គ្រឹះស្ថាន	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	សេសយដ្ឋានបច្ចុប្បន្ន
<input type="checkbox"/> ២២	06-321-429		ខេ រិទ្ធី អ.ខ ទី2 : 000000000	ប្រុស	15-10-1981	ផ្ទះ ១៨៧ ផ្លូវ លំ

a case of voter called Ke Rithy in the 2018 voter list

 បញ្ជីបោះឆ្នោតជំហូរឆ្នាំ២០១៨						
កូដរាជធានី: ១២ ឈ្មោះរាជធានី: ភ្នំពេញ		កូដសង្កាត់: ០៦៨ ឈ្មោះសង្កាត់: គីឡូម៉ែត្រលេខ ៦		ឈ្មោះភូមិ: ក្រោលគោ		
លេខកូដការិយាល័យ: ១១៤៥		ឈ្មោះការិយាល័យ: វត្តទួលសន្តិវ័ន្ត				
<input type="checkbox"/> ២២	06-321-429		ខេ រិទ្ធី អ.ខ ទី2 : 000000000	ប្រុស	15-10-1981	ផ្ទះ ១៨៧ ផ្លូវ លំ

D.7 Case Study with voters on Duplicated Data

Having found duplicated voter name/data in the 2019 voter list, COMFREL conducted four case studies at Bathambong, Prey veng, Ratanak kiri and kandal province to meet and verify with voters who's their name/data is duplicated in the list.

Photo 10: a case of Duplicated names in Baddambong Province



បញ្ជីបោះឆ្នោតឆ្នាំ២០១៩

កូដខេត្ត: **០២** ឈ្មោះខេត្ត: បាត់ដំបង កូដឃុំ: **០៩៦** ឈ្មោះឃុំ: តាក្រី
 ឈ្មោះភូមិ: ផ្លូវប្រាំមួយ លេខកូដការិយាល័យ: **១៥៣៤** ឈ្មោះការិយាល័យ: បឋមសិក្សាសាមសិប

ល.រ	អត្តសញ្ញាណ	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	អាសយដ្ឋានបច្ចុប្បន្ន
□ ៨	01-387-800		កែវ គុន្ទា អ.ខ ទី៣ : 061040111	ស្រី	01-07-1989	ផ្ទះ 331 ក្រុម 22



បញ្ជីបោះឆ្នោតឆ្នាំ២០១៩

កូដខេត្ត: **២៥** ឈ្មោះខេត្ត: ត្បូងឃ្មុំ កូដឃុំ: **០២០** ឈ្មោះឃុំ: ចាន់មូល
 ឈ្មោះភូមិ: ចាន់មូល លេខកូដការិយាល័យ: **០២៨៣** ឈ្មោះការិយាល័យ: សាលារៀនភូមិចាន់មូល

ល.រ	អត្តសញ្ញាណ	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	អាសយដ្ឋានបច្ចុប្បន្ន
□ ៩	11-089-322		កែវ គុន្ទា អ.ខ ទី២ : 061040111	ស្រី	01-07-1989	ភូមិ ចាន់មូល


Having interviews with COMFREL’s provincial secretariat, Ros Khorp a chief of Takrope, Kom Rieng District, Bathambong and his commune clerk responded that the female voter called Keo Kunthea listed number 8th as seen in the photo has residence in village six, of his commune. He would also affirm that by 2018, in spite leaving for work, she still moved around the commune but since 2019 she has not been in the commune and has not been reported to move out yet.

Photo 11: A Case of Duplicated Names in Prey Veng



បញ្ជីបោះឆ្នោតឆ្នាំ២០១៩


កូដខេត្ត: **០៨** ឈ្មោះខេត្ត: កណ្តាល កូដឃុំ: **០៨៣** ឈ្មោះឃុំ: សំបូរ
 ឈ្មោះភូមិ: ព្រែកចាវ លេខកូដការិយាល័យ: **០៨៨៦** ឈ្មោះការិយាល័យ: បឋមសិក្សាព្រែកចាវ (ត្បូង)

ល.រ	អត្តសញ្ញាណ	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	អាសយដ្ឋានបច្ចុប្បន្ន
□ ៤៨	04-804-043		ប្រឹក ជា អ.ខ ទី៣ : 050147835	ស្រី	12-12-1980	ភូមិ ព្រែកចាវ



បញ្ជីបោះឆ្នោតឆ្នាំ២០១៩

កូដខេត្ត: **១៤** ឈ្មោះខេត្ត: ព្រៃវែង កូដឃុំ: **០៧៨** ឈ្មោះឃុំ: បឹងដោល
 ឈ្មោះភូមិ: អំពិល លេខកូដការិយាល័យ: **១២១០** ឈ្មោះការិយាល័យ: វត្តអំពិល

ល.រ	អត្តសញ្ញាណ	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	អាសយដ្ឋានបច្ចុប្បន្ន
□ ៦៦	07-754-062		ប្រឹក ជា អ.ខ ទី១ : 050147835	ស្រី	12-12-1980	ភូមិ អំពិល

In September of 2019, COMFREL’s secretary visited Ampil Village, Beongdorl Commune, Preah Sdach District and first met with the village chief to ask for voters as shown in the list. He affirmed that the female voter called Chrek Chea listed 66th in the list has a residence in this village and he also reject to know the voter listed number 48th in the list of Prekchar, Sambur, Lavear Em, Kandal Province. In addition to the village chief’s confirmation, two ladies known as the voter’s mother and sister in the village also affirmed that a voter called Chrek Chea listed 66th in the voter list had left for a job in Phnom Penh with her husband and they both rejected to recognize a voter also called Chrek Chea listed 48th in voter list of Kandal province.

It is very risky to make a conclusion that this is a case of duplicated names but their data and number of registry document are matching.

Photo 12: A case of Duplicated data in Kandal

 បញ្ជីបោះឆ្នោតឆ្នាំ២០១៩						
កូដខេត្ត: ០៨ ឈ្មោះខេត្ត: កណ្តាល កូដសង្កាត់: ១៣៨ ឈ្មោះសង្កាត់: ស្វាយរលំ ឈ្មោះភូមិ: ភូមិលេខ ៥ លេខកូដការិយាល័យ: ១៥៨៨ ឈ្មោះការិយាល័យ: សាលារៀនដើមអង្កោល						
ល.រ	គ្រឹះសេខ	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	សេសសន្លឹកបញ្ជីបោះឆ្នោត
<input type="checkbox"/> ២២១	05-137-788		ផ្អែង ផល អ.ខ ទី៣ : 020869633	ប្រុស	08-04-1994	 ភូមិ ភូមិលេខ ៥
<input type="checkbox"/> ២២២	05-137-793		ផ្អែង ផល អ.ខ ទី២ : 020869633	ប្រុស	08-04-1994	

COMFREL’s secretary conducted a study on voters named Phon Phal who have two ID (version II and III) numbered 020869233 and have residence at village 5, Svay Rolom Kakmao city.

According to Deputy commune chief Mr. Ly Nouch Sim, voters listed number 221 and 222 in the list are siblings. The voter listed number 221 is originally called Phon Phal and the voter listed number 222 is originally called Phon Phea. He added that this case happened because version II ID of Phon Phal was unintentionally used as registry document for his brother Phon Phea and this case has been already reported to the NEC.

Through a phone call interview, the voter whose original name is Phon Phea said that in 2016 his brother Phon Phal and himself accompanied by their mother went for voter registration at commune office. it was their mother who kept their ID. Phon Phal who is an elder brother got registered first with his ID and his ID was handed back to their mother. Then he took a turn for the registration. At that time, his mother handed the version II ID of his brother to him and he presented it to the team for registration.

Photo 13: A Case Duplicated Names/data and Photo in Ratanakiri province



បញ្ជីបោះឆ្នោតឆ្នាំ២០១៩

កូដខេត្ត: **១៦** ឈ្មោះខេត្ត: **រតនគិរី** កូដឃុំ: **០៤១** ឈ្មោះឃុំ: **ប៉ុង**
 ឈ្មោះភូមិ: **បានប៉ុង** លេខកូដការិយាល័យ: **០២៤០** ឈ្មោះការិយាល័យ: **បរមសិក្សាបានប៉ុង**

ល.រ	អត្តសញ្ញាណ	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	អាសយដ្ឋានបច្ចុប្បន្ន
<input type="checkbox"/> ៣៥២	12-320-467		វ៉ាន់ សារាក់ អ.ខ ទី៣ : 240133297	ប្រុស	06-07-1988	ភូមិ បានប៉ុង



បញ្ជីបោះឆ្នោតឆ្នាំ២០១៩

កូដខេត្ត: **១៦** ឈ្មោះខេត្ត: **រតនគិរី** កូដឃុំ: **០១៨** ឈ្មោះឃុំ: **ត្រពាំងក្រហម**
 ឈ្មោះភូមិ: **ភូមិ ២** លេខកូដការិយាល័យ: **០១២២** ឈ្មោះការិយាល័យ: **វិទ្យាល័យត្រពាំងក្រហម**

ល.រ	អត្តសញ្ញាណ	រូបថត	នាមត្រកូល និងនាមខ្លួន	ភេទ	ថ្ងៃខែឆ្នាំកំណើត	អាសយដ្ឋានបច្ចុប្បន្ន
<input type="checkbox"/> ៣២៧	08-502-593		វ៉ាន់ សារាក់ អ.ខ ទី៣ : 240133297	ប្រុស	06-07-1988	ផ្លូវ ៧៨

On 9th October 2019, COMFREL’s staff visited BanPong village, Pong commune, Vern Sai District and met with the village chief to ask about the case of the voters who have duplicated name and photos in the list. Mr. Thorn Noun, village chief, affirmed that the voter called Van Sarak listed number 352 now has a residence in the commune but before getting married he was living in village II, Trangpang Krohom commune where his original residence is. He could give further comments on his duplicated names.

COMFREL staff also visited and talked with the voter called Van Sarak to verify the case. Van Sarak agreed to what the village chief had said. He also added that during the process of his registration he had notified to the commune clerk, who is official appointed a chief deputy of registration team, and computer operator that he had been registered once so far. Finally, he strongly confirmed that in May of 2019 he was registered and allocated to 0240 polling station.

Mr. Chun Bunchan, a commune clerk and registration team deputy chief explained the case that he had not marked the box indicating that registered voter requested to change their station in the list. See the photo below:

Photo 14: Voter Registration Receipt



However, computer operator argued over the case that if the voter was successfully registered once in the past, during inputting his biometric fingerprint, there should have been a notification to alert about it.

E. Interview with Registered Voters

The 2019 voter list audit is aimed to measure the quality of voter list and challenges of voter registration. The audit was applied with List to People (L2P) methodology that we randomly identify registered voters from the list of 25 capitals and provinces and have interviews with them. According to voter’s information in the list, we visit a field to certify the residence of the targeted voters as recorded in the list. We also conducted interviews with targeted voters in order to verify their data in the list and in registry documents.

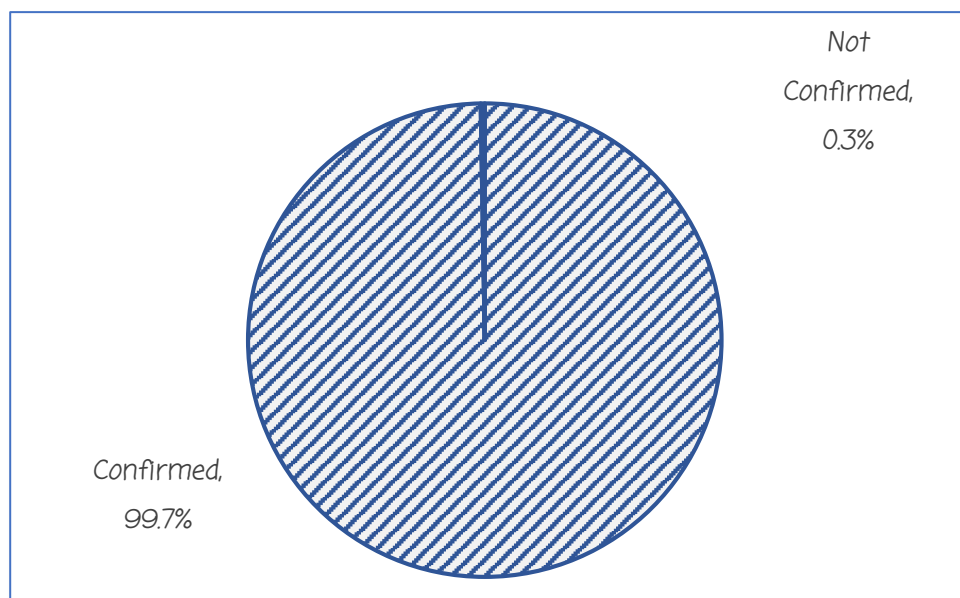
The findings of the audit are only the results of case studies for 6 out of 25 provinces such as Banteay Meanchey, Kampong Chhnang, Kampot, Kandal, Prey Veng, and Ratanakiri. The audit was carried out with 740 targeted registered voters/ correspondents from 74 communes/villages.

67 (23 Females) people from COMFREL’s network were deployed to verify the presence of voters and interview them. They conducted a two-day field visit and interviewed ten voters per village.

It is important to note that the findings result from an analyzing information from only 724 correspondents/voters. Then the following results could be considered as the trend only.

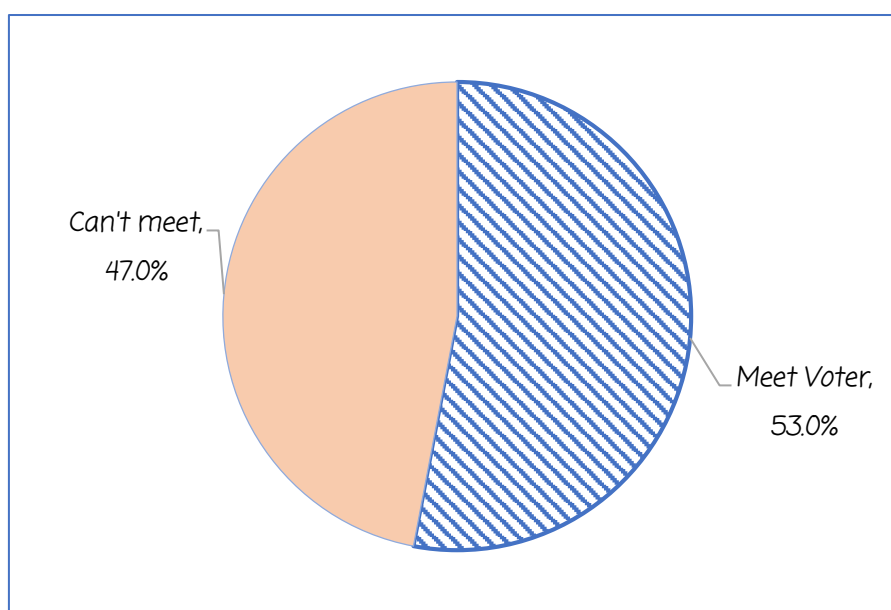
E.1 Verification of Registered Voter in list with Voter at the Field

Graph 11: Verification of Registered Voter in List with Voter at the Field



The verification of registered voter names in the 2019 list and voter at the field shows that 99.7% of 740-targeted voters/ correspondents are confirmed that they have a residence stating in the voter list while another 0.3% cannot be identified by local authorities in the village and commune. The registered voter names which could not be identified include Sok Kheng, ID # 021199736, listed number 327th from station 205 of Sdao Kanlaeng II village, Dei Ith commune, Kandal province and Tem Bola, ID # 190523865, listed number 89th of station 209, kork Chrab Village, Sras Veong commune, Banteay Meanchey province.

Graph 12: Interview with Target Voters

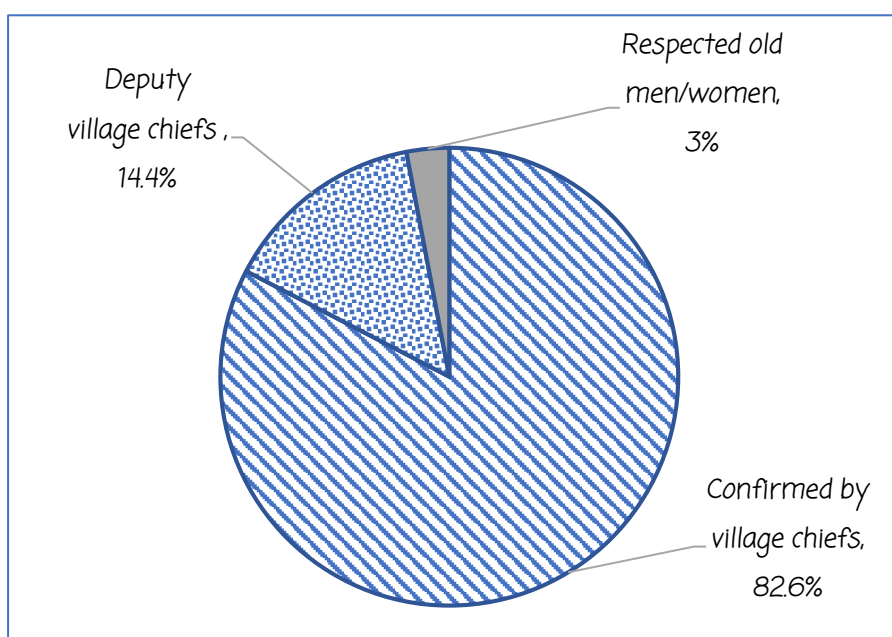


Although target voter names were confirmed to have a residence in the village, COMFREL could only meet and have a direct interview with only 53.0% of them while COMFREL could not make it directly with another 47.0% for several reasons. For example, 77.3% of registered voters, with whom we were impossible to have an interview but having a residence, were reported to go away for jobs or they often stay at home at nighttime only. For more information, please see table 3 below.

Table 3: The interview not conducted with bearer Voters due to:

N	Reasons	#	%
1	Usually stay away from home for job	165	48.7%
2	stay home only at nighttime after working	63	18.6%
3	migration	34	10.0%
4	being ill in the bed or on temporary leave	26	7.7%
5	move to a new residence	17	5.0%
6	often move around	6	1.8%
7	Death	4	1.2%
8	Others	24	7.1%
Total		339	100.0%

Graph 13: Residence of Registered Voter Names Confirmed by



Target registered voter names from the 2019 voter list were confirmed by several stakeholders in the villages if they have a residence according to the voter list or not. 82.6% of target voter names were confirmed by village chiefs; 14.4% by deputy village chiefs and 3% by respected old men/women.

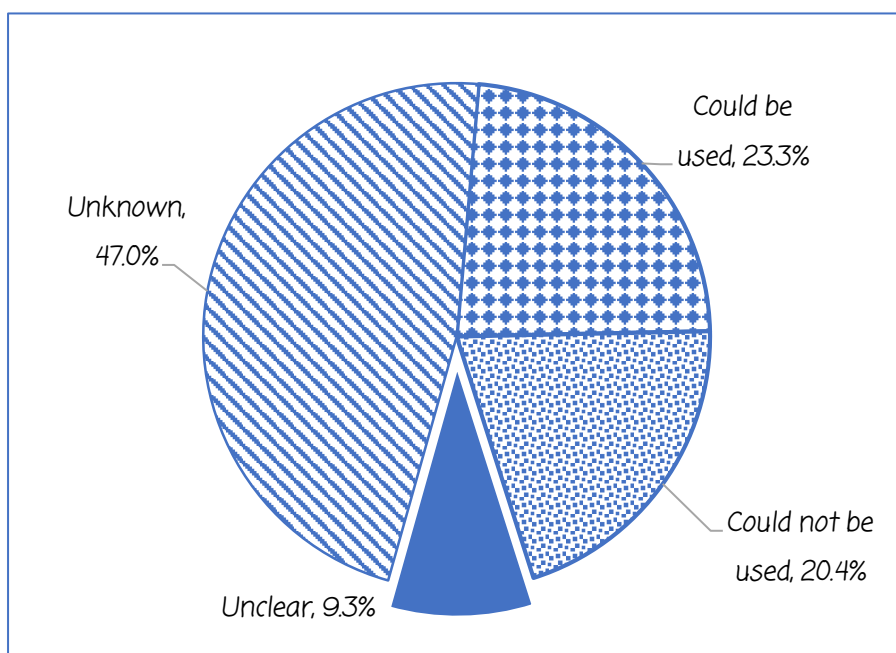
E.2 Notification about Validity of Khmer ID for Voting

The NEC announced that for the 2019 registration, eligible voters shall present only either a valid ID version II, an ID version III or an ICR for registration.

General Department of Identification of Ministry of Interior (MOI), on 5 November 2018, made a call for Cambodian people who are 15 years old but having no ID or still holding ID version I and II to immediately apply for a new ID (version III) since the ID version I and II would be no longer valid from 31 December 2018.

According with the notification of the MOI and the NEC, the ID version I and invalid ID version II cannot be a registry document for the 2019 voter registration.

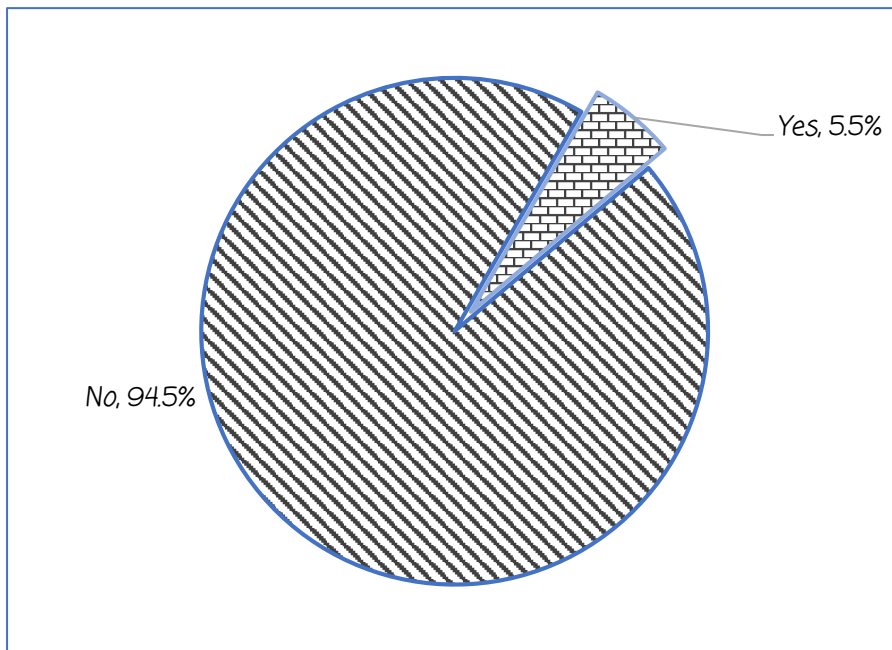
Graph14 Validity of Khmer Citizen Identity Card (ID)



Following a call to the people from General Department of Identification of Ministry of Interior (MOI) and according to interviews with target correspondents, COMFREL found that 20.4% of them were aware that invalid ID no longer was used for the registration, while 23.3% learnt it could be used. 9.3% responded that It could either or not be used while another 47% confirmed that they had never received that information.

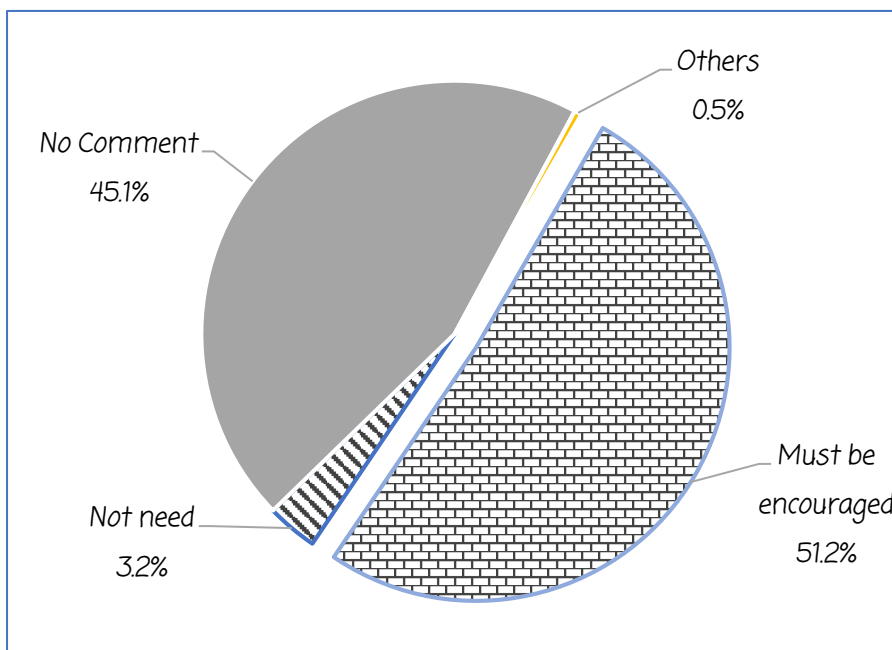
E.3 People Understanding of Migration Worker

Graph 15: Eligible Voter Missed to the Registration



The interviews with target correspondents show that 5.5% of them confirmed that they have at least one relative, who is an eligible voter, missed taking registration. Most of them missed taking it because they are migrants and stay away for a job during the registration time.

Graph 16: People Understanding of Migration Worker and Voter Registration



The interview also found that 51.2% of the total correspondents agreed with an idea for getting migrants eligible voters in the voter list while 3.2% of them did not. However, another 45.1% either agreed or disagreed with the idea.

E.4 Public Announcement on Voter Registration

Table 4: Announcement on Voter Registration

N	Information Source	#	%
1	Chief or Deputy Chief of Village	257	26.8%
2	Television Channel	164	17.1%
3	Commune authority	120	12.5%
4	Loudspeakers in the villages	112	11.7%
5	Radio Channel	114	11.9%
6	Banner and Poster at public space	66	6.9%
7	NEC's registration invitation	33	3.4%
8	Election officer in the village	27	2.8%
9	Being told by friends and communities	27	2.8%
10	Social media (Facebook)	17	1.8%
11	NEC	8	0.8%
12	Printed newspaper	9	0.9%
13	Call / E-notification	3	0.3%
14	Political activist	1	0.1%
Total		958	100.0%

According to table 4, village chiefs and deputy village chiefs including local authorities still played significant roles to disseminate voter registration information. Consequently, they must be impartial and independent from political activities otherwise eligible voters will lose that information.

F. The NEC's Response to COMFREL's Recommendations

COMFREL found that in 2019 the number of cases where ICR has duplicated number has decreased if compared to 2018. It is also noted that by 2019 the NEC though it has made a revision for those cases, has not finished yet.

Having finished its audit, on 5 February 2020 COMFREL submit a summary report on voter list audit to the NEC. And on 21 February 2020, COMFREL had a meeting with NEC technical team led by Deputy General Secretary **H.E Som Sorida** to present their findings and discuss them. H.E Deputy General Secretariat addressed that:

- The NEC highly appreciated COMFREL's efforts, findings and recommendations submitted to NEC.
- The NEC is aware of COMFREL's findings and will check and verify those cases.
- The NEC is highly concerned about the duplicated voter names in the list.
- The irregularity of registry documents results from technical mistakes.
- The NEC is ready for voter registration for migrant voters once there is availability of the law.

Adding the Deputy General Secretariat, **H.E. Top Vuthy**, president of voter's data and voter list department also pointed out that:

- According to COMFREL's Finding on the duplicated ID version III, it is not a fault of the Ministry of Interior, but they result from NEC's technical mistakes and they will be revised.
- The duplicated voter names that are found in 2019 voter list remained from voter list in 2018 when NEC did not finish resolving them.
- Since some registry documents were not clear enough to see their number, the computer operator of the registration team decided to put #0000 in the filling box in order to proceed the registration.
- The NEC also requested duplicated voter names/data or duplicated number of registry document from COMFREL to check and verify. It is also noted that COMFREL agreed with NEC's request.

In conclusion, H.E. Som Sorida declared that the NEC will officially respond in written to COMFREL's findings.

G. Challenges and Lessons Learnt

The voter list audit (VLA) was carried out with cooperation from the NEC. The NEC also sent early notification to its bodies Provincial Election Commission (PEC). In spite of having notifications from the NEC and MOI, the process of interviewing people of the VLA still met some challenges from local authorities.

G.1. Challenges

Basically, the voter list audit was conducted in cooperation from the NEC. But there were still challenges in its implementation in the field including:

- A case at Kampong Chhnang: COMFREL's network who was to be deployed to interview voters at Kampong Tralach Krom village, Kampong Tralach district, on 7th September 2019 was prevented from conducting his task by local authorities including the village chief and the commune chief though she/he was carrying a mission letter issued by COMFREL and NEC's observation accreditation letter. They reasoned that he had no citizen ID, a

COMFREL's staff Identity card and an approval letters from commune, district or province.

- A Case at Ratanakiri: COMFREL's network who was to be deployed to interview voters at Norng Hai village, Saeda commune, Lompat district, was on 16 September 2019, barred by the village chief from interviewing voters following the order from district chief Mr. Nou The.
- It was because of an absence of letter of approval from provincial administration though he/she was carrying a NEC's accreditation letter, and MOI's Letter- CSOs' activities without notification, a mission letter of COMFREL, the activity had been interrupted because of an absence of approval letters from the provincial administration.

G.2. Solution and Lesson Learnt

The cases were resolved with intervention from provincial electoral secretary (PES) of those provinces. Following the intervention, the interview was conducted as planned at Ratanakiri but at Kampong Chhnang it went without cooperation from the people. And it is noted that the village chief had well acknowledged who were to be interviewed before he interrupted the process.