

VINH LONG PROVINCIAL PEOPLE'S COMMITTEE Vinh Long ODA Project Management Unit (PMU)

Vinh Long City Urban Development and Enhanced Climate Resilience Project Additional Financing (P177314)

UPDATED STAKEHOLDER ENGAGEMENT PLAN (SEP)



Vinh Long, January 2022

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ACRONYMS AND ABBREVIATIONS

AF : Additional Financing

AP : Project Affected Person

DARD : Provincial Department of Agriculture and Rural Development

DOC : Provincial Department of Construction

DOCST : Provincial Department of Culture, Sport and Tourism

DOIC : Provincial Department of Information and Communication

DONRE : Provincial Department of Natural Resources and Environment

DPC : District People's Committee

DOT : Provincial Department of Transport

DPI : Provincial Department of Planning and Investment

CFSC : Provincial Committee for Flood and Storm Control

CPC : City People's Committee

ESF : Environemental and Social Framework

ESIA : Environmental and Social Impact Assessment

ESMP : Environmental and Social Management Plan

ESS : Environmental and Social Standards

GOV : Government of Vietnam

GRM : Grievance Redress Mechanism

LEP : Law on Environmental Protection

LFDC : City/District Land Fund Development Centre

LMP : Labour Management Procedures

MDR : Mekong Delta Region

PAPs : Project Affected Parties

PMU : Vinh Long ODA Project Management Unit

PPC : Provincial People's Committee

RPF : Resettlement Policy Framework

SEP : Stakeholder Engagement Plan

WPC : Ward People's Committee

WB : World Bank

1. INTRODUCTION

1.1 Project Description

- 1. The Socialist Republic of Vietnam intends to apply for a loan from the World Bank to finance the proposed Vinh Long City Urban Development and Enhanced Climate Resilience Project in Vinh Long Province hereafter referred as "the Project".
- 2. The proposed project will take an integrated multisectoral approach to promote the economic and demographic densification of Vinh Long's urban core, thereby unlocking the City's development potential and enabling the City to function as an economically and physically integrated metropolitan area. The project investments include a comprehensive set of structural and non-structural interventions to improve access to infrastructure and to reduce the flood and environmental pollution risk in the urban core area of Vinh Long city, through developing flood control systems and nature-based solutions, wastewater collection and treatment, as well as key transport links.
- 3. These measures will eliminate the physical constraints to development in the urban core, increase land values, stimulate private capital investments, and reduce the pressure for urban sprawl. Increased demand on land will also create an opportunity for the local government in Vinh Long to capture some of the associated land value increase from private development. By providing comprehensive improvement to infrastructures in the urban center, where the majority of poor people live and increasing the connectivity of these areas to other parts of the city, especially centers of employment, the project is expected to improve the living conditions of the poor and vulnerable populations and increase their accessibility to jobs and public services. Citizens and community organizations will be engaged throughout the project preparation and implementation process in order to raise their awareness about flood risks and enhance their ownership of the project. Providing technical assistance to improve urban planning, transport management and the operation and maintenance of infrastructure will enable the city to become more interconnected, livable and resilient to disasters. The project is organized around four components:
 - Component 1: Flood risk management and environmental sanitation. The objective of this component is to reduce flood-related risks and improve environmental sanitation in the urban core of Vinh Long City through investments in drainage, flood protection structures, sewage networks, and wastewater treatment. In addition to improving the environmental sanitation conditions in the city, the upgrading of wastewater collection and treatment in Vinh Long will contribute to improving surface water quality. Design of this component was based on the existing national building codes and standards and investment proposals were selected based on assessment of the flood risks, including flood hazards and the vulnerability of the affected community. Investments will consist of a balance between gray and green infrastructure (or nature-based solutions).
 - Component 2: Strategic corridors development. The objective of this component is to increase connectivity and flood protection capacity in Vinh Long. This component will finance prioritized investments in roads identified in the city's master plans ¹ and will specifically finance three urban roads. The first two roads run through the existing built-up area, creating important vertical and horizontal links in the urban road network, while the

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¹ Draft Adjusted Construction Master Plan of Vinh Long City and approved Adjusted Transport Development Master Plan up to 2020 with a vision to 2030 dated 2018.

- third road diverts intercity traffic from the national roads and future expressway and serves as a development boundary to the south. Two of these three roads in the south also form part of the overall flood control scheme, serving as the boundary of the current and future polder system.
- Component 3: Resettlement Area Development. The project will try to minimize resettlement impacts through adopting fit-for-purpose standards and appropriate design, however, significant resettlement impacts are expected due to the proposed investments, particularly under the embankments in Component 1 and the roads in Component 2. An estimated 550 households may have to be relocated under the project. This component will ensure improved living conditions and security of tenure for those target communities who are subject to relocation and resettlement under the project. An investment for technical and social infrastructure at the resettlement site in Ward 8 of Vinh Long City will be proposed with green and nature-based solutions incorporated, such as park connectors, water absorbing tree pits and landscapes, pervious pavements, stormwater detention ponds, raingardens, etc. This resettlement site covers an area of 12.5 hectares which is currently agricultural land and not occupied by any households, easing the compensation process. In addition, the resettlement site is assessed to be appropriate, as it is just 5 km from the city centre and close to National Road 53. Services (water, drainage, electricity, access roads) are already present along the proposed resettlement area, which will facilitate the development of the site.
- Component 4: Enhancing Climate Resilience and Leveraging Disruptive Technologies in Urban Management. This component aims to improve urban management in a climate and risk informed manner and to set the stage for the development of Vinh Long as a smart city through leveraging disruptive technologies. The proposed project will support implementation of Vinh Long's smart city framework currently being developed, through investments in data and information and communication technologies (ICTs) including software, in conjunction with counterpart fund from the province. Combined, these activities should improve knowledge of the built and natural environments, which can better inform decision making in the future. For example, it will create a visual representation of flood risk overlaid with existing people and assets to guide future development in a risk-informed manner, away from high flood and climate risk. Analysing data related to lack of access to basic services, population income level, and density will also enable decision makers to identify areas of high health risk to prepare for and respond to future health crises. Key investments under Component 4 include an integrated flood risk management information system, strengthened IEC and O&M on wastewater management, a geospatial data sharing platform to improve data sharing across different departments, and an intelligent transportation system (ITS). Component 4 will also provide technical implementation support to the implementing agencies in Vinh Long.

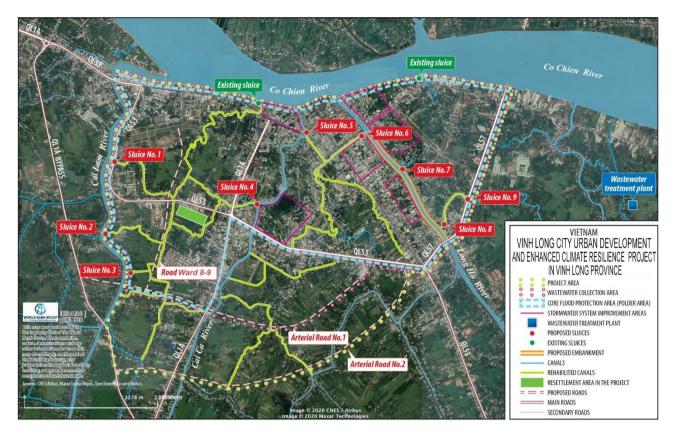


Figure 1: Project location Map

Additional Financing Scale-up activities:

- 4. All four parent project components and their sub-components would remain substantively the same. The proposed AF in the form of a US\$2 million trust fund grant, would enable the scaling up of existing activities under Component 4: Enhancing Climate Resilience and Leveraging Disruptive Technologies in Urban Management. Project Component 4 aims to improve urban management in a climate and risk informed manner and to set the stage for the development of Vinh Long as a smart city through leveraging disruptive technologies. Three components are proposed under this AF which are directly linked to Component 4 of the parent project. These three components include: (i) development of an integrated flood risk management information system, (ii) strengthening IEC and O&M on wastewater management, and (iii) development of a geospatial data sharing platform to improve data sharing across different departments. These three AF components are expected to improve the quality and sustainability of the parent project investments in flood mitigation, drainage system and wastewater collection and treatment (parent project Component 1), and better inform decision making in the future.
- 5. The three AF components and sub-components are presented below:
 - Component 1: Development of an integrated Flood risk Management Information System (FMIS) (AF of US\$0.8 Million).
- 6. The AF would improve the ability of technical experts and decision makers to better predict flood events and respond to flooding with an integrated set of actions. Specifically, the financing would enhance the sustainability and the quality of the service provided by the flood control infrastructure financed under parent project component 4. The proposed AF sub-component include:

- Sub-component 1.1 Investigation and FMIS conceptual Design. Under this sub-component, the AF would be used to assess and review the urban flooding challenges and the flood risk management capacity in Vinh Long, as well as to identify the structural and non-structural measures for city flood risk management. Based on the outcome of this assessment, the needs and functional requirements of an information system for city flood management (FMIS) would be discussed and agreed with the city and provincial counterparts in Vinh Long. An initial FMIS design concept would be developed followed by detailed designs for the FMIS.
- Sub-component 1.2 Developing FMIS. Based on the detailed FMIS design, the three principal components of the FMIS (1. Database, 2. Data processing, 3. Flood information outcome and dissemination) would be developed by a consulting firm under Vinh Long PMU supervision. Development of the FMIS database will ensure close interoperability with the geospatial data sharing platform under parent project component 4 as well as with component 3 under the AF. The data processing component will be established based on hydrodynamic and Geographic Information System (GIS) models. A Decision Support Tool (DST) will also be developed for daily operation of the flood control infrastructure such as tidal gates and pumps. A GIS model will be developed for flood mapping based on inputs from hydraulic modeling results and/or real-time monitoring system (SCADA). This will enable real time flood and flood early warning functionality based on river flood forecasting and forecasted rain scenarios, as well as real time data sourced from SCADA and other monitoring systems. Based on flood risk analysis, a Water Control Plan (WCP) will be developed for multi-purposes of flood mitigation (create room for water detention on the canal network), water quality improvement and water way navigation (less of gate closed). A flood information outcome and dissemination component will be built which presents the outputs from the data processing component, in order to improve flood management. In addition, a web-based ITC platform will be developed for the dissemination of flood information to end users.
- Sub-component 1.3 FMIS establishment. The parent project (subcomponent 4) funds the installation of FMIS hardware, software and accessories. Under this subcomponent, AF support will be provided for the preparation of technical specifications relating to the hardware, software and accessories, as well as supervising equipment/ instrument supply, installation and testing to ensure the FMIS can be effectively used for the city. This subcomponent will also provide expertise support for preparing the O&M manual and supporting the establishment of the institutional arrangements for managing and operating the FMIS including an O&M team for the FMIS.
- Sub-component 1.4 Training for FMIS Operation and Maintenance. The Vinh Long FMIS O&M team staff will be responsible for ensuring proper operation, maintenance, updating and future development of the FMIS. Sub-component 1.4 will provide training in order to enable the O&M team to perform their roles effectively. Training will also be provided for the responsible city/ provincial departments/ agencies to use the FMIS effectively for their assigned responsibilities such as providing flood early warning information. Finally, community training will be provided to Vinh Long city residents on accessing flood related information such as road and transport disruption, through the web-based platform developed under sub-component 1.2 above.

- Component 2: Strengthening IEC and O&M for Wastewater Management (AF of US\$0.200 Million).
- 7. The AF would be used to strengthen the quality of implementation and the sustainability of the parent project component 1 and component 4: Strengthening IEC and O&M on wastewater management. The proposed AF sub-component include:
 - Sub-component 2.1 Strengthening IEC for wastewater management. The successful engagement of the public in order to increase public awareness and support for the project outcomes through the parent project is critical to the achievement of the parent project PDO. Specifically, the AF would finance the following IEC related activities: (i) Rapid baseline IEC survey to measure the existing public awareness of environmental sanitation issues and identify appropriate IEC channels; (ii) Detailed IEC plan to address environmental sanitation issues; (iii) Develop the communication materials identified in the IEC plan; (iv) Deliver training courses for relevant agencies and assigned staff on IEC delivery and (v) Provide implementation support for: upgrading the Urban Management Division's website and information on project activities; and coordinating with local government to implement communication activities. The AF would incorporate emerging needs resulting from the COVID-19 pandemic and seek to incorporate future needs in the post COVID-19 environment such as IEC to improve relevant behaviors and practices (e,g, handwashing).
 - Sub-component 2.2 Strengthening O&M for wastewater management. Ensuring the quality of arrangements for O&M of wastewater management is vital to sustaining long term gains under the parent project. The AF would be used to develop the capacity of the Urban Management Division of Vinh Long to strengthen O&M through making improvements to current practices in the areas of: regulation; asset management and operational planning; financial strategy and cost recovery; and contract management. Specifically, the AF would finance the following activities: (i) Analysis and review of the current organizational structure and policies of the City's Urban Management Division as well as propose improvements to policies and the organizational and institutional structure of the department. This will enable the department to improve performance of its tasks in areas of planning, developing and calculating service pricing strategies for the drainage/wastewater system and the solid waste management system, management and supervision of service contracts between the City People's Committee and service providers and Asset management of the drainage/wastewater system and the solid waste management system; (ii) Support to the Urban Management Division to develop and implement regulations on wastewater management; (iii) Development of an asset management and operation plan at the Urban Management Division; (iv) Support the Urban Management Division and DOC to develop a sustainable financial strategy, including a roadmap to increase tariffs for services in order to cover operation and maintenance costs; (v) Review existing service contracts and support the Urban Management Division to update service contracts and to strengthen their capacity to supervise those contracts and (vi) Build a GIS based asset management system at the Urban Management Division, in order to support the effective management and operation of drainage and waste infrastructure. The institutional strengthening on O&M will include technical support for wastewater service providers to prepare contingency plans, to ensure the continuity of wastewater services during the current COVID-19 pandemic and future potential pandemics.

• Component 3: Developing a Geospatial Data Sharing Platform (GDSP) (AF of US\$0.750 Million)

- 8. The lack of adequate spatial data infrastructure, digitized spatial data and spatial data management capacity, is a significant barrier to efficient infrastructure planning and management in Vinh Long. This activity will enhance the quality and sustainable operation of equipment and hardware installed under the parent project subcomponent 4, by developing a geospatial data sharing platform, in order to strengthen spatial planning and development in Vinh Long. The AF would finance the following sub-components:
 - Sub-component 3.1 Data sharing, regulation and institutional setup Development of GDSP requirements. Under this sub-component, the AF would finance an assessment of existing geospatial data in Vinh Long, including its regulation and sharing, as well as geospatial hardware, software and staff capacity. The information from this assessment would be used to inform sub-components 3.2 to 3.3 below: This sub-component would also recommend enhancements to regulation as well as develop recommendations for the establishment of an institution to operate the GDSP. sub-component 3.1 would also establish data management and sharing protocols and policies.
 - Sub-component 3.2 Data gathering, collation and digitization. Data gathering, collation and digitization is critical to the success of the parent project. Based on the needs identified in subcomponent 3.1, geospatial data gaps would be filled through the collection of new data and the digitization of existing data. This sub-component would also draw on the phase 1 data outputs of the ongoing World Bank-financed Vietnam Improved Land Governance and Database Project. Based on the data collected, a 3D City Model would be developed that would serve as the basis for urban management.
 - Sub-component 3.3 Develop and deploy geospatial data sharing platform. Under sub-component 3.3, a Spatial Data Infrastructure (SDI) would be developed in line with the Vinh Long provincial and city land database development programs and in close partnership with city officials. The SDI would integrate multiple data sources from different departments in Vinh Long, enabling users to effectively access spatial data for planning and investment purposes. The SDI would ensure close interoperability with the FMIS under activity 1.2 above. 48. The geospatial data sharing platform would act as an important tool to assist with the management of a disease outbreak such as COVID-19.
- 9. The geospatial data sharing platform would act as an important tool to assist with the management of a disease outbreak such as COVID-19.

1.2 Project Environmental and Social Risks/Impacts

10. Potential environmental risks and impact are related to construction works and include common risks such as dust, noise, vibration, generation of solid wastes and wastewater, water quality reduction, localized flooding and related unhygienic conditions, disturbance to landscape; interruptions to public services and infrastructure, traffic and traffic safety issues, loss of some trees, vegetation cover and benthic species, health and safety risks to workers, etc., Most of these are temporary, at low to moderate level and reversible. The main risks and impacts during operation would be permanent changes in land use and elevated local ground elevation at and/or along the new roads. Regarding wastewater system operations, there are pollution risks due to potential failures at the pumping stations and treatment plant.

- 11. Potential social risks and adverse impacts include (i) land acquisition from an estimated 1,800 PAHs, of whom roughly 550 may have to be relocated; (ii) the loss of agricultural land, affecting farmers' livelihoods; (iii) loss of assets affixed to lands, commercial and other properties; (iv) possible additional land acquisition, under city financed domestic projects, may lead to a perception that these are associated with the World Bank financed project; (v) relocation of graves; (vi) the risk that city government units responsible for land acquisition and resettlement may not have the capacity to deliver the land and the resettlement site required for the project in a timely fashion, (vii) the risks and impacts on community health and safety due to construction works (wastewater, dust, noise) and operation (traffic accidents), and related risks from the influx of labour.
- 12. The AF will have positive impacts by maximizing the achievement of the Project Development Objective by scaling up activities that enhance the quality of the management and sustainability outputs delivered under the Component 4 of the parent project. Given the nature of the AF activities, the adverse environmental or social risks and impacts are expected to be low. The AF will not finance civil works or any analytical, advisory or other activities which could have or lead to downstream physical, social or environmental impacts.
- 13. The AF activities are expected to result in negligible environmental risks and impacts. The AF will also not involve any kind of land acquisition or resettlement or people's livelihoods. Technical assistance related activities foreseen under the AF will not lead to any downstream activities (e.g., through the design of major infrastructure investments) that may require land acquisition or resettlement.

1.3 Objectives of Stakeholder Engagement Plan

- 14. The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure, grievance redress mechanism and consultation, throughout the implementation and operation of the proposed projects. The SEP outlines the ways in which PMU and contractors will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project, contractors, and the Project itself. The consultation and engagement with the local population is essential to the success of the Project in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed Project.
- 15. The Project's environmental and social risks are classified as substantial at this stage. The project is expected to have positive environmental and social impacts. Residents will benefit from improved urban infrastructure that will reduce the risk of flooding, expand access to improved sanitation and hence improve public health, as well as reduce travel times on new and improved roads. The project will also improve connectivity with industrial parks and tourist attractions in the project city. By improving infrastructure in the urban core areas, and increasing their connectivity, the project will improve the living conditions of their poor and vulnerable residents, as well as their accessibility to jobs and public services while reducing vulnerability flood related risks.
- 16. **Scope of the SEP** is to assess the level of stakeholder interest and support for the project, enable stakeholder views to be taken into account in project design and environmental and social performance, promote and provide means for inclusive engagement throughout the project life-cycle, ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format, provide citizens with accessible and inclusive means

to raise issues and grievances and enable the project implementing entity to respond to and manage such grievances.

17. The objective and scope of the SEP for the parent project remain fully applicable to the AF.

1.4 Regulations and Requirements

- 1.4.1 National Regulations
- 18. This SEP considers the existing institutional and regulatory framework within the context of the following main Government of Vietnam (GOV) legal instruments:
 - (1) The Constitution of the Socialist Republic of Viet Nam (2013), effective January 1, 2014.
 - (2) The Law on Environmental Protection (No.55/2014/QH13) dated June 23, 2014 and Decree on Environmental Protection Planning, Strategic Environmental Assessment, Environmental Impact Assessment and Environmental Protection Plans (No. 18/2015/ND-CP) dated February 14, 2015 are key legal frameworks for environmental management in Vietnam. Law on Environmental Protection (LEP) provides statutory provisions on environmental protection activities; measures and resources used for the purpose of environmental protection; rights, powers, duties and obligations of regulatory bodies, agencies, organizations, households and individuals who are tasked with the environmental protection task. LEP is applicable to regulatory bodies, public agencies, organizations, family households and individuals within the territory of the Socialist Republic of Vietnam, including mainland, islands, territorial waters and airspace. LEP is on regulating strategic environmental assessment, environmental impact assessment and environmental protection commitment.
 - (3) The Land Law 2013 implementing decrees (Nos.43/2014, 44/2014, 47/2014, 01/2017 and 104/2014) and circular 37/2014 provides a comprehensive framework for land acquisition and resettlement. At provincial level, Vinh Long PPC has issued decisions on compensation, assistance and resettlement when the State acquires land, based on the Land Law and implementing decrees.
 - (4) **Law on Complaints, 2011.** This Law and implementing Decree 75/2012/ND-CP identify the legal framework on grievances.
 - (5) **The Law on Reception of Citizens, 2013.** The Law is stipulating responsibilities in receiving citizens, and the rights and obligations of complainers and denouncers.
 - (6) **Ordinance No. 34/2007/PL-UBTVQH11** on exercise of democracy in communes, wards and townships. This ordinance stipulates projects and information that have to be disclosed, discussed, decided and monitored by the people.
- 1.4.2 World Bank requirements for stakeholder engagement
- 19. The World Bank's Environmental and Social Framework (ESF) came into effect on October 1, 2018. The Framework includes Environmental and Social Standard (ESS) "Stakeholder Engagement and Information Disclosure" (ESS10), which recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice". ESS10 emphasizes that effective stakeholder engagement can significantly improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. As

a requirement of this ESS10 Standard this Stakeholder Engagement Plan (SEP) has to be prepared and will be implemented for the whole Vinh Long Project.

- 20. **Scope of application.** ESS10 applies to all projects supported by the Bank through Investment Project Financing. For the purpose of this ESS, "stakeholder" refers to individuals or groups who: (a) are affected or likely to be affected by the project (project-affected parties); and (b) may have an interest in the project (other interested parties).
- 21. **Requirements.** The Bank standard on Stakeholder Engagement and Information Disclosure requires that the project implementing agency engages with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts. The project will engage in meaningful consultations with all stakeholders. It will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, free of manipulation, interference, coercion, discrimination and intimidation. The project implementing agency will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not. This SEP is prepared taking into account these requirements.
- 22. The Borrower is required to develop a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts (paragraph 13 ESS10). Stakeholders have to be identified and the SEP has to be disclosed for public review and comment as early as possible, before the project is appraised by the World Bank. ESS10 also requires the development and implementation of a grievance redress mechanism that allows project-affected parties and others to raise concerns and provide feedback related to the environmental and social performance of the project and to have those concerns addressed in a timely manner.
- 23. **For the AF scale-up activities,** provisions and requirements for stakeholder engagement for the parent project will be fully applicable.

2. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

- 2.1 Consultation Undertaken for the Vinh Long City Urban Development and Enhanced Climate Resilience Project in Vinh Long Province
- 24. During the process of preparing the Stakeholder Engagement Plan, the consultants have joined the Vinh Long ODA PMU, World Bank Task team, and technical colleagues in conducting site vities to the proposed components. The consultants held meetings with relevant stakeholders in the form of public consultations and individual interviews. There are 363 individuals attended 17 meetings and 9 individual in-depth interviews. The participants included wide-ranging representatives from implementing agency (PMU staff), local governmental agencies (City/district PCs, LFDCs, Ward/Commune PCs, Land cadastral), community (community heads, project direct affected houhseholds and beneficiaries), and local mass organizations (Women's Union, Fatherland Front, Veterans Association, Youth Union).

- 25. The consultants provided overall information about the project (objective, components, project footprint, potential risks/impacts, funding source, implementation arrangement, etc.). The consultants also introduced the new applicable World Bank's ESF and its E&S standards and requirements. The aim of the consultations were to familiarize the stakeholders with the scope of the project and identify appropriate mechanisms for communication and consultation throughout the life of the project. In particular, the required E&S documents prepared for the project such as ESIA/ESMP, RPF, SEP, LMP and ESCP were also consulted in order to get feedbacks from the participants for further improvement. All the meeting minutes are documented and presented in the Annex 4.
- 26. The main issues raised during the consultations are summaried as followings:
 - (i) Full support provided to the project implementation: The project will play important role and contribute to the development of the city in particular and the Mekong delta region in general. It will bring benefits to local residents, economically, socially, and environmentally.
 - (ii) Compensation, support and resettlement: The market approach should be applied for compensation. Livelihood restoration and life stabilization programs are necessary to ensure all the affected people are assisted to restored their living conditions. The coordination with and support of local authorities/agencies to ensure the smooth and timely site clearance are critical. Resettlement areas should be ensured available and fully served prior to the relocation.
 - (iii) Sustainability, connectivity and functioning of the infrastructures should be taken into consideration.
 - (iv) Meaningful participation of local authorities and people should be sustained throughout project planning, design and construction, and operation.
 - (v) Safety assurance during construction stage: The construction activities must ensure environmental sanitation and air condition of nearby communities.
- 27. Detailed consultation activities are presented in Annex 1 and 2. Table 1 summarizes the consultations conducted at the city level for the E&S instruments.

Table 1: Consultation undertaken for the ESIA/ESMP/RPF/ESCP/SEP/LMP

| Time Location | | Participants | Contents |
|---------------|----------------|------------------------------------|-------------------------------------|
| | | • E&S consultants. | • Introduction of overall |
| | | • PMU representatives. | information about the project: |
| | | • Representatives of the unions | type/scope, locations, funding |
| | | and departments of Vinh Long | source, implementation |
| | | City PC. | arrangement/ schedule. |
| | | • Representatives of Long Ho | • E&S documents to be developed. |
| | | District PC. | Activities needed to be |
| | | • Representatives of Center for | implemented to support the |
| | | Land Fund Development. | development of safeguard policy |
| | | • Chairman/Vice Chairman of PCs | reports. |
| | Vinh Long City | of Ward 1,2,3,4,5,8,9 and Tan | Agreement on consultation and |
| | People's | Hoa and Tan Ngai Communes of | survey plans in wards and |
| January 08, | Committee | Vinh Long City and Thanh Duc, | communes. |
| 2020 | | Long Phuoc, Phuoc Hau and Tan | Consultation on Resettlement |
| 9:00 – | Ward/Commune | Hanh Communes of Long Ho | Policy Framework: local |
| 10:30am | People's | district. | compensation and support |
| | Committees' | • Representatives of local | policy. |
| | Office | branches, mass organizations: | • Consultation on the participation |
| | | Women's Union, Fatherland | of stakeholders during the phases |
| | | Front, Veterans Association, | of the project. |
| | | Youth Union, Land | Consultation on environmental |
| | | Administration Officer | and social impacts during project |
| | | • All hamlets/heads of residential | implementation |
| | | groups in communes/wards. | Socio-economic surveys and |
| | | • Representatives of affected | investigation of a number of |
| | | households and beneficiaries in | households in the area; |
| | | the project area (15 | • In-depth interview: Leaders and |
| | | households/commune, ward). | some key officials. |

2.2 Consultation Undertaken for the SUUP

- 28. Vinh Long is currently implementing the Scaling up Urban Upgrading Project (SUUP). A large number of stakeholders for the SUUP are expected to be the same for the Vinh Long City Urban Development and Enhanced Climate Resilience Project in Vinh Long Province (VLUDECRP). Therefore, experience and lessons learned from the SUUP, regarding stakeholder involvement, should be taken into account for the preparation of this SEP.
- 29. The Scaling up Urban Upgrading Project (SUUP), since its launch in 2017, following a number of the Bank projects in the urban sector in the Mekong Delta region, has conducted series of consultations with urban residents and other beneficiaries. In this process, the Vinh Long ODA PMU has gathered knowledge and expertise on collecting and responding to stakeholder feedbacks and has diversified its channels used for communication with stakeholders. Under the SUUP, Vinh Long ODA PMU has led and participated in various key stakeholder discussions with relevant lineministries (MPI, MOC, MOF) and provincial departments (DONRE, DPI, DOC, DOT), urban

residents, mass organizations (Women's Unions, Fatherland Fronts, Farmer's Association, Youth's Union), among others. The nature and findings from these engagements are summarized below. It is likely that issues raised by the stakeholders for the SUUP will also be raised for the current project.

30. During the SUUP preparation, 5 public consultations with 170 households were held in wards in the project area; and 1,304 households participated in socio-economic assessment. Various consultation activities were undertaken with relevant stakeholders for preparation of safeguard documents (RPF, ESIA and RP). Main issues raised are presented in the following Table.

Table 2: The issues raised of the SUUP project

| Concerns raised | Details | | | |
|----------------------------------|---|--|--|--|
| Existing issues to be im | Existing issues to be improved | | | |
| Transportation | The city transport system currently does not meet the demands of connection and local economic development; Common deterioration and lack of appropriate budget to upgrade and build new transport systems, both main roads and inner roads. | | | |
| Local flooding | Local flooding is more often and in longer time due to degraded drainage system and climate change. | | | |
| Water pollution/Saline intrusion | Saline intrusion is always getting more serious year by year, causing significant impacts on local agriculture and fishery and no effective measure is provided. | | | |
| Living conditions | Infrastructure in many residential areas is of low quality, hence, affecting the living of local people. People in residential areas currently have very low income, so it is difficult for them to renovate and improve their living conditions. A "push" is in need for to make a significant change and to foster the development of residential areas. | | | |
| Issues during the project | ct implementation | | | |
| Project design | The project design should minimize land acquisition and resettlement in order to minimize disturbance to local people's lives. | | | |
| Site clearance and resettlement | It is necessary to ensure the appropriate compensation and supportive policies for local people; resettlement should be carried out along with thorough consultations with local people to choose the most suitable resettlement site/form. The livelihood restoration program must be practical and feasible. | | | |
| Environmental issues | Attention should be paid to environmental impacts during the construction process, including: domestic wastes of workers and hazardous wastes of works under construction and there should be measures to handle smoke, dust, noise, etc. and commitments to treatment measures to minimize adverse impacts on the environment. There is no conflict between the labour force for construction and the local community. | | | |
| Construction of work items | Plans, schedules, progresses and actions to ensure the set-out plan should be publicly disclosed so that local people can proactively arrange their lives and coordinate with the construction unit. | | | |

2.3 Stakeholder Consultation on Vinh Long City Master Plan

31. A Master Plan is currently being prepared for Vinh Long City. Most of the investments under the proposed Vinh Long Project are included in this Master Plan. Therefore, issues raised during the consultation of the Master Plan may also be raised for the current project. There have been at least 5 meetings among stakeholders to develop the master plan of the project. These meetings are chaired by the Department of Planning and Investment and the People's Committee of Vinh Long City.

Participants include relevant departments, City People's Committee, related agencies and representatives of mass organizations at all levels. The overall planning consultation activities for the stages are shown in Table 3 below.

Table 3: Consultation Undertaken for the Master Plan

| Time | Venue | Participants | Main issues raised |
|------------|-------------------------------------|--|--|
| 24/6/2019 | Provincial People's Committee | Representatives of provincial and city People's Committees, related departments and agencies Representatives of mass organizations | The City Master Plan should be used as an essential guidance for project design to ensure the development strategy for the city; Financial arrangement and capacity, debt return of Vinh Long province to be carefully assessed; Implementation plan, in which the stakeholder engagement plan should be discussed as early as possible. |
| 25/8/2019 | City People's Committee | Representatives of provincial and city People's Committees, related departments and agencies Representatives of mass organizations | A thorough study and analysis of project proposal is necessary, taken into account and adjustable options; Financial arrangement and counterpart funding of Vinh Long city to be carefully assessed; Relevant stakeholders should be engaged to facilitate the project implementation. |
| 17/11/2019 | City People's Committee | Representatives of provincial and city People's Committees, related departments and agencies Representatives of mass organizations | A thorough study and analysis of project proposal is necessary, taken into account and adjustable options; Financial arrangement and counterpart funding of Vinh Long city to be carefully assessed; Relevant stakeholders should be engaged to facilitate the project implementation. |
| 15/11/2019 | City People's Committee | Representatives of provincial and city People's Committees, | • A thorough study and analysis of project proposal is |

| | | related departments and agencies Representatives of mass organizations | necessary, taken into account and adjustable options; • Financial arrangement and counterpart funding of Vinh Long city to be carefully assessed; • Relevant stakeholders should be engaged to facilitate the project implementation. |
|------------|----------------------------|---|--|
| 17/12/2019 | City People's Committee | Representatives of provincial and city People's Committees, related departments and agencies Representatives of mass organizations | A thorough study and analysis of project proposal is necessary, taken into account and adjustable options; Financial arrangement and counterpart funding of Vinh Long city to be carefully assessed; Relevant stakeholders should be engaged to facilitate the project implementation. |

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

- 32. Project stakeholders are people and entities who have a role in the Project, or could be affected by the Project, or who are interested in the Project. Project stakeholders are defined as individuals, groups or other entities who:
 - (i) are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as 'affected parties'); and
 - (ii) May have an interest in the Project ('interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

3.1 Project-Affected Parties

- 33. One of the primary goals of the Project is to identify stakeholders on which the project can have negative impact such as households or businesses who may be impacted by land acquisition, business activities. However, the Project may influence the activities of various stakeholders in positive or negative ways. Thus, a list of key stakeholder groups can be identified as potentially affected parties. These should be engaged throughout the life of the Project and impacts on them should be monitored and mitigated. The following groups can be identified as potential project-affected stakeholders:
 - (1) City urban/peri-urban residents;
 - (2) Individual business households;
 - (3) Small enterprises;
 - (4) Smallholder farmers;

- (5) Street vendors;
- (6) Public service utilities (tele-communication, power, water supply, waste water);
- (7) Agricultural workers;
- (8) Women;
- (9) Other vulnerable groups (disabled, poor/near poor, landless households).
- 34. Project-affected parties includes those likely to be affected by the Project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. The table below indicates potential project-affected parties of the Vinh Long City Urban Development and Enhanced Climate Resilience Project in Vinh Long Province.
- 35. The AF will focus on the Component 4 of the parent project, which will be mainly related to technical assistance. Therefore, the AF will have positive impacts by maximizing the achievement of the Project Development Objective, and hence there is no project-affected parties envisaged. The AF will not finance civil works or any analytical, advisory or other activities which could have or lead to downstream physical, social or environmental impacts. The AF will not involve any kind of land acquisition or resettlement or people's livelihoods. Technical assistance activities foreseen under the AF will not lead to any downstream activities (e.g., through the design of major infrastructure investments) that may require land acquisition or resettlement.

Table 4: List of Project-Affected Parties

| Project- affected parties | Indicative description | Identified groups of project-affected parties | Relevance to the Project | Impacts | Engagement methods |
|--|--|---|---|--|---|
| People who will be physically or economically displaced by the project | Physically or economically persons displaced by the Project. People who reside or have land and non- land assets in the Right of Way (ROW) of the proposed investments. | Urban/peri-urban residents; Business households; Smallholder farmers; Public service utilities (tele-communication, power, water supply, waste water); Women; Other vulnerable groups (disabled, poor/near poor, landless households). | The project will cause land acquisition and restrictions on land use, which may lead to physical displacement (relocation, loss of residential land or loss of shelter) and economic displacement (loss of productive land, assets or access to assets, leading to loss of income sources or other means of livelihood). Potential Project Affected Persons (PAPs) shall be consulted using the plan outlined in this SEP. This will be done throughout the project cycle to ensure their views are incorporated in the RPF/RP and project design. | Negatively affected. Moderate to substantial impacts. | PAPs shall be informed and consulted during all project implementation to ensure their views are incorporated in the RP and project design through public consultation and surveys. PAPs shall be consulted about their choices and options, particularly on relocation issues and restoration of livelihoods, through public meetings and focus-groups discussions. |
| Project beneficiaries | Executing/ implementing agencies, relevant province/city/district's agencies. Local administrative authorities at all levels. | ○ Vinh Long ODA PMU, DPI, DONRE, DOT, DOC, DOIC, DOCST, CFSC, City/district LFDC; ○ PPC, C/DPC, WPCs; | Legislative and executive/ implementing authorities. Functions of supervision and monitoring The project is expected to bring about environmental and social benefits in the long term from: i) improved urban infrastructure that | Positively affected.Moderate impacts. | Should be informed on the progress of the project, schedule of civil works through meetings and progress reports. Should be informed on the progress of the project and |

| Project- affected parties | Indicative description | Identified groups of project-affected parties | Relevance to the Project | Impacts | Engagement methods |
|---|--|---|---|---|---|
| | Local community residing within and/or around the project areas. People who will benefit from project related employment or business opportunities. Disadvantaged/ vulnerable groups Utilities providing urban public services. | Urban/peri-urban residents; Business households; Street vendors; Public service utilities (tele-communication, power, water supply, waste water treatment, traffic management); Non-skilled workers who will be engaged by the project. | will reduce the risk of flooding; ii) expand access to improved sanitation; iii) improve public health; and iv) reduce travel times on new and improved roads. The project will generate employment or business opportunities for the community through construction and maintenance of the infrastructures (i.e. canals dredging, sewage system, roads etc.). | | schedule of civil works through public meetings and information posted at local levels. Should be informed on the works opportunities under the project through information posted at local levels. |
| Local community residing around the project areas | o Local community who are exposed to pollution, traffic safety risks, gender risks, among others. | Urban/peri-urban residents; Business households; Street vendors; Agricultural workers; Women; Other vulnerable groups (disabled, poor, landless households). | o The project is likely to cause adverse environmental and social impacts on the local community in the project areas. | Negatively affected.Low to moderate impacts. | o Should be informed on the progress of the project, schedule of civil works, mitigations measures and GRM through public meetings and information posted at local levels and FGD with women and vulnerable groups. |

3.2 Other Interested Parties

- 36. The term "other interested parties" refers to individuals, groups, or organization with an interest in the Project, due to either the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include government officials, the private sector, the scientific community, academics, mass organizations, other civil society organizations, and cultural groups. The following table shows the preliminary finding of project stakeholders by categories:
- 37. As it nature, the AF will involve in technical assistance activies targeted to defined local beneficiaries such as DOC, DONRE, DOIC, DARD, Urban Planning Division, CFSC. In addition, the mobilization of consulting firms to provide technical services (i.e. FMIS/GIS, urban management). These stakeholders are defined the same as the other stakeholders of the parent project (listed in the table 5).

Table 5: List of Other Interested parties

| Stakeholder | Interests | Indicative List | Degree of Influence and Engagement methods |
|--|--|--|--|
| Governmental age | encies | | |
| Central ministries and government agencies | Ministries and government agencies are key stakeholders for the project and needs to be informed about project progress. State ministries and government agencies need to ensure project compliance with national legislation and collaboration with relevant national plans/programs (i.e., Regional Plan for Infrastructure Development of the Mekong Delta; smart city plan, Flood Control Plan for Vinh Long city). | Ministry of Planning and Investment (MPI). Ministry of Construction (MOC). Ministry of Agriculture and Rural Development (MARD). Ministry of Natural Resources and Environment (MONRE). Ministry of Information and Communication (MOIC). | High influence. Comments on the proposals and design. Advise the Prime Minister in accordance with functions and duties. Issue dispatch, relevant decisions to accelerate the project process. |
| Vinh Long province | Vinh Long PPC is the highest authority to promulgate regulations, solve issues concerning guidelines and policies, and give instructions for the Project implementation and are the links between the functional organizations in the Project implementation. The relevant provincial departments are also interested in the Project at their sectoral responsibility. | Department of Agriculture and Rural Development (DARD). Department of Construction (DOC). Department of Transport (DOT). Department of Natural Resources and Environment (DONRE). Steering Committee of Disaster Prevention, Search and Rescue (SCDPSR). | High influence. Leading role in seminars, conferences on planning, implementation and evaluation. Advise on the tasks and responsibilities of the management unit. Leading role in intensive consultation activities. |

| Stakeholder | Interests | Indicative List | Degree of Influence and Engagement methods |
|---------------------------------------|--|---|--|
| Vinh Long city/Long Ho district | Local government institutions protect the rights of inhabitants in the project area and represent the local communities/PAPs. | Ward and communes within the Project area. City/District Land Fund Development Center (C/DLFDC). | Moderate influence. Provide information to stakeholders in seminars, conferences and during public consultation. |
| | o City/district has responsibility for land clearance (C/DLFDC). | | Moderate influence. Provide information to PAPs on resettlement implementation and policy. Participate in monitoring, evaluation. |
| Civil Society | | | |
| Mass organizations | Mass organizations operate at central/national down to provincial, city, and commune/ward levels. They main role is mobilization, mediating problems and dissemination of information through their members. These organizations get feedback from the population and can channeled complaints and concerns regarding any impact of the Project on the community. | Women's Union. Farmer's Union. Youth Union. Fatherland Front. | Moderate influence. Intermediaries for informing local people about the planned activities, for information disclosure and to transmit concerns of the community to PMU, PPC, City PC. Participate in project communications. Support women and vulnerable HHs. Mobilize community participation in the project. Receive comments from local community and deliver to stakeholders. |

| Stakeholder | Interests | Indicative List | Degree of Influence and Engagement methods |
|--|---|--|---|
| Citizen groups | Citizen groups can be involved in the preparation and monitoring of activities such as resettlement or environment. | o Citizen groups in Vinh Long city and especially in LIAs. | Low to moderate influence. Participate in project monitoring. |
| Other key interest | ted parties | | |
| Technical assistance service providers | Companies in charge of water supply, wastewater and drainage in Vinh Long City have a direct interest in the project. Consulting firms | Vinh Long Water Supply Joint-stock Company (VWACI). Vinh Long Public Utilities Joint-stock Company (VIPUCO). Consulting firms who provide TA service in FMIS/GIS, urban planning, etc. | Low influence. Comment on design options. Provide technical guidance during consultation activities. Supervise construction activities. Low influence. TA provision on design options. Provide technical assistance during consultation activities. Supervise/ training on TA activities, knowledge sharing. |
| Other interested donor | o The Netherlands Enterprise Agency (RVO), on behalf of the Minister for Foreign Trade and Development Cooperation of the Netherlands is interested in co-financing for selected investments related to wastewater collection and treatment with the DRIVE program. | o Netherlands Enterprise Agency (RVO). | Moderate influence. Should be informed on progress of the project through progress report. |

3.3 Disadvantaged/Vulnerable Individual and Groups

- 38. "Disadvantaged or vulnerable" refers to those who may be more likely to be adversely affected by the Project. Such groups may be less able to take advantage of a project's benefits. Such groups are also more likely to be excluded from the consultation process. Various types of barriers may influence the capacity of such groups to articulate their concerns and priorities about project impacts.
- 39. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders. Within the Project Area of Influence, the vulnerable groups may include and are not limited to the following:
 - (1) Elderly people and/or social policy householders (invalid soldiers, martyrs, heroic mothers);
 - (2) Poor/near-poor families;
 - (3) Persons with disabilities and their caretakers;
 - (4) Women, particularly women-headed households or single mothers with underage/dependent children;
 - (5) The unemployed persons.
- 40. The following table indicates disadvantaged or vulnerable groups encountered under the Vinh Long Project.

Table 6: List of disadvantaged/vulnerable groups

| Disadvantaged/vulnerable groups | Potential barriers to limit stakeholder effective engagement | Specific needs to address the barrier |
|---|---|--|
| Elderly people and/or social policy householders (invalid soldiers, martyrs, heroic mothers); Poor/Near-poor households, female-headed HH with dependents, elderly, persons living with severe illness, landless HHs. The unemployed persons. | Poverty. Absence of suitable family person to participate. Mobility. Lack of time to participate. Lack of interest. | Meeting at ward/commune level. Individual meetings. Specific meetings in LIAs. Adjustment of timing of meetings to avoid working time. Provision of transport allowance. |
| Female community members and female workers. | Potentially any of above barriers. | Focus group meetings. Child care provision during meetings. Adjustment of timing of meetings that allows women to adequately tend to their domestic duties. |

| Disadvantaged/vulnerable groups | Potential barriers to limit stakeholder effective engagement | Specific needs to address the barrier |
|------------------------------------|---|--|
| | | Mediation by Women's Union. |
| People with disabilities. | Physical disabilities preventing mobility. Various disabilities such as visual and hearing impairment. | Blind language, braille information. Accessible consultations venues. |

- 41. Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. Specific measures to address the needs of the poor and women will be put in place through both stakeholder consultation and communication, livelihood restoration and land acquisition. There will be separate consultation meetings conducted with vulnerable group/individuals and the purpose will be to explore the critical issues for vulnerable and what method will be considered to support vulnerable people.
- 42. Disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project. In the present context, this would include women, who for cultural reasons have low mobility and are hard to reach, disabled and any displaced (internally or externally) families among the PAPs. Special efforts will be taken to disseminate project information to these groups and to ensure their inclusion in the stakeholder engagement process. To involve women, particularly among the PAPs, in the stakeholder engagement process, the Project will work through female representatives in the affected communities, to identify suitable venues and timing for consultations. Regarding disabled groups, all venues for consultations, workshops and meetings should be selected with a view to facilitate physical access for disabled. Displaced PAPs will be informed about meetings and consultations via other community members in the area, and potentially through radio and social media.
- 43. The AF will not involve in any activities that affect the vulnerable/disadvantage groups.

3.4 Summary of project stakeholder needs

- 44. The following table summarizes the stakeholders needs for the Vinh Long project.
- 45. Given the AF will support scaling-up the Component 4 of the parent project, where the targeted beneficiaries have been identified and the needs have been analized.

Table 7: Summary of Stakeholder Needs

| Stakeholder Group | Key characteristics | Languages Needs | Preferred notification means | Specific Needs |
|--|---|--------------------|--|---|
| Local affected communities by the proposed investments in Vinh Long city | Approximately 3,000 HH affected, 500 HHs to be relocated. 4 LIAs affected. | Vietnamese | Meetings at ward/commune level. Specific meetings in LIAs. Posters at ward/commune PC office. Local media (radio, TV). Separate consultation and FGD with women and affected persons with a special consideration for vulnerable and disadvantaged groups. | Suitable location for consultations with PAP (i.e. ward/commune or LIA). Adjustment of timing of meetings to avoid working time. Reaching absentee PAPs. Involve mass organization (especially women's union) in consultation preparation to ensure inclusion of women and vulnerable and disadvantaged groups in Stakeholder engagement. Preparation of minutes of meetings. |
| Local government agencies | Relevant department in Vinh Long PPC concerned with project investments (i.e. DOC, DOT, DARD, DONRE). Utilities. | Vietnamese | Email & mail notification and telephone. Presentation and meetings. | Technical information on proposed investments. |
| Implementing agencies | City/District PC PMU C/DLFDC | Vietnamese | o Workshops | Presentation of ESF requirements. |
| Central government | Ministries and government agencies | Vietnamese | Email & mail notification and telephone. Presentation and meetings. Aide-memoire. | General information on the project. |

4. STAKEHOLDER ENGAGEMENT PROGRAM

46. This section describes stakeholder engagement activities that will be implemented under the Project, including activities tailored for vulnerable and disadvantaged groups.

4.1 Purpose and Timing of Stakeholder Engagement Program

- 47. The main goal of stakeholder's engagement program is to create awareness of the key deliverables of the project, keep stakeholders updated on key activities, and provide avenues for affected-people to voice their concerns and grievances. Main consultation planned is as follow:
 - o ESIA, ESMP, RPF, LMP and ECSP will be subject to consultations prior to appraisal;
 - o RP will be subject to consultation once detailed design will be available;
 - The relevant parts of the ESCP will be shared for general orientation on the Government's commitments;
 - During the project life cycle, it is planned to conduct, during the early stages of the project, two meetings annually to update and consult stakeholders on project activities. During the months leading up to, and during the construction phase, quarterly meetings will be conducted.

4.2 Proposed Strategy for Information Disclosure

- 48. Multiple channels will be used to publish information linked to project activities. These include: (i) disclosure of all relevant documents in the relevant sites and through the World Bank website. The documents will also be made available to local communities, in a manner and language to be understandable to them (ii) publication of posters and public notification in the targeted areas accessible to local communities, mass organizations and other stakeholders; (iii) broadcasting notification through local medias; and (iv) stakeholder workshops.
- 49. Free printed copies of the ESIA/ESMP/RPF/RP/LMP and the SEP in Vietnamese will be made accessible for the general public at the following locations:
 - o PMU office:
 - Vinh Long City PC/ Long Ho District PC's office;
 - Ward/commune PC's office; and
 - Other designated public locations to ensure public dissemination of the project materials.
- 50. Electronic copies of the ESIA, ESMP, RPF/RP, LMP and SEP will be placed on the project web-site and as well as Vinh Long PPC official website. This will allow stakeholders with access to the website via internet to view information about the planned development and to initiate their involvement in the public consultation process. The website will be equipped with an on-line feedback feature that will enable readers to leave their comments in relation to the disclosed materials.
- 51. The PMU will employ different means of communication to disseminate information to different categories of stakeholders, and to engage them in consultations:
 - o To reach the maximum audience, radio spots (local radio) will be transmitted;
 - Information will be posted at ward/commune PCs, to transmit brief information regarding the project activities and upcoming consultations;

- Workshop with the local communities for in-depth consultations;
- Brochures and leaflets which will contain information on eligibility criteria and entitlement matrix- these brochures will be distributed to affected people in Vinh Long city and Long Ho district;
- Press releases/press conferences;
- Consultations in Vinh Long city and Long Ho district for all locally based stakeholder groups;
- Separate meetings will be conducted for women and other vulnerable and disadvantaged groups (as needed). Suitable location(s) will be identified with easy access.
- 52. The strategy for engagement for the parent project will be fully applicable to the AF. Once updated, the LMP, SEP, and ECSP will be disclosed locally at the project areas. The electronic version will be published on the official website of the People's Committee of Vinh Long province, the hard copy will be published on the bulletin board at the office of the PMU, the People's Committee of Vinh Long City, the People's Committee of Long Ho district and the People's Committees of the project wards/communes.
- 53. Table 8 summarizes the proposed strategy for public disclosure.

Table 8: Stakeholder Engagement and Disclosure Methods

| Project stage | Information to be disclosed | Methods proposed | Timetable: Locations/dates | Target stakeholders | Percentage reached | Responsibilities |
|---|---|---|---|--|--------------------|---|
| Stage 1: Project preparation (before project appraisal) | Project key features. ESIA, ESMP, RPF, SEP and LMP. | Public consultation (13 events at communal level; 30 events at local level). Posting at city/ward/commune PCs. Vinh Long Province website. World Bank website. | Affected Ward/ communes. Before appraisal (i.e. April 2020). | ○ All stakeholders | o 100% | PMU E&S team. Consultant. City/District Land Fund Development Centre. |
| | Technical details on project design. Compliance with national regulations and relevant programs. | Individual meetings (17 meetings were conducted). Emails. | As needed (and continued throughout the project life). | Local government, state ministries, mass organizations and community groups. | O | PMU.Consultant. |
| Additional Financing (scale- up activities) | Main contents of additional funding AF scale up activities LMP, SEP update | Consult with local departments in writing; Public consultation in project communes/wards | As needed (and continued throughout the project life). | Local government, mass organizations and community groups. | | PMU.TA Consultant. |
| | Site-specific environmental and social impacts and mitigation measures in ESIA, | Public consultations (quarterly basis). Individual meetings through RP preparation process. Preconstruction site visits. | Prior to start of civil work at ward/communes. The GRM is maintained | Project affected parties (PAPs). Community groups supporting PAPs. | 0 | PMU E&S team. Consultant. City/District Land Fund Development Centre. |

| Project stage | Information to be disclosed | Methods proposed | Timetable: Locations/dates | Target stakeholders | Percentage reached | Responsibilities |
|--|--|--|---|---|-----------------------|---|
| Stage 2: Preconstruction and during construction | ESMP, LMP and SEP. O Awareness-raising on the GRM. | o GRM accessibility will be advertised on worksites and at the commune/ward level (e.g. on notice boards). | throughout the project life. | | | |
| | EmployeeGrievanceProcedure.Staff handbook. | Group Meetings. Disclose GRM at public places, worksites and at the ward level to ensure all target audience can reach. | Prior to start of civil work at project site. | o Project workers. | | PMU.Contractor. |
| | Selection criteria and TOR for employment opportunities for construction work. | Group meetings with mass organizations to engage women and vulnerable groups. | o Prior to start of civil work at ward/communes. | People who may benefit from employment opportunities. | | PMU safeguard team. Women's union Supervision consultant. |
| Stage 3: Postconstruction | Summary of the outcome of project monitoring (including GRM). | Summary to share at public consultation on a quarterly basis; Media releases and/or newsletters via email. | Following the completion of civil work. | o All stakeholders. | | PMU safeguard team.Independent Monitoring Consultant. |

4.3 Proposed Strategy for Consultation

- 54. The project will mostly employ interviews, focus group discussions, open meetings, and workshops as a means of carrying out consultations. This will be done right in the affected wards/communes and LIAs to enable easy participation of vulnerable and disadvantaged groups of people. The strategy will also be different depending on the Project stage as presented below.
- 55. **Project preparation stage (before project appraisal).** While the details of some proposed investments are unknown at this stage, the consultation will focus on a broader range of stakeholders to understand their general interests and concerns on the project and its potential positive and negative impacts to inform the project's environmental and social frameworks. This is also the stage where potential vulnerable/disadvantaged groups relevant to the project will be identified.
- Pre-construction and construction stage. At this stage, the details of proposed investments will be determined and specific project-affected parties (PAPs) identified. The consultation will focus on PAPs to address their concerns through the implementation of subproject-specific environmental and social plans. The project will ensure that the GRM will remain effective during the civil works to promptly address any grievances from the PAPs. The PMU will pay particular attention to vulnerable groups to ensure inclusion and non-discrimination of such groups.
- 57. **Post construction/maintenance stage**. At this stage, the consultation will focus on the feedback from PAPs on the performance of environmental and social mitigations conducted during the construction stage. The consultation on employment opportunities for O&M works will be also conducted. Areas for improvement and lessons learned should be identified for the following subprojects. Dissemination and reporting back to general stakeholders on the outcome of the monitoring and evaluation of the project will be also arranged.
- 58. In the context of the outbreak and spread of COVID-19, the Government of Vietnam (GOV) has taken various restrictive measures, imposing strict restrictions on public gatherings, meetings and people's movement, and others advising against public group events. People have been advised to exercise social distancing, and specifically to avoid public gatherings to prevent and reduce the risk of the virus transmission. These restrictions have affected Bank requirements for public consultation and stakeholder engagement in the project. The Bank's Technical Note on Public Consultations and Stakeholder Engagement was issued to guide the public consultation and stakeholder engagement activities during COVID-19. The Note offers suggestions to the client on managing public consultation and stakeholder engagement, with the recognition that the situation is developing rapidly, and careful regard needs to be given to national requirements and any updated guidance issued by the World Health Organization (WHO). It is important that the alternative ways of managing consultation and stakeholder engagement discussed with the client are in accordance with the local applicable laws and policies, especially those related to media and communication.
- 59. The SEP will be reviewed and updated during project implementation as necessary on adaptive stakeholder engagement arrangements, particularly the approach, methods and forms of engagement proposed, and assess the associated potential risks of virus transmission in conducting various engagement activities.
- 60. Table 9 summarizes the proposed strategy for consultation.

| capacity bui | ilding for PMU | J and local author | cale-up activities: these activities are mainly technical assistance and local authorities so the consultation activities will be mainly through d training courses. | | | |
|--------------|----------------|--------------------|--|--|--|--|
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Table 9: Strategy for Consultation

| Project stage | Target stakeholders | Topic of consultation/engagement | Methods used | Locations/dates | Responsibilities |
|---|---|---|--|---|--|
| STAGE 1: PROJECT PREPARATION (DESIGN, SCOPING, E&S PLANNING, ESIA/RPF/SEP/L MP/ESCP DISCLOSURE) | Project Affected Parties: O All stakeholders. PAPs. Vulnerable groups. Other Interested Parties: Local authorities (PPC, C/DCs, C/WPCs). Governmental agencies (DPI, DONRE, DOC, DOT, DOIC, DOCST). LFDCs. Donors. Public utilities. | Project interventions and scope. Project E&S principles, and risks/impacts and proposed mitigation measures ESIA, RPF, SEP, ESCP, LMP, and RP (when available) disclosures. Land compensation and acquisition process. Resettlement and livelihood restoration options. Grievance redress mechanism. Legal compliance issues. Project information scope and rationale and E&S principles. Coordination activities. Land compensation and acquisition process. Grievance redress mechanism. ESIA, RPF, SEP, ESCP, LMP, and RP (when available) disclosures. | Face-to-face public meetings. Disclosure of project information (booklets, posters, website). Posters at city/ward/commune PCs. Separate in-depth consultation with PAPs. Focus Group Discussions. HH questionnaires. Face-to-face public meetings. Disclosure of project information (booklets, posters, website). Separate in-depth technical discussions. Sharing of project relevant documents. | ○ Affected Ward/communes PC, and other places as convenience. ○ Before Project Appraisal. ○ PMU venues ○ Before Project Appraisal. | ○ PMU E&S team. ○ Consultants. ○ City/District Land Fund Development Centre. ○ PMU E&S team. ○ Consultants. |
| | Other Interested Parties: O Mass organizations. NGOs/CSOs. Academies. | Project scope and E&S principles. ESIA, RPF, SEP, ESCP, LMP, and RP (when available) disclosures. Grievance redress mechanism. | o Public meetings, trainings/workshops (separate meetings specifically for women and vulnerable as needed). | o Project communities' meeting places. o Before Project Appraisal. | PMU E&S team.Consultants. |

| Project stage | Target stakeholders | Topic of consultation/engagement | Methods used | Locations/dates | Responsibilities |
|----------------------------------|---|---|---|---|---|
| | | | Mass/social media communication. Disclosure of brochures, posters, website. | | |
| | Other Interested Parties: o Local community. o Others. | Project interventions and scope. Project E&S principles, risks/impacts and proposed mitigation measures. ESIA, RPF, SEP, ESCP, LMP, and RP (when available) disclosures. Land compensation and acquisition process. Resettlement and livelihood restoration options Grievance redress mechanism. | Face-to-face public meetings. Leaflets. Posters at city/ward/commune PCs. | Affected Ward/ communes PC, and other places at convenient. Before Project Appraisal. | PMU E&S team. Consultants. City/District Land Fund Development Centre. |
| STAGE 2: PROJECT IMPLEMENTAT ION | Project Affected Parties: o All stakeholders. o PAPs. o Vulnerable groups. | Project status. Grievance redress mechanism. Land compensation and acquisition packages. Resettlement and livelihood restoration implementation. Health and safety impacts (community H&S, community concerns). Employment opportunities. Update and publish SEP, LMP and ESCP. | Face-to-face public meetings. Separate in-depth consultation with PAPs. Separate meetings as needed for women and vulnerable. Focus Group Discussions. Grievance redress mechanism. | Affected Ward/ communes PC, and other places as convenience. Before Project implementation | o PMU E&S team. o Consultants. o City/District Land Fund Development Centre. o Construction supervision and independent E&S monitoring consultants. o Contractors/sub- contractors. |

| Project stage | Target stakeholders | Topic of consultation/engagement | Methods used | Locations/dates | Responsibilities |
|---------------|--|--|---|---|---|
| | Other Interested Parties: o Local authorities (PPC, C/DCs, C/WPCs). o Governmental agencies (DPI, DONRE, DOC, DOT, DOIC, DOCST). o LFDCs. o Donors. o Public utilities. | Legal compliance issues. Project status and E&S principles. Coordination activities. Reviewing and approval procedures of land compensation and acquisition, and resettlement. Grievance mechanism process. Technical assistance activities | Face-to-face public meetings. Sharing of project relevant documents. | ○ PMU venues ○ Before Project implementation. | PMU E&S team. Construction Supervision and independent E&S monitoring consultants. Contractors/subcontractors. Specialists/technicians of the consulting firms for AF activities. |
| | Other Interested Parties: o Mass organizations o NGOs/CSOs. o Academies. | Project status. Grievance redress mechanism. Health and safety impacts (community H&S, community concerns). Environmental and social concerns. | Public meetings, trainings/workshops. Mass/social media communication. Disclosure of brochures, posters, website. | Project communities' meeting places. Before Project construction. | PMU E&S team. Construction supervision and independent E&S monitoring consultants. Contractors/sub-contractors. |
| | Other Interested Parties: o Local community. o Others. | Project status. Grievance redress mechanism. Environmental and social concerns. | Public meetings, trainings/workshops. Mass/social media communication. Disclosure of brochures, posters, website. | Project communities' meeting places. Before Project implementation. | PMU E&S team. Construction supervision and independent E&S monitoring consultants. |

| Project stage | Target stakeholders | Topic of consultation/engagement | Methods used | Locations/dates | Responsibilities |
|----------------------|--|---|---|--|---|
| | | | | | o Contractors/sub- contractors. |
| | Other Interested Parties: Supervision consultants. Contractors/sub- contractors., service providers, suppliers and their workers. | Project status and E&S principles. Grievance redress mechanism. Environmental and social concerns. Training on LMP requirements and other management plans. Worker grievance mechanism. | o Public meetings, trainings/workshops. | Project communities' meeting places. Before Project implementation. | PMU E&S team. Construction Supervision and independent E&S monitoring consultants. Contractors/subcontractors. |
| STAGE 3: | Project Affected Parties: | Project status. Satisfaction with engagement activities and GRM. | Face-to-face public meetings. Separate in-depth consultation with PAPs. Separate meetings as needed for women and vulnerable. Focus Group Discussions. HH questionnaires. | Affected Ward/ communes PC, and other places as convenience. After Project implementation | o PMU E&S team. |
| PROJECT OPERATION | Other Interested Parties: o Mass organizations o NGOs/CSOs. o Academies. o Local community. o Consulting firms o Others. | Project status. Grievance redress mechanism. Health and safety impacts (community H&S, community concerns). Environmental and social concerns. Technical assistance (O&M) | Public meetings, trainings/workshops. Mass/social media communication. Disclosure of brochures, posters, website. | Project communities' meeting places. After Project implementation. | ○ PMU E&S team. ○ Consultants. |

4.4 Stakeholder Engagement Methods to Be Used

Public/community meetings

62. The Vinh Long ODA PMU will organize project launch meeting on a national level as well as organize meetings in each project ward/commune level with leaders, PAPs, and other interested parties. Meetings will be open house events where PMU will present information and people will be invited to make comments and express any concerns. A range of consultations with different stakeholders will be conducted and documented, and community level meetings will also be conducted with men and women (including vulnerable households) to better understand needs, expectations, and concerns of these population groups in relation to the project. The feedback received at these meetings will be documented along with measures that the project will take to address the feedback received. Meetings in each of the district/city will also be organized on a quarterly basis.

Communication materials

63. Written information will be disclosed to the public via a variety of communication materials including leaflets, posters, etc. The PMU will also update its website regularly (at least on a quarterly basis) with key project updates and reports on the project's performance in Vietnamese. The website will also provide information about the grievance mechanism for the project.

Training, workshops

64. Training on a variety of social issues will be provided to PMU, and possibly other relevant government or non-government service providers. Issues covered will include sensitization to inclusion/exclusion, labor issues, gender-based violence risks.

Grievance redress mechanism

- 65. In compliance with the World Bank's ESS10, a project-specific grievance mechanism will be set up to handle complaints and issues, and this will be integrated into a country system on GRM that are available to citizens. Dedicated communication materials (specifically, a GRM brochure or pamphlet) will be developed to help local residents become familiar with the grievance redress channels and procedures. The PMU will coordinate with administrative authorities to maintain a grievance register in order to capture and track grievances from submission to resolution and communication with complainants.
- 66. The initial effort to resolve grievances to the complainant's satisfaction will be undertaken by administative levels. The mechanism is described in more detail in Section VI below. Grievances may be submitted anonymously, but in that case, it cannot be known if the complainant is satisfied with the resolution. PMU website, posters, and leaflets will include clear information on how feedback, questions, comments, concerns, and grievances can be submitted by any stakeholder. It will also provide information on the way grievances will be handled, both in terms of process and deadlines.

4.5 Proposed Strategy to Incorporate the Views of Vulnerable Groups

67. All views expressed by stakeholders will be carefully noted, documented in the consultation summary and considered, including those of disadvantaged or vulnerable groups. The following strategy will be used for consultation with vulnerable groups:

- O Issuance of invitations specific to the relevant groups: i) female PAPs; ii) displaced PAPs; and iii) poor and other vulnerable groups;
- Conduct specific consultations with each of these groups separately in a location and venue easily accessible to them. Women's union, Youth Union, Fatherland Front or elderly group will be used as mediators and will be involved reaching these groups;
- Consultation with vulnerable people will be conducted throughout the project life. There will be separate FGDs arranged with vulnerable people during project design/ preparation stage on a quarterly basis. The key focus will be to explore problems and needs of these groups and how to reach them. There will also be quarterly meetings conducted with these groups during project implementation.

4.6 Timeline

68. The timeline for the Project is presented in the Table 10 below:

Bank **Project Project Project Project** Bank **Appraisal Activity Implementation** preparation decisions **Implementation** Phase out **Preparation** Timeline September 2019 April 2020 June 2020 June 2020-2022 2025 - March 2020 December 2021

Table 10: Project phase timeline

4.7 Information Disclosure

- 69. Currently Vinh Long ODA PMU website (https://bqldaddcn.vinhlong.gov.vn) is being used to disclose project documents in Vietnamese and English.. All future project-related monitoring reports listed in the above sections will be disclosed on this webpage. Project updates will also be posted on the DPI's homepage website. All information brochures/fliers will be posted on the website. Contact details of the Community Liaison Team will also be made available on the website.
- 70. The draft verions of ESCP, SEP and LMP in both English and Vietnamese were disclosed on the PMU website on January 11, 2022 for public hearings and feedback.

4.8 Review of Comments

- 71. The comments from the Stakeholder engagement process will be gathered (written and oral comments) and reviewed by the PMU E&S team whose information and contact details will be shared during the first consultation meetings. The minutes of consultations will be supplemented with any written comments received within the deadline after the consultation.
- 72. The comments will be entered into a format with official responses to each issue raised. This response, matrix will be shared with the participants by email and put on the PPC/City website. The Minutes and response matrix will be available in English and Vietnamese.
- 73. The SEP will remain in the public domain for the entire period of project development and will be updated as needed as the project progresses through its various phases. This will help to ensure timely identification of new stakeholders and interested parties and their involvement in the process of collaboration with the project. The methods of engagement will also be reviewed periodically to

assess their effectiveness and relevance to the project's evolving environment, and will be modified as necessary to ensure continued effectiveness.

74. The above methods are fully applicable for the AF.

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1 Resources

- 75. PMU is the implementing agency, under the Vinh Long PPC, and directly manages the project implementation. The Environmental and Social Specialists within the PMU have overall responsibility on preparation and implementation of the relevant safeguard instruments, including the SEP, and ensuring continuous community outreach and consultation, monitoring and evaluating program implementation and impacts, developing and managing the grievance redress mechanism (GRM) and reporting results to various stakeholders. Other specialists and officers in the PMU will support the Environmental and Social Specialists in stakeholder engagement activities.
- 76. The PMU shall be responsible for the implementation of the Project SEP. Its main tasks are:
 - (i) Preparation of the SEP to submit to the PPC for approval;
 - (ii) Preparation of quarterly reports on social and environmental activities to the World Bank.
- 77. Regarding GRM implementation, the PMU will be assisted by the C/DLFDC and the City/District Inspectorates. A focal person will be identified within the CLFDC or the city inspectorate to answer to questions regarding the GRM. The contact information of the PMUs and other key persons is as follows:

PMU Focal person for **Contact** PMU social **PMU Director** environmental information **GRM/** specialist specialist Nguyễn Hồng Trung Name Lê Thanh Sơn Nguyễn Hồng Trung Vũ Hồng Ngọc Address 1A18 Luu Văn Liêt, Ward 2, Vĩnh Long City, Vĩnh Long province hongtrung200801@ Vuhongngoc078 hongtrung200801@ Email lethanhsonubtp@gmai address yahoo.com.vn @gmail.com yahoo.com.vn 1.com Phone 0913 763 696 0913 105 886 0963 721 615 0913 105 886 number

Table 11: Contact information of key persons

- 78. **The construction supervision consultant (CSC)**. The PMU will be supported by a contracted engineering and supervision consultant who will be responsible for monitoring the contractors of the civil works as well as monitoring adherence to the safeguard instruments including the SEP.
- 79. **Contractor**. The contractor will assign an Environmental, Social, Health and Safety (ESHS) officer, who will be responsible for the implementation of environmental and social requirements at construction sites. The ESHS officer will also maintain regular contact with affected communities at

the site and assist in community awareness-raising and addressing their grievances.

80. **Budgetary resources for stakeholder engagement**. Adequate budget for stakeholder engagement will be allocated from the overall project cost, which will include cost for organizing meetings, workshops and training, hiring of staff, field visits to subproject locations, translation and printing of relevant materials and operating GRMs. The cost for environmental and social mitigation measures at construction sites will be integrated into the construction costs and will be borne by the contractors.

5.2 Management Functions and Responsibilities

- 81. The Stakeholder Engagement activities will form part of the Environmental and Social Commitment Plan (ESCP). This is a tool which will commit stakeholders to ensure that the planned activities are implemented and will form part of project approval documents which will be monitored by the World Bank. The monitoring and evaluation framework for the project will also have indicators on the ESCP whose implementation progress will be tracked and reported accordingly. ESCP implementation progress report will be periodically produced and shared with stakeholders for review, deliberation and action.
- 82. Stakeholder engagement activities at community level will mostly be done by PMU E&S team who will be supported by the relevant departments at city/province level. Overall management responsibility for implementing the SEP will rest with the Director of the PMU.

5.3 Estimated Budget

- 83. A tentative budget for implementing the stakeholder engagement plan over the project cycle is reflected in Table 12. The stakeholder engagement activities featured above cover a variety of issues, which may be part of other project documents, so it is possible that they have also been budgeted in other plans. However, the table summarizes all the stakeholder engagement activities in one place for better coordination and monitoring. The PMU will review this plan every six months to determine if any changes to stakeholder classification or engagement are required. If so, the plan will be updated, and a new revision distributed. The budget will be revised accordingly. Total roughly estimated cost for SEP implementation is **VND979,000,000** (equal to USD42,000).
- 84. The AF will be using resources and responsibilities for implementing stakeholder engagement activities same as the parent project.

Table 12: Estimated budget for SEP

| No. | Stakeholder Engegament Activities | Quantity | Unit cost (VND per year) | Number of year | Total cost (VND) |
|-----|--|-----------|--------------------------------|-------------------|---------------------|
| 1 | Staffing (3 per*5yr*VND1.5mil/month) | 3 pers | 18,000,000 | 5 | 540,000,000 |
| 2 | Training course (2 course*3yr) | 6 courses | 20,000,000 | 3 | 120,000,000 |
| 3 | Communication materials | 5 yrs | 10,000,000 | 5 | 50,000,000 |
| 4 | Travel expenses (3 pers*5yr*VND1mil/month) | | 12,000,000 | 5 | 180,000,000 |
| | Sub-total | | | | 890,000,000 |
| 5 | Contigency (10%) | | | | 89,000,000 |
| | TOTAL | | | | 979,000,000 |

6. GRIEVANCE REDRESS MECHANISM

6.1 Objectives of the GRM

85. The objective of the project Grievance Redress Mechanism (GRM) is to provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow PMU to respond to and manage grievances filed by affected people and other parties. Grievances may emerge from directed and indirect activities related to components 1, 2 and 3 civil work activities. Grievance may arise among affected households and communities on variety of issues regarding land acquisition and resettlement (i.e. compensation rates, land use origin, and eligibility to resettlement allocation) or related to construction (dust noise, vibrations, water/soil contamination, etc.,). Workers' related grievances mechanisms are addressed in the project's Labour Management Procedure (LMP) and Resettlement related grievance shall be addressed in accordance with Chapter VII of the Resettlement Policy Framework (RPF) and ESIA.

86. GRM is established during the project effectiveness. The main goals of GRM are ensuring the receipt and timely redress of grievances and concerns submitted by the aggrieved project affected persons and resolve complaints at the project level and prevent escalation to the courts or World Bank Accountability Mechanism. The GRM will be established to allow affected persons appealing any disagreeable decision, practice or activity arising from land or other assets compensation or arising from project construction. PAPs will be fully informed of their rights and of the procedures for addressing complaints whether verbally or in writing during consultation, survey, training and time of compensation. The GRM shall not impede access to the country's judicial or administrative remedies. Affected persons can approach a court of law at any time and independent of the project level grievance redress process. Along with the World Bank requirements on development and approval of grievance redress mechanism by implementation of investment projects, grievance redress procedures in Vietnam is also regulated by the national legislation, in particular by the Law on Complaints (2011) and the Law on Denunciation (2018).

- 87. While handling grievances, the PMU shall establish GRMs as part of the accessible and inclusive means to raise issues and grievances and to and manage grievances filed by affected people and other parties². The PMU shall appoint a GRM focal point to collaborate with local authorities in handling the grievances. The design of the GRM shall take into consideration the views of affected communities expressed during the resettlement planning process. The PMU shall be required to disclose and explain to affected persons and communities and, to interested other stakeholders the procedure for complaints filing as early as possible and on a regular basis throughout the project cycle. The grievance mechanism shall be available at no cost, and it is important that it be easily accessible, with special attention paid to accessibility for disadvantaged and vulnerable individuals or groups.
- 88. The PMU will ensure that the following grievance procedure is accessible, adequately registered and tracked, and resolution is affirmed within one month of registration. The PMU and relevant agencies will:
 - o Record, categorize and prioritize the grievances;
 - Settle the grievances via consultation with all stakeholders (and inform those stakeholders of the solutions) through the below process.

6.2 Project Grievance Redress Mechanism

- 89. Complaints relating to any subproject's problems will be solved through negotiations to achieve the consensus. A complaint will go through three stages before it can be transferred to the court. The enforcement unit will pay all administrative and legal fees relating to the acceptance of complaints. This cost is included in the project budget. Complaint procedures and resolution will be performed as follows:
 - (1) The first level Ward/Commune People's Committee (W/CPC). An affected household is to take his/her complaint to any member of the People's Committee of the ward/commune, through the village/cluster head or directly to W/CPC, in written or oral form. The said member(s) of the W/CPC or the village head will inform the W/CPC on the complaint. The W/CPC will work directly in person with the said affected household and will decide on the settlement of the complaint within 5 working days after receiving such complaint. The secretariat of the W/CPC is responsible for documenting and recording all the complaints that it is handling. Once the W/CPC issues its settlement decision, the household can make an appeal within 30 working days. In case a second decision has been issued but the said household is still not satisfied with such decision, the household can appeal to the City/District People's Committee.
 - (2) The second level City/District People's Committee (City/DPC). Upon receiving a complaint from a household, the City/DPC will have 15 working days to resolve the case. The City/DPC is responsible for filing and storing documents on all complaints that it handles. When the City/DPC has issued a decision, the household can make an appeal within 30 working days. In case a second decision has been issued and the household is still not satisfied with such a decision, they can appeal to the Provincial People's Committee (PPC).
 - (3) **The third level Provincial People's Committee (PPC)**. Upon receiving a complaint from the household, the PPC will have 30 working days to resolve the case. The PPC is responsible

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² See paragraph 21 and ESS10

- for filing and storing documents for all complaints to be submitted. After the PPC has issued a decision, the household can appeal within 45 working days. In case a second decision has been issued and the household is still not satisfied with such decision, they can appeal to the people's court within 45 working days. The PPC will then have to pay the compensation into an account.
- (4) The forth level District/Provincial People's Court. In case a complainant brings his/her case to district/provincial people's court and the court rules in favour of the complainant. The decision ruling the settlement of complaints will have to be sent to complainants and concerned parties and shall be publicly posted at the headquarters of the People's Committee of the relevant level. The complainant will receive such ruling three days after the result of complaint resolution at the ward/commune level has been decided upon and 7 working days at the district or provincial level.
- 90. **Personnel**: The environment and resettlement staff (safeguard staff) assigned by the PMU will design and maintain a database of the project-related complaints from affected households, including information such as: the nature of the complaint, the source and date of receipt of the complaint, the name and address of the complainant, action plan, and current status. For oral complaints, the receiving/mediator board will record these requests in a complaint form at the first meeting with the affected person. This staff will be able to contact directly with affected people and guide them through the official channels. A deputy director of the PMU shall be assigned to be GRM focal point. The GRM focal point will play the essential and coordination role among respective administrative levels for handling the complaints in a timely and satisfactorily manner.
- 91. Contractor and Construction Supervision Consultant (CSC): During construction, the GRM will also be managed by the contractors under supervision of the CSC. The contractors will inform the affected communities and communes about the GRM availability to handle complaints and concerns about the project. This will be done via the community consultation and information disclosure process under which the contractors will communicate with the affected communities and interested authorities on a regular basis. Meetings will be held at least quarterly, monthly information brochures will be published, announcements will be placed in local media, and notices of upcoming planned activities will be posted, etc. All contractors and CSCs will also appoint grievance focal persons to catch and solve the problem timely.
- 92. All complaints and corresponding actions undertaken by the contractors will be recorded in project safeguard monitoring reports. Complaints and claims for damages could be lodged as follows:
 - Verbally: direct to the CSC and/ or the contractors' safeguard staff or representatives at the site offices;
 - In writing: by hand-delivering or posting a written complaint to specified addresses;
 - O By telephone, fax, e-mails: to the CSC, the contractors' safeguard staff or representatives.
- 93. Upon receipt of a complaint, the CSC, the contractors' safeguard staff or representatives will register the complaint in a complaint file and maintain a log of events pertaining to it thereafter, until it is resolved. Immediately after receipt, four copies of the complaint will be prepared. The original will be kept in the file, one copy will be used by the contractor's safeguard staff, one copy will be forwarded to the CSC, and the fourth copy to the PPMU within 24 hours since receipt of the complaint. Information to be recorded in the complaint log will consist of:

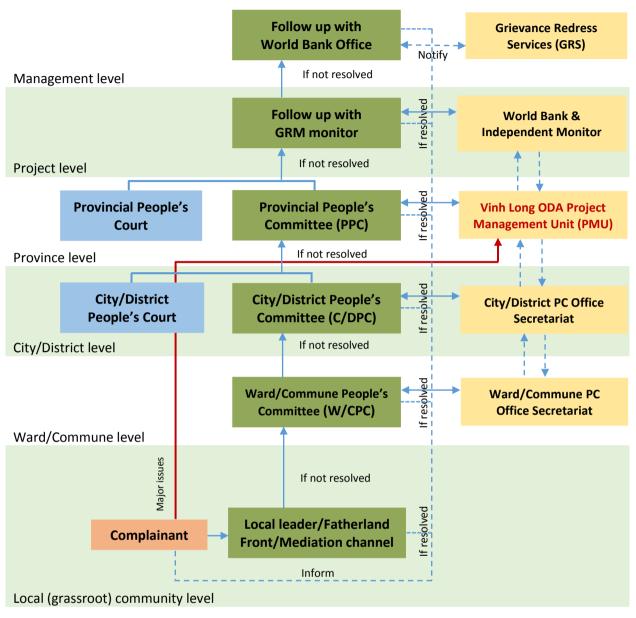
- The date and time of the complaint;
- o The name, address and contact details of the complainant;
- A short description of the complaint;
- Actions taken to address the complaint, including contact persons and findings at each step in the complaint redress process;
- o The dates and times for the purpose of contact during the redress process;
- The final resolution of the complaint;
- o The date, time and manner in which the complainant was informed thereof;
- o The complainant's signature when resolution has been obtained.
- 94. Minor complaints will be dealt with within one week. Within two weeks (and weekly thereafter), a written reply will be delivered to the complainant (by hand, post, fax, e-mails) indicating the procedures taken and progress to date.
- 95. The main objective will be to resolve an issue as quickly as possible by the simplest means, involving as few people as possible, and at the lowest possible level. Only when an issue cannot be resolved at the simplest level and/ or within 15 days, will other authorities be involved. Such a situation may arise, for example, when damages are claimed, the to-be-paid amount cannot be resolved, or damage causes are determined.
- 96. **Grievances related to Gender Based Violence (GBV).** To avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal, the GRM shall have a different and sensitive approach to GBV related cases. Where such a case is reported to the GRM, it should immediately be referred to the appropriate service providers, such as medical and psychological support, emergency accommodation, and any other necessary services. It should also be reported to the safeguard staff of the PMU who can advise on relevant service providers. Data on GBV cases should not be collected through the GRM unless operators have been trained on the empathetic, non-judgmental and confidential collection of these complaints. Only the nature of the complaint (what the complainant says in her/his own words) and additional demographic data, such as age and gender, can be collected as usual.
- 97. **Publicizing the GRM**. The PMU will be in charge of publicizing the GRM. PMU should ensure that GRM is explained during public meetings. PMU should also ensure that leaflets on GRM are distributed during public meetings and made available at ward/commune levels with contact numbers of the focal person for the GRM. Posters will be also be posted at ward/commune levels.
- 98. **Independent monitoring consultants (environmental, social and resettlement)**, will be selected by PMU through bidding. Independent monitoring consultants are responsible for checking the procedures and decisions on settling complaints. Independent monitoring consultants may propose additional measures to address any outstanding complaints. While checking the procedure for complaint resolution and reviewing the decision on complaint resolution, the independent monitoring agencies are required to closely coordinate with the Vietnam Fatherland Front, whose members are responsible for monitoring law enforcement of local complaints.
- 99. The following procedures shall be followed while filing and processing complaints through the above described GRM structures:

- O Grievance Register Book: A grievance register book shall be opened and kept in the office of resident engineer. All grievances shall be registered when and upon the receipt of complaints from the aggrieved. The book shall have: i) case reference number, ii) the aggrieved name, iii) the date the case is received, iv) the date the case is resolved and, v) a remarks column;
- Responsibility for Registering Complains: the resident focal point in the project area shall register in the Grievance Register Book all written complaints received;
- Case Receipt: Within 24 hours of receiving complaints, the monitoring consultant shall issue a letter to the aggrieved acknowledging receipt of the case and providing a date when the case will be reviewed as well as the venue;
- Public Access to the book: The book shall be accessible to the public;
- o GBV grievances will not be documented in the public accessible book. However, a GBV action plan will be prepared to manage related risks. The all-level women's unions will be engaged for awareness raising and ensure a system that capture GBV/SEA and HIV/AIDS related issues will be developed;
- o PAPs: All PAPs who have issues with their compensation and assistances are required to submit written complaints to the appropriate level of GRMs;
- o Mediation meetings and outcomes will be recorded and kept by the GRM person-in-charge.

6.3 World Bank Grievance Redress Service

- 100. Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanism or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaints to the World Bank's independent Inspection Panel which determines whether harms occurred, or could occur, as a result of WB non-compliance with its policies and procedures.
- 101. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit www.worldbank.org/grs. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

THE GRIEVANCE PROCESS CHART



102. The GRM for the parent project is fully applicable for the AF.

7. MONITORING AND REPORTING

- 103. This SEP will be periodically revised and updated as necessary in the course of off-grid solutions project implementations in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP.
- 104. Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective actions will be collated by responsible staff and referred to the senior management of the project. The monthly summaries will

provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and satisfactorily manner.

7.1 Involvement of Stakeholders in Monitoring Activities

- 105. **Monitoring Indicators**. The PMU will monitor the project implementation to assess progress on indicators to be defined in the results framework, such as roads/canal/sewage system rehabilitated/built; beneficiary satisfaction on such roads/canals/sewage systems; employment creation through the civil work; and functional maintenance systems. More specific monitoring indicators on environmental and social issues, such as noise levels, air quality, water quality, soil erosion, traffic and other occupational or community accidents and social issues including gender impact will be proposed in the ESMP. The functioning of the GRM will be also closely monitored.
- 106. **Internal Monitoring**. The PMU will prepare data on activities and output in regular monthly and quarterly reports based on input from the supervision consultant and the contractor. To the extent possible, the monitoring and evaluation process will be participatory, engaging community members benefiting from the infrastructure investments. A baseline survey and end-line beneficiary survey will be carried out to measure who and to what extent people benefit from the infrastructure as well as how it affects their lives in both social and economic terms. The M&E system will target the documentation of case studies capturing the impact of the project on communities, taking into account gender, impacts on vulnerable or marginalized groups and host communities.
- 107. **Independent E&S monitoring consultants.** An independent consultant will be hired by the PMU to monitor the implementation of E&S instruments. The overall objective of independent monitoring is to provide a periodic independent evaluation of the results of implementing the environmental and social risk/impact management objectives, such as the changes in living standards and employment, income rehabilitation and the social basis of those affected, effectiveness, impacts and sustainability of entitlements, the need for additional measures to minimize the damage (if any). The agency will be responsible for carrying out environmental sampling, monitoring and marking report during subproject implementation. The implementation of the independent monitoring mission should be based on the terms of reference approved by World Bank. The independent monitoring agency will begin its work as soon as the project implementation begins. Monitoring report will be periodically submitted to the PMU and the World Bank (respectively every 03 months for PMU and every 6 months for WB in construction phase). The agency will also supply specialized assistance to PMU and E&S matters.

7.2 Reporting Back to Stakeholders

- 108. The project performance assessed through monitoring activities will be reported back to stakeholders during the operation and maintenance phase, such as through disclosure of monitoring outcome and engagement local community. The lessons learned through the monitoring will also contribute to the design of future subprojects and be shared with their stakeholders.
- 109. Monitoring and evaluation of the stakeholder process is considered vital to ensure the project is able to respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. Adherence to the following characteristics/commitments/activities will assist in achieving successful engagement:
 - Sufficient resources to undertake the engagement;
 - o Inclusivity (inclusion of key groups) of interactions with stakeholders;

- o Promotion of stakeholder involvement;
- Sense of trust shown by all stakeholders;
- o Clearly defined approaches; and
- o Transparency in all activities.
- 110. Monitoring of the stakeholder engagement process allows the efficacy of the process to be evaluated. Specifically, by identifying key performance indicators that reflect the objectives of the SEP and the specific actions and timings, it is possible to both monitor and evaluate the process undertaken. Two distinct but related monitoring activities in terms of timing will be implemented:
 - O During the engagement activities: short-term monitoring to allow for adjustments/improvements to be made during engagement; and
 - o Following completion of all engagement activities: review of outputs at the end of engagement to evaluate the effectiveness of the SEP as implemented.
- 111. The monitoring and reporting for the parent project is fully applicable for the AF.

ANNEXES

Annex 1. Summary of Stakeholder Consultations Meeting

1. Ward 8- Vinh Long city

- It is expected that Mekong Delta will be totally flooded in the next 50 years; So, is there any subproject work for the flooding prevention or control?
- The invested roads that will be expanded 30m must connect to the main road to ensure the synchronous structure (the NH has a width of under 30m, thus, expansion of inner urban road is not suitable).
- Wastewater treatment in previous resettlement areas has been poor. Therefore, the subproject's resettlement areas must pay special attention to wastewater collection and treatment.
- The compensation must be specifically planned, the compensation rate must be equivalent to the market price.
- It should prepare a livelihood restoration program for displaced people; affected people must use the compensation amount reasonably, and carry out sound economic development to ensure better and more stable living conditions.
- The lessons from former projects that compensation for land and trees of affected households is not satisfactory, leading to delay of site hand over. Therefore, the subproject should prepare a good compensation policy framework.
- Waste collection system is required because the waste collection system in some areas is overloaded.

2. Ward 9- Vinh Long city

- Climate change is posing flooding situation of the city; will the subproject propose remedies for flood control toward 2026?
- The construction activities will directly affect land and houses of local people, it should develop a suitable compensation plan, the compensation rate must be equivalent to the market price.
- Livelihood restoration program, job creation services for displaced households must be delivered.
- Support the subproject implementation because it is beneficial to the country, the city and local residents.
- The subproject must be implemented in line with the set forth schedule and with notification to local authorities and local people.
- It should work closely with authorities and agencies to ensure the smooth site clearance, avoiding the subproject delays due to minor problems.
- The compensation rate must be based on the market price (the rate proposed by the officials without agreement of local people is not allowed)
- Traditionally, conditions of resettlement areas have been inequal or poorer than previous shelter of displaced. Most of new resettlement areas are unsatisfactory. The subproject should take full consideration in resettlement area so that displaced people can have a stable and better life, avoid claims and complaints related to site clearance and compensation.

3. Ward 5 - Vinh Long City

- When construct embankments on both river sides as well as some canals, more bridges should be built for convenient travel.
- The cable-stayed bridge section between Ward 1 and Ward 5 needs to be equipped with more connecting walls for better synchronization.

- Local authorities and people should be enabled to participate throughout project planning, design and construction, and supervision also.
- If embankment is constructed, more travelling paths along the embankment are recommended
- Rebuilt the cable-stayed bridge between Vinh Long City and Ward 5
- Drainage system must be taken into account during the construction of canals to avoid flooding.
- Compensation clearance must be performed well and satisfy the people's expectation.
- People and localities must participate in monitoring all project implementation process until the project is completed.

4. Tan Ngai Commune - Vinh Long City

- The locality agreed with the project implementation
- Prior to the project implementation, it is necessary to develop infrastructure of the resettlement area to ensure living conditions for relocated households.
- The construction process must ensure environmental sanitation and fresh air in the surrounding.
- Construction of work items should pay attention to the drainage system to avoid affecting nearby residential areas.
- Proposed road to be constructed will pass some local agricultural production groups, therefore, there should be appropriate measures to mitigate negative impacts on local agricultural production.

5. Ward 4 - Vinh Long City

- The construction must be in line with the disclosed schedule as well as the project must be completed as scheduled.
- Experiences from previous projects implemented in the locality show that resettlement areas are not in good conditions, so more attention should be paid to the quality of resettlement areas.
- There should be programs to improve livelihoods, create jobs for local people, especially relocated households of the project.
- Project information must be updated regularly for local authorities as well as local people.

Annex 2. Consultation undertaken for the ESIA/ESMP/RPF/LMP/ESCP

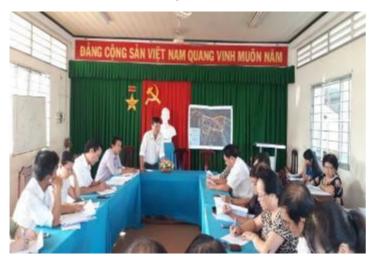
| Time | Location | Participants | Contents |
|--|--------------------------------------|--|--|
| January 08, 2020 9:00 – 10:30am | Vinh Long City People's Committee | E&S consultants. PMU representatives. Representatives of Vinh Long City Mass organizations and departments. Representatives of Long Ho District. Representatives of Center for Land Fund Development. Chairman/Vice Chairman of PCs of Ward 1,2,3,4,5,8,9 and Tan Hoa and Tan Ngai Communes of Vinh Long City and Thanh Duc, Long Phuoc, Phuoc Hau and Tan Hanh Communes of Long Ho district. | Introduction of overall information about the project: type/scope, locations, funding source, implementation arrangement/schedule. E&S documents to be developed. Activities needed to be implemented to support the development of safeguard policy reports. Agreement on consultation and survey plans in wards and communes. |
| January 10, 2020 8:00 – 10:30am | War 1 PC – Vinh Long City | E&S consultants.PMU representatives. | • Introduce information about |
| January 15, 2020 14:00 – 16:00pm | War 2 PC – Vinh Long City | Representative of commune/ward PCs. Representatives of local branches, mass organizations: Women's Union, Fatherland Front, Veterans Association, Youth Union, Land Administration Officer. All hamlets/heads of residential groups in communes/wards. the project: funding sou implementatione. Introduce the purpose and requirement social environment safeguard rethe request donor. | funding source, implementation |
| January 10, 2020 8h-10h30 | UBND. P3 – Vinh Long City | | • Introduce the purpose and |
| January 15, 2020 14:00 – 16:00 pm | War 4 PC – Vinh Long City | | social environmental |
| January 13/01/2020 8:00- 10:30am | War 8 PC – Vinh Long City | | • Consultation on |
| January 13, 2020 | War 9 PC – Vinh Long City | affected households and beneficiaries in the | Resettlement Policy Framework: local |

| Time | Location | Participants | Contents |
|--------------------------------------|---|----------------------------|--|
| 14:00 – 16:00 pm | | project area (15 | compensation and |
| January 14, 2020 8:00 - 10:30am | War 5 PC – Vinh Long City | households/commune, ward). | support policy.Consultation on the participation of |
| January 14, 2020 14:00 – 16:00 pm | People's Committee of Tan Hoa Commune - Vinh Long City | | stakeholders during the phases of the project. • Consultation on |
| January 15, 2020 8:00 - 10:30am | People's Committee of Tan Ngai Commune - Vinh Long City | | environmental and social impacts during project |
| January 15, 2020 14:00 – 16:00 pm | People's Committee of Thanh Duc commune, Long Ho district | | implementationSocio-economic surveys and investigation of a |
| January 16, 2020 8:00 - 10:30am | Long Phuoc Commune People's Committee, Long Ho district | | number of households in the area; |
| January 16, 2020 14:00 – 16:00 pm | People's Committee of Phuoc Hau commune, Long Ho district | | • In-depth interview: Leaders and some key officials. |
| January 17, 2020 8:00 - 10:30am | People's Committee of Tan Hanh commune, Long Ho district | | |

Annex 3. Some pictures during the public consultation meetings



Meeting in Ward 1



Meeting in Ward 3



Meeting in Ward 2



Meeting in Ward 4



Meeting in Ward 5



Meeting in Ward 9



Meeting in Ward 8



Meeting in Vinh Long city

Annex 4. Meeting minutes of the public consultation meetings

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| Tên dự án: Dự án Phát triển đô thành phố Vĩnh Long | thị và tăng cường khả năng thích ứng biến đổi khí hật |
| Thời gian họp: ngày tháng nã Địa chỉ nơi họp: Trư số [| IBAD phiong 3 - IT Vinh Long |
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| - Ông/Bà | Chức vụ |
| - Ông/Bà | Chức vụ |
| 1.4. Đại diện các hộ gia đình BAH b | ời dự án |
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| - ông/Bà Lê Ngo.c | |
| 2. Nội dung làm việc: | |
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Dự án Phát triển đô thị và tăng cường khả năng thích ứng biến đối khí hậu thành phố Vĩnh Long

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| ✓ Nội dung khung chính sách liên quan đến vấn đề t | bồi thường, hỗ trợ và giải phóng mặt |
| bằng, tái định cư của Chính phủ và Nhà tài trợ | |
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| Thời gian họp: ngày tháng năm Địa chỉ nơi họp: UBND phương | |
| 1. Thành phần tham dự: (Danh sách chi tiết đính kèm th | |
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| Cuộc họp kết thúc vào hồigiờ cùng | |
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| ĐẠI DIỆN BQLDA (Ký, ghi họ tên) | ĐẠI DIỆN CHÍNH QUYỀN ĐỊA PHƯƠNG (Ký, ghi họ tên) |
| | CHŮ TICH |
| | Nguyễn Hồng Thanh |
| ĐẠI DIỆN ĐƠN VỊ TƯ VẪN (Ký, ghi họ tên) | ĐẠI DIỆN CỘNG ĐÔNG DÂN CƯ (Ký, ghi họ tên) |
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Đự án. Phật triển đô thị và tang cường khá năng thích ứng biến đổi khí hậu thành phố Vĩnh Long

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thư ám: Phát triện đô thị và tang cường khá năng thích ứng biến đổi khí hậu thành phố Vĩnh Long

| TI_ | Ouc Họ và tên | Địa chỉ | Chữ ký |
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CỘNG HÒA XÃ HỘI CHỦ NGHĨA VIỆT NAM Độc lập - Tự do - Hạnh phúc

| V/v: Dark giá tạc tạg một tạ | M VÁN vống xã Liệi |
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| Tên dự án: Dự án Phát triển đô thị và tăng cường l thành phố Vĩnh Long | khả năng thích ứng biến đổi khí hậu |
| Thời gian họp: ngày tháng năm | |
| Dia chi noi hop: UB. N.D. pluring 1 , TP. Vi | the Long, trob Vivib Long |
| 1. Thành phần tham dự: (Danh sách chi tiết định kèm ti | heo) |
| 1.1. Đại diện chính quyển địa phương | |
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| - Ong/Ba Dudig Quốc Lường | Chirc vu Công chưa tia chính phường |
| 1.2. Đại diện Ban QLDA. | 0 . , 1 |
| - Ông/Bà | Chức vụ |
| - Óng/Bà | Chức vụ |
| 1.3. Đại diện đơn vị Tư vấn: | |
| - Ông/Bà | Chức vụ |
| - Óng/Bà | Chức vụ |
| 1.4. Đại diện các hộ gia đình BAH bởi dự án | |
| - Ong/Ba Ngô khi Ny Phường | Dia chi Turky Schoon Nguyễn Du |
| - Ong/Ba Nguyão VXv Dung | Dia chi Turky Schoon Nguyễn Du Dia chi Turky Llura Hury Pao Vường |
| 2. Női dung làm việc: | |
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| ĐẠI DIỆN BQLDA (Ký, ghi họ tên) | ĐẠI DIỆN CHÍNH QUYỀN ĐỊA PHƯƠN (Ký, ghi họ tên) |
| ĐẠI DIỆN BQLDA (Ký, ghi họ tên) | ĐẠI DIỆN CHÍNH QUYỀN ĐỊA PHƯƠN (Kỷ, ghi họ tên) |
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| ĐẠI ĐIỆN BQLĐA (Ký, ghi họ tên) ĐẠI ĐIỆN ĐƠN VỊ TƯ VẪN (Ký, ghi họ tên) | Prán Văn Nghị DẠI DIỆN CỘNG ĐÔNG DÂN CƯ (Ký, ghi họ tên) |
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| (Ký, ghi họ tên) ĐẠI ĐIỆN ĐƠN VỊ TƯ VẪN | Prán Văn Nghị DẠI DIỆN CỘNG ĐÔNG DÂN CƯ (Ký, ghi họ tên) |

Dự án: Phát triển đô thị và tang cường khả năng thích ứng biến đổi khí hậu thành phố Vĩnh Long

| TT | Họ và tên | Địa chi | Chữ ký |
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Dự án: Phát triển đô thị và tang cường khả năng thích ứng biến đổi khí hậu thành phố Vĩnh Long

| TT | Họ và tên | Địa chỉ | Chữ ký |
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