



# Concept Environmental and Social Review Summary

## Concept Stage

### **(ESRS Concept Stage)**

Date Prepared/Updated: 10/10/2019 | Report No: ESRSC00857



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Vietnam	EAST ASIA AND PACIFIC	P171030	
Project Name	Reducing Income- and Health-Related Vulnerability of Older Persons in Vietnam		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Health, Nutrition & Population	Investment Project Financing		1/20/2020
Borrower(s)	Implementing Agency(ies)		
HelpAge International	HelpAge International		

Proposed Development Objective(s)

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>2.75</b>

**B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?**

No

**C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]**

**D. Environmental and Social Overview**

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]  
The project will be implemented in around 180 communes in six provinces, clustered within three regions and with variation in socio-economic and aging profiles. They are Hoa Binh (elder-child ratio of 37.3) and Thanh Hoa (57.4) in the North, Quang Binh (50.3) and Da Nang (38.5) in the central coast, Khanh Hoa (42.9%) and Ninh Thuan (30.9%) in the South Central coast.



Thanh Hoa is located in the North Central region, with the area of 11,133.4 km<sup>2</sup>, 3.5 million population, the per capital GDP of 1,705 USD. The main income sources are agriculture, forestry and fishery (4.2%); industry and construction (42.4%); services (39.3%). Thanh Hoa has long coast, large farming land, large track of mountainous districts. Ethnic Minority population make up 18.6%. Thanh Hoa has 635 communes, 100% of which have a commune health station (CHS). Of 635 CHSs, 60% meet the national benchmarks, 74% have a physician, 90% have a midwife or obstetric assistant.

Hòa Bình is mountainous province in the Northwest region, with the area of 4,662.5 km<sup>2</sup>, 976,699 population, the per capital GDP of 1,002 USD. The main income sources are agriculture, forestry and fishery; industry and Construction; services; Ethnic Minority population make up 69.4%. Hoa Binh has 210 communes, 100% of which have a CHS. Of 210 CHSs, 41% meet the national benchmarks, 79% have a physician, 83% have a midwife or obstetric assistant.

Quang Binh is located in the North-central region, with the area of 8,000 km<sup>2</sup>, 882.505 population, the per capital GDP of 1,287 USD. Ethnic Minority population make up 2.7%. The main income sources are agriculture, forestry and fishery: 18.79%; industry and Construction: 26.75%; services: 54.46%. Quang Binh has 159 communes, 100% of which have a CHS. Of 159 CHSs, 82% meet the national benchmarks, 98% have a physician and 100% have a midwife or obstetric assistant.

Da Nang is is the center of politics and socio-economic of the Central and Highlands, with the area of 1,284.7 km<sup>2</sup> and 1.05 million population. Ethnic Minority population make up less than 0.5% of the population.. Da Nang has 56 communes, 100% of which have a CHS that meet the national benchmarks and have a physician.

Khanh Hoa is a coastal province in the south central, with the area of 5,217.6 km<sup>2</sup>, 1,3 million population, the per capital GDP of 1,495 USD. The province makes up of the mainland area and over 200 islands, archipelagoes. Ethnic Minority population make up 5.7%. The main income sources are: agriculture, forestry and fishery (9.81%); Industry and Construction (31.06%); Services (47.4%) and product taxes (11.73%). Khanh Hoa has 140 communes, 98% of which have a CHS. Of 140 CHSs, 86% meet the national benchmarks, 91% have a physician, 95% have a midwife or obstetric assistant.

Ninh Thuan is a coastal province in the south central, with the area of 3,355.2 km<sup>2</sup>, 601,400 population, the per capital GDP of 1,210 USD. Ethnic Minority population make up 23.1%.; The main income sources are: Agriculture, forestry and fishery (35.77%); Industry and Construction (20.28%); services (38.08%). Ninh Thuan has 65 communes, 100% of which have a CHS. Of 65 CHSs, 72% meet the national benchmarks, 49% have a physician, 95% have a midwife or obstetric assistant.

Most beneficiaries of the project are expected to fall within the age group of 60 to 80, with the proposed ISHC model focused on vulnerable older persons who are in income-based poverty, without proper family support, facing severe illness and disability, or from ethnic minority groups. Some of the project provinces have a high proportion of ethnic minority populations, such as Hoa Binh, Thanh Hoa, and Ninh Thuan. As the proposed ISHC model is designed to focus on vulnerable older persons, it is likely that the project activities will take place in some poor communes with high rates of the elderly population in these provinces belonging to an ethnic minority group, although the names of the project communes remain unknown at this stage.

#### D. 2. Borrower's Institutional Capacity



This project, financed exclusively by the Japan Social Development Fund, will be implemented by the HelpAge International in partnership with Association of the Elderly (AE) both at National and local levels, and in close cooperation with the Department of Health and Department of Labor, Invalids and Social Affairs (DOLISA) and local authorities. HelpAge International has not prepared and implemented a World Bank financed project in Vietnam, even though the NGO has sufficient capacity to manage projects funded by other international donors. Six provincial authorities have been involved in the implementation of World Bank financed projects, and have experience managing environmental and social risks under the Bank’s safeguards policies. However, none of the project implementing agencies has experience in preparation and implementation of a World Bank financed project under the new Environmental and Social Framework (ESF). They are not familiar with the concept of proportionality and adaptive management of the ESF, and Environmental and Social Standards (ESSs). The communities which will directly implement the project interventions and mitigation measures are expected to have variable capacity, and in some cases implementation capacity may be quite weak. This will be further assessed during project preparation, and supportive measures including training and technical support to the local communities by HelpAge and local partners will be put in place. Overall, the institutional capacity for ESF implementation of the implementing agencies will need to be strengthened. The task team expects a significant increase in their demand for continuous support in environmental and social risk management during preparation and implementation, and anticipates that this will require additional resources and may affect the preparation time.

**II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS**

**A. Environmental and Social Risk Classification (ESRC)**

Moderate

**Environmental Risk Rating**

Moderate

The project is expected to bring about significant positive impacts by reducing income- and health-related vulnerabilities of older persons, thus meeting their basic needs and allowing them to remain independent and active and able to support themselves later in life. The project will not generate any substantial risk or adverse environmental impact on the environment. The main adverse environmental risks and impacts would be expected from the livelihoods program would be likely temporary, reversible, low - to moderate in magnitude and site-specific given the nature and scale of the investment, and the health status of the benefited old people. The civil works would not involve construction and building of new infrastructure but would focus on rehabilitation of small assets, which are developed by small age-friendly and pro-poor income-generating enterprises. Since the revolving fund by each beneficiary (who borrows ISHC’s fund for income generating activity (IGA)) is very small (250 USD), most of this revolving funding would be used to purchase IGA assets (animal, feeds, plants or seeds) and or tools. In some cases, they might use the revolving fund to improve or built animal husbandry pen, shed, cage or expand or dig deeper fishponds. In each ISHC, there will be around 20-30 members having these assets. Health promotion activities can improve the access to health check-up and low-cost home-based health services, however, these services by their nature will not deploy any invasive procedure and will not increase hazardous waste significantly. Exposing to age-unfriendly jobs under the livelihoods program and unqualified health workers under the health promotion program can raise a concern about the safety of older people. Social care activities themselves do not have adverse environmental impacts. Therefore, project is classified as Moderate risk from an environmental perspective based on the nature of the proposed activities and associated environmental risks, and the capacity of the client in the application of Bank's ESF and relevant Standards.

Public Disclosure



**Social Risk Rating**

Moderate

Despite the positive impacts that the project may bring to elderly beneficiaries, there may be some implementation risks. In particular, under the livelihood program for needy ISHC members, there is a risk that the older persons may not be able to pay back their loans to the revolving fund if they fail to generate incomes through the project's livelihood activities for various reasons, which may undermine their self-esteem and self-confidence and add to their socio-economic vulnerability. For activities focused on the health of older persons, there may be risks of failure to familiarize older persons from remote rural areas and from ethnic minority groups with the proposed health promotion models given their cultural differences. For activities focused on personal care, it is concerning that it may be impossible to mobilize enough volunteers who can work on a part-time and unpaid basis to meet the increasing demand for basic personal care from older persons. Also, this approach may result in weak commitment and poor services provided by volunteers to the project's beneficiaries. On a basis of the nature of these implementation risks and the client's capacity in the application of the relevant standards from the Bank's ESF, the project's social risk is classified as Moderate.

**B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered**

**B.1. General Assessment**

**ESS1 Assessment and Management of Environmental and Social Risks and Impacts**

***Overview of the relevance of the Standard for the Project:***

The adverse impacts would be expected from implementation of the activities under the project livelihoods generation program. Operated as a revolving fund, a member of the ISHCs can get capital to start livelihoods activities (e.g. small-scale agriculture, animal husbandry, handicrafts, or small business) to provide much needed income in old age. These activities, although small, may have moderate health risks for the old people given their vulnerable health status at the old age. These health risks include those associated with pesticide use in small-scale agriculture activities, animal waste generated by animal husbandry, and safety risks in handicrafts and small business activities. In addition to the health risks, improper management of the wastes generated during implementation of these activities would cause adverse impacts on the environment. These potential impacts are assessed to be of small scale, localized, in short-term period and manageable. It is anticipated that the project activities will not cause long-term, cumulative impact to environment and human health if good design and construction practices are followed.

Since the scope and sites of project activities are not yet defined nor identified, the implementing agency, HelpAge, will prepare an Environmental and Social Management Framework (ESMF) for the assessment and management of E&S risks and impacts at the framework level during project preparation. The ESMF will establish the principles and procedures to screen, assess, manage and monitor the mitigation measures of environmental and social impacts during implementation. During implementation, the identified activities will be screened for their environmental and social issues. Given the nature and scale of the project investment activities, it is not expected that an Environmental and Social Impact Assessment (ESIAs) or Environmental and Social Management Plans (ESMPs) would need to be prepared. Instead, Environmental Code of Practices (ECOPs) would suffice to manage the potential risks and impacts of the livelihood activities. The ECOPs will describe mitigation measures to address identified environmental issues such as solid waste generated from animal husbandry; pesticides used in agriculture activities, safety issues due to exposure to age-unfriendly jobs and unregulated health services; and animal welfare. The ESMF will be finalized and disclosed before the Project Appraisal and a part of the Project Operational Manual.



A social assessment (SA) will be prepared to assess the social risks and impacts of the project throughout the project cycle, particularly those relating to livelihood programs for needy ISHC members, and activities focused on the health of older persons and personal care. The SA, which will inform project design and provide measures to be considered during implementation, will also take into account: (i) the country's applicable policy framework, national laws and regulations, and institutional capabilities (including implementation) relating to the care of older persons; (ii) risks that project impacts fall disproportionately on vulnerable older persons who, because of their particular circumstances, may be disadvantaged; (iii) any prejudice or discrimination towards elderly persons in providing access to development resources and project benefits, especially in the case of vulnerable ones; (iv) impacts on the health, safety and well-being of working elderly and project communities; and (v) relevant gender and disability aspects. Elderly women from poor and ethnic minority communities and elderly with disability may face the intersectionality of multiple disadvantages which need adequate attention. On a basis of these findings, the SA will propose and implement differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable groups. The results of the SA can be integrated into project design, and captured in the ESMF and EMPF (for risks related to ethnic minorities).

An Environmental and Social Commitment Plan (ESCP) will be prepared. The ESCP, drawn and agreed upon with the Implementing Agency, will set out the substantive measures and actions that will be required for the project to meet environmental and social requirements over a specified period of time. These measures shall be implemented within the specified timeframes and the status of implementation will be reviewed as part of project monitoring and reporting. The draft ESCP will be finalized and disclosed before Bank Board Approval.

**Areas where “Use of Borrower Framework” is being considered:**

Although Vietnam has its own E&S Framework, regulations and standards applicable to the community level interventions are fragmented and insufficient. There are gaps between the environmental and social assessment regulation and practice, especially in description of the environment, level of impact analysis and mitigation measures, and public consultation and disclosure of information. In addition, there is no experience of the implementing agencies in implementing and applying ESF and its associated environmental and social standards. Therefore, there are no plans to use the Borrower's E&S Framework within this project.

**ESS10 Stakeholder Engagement and Information Disclosure**

The Borrower and World Bank task team recognize the importance of engagement with relevant stakeholders, beneficiary communities and project affected parties throughout the project cycle. During the development of Idea Proposal for JSDF, HelpAge has already conducted consultations with potential beneficiaries to identify the needs not yet met by the current ISHC model. The World Bank task team has also joined HelpAge on fieldtrips to learn more about the needs of beneficiaries. These consultations have revealed the need for greater collaboration between formal health and social protection services, on the one hand, and community-based organizations for the elderly, on the other. In addition, it was found that the current ISHC model does not yet fully meet the health and care needs of older persons with chronic or terminal disease, or who need rehabilitation services to regain physical or cognitive capacity after illness. Consultations also confirm the need for support to livelihoods of older persons and the benefit provided to older persons and their family caregivers by the livelihoods/income generation activities of the ISHC. Throughout the project life cycle, the Implementing Agency (HelpAge) will prepare and implement an inclusive Stakeholder Engagement Plan (SEP) proportional to the nature and scale of the project and associated risks and impacts. The SEP will involve all project affected parties including HelpAge, World Bank and JICA, Association of the Elderly at all levels, commune health stations, and particularly targeted ISHCs and communities. The SEP will also



involve in other interested parties including local authorities, community leaders (village heads and others), local Women’s Union, local Farmer’s Union, local Red Cross, local Father Land Front, local media.

The Borrower will provide stakeholders, including potential beneficiaries from vulnerable groups, with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. The SEP will include provisions for establish a Grievance Redressal Mechanism (GRM). The implementing agency use the GRM to strengthen social accountability and to empower households to voice their complaints, concerns, queries, clarifications, and to increase awareness about the features of the program and their entitlements. The GRM platform will seek to establish a continuous feedback and responsive platform between beneficiary communities and implementing structures. The SEP will be prepared and disclosed as early as possible and before project appraisal. The SEP, along with other social and environmental instruments, will be subject to public consultation and disclosure per requirements of ESS10 and will be treated as a live document to be updated be regular updated along the pace of project implementation.

## **B.2. Specific Risks and Impacts**

**A brief description of the potential environmental and social risks and impacts relevant to the Project.**

### **ESS2 Labor and Working Conditions**

Project will include direct workers and community workers. The direct workers are HelpAge’s employees, AE’s employees, working specifically for the project. The community workers would include the ISHCs’ management board, voluntary health educators, health workers and caregivers who provide health services and basic personal care to the older people. Due to the nature of the investment activities it is not expected that the project would involve contracted workers. There will be no government project management unit, therefore, there would not be government workers involved in the project.

Since the project will involve community workers in a number of different circumstances, including where labor is provided by the community as a contribution to the project, the requirements relating to working conditions and occupational health and safety will apply to this category.

The Implementing Agency will therefore prepare Labor Management Procedures (LMP) which set out the way in which project workers (including community workers) will be managed in accordance with the requirements of the national laws and ESS2. This includes terms and working conditions and occupational health and safety (for community workers), as well as non-discrimination and equal opportunity. The LMP will include measures to ensure that community labor is provided on a voluntary basis, has established work hours, paid as agreed and in a timely manner, and to further ensure that the occupational health and safety of the community workers, especially women and ethnic minorities are given adequate attention. Measures relating to Occupational Health and Safety (OHS) are for protecting workers from injuries, illness or impacts associated with exposure to hazards encountered in the work place or while working. Such OHS measures include provision of PPE, awareness raising and guidance on how to prevent accidents at work place. The LMP will assess whether there is risk of child labor within the community labor and identify and manage those risks by taking appropriate steps to remedy the situation in a manner consistent with ESS2. The LMP will also has the details of the grievance redress mechanism (GRM) for direct workers and contracted workers to raise their concerns. The LMP will specify the way in which community workers can raise grievances in relation to the project (project level GRM or other possible grievance mechanisms). The LMP will also take into consideration that proper training is provided to community workers, tailored to needs and potential risks and impacts of the project.



### **ESS3 Resource Efficiency and Pollution Prevention and Management**

The nature and scale of the proposed project will not cause significant water and energy use. However, the project will support a livelihoods program, in which IHSCs' members can get capital to start livelihoods activities (e.g. small-scale agriculture, animal husbandry). These activities may increase waste generated from animal husbandry and pesticide used in agriculture. The risks and impacts related to the release of pollutants, waste generation, the management of pesticides, and impact on community will be assessed, and mitigation measures will be proposed during project preparation to be included in the ESMF and ECOPs.

### **ESS4 Community Health and Safety**

The project is anticipated to have positive impact on the community health thanks to health and social care activities. Risks and negative impacts related to labor influx are not expected as the project involves in minor renovation of small assets that can be conducted by community members. Given its nature and scale, the project is not expected to exert substantial amount of hazardous materials affecting community health, to cause substantial road safety issues, or to any cause adverse impacts on the community due to labor influx. Therefore, standard measures in the World Bank Group Environment, Health, and Safety Guidelines (EHSG) to ensure the community health and safety of communities during implementation should suffice.

However, there may be some GBV risks, especially those relating to economic, emotional and physical violence, when older persons are involved in the project's livelihood programmes and expected to receive personal care from community volunteers. The social assessment will include GBV assessment and propose relevant mitigation measures.

### **ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

The project includes only minor renovation of small assets and thus will not require any land acquisition, restriction on land use and involuntary resettlement.

### **ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

Given its location, nature, and scale, the project is not expected to have potential adverse impacts on natural and critical habitats or ecosystem services. Nevertheless, the ESMF will provide guidance on screening and mitigation measures to ensure that project activities related to agriculture do not alter or cause destruction of any critical or sensitive natural habitats. Although animal welfare might be an issue, potential environmental risks and impacts associated with this ESS is not relevant at this stage. However, relevance of this ESS will be further assessed during project preparation as part of the environmental and social assessment process.

### **ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**

Although names of specific beneficiary communities may not be determined by appraisal, it is known that some of the identified project provinces have a high proportion of ethnic minority populations, such as Hoa Binh, Thanh Hoa, and Ninh Thuan. These groups include Muong, Thai, Tay, Dao, Mong, Bru Van Kieu and Chut. Among them, Muong,





Thai and Tay generally have a higher level of economic development and a better command of the Vietnamese language than the remaining groups. As the proposed ISHC model is designed to focus on vulnerable older persons, it is likely that the project activities will take place in some poor communes with high rates of ethnic minority older persons, although the names of the project communes remain unknown at this stage. The SA will identify the existing barriers against the ethnic minority older persons to participate in and benefit from the project’s activities to improve their quality of life and well-being. These barriers may be related to languages, cultural practices, institutional arrangements, and religious or spiritual beliefs. Different needs and preferences of older men and women from ethnic minority groups in the project communes will also be considered in the design of the project’s activities and organization of consultations. An engagement process with older persons from the ethnic minority groups in the project communes will be undertaken, including stakeholder analysis and engagement planning, disclosure of information, and meaningful consultation, in a culturally appropriate and gender and inter-generationally inclusive manner. On a basis of the findings from the SA and the engagement process, an EMPF will be prepared prior to appraisal. This EMPF provides guidance on how an Ethnic Minority Development Plan should be prepared during implementation to set out the measures or actions proposed with a clear time frame.

**ESS8 Cultural Heritage**

Given its location, nature, and scale, the project is not expected to have potential adverse impacts on tangible and intangible cultural heritage.

**ESS9 Financial Intermediaries**

At this stage, the project is not expected to use any financial intermediary.

**B.3 Other Relevant Project Risks**

No other relevant project risks are envisaged.

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways**

No

The project will not carry out any investment linked to international waterways as defined in the Policy.

**OP 7.60 Projects in Disputed Areas**

No

The project will not be implemented in areas known to involve disputed areas.

**III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE**

**A. Is a common approach being considered?**

No

**Financing Partners**

Japan Social Development Fund

Public Disclosure



**B. Proposed Measures, Actions and Timing (Borrower’s commitments)**

**Actions to be completed prior to Bank Board Approval:**

Preparation and consultation of the following ESF instruments are expected prior to Bank Board Approval:

- A social assessment
- Environmental and Social Management Framework (ESMF) and ECOPs to be disclosed prior to the project appraisal
- Labor Management Procedures (LMP) to be ready prior to the project appraisal
- Ethnic Minority Development Framework to be disclosed prior to the project appraisal
- Stakeholder Engagement Plan (SEP) including a project level grievance redress mechanism to be disclosed prior to the project appraisal
- Environmental and Social Commitment Plan (ESCP)

**Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):**

Possible issues to be addressed in the Borrower ESCP:

- Preparation of the relevant instruments per ESSs’ requirements
- Completion of the Ethnic Minority People Plan
- Adequate allocation of resources for the implementation of ESF, ESSs and relevant instruments
- Preparation and implementation of a capacity building plan with strong focus on application/implementation of ESF, ESSs and relevant instruments
- The operationalization of a project level grievance redress mechanism in the project life cycle

**C. Timing**

**Tentative target date for preparing the Appraisal Stage ESRS**

16-Dec-2019

**IV. CONTACT POINTS**

**World Bank**

Contact:	Nga Nguyet Nguyen	Title:	Senior Economist
Telephone No:	5777+7327 /	Email:	nnga@worldbank.org
Contact:	Caryn Bredenkamp	Title:	Senior Economist
Telephone No:	5777+8204 /	Email:	cbredenkamp@worldbank.org

**Borrower/Client/Recipient**

Borrower: HelpAge International

**Implementing Agency(ies)**

Implementing Agency: HelpAge International

Public Disclosure



**V. FOR MORE INFORMATION CONTACT**

The World Bank  
1818 H Street, NW  
Washington, D.C. 20433  
Telephone: (202) 473-1000  
Web: <http://www.worldbank.org/projects>

**VI. APPROVAL**

Task Team Leader(s):	Nga Nguyet Nguyen, Caryn Bredenkamp
Practice Manager (ENR/Social)	Christophe Crepin Recommended on 10-Oct-2019 at 08:03:59 EDT