COMBINED PROJECT INFORMATION DOCUMENTS / INTEGRATED SAFEGUARDS DATA SHEET (PID/ISDS)
CONCEPT STAGE

Report No.: PIDISDSC15055

Date Prepared/Updated: 10-Mar-2016

I. BASIC INFORMATION

A. Basic Project Data

Country:	Vietnam	**Project ID:**	P156143
		Parent Project ID (if any):	
Project Name:	Vietnam Coastal Cities Sustainable Environment Project (P156143)		
Region:	EAST ASIA AND PACIFIC		
Estimated Appraisal Date:	26-Sep-2016	**Estimated Board Date:**	15-Feb-2017
Practice Area (Lead):	Water	**Lending Instrument:**	Investment Project Financing
Sector(s):	General water, sanitation and flood protection sector (84%), Urban Transport (16%)		
Theme(s):	Pollution management and environmental health (85%), Urban Economic Development (15%)		
Borrower(s):	Socialist Republic of Vietnam		
Implementing Agency:	Binh Dinh PMU, Quang Binh PMU, Khanh Hoa PMU, Ninh Thuan PMU		

Financing (in USD Million)

Financing Source	Amount
BORROWER/RECIPIENT	37.70
International Bank for Reconstruction and Development	46.00
International Development Association (IDA)	190.00
Total Project Cost	273.70

Environmental Category:	A - Full Assessment
Concept Review Decision:	Track II - The review did authorize the preparation to continue
Is this a Repeater project?	No

Other Decision (as needed):	

B. Introduction and Context

Country Context

Vietnam has made remarkable progress in economic growth and poverty in recent years, and has recently graduated to lower middle income country status. Over the last two decades, the country has recorded among the highest growth rates in the world, which in turn enabled poverty reduction at record pace. GDP growth, however, fell from an average rate of 7.3 percent during 2000-2007 to 5.8 percent during 2008-2012. Growth has subsequently recovered to around 6.0 percent in 2014 and an estimated 6.2 percent in 2015. The external sector has held up well despite the global situation, but domestic demand remains weak on account of subdued private sector confidence, overleveraged SOE and (undercapitalized) banking sectors, and shrinking fiscal space. The slowing of the growth rate has had limited impact in large cities which continue to attract domestic and foreign investment.

An integral part of Vietnam's transition from low- middle income to advanced status has been its transition from a largely rural to urban economy. The country's economic progress has coincided with rapid urbanization, with Vietnam sustaining a 3 percent annual urban population growth rate from 1999 to 2011. The urban population is currently 35 percent of the total population and is expected to reach 40 percent by 2020. This growth has contributed to the significant challenges in service delivery and infrastructure in the cities, in general, and specifically, for sanitation management (wastewater, drainage and solid waste).

Sectoral and Institutional Context

In 2009 the Government set out its' policy and targets for wastewater and drainage in Decision No. 1930/2009/QD-TTg - Orientation Plan for Urban Drainage to 2025 and Vision to 2050. 2020 Government targets include: flooding will be eliminated in cities in Class IV and above; drainage system coverage will reach 80 percent, and; 60% of domestic wastewater will be collected and treated centrally in Class III and above cities.

Delivery of water and sanitation services has been decentralized to the provinces, which are also responsible for project preparation and implementation. The central government is responsible for policy setting and monitoring progress in meeting sectoral targets.

Sector performance: While the sector policies and institutional arrangements are relatively clear, there are a number of critical issues surrounding sector performance. In many urban areas drainage systems have been poorly operated and maintained, and their capacity has not been upgraded in line with the demands of the rapidly urbanizing population. This has resulted in increased flooding risk in many urban centers. With respect to wastewater management, JMP estimates that access to an improved toilet facility reached 93% in 2012. Whilst this figure seems encouraging only 10% of urban wastewater is treated and very few towns or cities have a wastewater treatment plant. The bulk of drainage networks are in fact combined surface water drainage and sewage systems, and often overflow in the rainy season, discharging pathogenic waste directly into the streets (and beaches in coastal cities).

Wastewater Treatment: The construction of centralized wastewater treatment plants for urban areas only started in 2004. Where wastewater treatment plants exist, these tend to be under-

utilized since: (i) household connection rates to the sewers are low due to the high costs/low incentives for connecting, and (ii) most household toilets are connected to a septic tank or pit which retains the bulk of the solids – only the overflow discharges into the drainage network, and then mixes with storm water so that wastewater entering the treatment plants is fairly dilute, in some cases meeting discharge standards before it is treated. This challenges the current practice, when investments are made, of building relatively expensive plants that can treat wastewater to a very high standard.

Septic Tanks: 90% of urban households have septic tanks or pits which tend to be constructed without a sealed base and emptied only rarely (if at all) and hence function inefficiently. The removal of septage (septic sludge) is largely unregulated, with only 4% of septage safely disposed/treated.

Investment Needs: While investment in urban sanitation has grown in recent years, almost all of this growth has been donor-funded; government expenditure - both capital and operational - has been quite limited. The country needs to raise an estimated US$771 million per year in order to meet its 2020 targets for urban sanitation . With very few wastewater treatment plants, at least relative to the population, almost three-quarters (US$580 million per year) of this amount is needed for new treatment facilities. The estimated investment requirements are actually conservative because they focus on wastewater treatment only and ignore replacement costs of existing toilets and on-site treatment systems as well as the cost of making direct connections from household toilets to sewers. Annual anticipated investments are expected to cover only about 27% of the annual requirements. It will be important that future investment decisions are based, therefore, on a lowest life-cycle cost basis with the adoption of appropriate, cost-effective technologies.

Sustainable Operations: Additional pressure on finances is also expected to come from the estimated US$124 million per year needed for maintenance and operating expenditures. Wastewater and drainage services are not yet generally provided on a commercial basis, and operating costs are not fully recovered and are financed through (unreliable) subsidies from the provinces. There is a clear and pressing need to set up proper institutional and financial arrangements to ensure sustainable operations. There is also a need to establish a system through which the costs are accounted for properly and recovered to minimize the burden on the provinces. Historically costs have been recovered through environmental taxes (as per Decree 67) and wastewater fees (as per Decree 88), with fees capped at 10% of water bills. Such a low revenue base has resulted in low investments, low cost recovery, low levels of asset maintenance and poor service levels – a situation compounded by low technical and management capacity.

Decree 80/2014/ND-CP on Drainage, Sewerage and Wastewater Treatment came into effect this year and introduces a number of measures to significantly improve technical and financial sustainability, including:

- Mandatory connection of households to sewers – with subsidies for poor households
- Performance based management contracts (5-10 years) to be signed between the owner of the drainage and sewerage system (PPC or allocated to lower people's committees) and an O&M service provider. Clear elaboration of rights and obligations of each party, scope of work, service standards, contract value, mode of payment etc.
- Users to pay service "price" for drainage/wastewater services (per m3 of wastewater

generated) based on the actual costs of the providing O&M services and reasonable profit. To be collected by respective water supply service providers.

- Provisions for proper septic tank sludge management, including periodic emptying

Relationship to CAS/CPS/CPF

The World Bank Country Partnership Strategy (CPS, 2012-2016) for Vietnam supports investments and policies organized into a strategic framework of three pillars: (1) strengthening Vietnam's competitiveness in the regional and global economy; (2) increasing the sustainability of its development; and (3) broadening access to opportunity. The CPS also has three cross cutting themes: (a) strengthening governance; (b) supporting gender equity; and (c) improving resilience in the face of external economic shocks, natural hazards and the impact of climate change.

The project will contribute directly to pillar 2 by increasing wastewater collection and treatment, improving solid waste management, and reducing flooding risks in the project cities. The project will also address the issues of governance and sustainability through proposed institutional arrangements to ensure that wastewater operations and management are carried out in a more sustainable manner. In relation to the third cross-cutting theme the project will be designed to take into account climate change impacts, in particular though increasing resilience to floods.

C. Proposed Development Objective(s)

Proposed Development Objective(s) (From PCN)

13. The proposed Project Development Objective is to increase access to improved sanitation services and urban road networks in selected areas and strengthen the utility reform agenda concerning sanitation sector in the project cities.

Key Results (From PCN)

1. At the project level, PDO indicators for the proposed project include:
- The number of people benefiting from reduced incidence and severity of flooding
- Number of people provided with access to improved sanitation facilities under the project
- Roads?
- Direct Project Beneficiaries (number) (disaggregated by gender, of which bottom 40 percent)
- Improved perception of stakeholders regarding sanitation management in the project cities (disaggregated by gender)
- Utility reform/strengthened capacity i.e. no. of service contracts

2. Intermediate outcome indicators include:
- Length of embankment improved (km)
- The number of people with wastewater collected and disposed of through piped networks
- Primary, secondary and tertiary drainage and wastewater sewage system constructed (km of pipeline)
- The number of pupils gaining access to improved sanitation facilities in their schools
- The BOD removed by treatment plant (tons/year)

D. Concept Description

This project will build on the success of the Coastal Cities Environmental Sanitation Project (CCESP) (P082295/P122940) which had the PDO to improve the environmental sanitation in the project cities (Dong Hoi, Nha Trang and Quy Nhon) in a sustainable manner and thereby enhancing the quality of life for city residents. The CCESP was implemented from June, 2007 to

November 30th, 2014. The design indicators of the CCESP were achieved and the following results achieved in the project areas: i) flooding decreased significantly and no wastewater was discharged onto beaches and into canals; ii) lakes, canals and rivers were upgraded; (iii) public toilets and toilets at schools have been properly operated and maintained, and; iv) capacity of the PMUs and relevant authorities was strengthened.

Key lessons learned from the CCESP include:

- Wastewater treatment technology: following technical visits to Singapore, Malaysia, and Thailand a better understanding of appropriate treatment technology options led to the adoption of more cost effective and less technically complex solutions.
- Household connections, public awareness and behavior change: it is essential to maximize the number of households connected to the sewer network – to minimize environmental pollution and increase volumes and biological loadings at the treatment plant to improve treatment efficiency. Many households remained unconnected and the cities need to do more work on public awareness, connection socialization and promotion – Information, Education and Communication/ Behavior Change Communication (IEC/BCC) campaigns backed by attractive connection incentive schemes.
- Cost recovery and financial sustainability: service provider cost recovery is critical to ensuring services are financially sustainable. The project set a target and made it a condition for each city to raise the tariff to a level that will allow the city to cover O&M costs. Not all the cities reached this target and it is important that the provincial and city authorities continue their commitment and not slip back.
- Institutional and regulatory arrangements at the local level: TF resources supported the development of institutional and regulatory capacity at local government and service provider level. This is critical for sustainable sanitation service delivery, but needs reinforcement with further capacity building to support the implementation of Decree 80 (service contracts between local government and service provider, fecal sludge management, tariff roadmaps, household connection policy).
- Social and Environmental management capacity of the three participating cities was built through the implementation and monitoring of social and environmental aspects of the CCESP project. Contractors' environmental performance was generally satisfactory under close supervision of PMU Officers and consultants. Generation of large amount of excavated materials, traffic disturbance, safety for the public, soil subsident were the main issues sucessfuly managed during pipeline construction while construction materials and waste managements and workers' health and safety issues, implementation of environmental friendly solutions, greening and landscaping measures were the key aspects regularly monitored during construction of the wastewater treatment plants. The PMUs gained experienced about social and environmental impacts, mitigation measures and monitor compliance. This is critical for social and environmental management in future similar projects.

After completion of CCESP the Government of Vietnam requested further Bank support to the CCESP cities to extend sanitation infrastructure and services city wide and improve service sustainability through further institutional reforms. The proposed project will comprise four components:

(i) Component 1: Sanitation infrastructure expansion (Estimated US$186m). This includes: flood reduction works (dredging and the embankment of lakes/canals/rivers); drainage and wastewater collection (including household connections); wastewater treatment plants; school sanitation and public toilets; revolving fund for household connections; solid waste management,

and; supervision consultants.

(ii) Component 2: Environment infrastructure improvement (Estimated US$45.9m). This includes priority roads, bridges and lake/canal/river rehabilitation investments to support urban development and supervision consultants;

(iii) Component 3: Compensation and site clearance (Estimated US$28.4m). This component will provide compensation, site clearance and construction of technical infrastructure for the resettlement area in Phan Rang; and

(iv) Component 4: Implementation support and utilities reform (Estimated US$13.2m). This includes a capacity strengthening program for the PMUs and relevant agencies, and reform activities related to implementation of Decree 80 i.e. sector planning, household connections, service contracts, cost recovery, SOE equitisation, and PSP/ PPP participation.

The total investment of the project is estimated to be USD 273.7m. Of this total, it is planned that USD 236m (including USD 190m IDA and USD 46m IBRD) will be funded by the Bank and USD37.7m from government counterpart funding.

II. SAFEGUARDS

A. Project location and salient physical characteristics relevant to the safeguard analysis (if known)

The project will be implemented in four cities in four provinces in central coastal region as follows:

• Dong Hoi (Quang Binh province) is the capital city of Quảng Bình Province in the north central coast of Vietnam. It is a Class 2 city with an area of 155.71 km2, and population of around 250,000. The economic contributors are industry, construction, services and agriculture-forestry-fishery.

• Quy Nhon (Binh Dinh Province): is a port city and the capital of Binh Dinh Province. It is a Class 1 city with an area of 286km2 and a population of 280,000. Its economy has historically revolved around agriculture and fishing. Tourism, industry and shipping have become more important in recent times.

• Nha Trang (Khanh Hoa Province): is the capital of Khánh Hòa Province, on the South Central Coast of Vietnam. It is a Class 1 city, with an urban area of 252km2 and population of 402,847. Nha Trang's economy relies largely on tourism and industry.

• Phan Rang-Thap Cham: is the capital city of Ninh Thuan province. It is a Class 2 city with an area of 79.38 km2 and population of 167,000 (2014). Phan Rang's economy relies on services, tourism and fishing.

B. Borrower’s Institutional Capacity for Safeguard Policies

The Provincial People’s Committees of Quang Binh, Binh Dinh, Khanh Hoa and Ninh Thuan are the project owners. The project will be implemented through dedicated project management units (PMUs) at provincial level. The PMUs of Quang Binh, Binh Dinh, and Khanh Hoa have implemented the earlier Coastal Cities Environmental Sanitation project (P082295/P122940), and so they have experience in managing social and environmental aspects in a World Bank funded project. While the performance of the World Bank safeguards policies are generally satisfactory in Khanh Hoa and Quang Binh in this project, particular attention is needed in Binh Dinh given persistent complaints of AHs experienced in this project. Regarding the newly joining province (Ninh Thuan), the PMU has recruited staff with suitable background to be responsible for safeguard management from project preparation phase. The staff work closely with project preparation teams to gain good understandings about the project proposals and safeguard issues. The Project will also promote training, and experience sharing activities will be implemented to enhance the PMU’s capacity and ensure compliance with Bank safeguard policies.

C. Environmental and Social Safeguards Specialists on the Team

Nghi Quy Nguyen (GSU02)

Roxanne Hakim (GSU02)

D. POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The proposed project covers four coastal cities: Dong Hoi, Quy Nhon, Nha Trang and Phan Rang – Thap Cham. The proposed investments in each city are described below: a) Dong Hoi: i) construction of approximately 58.5 km of secondary and tertiary sewers D150-500drainage, 9 wastewater pumping stations up to 16 m2 and 6-8 m deep, 9.5 km of combined storm water drainage and sewers D600-1500 and boxed drains 3000x1500, dredging 485 m and lining the embankments of the Cau Rao river (proposed under the CCESP but not implemented due to lack of financial resources); provision of waste collection equipment including 5 compactors, 500 garbage bins 240-500 L each, 500 hand-push carts and a tank truck, provision of aerators using wind/solar energy for the Duc Ninh WWTP (built under the CCESP) to reach its design capacity at 10,000 m3/d by 2020 ; construction of 2 public and 11 school toilets; ii) build 1.86 km of urban roads 19 m wide and 2 km roadside roads 7.5 m wide with footpath, lighting and greening included; compensation and resettlement for affected households b) Quy Nhon: i) construction of approximately 29 km of tertiary sewers D250-300 and boxed drains 600x400, construction of 1.2 km boxed drains 2750x2000, rehabilitate 1.3 km of existing canal 1600x1500, construction of 2.2 km of new drainage D600-1200 and 3.3 km boxed drains up to 4000x1500,construction of a new sanitary disposal cell in the exiting Long My landfill and provide equipment for solid waste collection system, and upgrading of the leachate treatment unit at the existing Long My landfill; build one more module to raise capacity of the Nhon Binh WWTP (built under the CCESP) from 14,000 m3/d to 28,000 m3/d; construction of 10 public and school toilets; reconstruction of the Y bridge (15 m wide, 90 m long and 2x30 m access roads) and construction of the

		Huynh Tat Phat bridge (15 m wide, 110 m long, and 90 m access roads); iii) compensation and resettlement for affected households c) Nha Trang: i) Construction of tertiary sewer systems in 12 wards and storm water drains D600-1000, construction of a new wastewater treatment plant capacity 15,000 m3/d, drainage and sewers systems, construction of a regulatory pond 1.5 ha and 687 connecting open channel, and one pumping station, rehabilitate or construction of 4 public and school toilets; ii) lining, construction 2.3 km (400 m on the northern side and 1.9 km on the southern side) of river embankments and construction of management roads along the Cai river for erosion and human encroachment protection, upgrade 365 m Chu Dong Tu urban road; iii) compensation and resettlement for affected households d) Phan Rang - Thap Cham: i) construction of approximately 55 km sewers and two pumping stations and 6.3 km drainage, rehabilitation some sections of Ong Co, Cha La, TH5, Tan Tai, Ong Co-Cha La connecting drainage/irrigation canals with total length of approximately 17 km, and construction of management roads along the canals; rehabilitation of 4.3 ha Dong Hai regulatory pond, construction of 30 ha new retention pond, connection pipes and two pumping stations; construction of 9 public and 5 school toilets; expand the existing wastewater treatment plant to raise capacity from 5,000 m3/d to 10,000 m3/d, provide waste collection equipment; vi) upgrade approximately 2 km the 150 and Huynh Thuc Khang urban roads including landscaping; vii) construction of 4.5 ha resettlement sites, The project's overall potential socio-environmental impacts would be positive as it is expected to bring about improved drainage and sanitation facilities, flood risk reduction, greener and cleaner urban areas etc. There are also potential negative socio-environmental impacts associated with the proposed physical investments. These include commonly known construction impacts and risks, such as: i) safety risks related to unexploded materials left from the war; loss of vegetation cover and trees,

		disturbance to the habitats of aquatic species i) increased level of dust, noise, vibration; ii) pollution risks related to generation of waste and wastewater, particularly large amount of excavated/dredging materials; iii) traffic disturbance, and increased traffic safety risks; iv) erosion and land slide risk on slopes and deeply excavated areas as well potential negative impacts on existing weak facilities; iv) interruption of existing infrastructure and services such as water and power supply; v) disturbance to daily socio-economic activities in project area and social disturbance; vi) health and safety issues related to the public and the workers at construction sites; viii) social impacts associated with construction disrupting businesses by construction-related activities and mobilisation of workers to the site etc. There are also other type-specific impacts associated with some specific types of investments, particularly generation of large volumes of dredging or excavation materials, impacts on aquatic biology and water quality of the works implemented on waterways. These are also type-specific potential impacts, risks and issues related to the operations of some types of investment. These includes, but not limited to: landscape along the river/canal sections to be dredged; increased gas emission and sludge generation from upgraded wastewater treatment plants; traffic safety on newly built roads; accessibility for the disabled people to public/school toilets as well as odor and hygiene conditions, etc. An Environmental and Social Impacts Assessment/ Environmental and Social Management Plan (ESIA/ ESMP) will be prepared for each of the cities to assess the potential impacts and risks of the proposed investments. The ESIA will include the World Bank Group Guidelines on Environmental, Health and Safety, due diligence review of existing landfill in Quy Nhon which will provide support for the establishment of leachate treatment units; cumulative im pact assessment of potential environmental and social impacts and the potential impacts of transporting materials to the landfill related to dredging; potential social impacts. The ESIA/ESMP of each city will take into account the approved EIA/ EMP of the work items implemented under the

		CCESP (such as the wastewater treatment plants in Dong Hoi and Quy Nhon) or originally proposed under the CCESP (such as the North Wastewater Treatment Plant in Nha Trang or dredging of the Cau Rao river in Dong Hoi, but not yet be implemented or fully completed), and social and environmental management experiences gained through the implementation of the CCESP. Public consultation will be carried out as part of ESIA/ESMP preparation. Hydraulic and hydrological calculations will be carried out as part of the feasibility studies and detailed engineering designs. A water resources management study for Ninh Thuan province has also be arranged by the Bank in response to the recent severe drought. In addition, BTC is funding drainage modelling work in Phan Rang. Findings and recommendations of these studies will be incorporated in the subproject proposals as appropriate. The final draft EA/EMP will be disclosed on the Bank website and locally for public access prior to project appraisal.
Natural Habitats OP/BP 4.04	Yes	While the Project will be implemented in urban areas, some civil works will be implemented on existing waterways such as dredging of the Cau Rao river in Dong Hoi and Cai river in Nha Trang for flood control, or construction of two bridges in Quy Nhon. Whether the proposed project would affect any critical natural habitats or rare/endangered species will be determined during the preparation of ESIA. Measures to mitigate the potential biological impacts, particularly aquatic biology, will be proposed as part of the Social and Environmental Management Plans
Forests OP/BP 4.36	No	The Project will be implemented in urban areas. No forest will be affected. The project does not cover afforestation
Pest Management OP 4.09	No	The Project will not involve the production, procurement, storage, handling or transportation of any pesticide
Physical Cultural Resources OP/BP 4.11	Yes	The proposed civil works will require some earthwork. Screening for physical cultural resources will be included in the TOR for EIA. Relocation of

		PCR will be avoided, and mitigation measures to minimize the potential impacts on any known existing PCR, if required, together with chance find procedures will be included in the EMP of all subprojects.
Indigenous Peoples OP/BP 4.10	No	There are no ethnic minority communities in the project areas. This is confirmed by the screening recently done in Pha Rang – Thap Chap and by a similar screening exercise done in the previous project in Dong Hoi, Quy Nhon and Nha Trang cities.
Involuntary Resettlement OP/ BP 4.12	Yes	The proposed pProject activities will involve the involuntary taking of land, resulting in physical relocation and impacts on livelihoods and resources. At this stage, this may occur in components 1 (sanitation infrastructure expansion), 2 (environment infrastructure improvement) and 3 (compensation and site clearance). The project budget will not be used to finance land expenditure. Under component 3, only the construction of technical infrastructure for the resettlement area in Phan Rang will be financed. An initial rough estimation indicates that the project will impact 1,675 HHs of which 325 HHs will be physically relocated. By appraisal, implementing agencies will prepare: (i) a Resettlement Policy Framework (RPF) that lays down the principles and objectives, eligibility criteria of displaced persons, modes of compensation and rehabilitation, potential relocation of these persons, and participation features and grievance procedures relocation. The RPF will be endorsed/adopted by competent governmental agencies; and (ii) 4 Resettlement Action Plans (RAPs) for subprojects with known impacts and locations in each city. Experiences in previous operations show that as the land management system in Vietnam is still weak, identification of land ownership and land use history should be more accurate to avoid ongoing complaints from the affected people. Second, avoiding changes to compensation policy during resettlement implementation is also critical in minimizing complaints, and there is a need for timely redress of grievances in close dialogue with the PAP to make the compensation and resettlement process a success. And finally, site clearance and compensation should be assigned to the employer to directly perform the work with maximum support from the local

		authorities, and the resettlement site should be constructed based on the affected HHs' requirements. The RPF and RAPs developed under this proposed Project will also take into account the experience of the previous project in implementing land acquisition, compensation and resettlement. Consultation will be conducted at least two times during the project preparation. RAPs and RPF will be publically disclosed at project areas, cities' websites and at Info Shop per the Bank's requirement.
Safety of Dams OP/BP 4.37	No	The project will not affect or is dependent on the safety of any existing dam.
Projects on International Waterways OP/BP 7.50	No	The project is not implemented on any international waterways.
Projects in Disputed Areas OP/ BP 7.60	No	The Project is not implemented in disputed areas.

E. Safeguard Preparation Plan

1. Tentative target date for preparing the PAD Stage ISDS

26-Sep-2016

2. Time frame for launching and completing the safeguard-related studies that may be needed. The specific studies and their timing should be specified in the PAD-stage ISDS.

N/A. No safeguard related studies will be conducted. Socio-economic survey will be conducted as part of safeguard instruments preparation.

III. Contact point

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V. Approval

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Country Director:	Name: Achim Fock (CD)	Date: 24-Apr-2016

1 Reminder: The Bank's Disclosure Policy requires that safeguard-related documents be disclosed before appraisal (i) at the InfoShop and (ii) in country, at publicly accessible locations and in a form and language that are accessible to potentially affected persons.