



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Vietnam	EAST ASIA AND PACIFIC	P174157	
Project Name	Vinh City Priority Infrastructure and Urban Resilience Development Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Urban, Resilience and Land	Investment Project Financing	1/18/2021	5/31/2021
Borrower(s)	Implementing Agency(ies)		
The Socialist Republic of Vietnam	People's Committee of Nghe An Province		

Proposed Development Objective

The Project Development Objective (PDO) is to reduce flood risk in the core urban area and strengthen urban resilience management capacity in Vinh City.

Financing (in USD Million)	Amount
Total Project Cost	175.00

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]

The Project Development Objective (PDO) aims to support efficient and integrated infrastructure development and resilient growth of Vinh city and its capacity in dealing with climate change through upgrading urban environmental sanitation services, enhancing regional connectivity, supporting integrated land use planning and infrastructure services, and strengthening capacity in urban resilience management and coastal flood control.

D. Environmental and Social Overview



D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

Vinh city is the capital city of Nghe An province, a grade-one city, known as the biggest economic and cultural center of the north-central region of Vietnam, and a hub connecting the East-West economic corridor. The city is situated at the south-eastern part of the province, along side the Lam river, on the main north-south transportation route of Vietnam. Vinh is about 300 km south of Hanoi and 1,400 km north of Ho Chi Minh city. The total natural area of Vinh city is 104.97 km². Its administrative structure comprises of 16 wards and 9 communes. It is the most populous city in the North Central Coastal region, with 339,114 people according to the 2019 census, with a population growth rate of about 1.7% per annum. The population density is 3,231 people per km². The urban population occupy 80%. In terms of ethnic composition, the vast majority of residents are Kinh people (98%), while the remainders are the Thai, Tho, Mong, and other small ethnic groups. The city's economic growth in 2018 reached 9.12%, and per capita income reached VND 84.6 million per person per year (compared to VND 58.5 million nationally).

There are two major rivers flowing through the city, the Lam River and the Rao Dung River. Water bodies within the city, such as the Bac Channel, Cua Nam Lake, Vinh Citadel Moat System and Dong Vinh Channel, are all in poor condition, and will be upgraded or rehabilitated by the project. None of these water bodies is known to support significant levels of aquatic biodiversity, with most being heavily polluted. The water supply capacity of the city is 60,000 m³/day. Around 75% of the population is connected to the existing wastewater drainage system, which includes three pumping stations with a total capacity of 60,000 m³/day, and several regulation lakes. With assistance from Germany's KfW, a wastewater treatment plant is being constructed to serve part of the old city and also the new urban areas. Most solid waste is transported to open landfills or dumped into the city's waterways. However, with assistance from Denmark and KfW, one existing land fill site (Nghi Yen) was upgraded to sanitary standards and put into operations in early 2011. Overall, the major environmental issues relevant to the project are (i) poor quality surface water (high concentrations of NH₄⁺, BOD₅, COD, and coliform bacteria); (ii) polluted ground water (Cl, Fe, Mn, NH₄⁺ and KMnO₄ often exceeding standard values); and (iii) polluted sediments and wastewater.

Vinh city plays an important role in Nghe An province and the North Central region (NCR). It was approved by the Prime Minister's Decision No.2468/QĐ-TTg dated December 29, 2015. Accordingly, the urban space of Vinh city will be expanded to an area of about 250 km², including all of Vinh city, and parts of surrounding towns/districts. The population of this metro region will be increasing to about 900,000 people by 2030. It is expected Vinh city will become a center of finance, commerce, tourism, science and technology, information technology, hi-tech industry, healthcare, culture, sports, education and training of the NCR. Along with the city's socio-economic development, the people's living conditions have been markedly improved over recent years. However, economic growth, quality of life improvements, and population increase have also put pressure on the existing urban infrastructure, leading to an increased demand for serviced residential and commercial zones in the urban core. Although the technical and social infrastructure and facilities have been gradually improved, it does not adequately meet the rapid development requirements of the city. Thanks to economic growth, the proportion of the poor and near-poor households in the city, reduced to 0.63% in 2016 compared to 0.75% in 2015. This means that even the commune characterized by the highest proportion of poor households (Nghi Duc commune with 2.58%) is still below the national average.

D. 2. Borrower's Institutional Capacity

Vinh City People's Committee (Vinh CPC) is the designated Project Owner. Project management responsibility is delegated to the City Project Management Unit (PMU), who will be in charge of project preparation and implementation. Nghe An Provincial People's Committee (PPC), and its relevant departments (DOC, DOT, DPI, DONRE,



DARD, DOF) will be playing coordination roles, engaging in various reviewing and approving procedures. Vinh CPC and its divisions will be providing supports at their areas of governing.

The City PMU has completed implementation of the Bank-financed Medium City Development Project (MCDP), where the city’s authorities and PMU have been familiar with previous Bank’s safeguards policies. Under the MCDP, the City PMU’s staff have received training on the World Bank’s Operational Policies on environmental and social safeguards. As this is the first project applying the Environmental and Social Framework (ESF) in Vinh city, some aspects of the ESF are new to the Vinh authorities, such as the need for labor management procedures, continuous stakeholder engagement (SE) throughout the project life, and the production and use of the environmental and social commitment plan (ESCP). Therefore, targeted training and capacity building to deal with these novel aspects of environmental and social (E&S) risk management will be necessary, and carried out during project preparation and implementation. Relevant aspects of the Environmental and Social Standards (ESSs) and ESF, where the Borrower may lack of familiarity (e.g. labor, stakeholder engagement, community health and safety, GBV, etc.), will be identified, and targeted support will be provided.

A Grievance Redress Mechanism (GRM) focal point, within PMU, should be appointed in order to coordinate different administrative levels for handling complaints in a timely and satisfactory manner. The PMU plans to recruit additional staff to be in charge of implementing E&S standards in the new project, and training on the ESF would be required. Furthermore, the responsibility for land acquisition and resettlement lies principally with the city government units (such as the Center for Land Fund Development), which may not have the capacity to deliver the land required for the project in a timely fashion. The Bank team also expects a significant increase in Borrower’s demand for continuous support in E&S risk management during preparation and implementation, as compared to the previous safeguard policies.

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

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Substantial

The project environmental risks and impacts are related to the implementation of investments under components 1,2,3, and 4. These include: i) construction the city secondary and tertiary drainage and wastewater collection systems; ii) construction of an effluent retention pond for an existing WWTP; iii) construction of a total of 3.6km urban roads ranging from 0.5km to 1.95km and three 50m long bridges; iv) dredging and embankment of 5.8km of Vinh River; v) construction of a 40ha regulation lake; and vi) construction of a 100.000 – 130.000 cubic meter per hour pumping station.

Overall, the project will have positive environmental and social benefits in terms of reducing the water-borne diseases and water pollution, preventing local flooding, and improving city road transportation. The project investments are not complex, of moderate scale, and located in areas with non-sensitive environmental baseline conditions: The waterways and surrounding lands that would be within the project footprint have been anthropogenically converted decades ago and are now part of the urban landscape. While many of these areas are environmentally highly degraded, some classified as modified natural habitats. The latter will be restored or upgraded



within project implementation. Many physical investments would happen on existing footprints within the urban setting and agricultural land. There is no critical habitat in the project area of influence.

The main substantial adverse environmental risks and impacts would be expected to stem from the upgrading of Vinh River, construction of the urban roads and bridges, and construction of the regulation lake and pumping station including: i) local water and environmental pollution due to disposal of a substantial amount of dredged materials; ii) adverse impacts on the aquatic ecosystems in Vinh and Lam Rivers; iii) potential water pollution of Lam River, a source of water supply for Vinh City; iv) community and worker health and safety from the vehicles and equipment that transport dredged materials and road construction spoils from the project sites; v) high accidental and injury risk due to construction of the roads in the urban densely populated areas; vi) potential river bank erosion of Lam River due flood water pumping operation; and vii) adverse impact on waterway traffic.

The environmental risks and impacts related to construction and operation of the secondary and tertiary storm water drainage system, wastewater collection system, and the WWTP retention pond would mainly include community and worker health and safety; localized flooding; traffic safety and business disturbance; and potential damages to public infrastructure and household assets. These potential adverse impacts are expected to be medium in magnitude, site-specific, predictable and/or reversible, and can be readily and reliably managed through the environmental and social mitigation measures.

The country's policy, legal and institutional framework, applicable to the Project sectors are expected to be consistent with the ESSs to a large extent. The technical and institutional capacity of the implementing agencies (IAs) is strong evidenced by its direct successful design and implementation of the Bank-financed MCDP in Vinh City. The IAs have good capacity and commitment to manage the risks and impacts under the current safeguard policies. However, they are not familiar with the ESF and its additional requirements, posing a risk of unsatisfactory management of risks and impacts consistent with the ESSs. However, this will be supplemented by implementation of a program for ESF capacity building which will be developed during project preparation.

The environmental risk will be reassessed during project preparation upon availability of more information and detailed analyses.

Social Risk Rating

Substantial

The project objective is to contribute to sustainable urban development and climate change adaptation, which is expected to have positive socio-economic impacts. The investments under Component 1 and 2 will affect the core urban wards with dense residential population, and a vibrant commercial scene, while Component 3 will mainly affect the fishing and aquaculture communities on the outskirts of the city.

The social risk rating for the project is substantial due to a number of potential adverse social impacts including (i) permanent land acquisition from an estimated 1,500 PAHs (including loss of residential land, agricultural land, agricultural land for aquaculture use, structures and land affixed assets), of whom about 225 may have to be relocated or resettled within their existing land plot; (ii) the temporary disruption of urban livelihoods and services due to works on the secondary and tertiary sewer systems, and road improvement, (iii) the potential disproportionate impact of land acquisition and resettlement on poor and vulnerable households squatting or encroaching on the right of way of infrastructure for livelihoods or residential purposes; (iv) the relocation of graves; (v) the risks and impacts on community health and safety due to construction works (wastewater, dust, noise, transport and disposal of



dredged material), and operation (traffic accidents), and related risks from the influx of labor into project areas, characterized by poor and vulnerable residents, during construction (e.g. Gender-based violence, sexual exploitation and abuse, and the spread of sexually transmitted and communicable diseases); and (vi) uneven access to project benefits among poor households who may have difficulties accessing the domestic sewage connection program.

Vinh City PMU, recently completed the implementation of the World Bank – financed MCDP, but does not have experience in preparing and implementing a project under the ESF. The project counterparts will need to familiarize with the new ESF (especially labor and working conditions, non-discrimination, community health and safety, cultural heritage, and stakeholder engagement). In addition, the responsibility for land acquisition and resettlement lies principally with city administrative units, who often have to clear land for multiple projects within a short timeframe, which sometimes result in the slow implementation of resettlement plans.

In the changing external environment due to the impact of COVID-19 pandemic, Vietnam has demonstrated its strong response and recovery mechanism to cope with the negative health and economic impacts. Cities in Vietnam play an important role both in terms of response and recovery, and urban residents are also particularly vulnerable to COVID-19 and other disease outbreaks. Nghe An province and Vinh city do not have infected cases and operated as institutional isolation hub for Vietnamese people coming back from Laos. It is well recognized that the city’s capacity to respond to pandemic needs to be strengthened. As such, Vinh city requests financing assistance from the World Bank for urban environment improvement and the creation of public space that can be utilized for emergency response. There are, however, potential risks of exacerbating outbreaks if labor, community health and safety and impacts on vulnerable people are not well managed.

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:

Overall, the project will have positive environmental and social benefits in terms of reducing the water-borne diseases and water pollution, preventing local flooding, and improving city road transportation. The expansion of the wastewater collection system to collect more wastewater for treatment will prevent a large pollution load from reaching the city’s waterways. In addition, dredging and general cleanup, will significantly improve surface water quality, which will benefit aquatic species and human health. The main environmental risks and impacts are related to Component 1,2,3, and 4 of the project.

The main substantial adverse environmental risks and impacts would be expected to stem from the upgrading of Vinh River, construction of the urban roads, construction of the regulation lake and pumping station including: i) water and environmental pollution due to disposal of a substantial amount of dredged materials; ii) safety risk due to unexploded ordnances (UXO) left from the war; iii); community health and safety from the vehicles and equipment that transport dredged materials and road construction spoils from the project sites; iv) health and safety of workers and communities along the road corridors where works will be carried out but also along transport routes of construction supplies, materials and equipment; v) exposure of population along the ROW and transport routes to noise, dust, vibrations, air pollution and traffic-related risks; (vi) siltation and sedimentation of waterways close to the



construction works; vii) river bank erosion of Lam River due to operation of the flood water pumping station that will pump the water directly to the river; and viii) adverse impact on waterway traffic.

The environmental risks and impacts related to construction and operation of the secondary and tertiary storm water drainage system, wastewater collection system, and strengthening the WWTP (i.e., installation of automatic water quality monitoring of input and effluent wastewater and construction of a retention pond for emergency wastewater discharge) would mainly include: i) community and worker health and safety; ii) traffic safety and business disturbance; iii) air, soil, and water pollution due to construction activities and waste generation; iv) localized flooding; and v) damages to public infrastructure and household assets. These potential adverse impacts are expected to be medium in magnitude, site-specific, predictable and/or reversible, can be readily and reliably managed through the environmental management hierarchy and mitigation measures.

During the preparation, the Borrower will prepare an Environmental and Social Impact Assessment (ESIA) in accordance with the ESF and national environmental and social assessment regulation to inform decision making in planning and technical design. The ESIA will describe institutional framework, the project and baseline conditions, identify and assess the potential environmental and social impacts and risks, and propose mitigation measures and plans to manage the impacts. The ESIA will follow requirements of the relevant ESSs in identifying and managing the environmental and social risks and impacts including direct, indirect, and cumulative impacts during pre-construction, construction, and operation. The ESIA will cover all the investment items under component 1,2,3, and 4, the areas of project influence, and any associated facilities that may be determined during project preparation. The ESIA will identify opportunities to preserve, expand and upgrade existing modified natural habitats, and facilitate a more holistic approach towards the design of the river upgrading, road construction, and urban flood management investments using man-made and natural based solutions to create greener urban infrastructure.

The ESIA will also assess the adequacy of current infrastructure design standards applicable to the proposed investments, considering the impacts of climate change and foreseeable changes of urban landscape. Public consultation and disclosure of information during the ESIA process will be in line with the relevant ESSs.

The ESIA will assess ESF capacity needs systematically to analyze the Borrower's and other implementing agencies' capacities and to manage the project environmental and social risks and impacts. The assessment could include the activities related to environmental and social (E&S) management such as identification of key tasks for E&S risk management; identification of relevant institution and actors involved in implementation; analysis of institutional arrangements and links; assessment of individual institutional capacity; recommendation of actions to strengthen and monitoring institutional capacity during implementation.

An Environmental and Social Management Plan (ESMP) covering pre-construction, construction, and operation phases of all investment items will be prepared as an integral part of the ESIA. The ESMP will consist of a set of mitigation, monitoring, and institutional measures, budget to be carried out during project implementation and operation to avoid adverse environmental and social risks and impacts, offset them or reduce them to acceptable levels.

Key social risks that need to be addressed include (1) risks related to land acquisition and resettlement for the Components 1, 2 and 3, (2) risks related to labor and working conditions, as well as GBV and communicable diseases



associated with labor influx from the other localities, and (3) risks associated with stakeholder engagement and grievance redress across all project components. It is expected that there will be limited adverse impacts on vulnerable populations, aside from those who may have to relocate under the road extension and Vinh river embankment upgrades or those who may have difficulty accessing the house connection program for drainage and wastewater collection services. There are no members of ethnic minority groups, that have a collective attachment to the project affected area, who are directly affected from the project. Key social risk instruments that will need to be prepared include a social assessment (to include as part of the ESIA/ESMP for all project components), a resettlement plan, as well as a stakeholder engagement plan and labor management procedures (for all components). The resettlement plan, stakeholder engagement plan, and labor management procedures will be prepared during project preparation.

A grievance redress mechanism will also be developed to provide guidance on the reception, recording, handling, and reporting of complaints that may be encountered during project implementation. The World Bank EHS Guidelines will also be applied when developing ESA instruments. Consultation during the preparation of the ESCP, ESIA/ESMP and other ES tools and disclosure of these documents will be carried out in accordance with ESS10.

The Borrower will prepare an Environmental Social Commitment Plan (ESCP). The ESCP will set out the activities to be carried out during project implementation and could be adjusted during the project cycle in line with the evolution of environmental and social risk and impacts. The ESIA and ESCP will be disclosed prior to project appraisal.

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

Although Vietnam has an advanced E&S Framework, 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. There is no experience of the implementing agencies in implementing and applying ESF and its associated environmental and social standards. The project therefore will apply World Bank ESF, and does not use the Borrower’s E&S Framework within this project.

ESS10 Stakeholder Engagement and Information Disclosure

The project’s key stakeholders include the project implementing agency, relevant authorities at provincial, city and ward levels, consultants, construction contractors, WWTP operators, and local residents. Interested parties include the Vinh City Project Management Unit (PMU), all-level authorities (PPC, City PC, W/CPCs), the agency responsible for monitoring and management of environment and natural resources (DONRE), the agency responsible for monitoring and management of irrigation and flood risk management and natural disasters (DARD), the agency responsible for urban planning and construction management, and ICT for smart city management (DOC), the department of transport (DOT) is responsible for planning, design and maintenance of transport system, and the Water Supply and Drainage Companies (waste water and drainage, water supply). The Provincial Committee for Flood and Storm Control (CFSC) has a mandate to coordinate flood management and emergency response. In addition, other interested parties include mass media, research institutes/academies, local/international NGOs and development partners (KfW, Cities Development Initiative for Asia - CDIA) working in the same area, mass organizations such as the Fatherland Front, the Women’s Union and the Farmer’s Union, and the private sector.

Of the key stakeholders who are affected parties, of primary concern are the poor/disadvantaged affected households/agricultural and aquaculture farmers/squatters that make up the residents of the low income



areas/fishing villages likely to benefit by the project, but also who are likely to be most affected by the physical and economic displacement. A stakeholder engagement plan (SEP) will be developed for the project to ensure transparency and meaningful consultation with the affected and interested parties. Stakeholder engagement and consultations will be conducted throughout the project cycle. The SEP, along with other social and environmental instruments, is subjected to public consultation and disclosure per the requirements of ESS10, and is to be treated as a live document, to be regularly updated during project implementation. A project-wide Grievance Redress Mechanism (GRM) will be established in coordination with localized grievance redress processes in order to ensure that concerns are captured and addressed by the PMU. The existing GRM is the already-established mechanism embedded in all administrative levels (e.g. one stop shops at the ward and community level, and inspectorates at the city level), as well as the people’s courts. This mechanism functions well in dealing with issues such as adjudicating land boundaries (at the commune level) or resolving the EHS impacts related to construction. However, they can be less effective in addressing concerns related to compensation for land acquisition required by the project, or the allocation of resettlement plots. The project GRM will build on, and coordinate, these mechanisms to ensure that concerns are captured and addressed in a satisfactorily and timely manner.

The SEP, ESCP and other E&S tools will be disclosed locally in a timely manner, in an accessible place, and in a form and language understandable to project-affected parties and other interested parties as set out in ESS10, so they can provide meaningful input into project design and mitigation measures. The documents will then be disclosed at the Borrower’s website and Bank’s external portal.

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

The Project workforce will include direct workers (directly employed by the PMU), contracted workers (recruited by third parties such as contractors or consultants), and primary supply workers (workers engaged for essential construction materials to be purchased). The project is not likely to engage community workers, as civil works will be the responsibility of contractors. The workers in Vietnam are regulated and protected under a labor framework including the Labor Law (2012), the Law on Occupational Health and Sanitation (2015), and the Social Security Law (2014). The policies and regulations stated in this legislation reflect the principles of ESS2 on issues such as fair treatment, non-discrimination and equal opportunities to workers, supporting the rights and benefits of the workers, recognizing workers’ rights to establish or join associations of workers, prohibition on sexual harassments/forced labor/child labor (under 15), etc. As the PMU is a government entity governed by the law on public service employment, trade unions and official grievance redress mechanisms exist, meaning minimal risks related to ESS2 for direct project workers are foreseen.

With contracted workers, the majority (estimated 250-300 workers during peak period) would be mobilized by the contractors, a number of whom may come from other localities. Potential risks related to labor and working conditions, such as labor influx, child labor, forced labor, work-related discrimination and OHS risks, risks of contamination during infectious disease outbreaks, and access to safe drinking water, power supply and limited availability of sanitation facilities, will be assessed and addressed through the preparation and implementation of labor management procedures (LMP). Key OHS risks relate to the moving equipment, noise, vibration, welding,



chemical hazard, working environment temperature, working at height and safety and hygiene in worker camps (where established). The LMP as part of ESMP will provide mitigation measures to address such risks and will be incorporated into procurement documents.

The LMP will include a well-functioning and easily accessible grievance mechanism for project workers. The borrower will include in the bidding documents, requirements for (ii) a worker's Grievance Mechanism (GM); and (iii) sensitization related to the availability of worker's Grievance Mechanism (GM) and on the of code of conduct to prevent and address potential harassment, child labor, gender or GBV/SEA issues, intimidation and/or exploitation during the implementation of the activities financed under this project.

The ESMP will also include measures to avoid and prevent potential hazards to workers under an OHS management plan (OHSMP) which ensure that all applicable health and safety legislation and the requirements set out in ESS2 and relevant sub-sections of the World Bank Group General EHS Guidelines are met during the construction and operation phases of the project. As part of each contractors' C-ESMP, an OHSMP will also be prepared to include: (i) an occupational health and safety, communication and training program; (ii) provision of organization charts; (iii) safety regulations, responsibilities, accident and incident response and reporting, use of personal protective equipment (PPE), fire prevention measures, fall protection and emergency preparedness; (iv) first aid and emergency response and transfer during construction. Furthermore, the construction supervisors will be responsible for support services to ensure that all sub-contractors adhere with the project OHSMP and report incidents and accidents as well as non-compliances in timely manner. The Borrower will require the O&M contractor to develop, implement and maintain the OHSMP to ensure that all applicable health and safety legislation and requirements set out in the ESS2 and relevant sub-sections of the World Bank Group General EHS Guidelines are met during the operation. The borrower will develop, and where relevant include in the bidding documents, requirements for (ii) a worker's Grievance Mechanism (GM) which could address all workers complaints; and (iii) sensitization related to the availability of worker's Grievance Mechanism (GM) and on the of code of conduct to prevent and address potential harassment, child labor, gender or GBV/SEA issues, intimidation and/or exploitation during the implementation of the activities financed under this project. The labor management procedures will include assessment of OHS risks and impacts related to project activities as they are defined through preparation and proposed measures to manage those risks – in parallel with project ESA instruments.

Key primary suppliers for the project will be the producers of aggregate material for construction who are mostly located Nghe An or other nearby provinces. The number of project primary workers is expected to be limited, with much of the work being done mechanically. Due diligence review on labor and working conditions of primary suppliers will be done as part of ESIA. Furthermore, ESS2 monitoring requirements, included in the ESMP, will also cover primary supply workers.

Due to the global spread of Coronaviruses (Covid-19). Project personnel and workers may be exposed to and infected by Covid-19 which in some can cause symptoms ranging from mild disease similar to a common cold, in it can present to more severe (even fatal) symptoms, and potentially lethal forms of the disease. To prevent Covid-19 exposure and infection to the project personnel and workers and transmission to the local community the following measures will be included in the ESMP: (1) include Covid-19 prevention and control measures into the civil works and consulting packages; (2) provide adequate hygiene and personal protection equipment to personnel and workers; physical distancing to minimize chance of exposure to staff, workers, and visitors; adhere to standard precautions procedures



issued by the government; provide training on Covid-19 prevention to personnel and workers; closely monitor implementation measures by the PMU, construction supervision consultant, and the contractor; and (3) develop rapid response procedures to identify nearest medical services for referral, designate quarters for safe isolation of personnel with symptoms.

ESS3 Resource Efficiency and Pollution Prevention and Management

The project is expected to use a substantial amount of resources and materials for construction of the urban roads, river embankment, secondary and tertiary storm water and wastewater collection systems, and the pumping station. Risks and impacts have been identified related to the release of pollutants, waste generation, the management of disposal materials and hazardous wastes, impacts on adjacent communities, and resource use efficiency. These will be assessed, and mitigation measures will be proposed during project preparation and included in the ESMP.

The dredged materials from Vinh River, the regulation lake, and pumping station could be polluted with organic (aliphatic / aromatic / polycyclical hydrocarbons, phenols, agro-chemicals) and anorganic pollutants (e.g. heavymetals, sulfur, phosphates and nitrates). In addition, the dredging activities in Vinh River will have temporary adverse impacts on water quality and aquatic species in the river itself and Lam River due to sediment disturbance and increased turbidity and sedimentation. The potential adverse risks and impacts related to dredging, storage, transportation, and disposal of these materials will be assessed in detailed during the ESA process with associated proposed mitigation measures. A dredged material management plan will be prepared to manage the safe handling, storage and disposal of the dredged materials, as well as exfiltrating waters. Risks and impacts due to generation of non-hazardous wastes as well as hazardous wastes will also be addressed during the ESIA study taking into account the standards measures in the World Bank Group Environment, Health, and Safety Guidelines (WBG ESHG) and WBG ESHG for Water and Sanitation. The project does not support an increase of treatment capacity of the existing WWTP which generates about 500kg of sludge a day. The sludge is dewatered by a sludge dewatering machine, then it is collected and transported to the landfill. Environmental due diligence on the existing WWTP including treatment and disposal of the sludge and health and safety issues will be conducted during the ESA process. Given the project investment types and scale it is not expected that the project will produce significant amount of exhaust gases and GHG emissions during construction and operation. Nevertheless, impacts and mitigation measures related GHG emissions will be addressed in the ESIA process during project preparation. To the extent technically and financially feasible the project will adopt measures, specified in the WBG ESHG and other Good International Industry Practice, for efficient use of raw materials and for optimizing energy use and integrate them into the project technical design.

ESS4 Community Health and Safety

The aspects of community health and safety that need to be considered include waterway and roadway traffic safety in impacted areas, community health issues and safety risks at the construction sites, hazardous substances generated during construction process, and public safety including concerns on GBV/SEA related to the influx of workers and security personnel. These risks and issues will be assessed during the ESA process and mitigation measures, and will be developed and incorporated as part of ESMP for application during the detailed design, bidding, construction or operational phases. The design of these flood control measures (which may also include retention ponds) would incorporate design features that minimize waterfowl and mosquitoes (that can function as disease vectors), and which include safety features (especially for children, disabled/aged people). Flood control



planning relating to the 100-year flood event for river and 10-year for rainfall event will be taken into account in planning flood control. Regarding traffic safety, the ESIA/ESMP will identify, assess and monitor the risks related to traffic and traffic safety risks that would affect local communities and travelers. Mitigation and risk management measures will be incorporated into the design of roads and the intersections, and cost estimations. Measures to enhance traffic safety in relation to the vehicles used by the Project during construction and operation phases will also be proposed. Other measures to minimize the safety risks for traffic means drivers and local residents, will also be proposed for the cases where the road surface is occupied or disturbed by project activities. The ESIA/ESMP will also considers the incremental safety risks when the public is using the footpaths and the application of universal access in the design of the footpaths and along the new roads including those within the resettlement site. Regarding community health and safety risks related plant operation, while the use of highly toxic substances in the WWTP operation is not likely, the ESIA will identify and assess health risks of the pollutants emitted from and the chemicals used for wastewater treatment, and ESMP will include recommendations on the size of buffer zone and Emergency Responsive Plan will be prepared as part of the WWTP's operational manual. The ESIA will assess risks posed by security arrangements to those within and outside project site and the ESMP will include the measures to avoid, mitigate the identified risks in accordance with ESS4.

During construction phase, especially construction of the urban roads in densely populated areas, air emissions will include exhaust from heavy vehicles and machinery, and fugitive dust generated by construction activities. Those most likely to be affected are people living within the proximity of the construction sites and along the corridor and transport routes. The implementation of mitigation measures such as dust suppression and vehicle maintenance will be applied to minimize the impact of air emissions during construction, and residual impacts are expected to be limited in scope and duration. Road safety issues will be assessed during ESA process, and appropriate safety measures will be established to avoid the occurrence of incidents and injuries to the communities and general public.

Civil works may result in the presence of workers from other localities the project area. Depending on the scale of each subproject, a moderate number of workers (250-300 workers) will be required for construction sites. This has the potential to result in impacts to community health and safety. Gender-based violence (GBV), sexual exploitation and abuse (SEA), and the spread of sexually transmitted and communicable diseases, may occur especially among vulnerable populations. During preparation, the project should (i) undertake a mapping of service providers and assess the capacity and quality of these services for the survivors, (ii) assess the ability of the client to respond to GBV risks, (iii) assess the risk of GBV for the project, (iv) establish procedures to review and update risk assessments during project implementation, (v) identify and include appropriate mitigation measures for inclusion of worker codes of conduct). In addition, efforts will be made to manage the potential labor influx by developing a labor influx management strategy to be included in the ESA. Furthermore, any private security to be retained by the PMU and Contractors will be unarmed, registered and trained (this requirement will be specified in the bidding documents).

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The main factor leading to the substantial social risk rating assigned to this project relates to the acquisition of land from approximately 1,500 households, of whom about 225 households need to be relocated. The scope of the infrastructure to be developed in the Component 1, 2 and 3, implies substantial land acquisition may be necessary, leading to the loss of lands, relocation of households, permanent economic impacts, and restrictions to access to livelihood activities. There may also be land acquisition requirements associated with the disposal of the dredge



materials and construction spoils leading to a permanent loss of crops, trees and land-affixed assets. Permanent acquisition of residential, garden, agricultural, water surface areas, and the permanent disruption of business activities, will occur. There is also a risk of temporary restrictions in access to residential and commercial establishments, which could affect people’s livelihoods. Temporary land acquisition is also possible.

The project will use the available resettlement sites in the city to serve for the relocation of PAPs. The RSs will be located close to affected areas and connected with the other neighborhoods of the city. Considering that relocated HHs can also choose to self-relocate, it is expected that the proposed resettlement sites will cover the needs of HHs wanting to be relocated in a serviced resettlement sites. Some sections of river embankments that will be constructed under Component 3, are densely populated. Those households located along the Vinh river have established property rights (with land use certificates), permanent houses and generally stable livelihoods. Further assessment needs to be carried out in the next stage to determine the likelihood of households without established rights being affected, and to ensure that any such households will receive adequate and secure housing, compensation for loss of assets.

Efforts will be made to avoid or minimize the potential land acquisition or involuntary resettlement during the subproject identification through the use of environmental and social screening tools in conjunction with early stakeholder engagement activities. With regard to the vulnerability associated with economic displacement, there are potential impacts by both permanent and temporary losses of informal urban small businesses, street trade, aquaculture, and fishing. Therefore, appropriate livelihood restoration measures will be required. Further assessment will be undertaken in the next stage of project preparation, taking into account the impacts on economic activity (street vendors, traders, and other potentially vulnerable groups), and various options for relocation. Self-relocation will be explained more fully once the next steps of consultations with the potential relocated households carried out and initial relocation options discussed and proposed. The issue of potential induced impacts on land prices and construction will be considered as part of the ESA.

A Resettlement Plan (RP) will be developed, taking into account the socioeconomic vulnerability of the affected population to avoid the risk of impoverishment, particularly among the people who do not hold property titles to the land they occupy, ensuring that the mitigation measures are adequate to restore their living conditions, including the analysis of options beyond cash compensation.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The project roads and drainage and wastewater collection systems will be constructed in the urban core area of the city. The areas where construction of the regulation lake, dredging and embankment of Vinh River, and construction of the new bridges will take place, are either fully converted to ethnological urban landscapes or can be classified as modified habitats disturbed. Most lands within the project footprint have been disturbed by human activities and polluted by wastewater and solid domestic wastes. While Vinh River and especially Lam River can in principle be considered aquatic ecosystems and home for aquatic species, none of the proposed investments are located within or in a proximity of any critical natural habitat or area of high biodiversity value. Nevertheless, the ESA process will take into account the adverse impact on aquatic ecosystems during construction (e.g. increased water turbidity, accidental pollution from spillage of construction materials and chemicals) and operation in the project area of influence including Vinh and Lam Rivers. The Borrower will conduct the environmental and social assessment in



accordance with requirements of ESS6 during project preparation. At minimum the assessment will include potential risks and impacts to natural habitats (including modified and critical) from the various project activities, including potential direct, indirect, and cumulative impacts on key biodiversity and aquatic ecosystem. The ESIA will include appropriate measures to avoid, mitigate, minimize or compensate for the disturbance or negative biological impacts through the siting of the works, engineering design or construction practices. The ESIA will also include the potential positive impacts on e.g. Vinh and Lam Rivers by the improved water quality of the outflows from Vinh City. Opportunities for upgrading and expanding modified habitats, and “greening” infrastructure by ecologically friendly urban design and landscape design will be included in the project technical design.

The project will involve primary suppliers, especially for stones, aggregates sand supply. The ESIA will include a basic evaluation of their E&S management systems and verification of operational practices used by the primary suppliers to: (i) identify where the supply is coming from and the licensed source area; and (ii) where possible, limit procurement to those suppliers that can demonstrate that they are not contributing to significant degradation of river natural or critical habitats.

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

The initial assessment indicates that the majority Kinh people are dominant (98%) in the project area with small numbers of Thai, Tho and Mong. The minority ethnic populations are made up of individual households, residing in mixed neighborhoods with the Kinh majority, and have no collective attachment to the project area. Therefore this standard is not relevant.

ESS8 Cultural Heritage

The project initial environmental and social screening identified no temples, pagodas and other cultural heritages located within or proximity to the project sites. Nevertheless, ESA process will further survey and consult with the local cultural and archeological authorities to identify the existence of tangible and intangible heritage within the area of influence of the Project; assess the extent to which the project interventions may cause impacts to these cultural assets; and propose appropriate mitigation measures to be included in ESMP for implementation. In any case, the ESA will at a minimum produce a chance find procedure for physical cultural heritage that may be affected during project implementation and include as part of the EMSP.

ESS9 Financial Intermediaries

The standard is not relevant, as the project does not involve any financial intermediaries.

B.3 Other Relevant Project Risks

No other relevant project risks envisaged.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

Yes

Public Disclosure



OP 7.60 Projects in Disputed Areas

No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?

No

Financing Partners

N/A

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

Actions to be completed prior to Bank Board Approval:

Actions to be completed prior to Appraisal:

- Complete the Environmental and Social Commitment Plan (ESCP)
- Complete the Environmental and Social Impact Assessment
- Complete the Stakeholder Engagement Plan (SEP) and project level grievance redress mechanism
- Complete Labor Management Procedures, including a workers grievance redress mechanism (LMP)
- Complete the Resettlement Plan (RP)

Prior to project appraisal, the ESCP, ESIA, SEP, RP, and LMP will be disclosed in places accessible to the public to meet the requirements set out in ESS10.

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

- Commitment to prepare the relevant instruments per Environmental and Social Standards (ESSs’) requirements.
- Adequate allocation of resources (human, finance) for application/implementation of ESF, ESSs and relevant instruments.
- Commitment to prepare and implement a capacity build plan with strong focus on application/implementation of ESF, ESSs and relevant instruments.
- Commitment to update and implement the Resettlement Plan, based on detailed designs and the latest Detailed Measure Survey and Replacement Cost Study, and establish associated grievance redress mechanism.
- Establish a Project Level Grievance Redress Mechanism.
- Update Stakeholder Engagement Plan based on the public health situation regarding communicable diseases.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

15-Oct-2020

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: The Socialist Republic of Vietnam

Implementing Agency(ies)

Implementing Agency: People's Committee of Nghe An Province

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VI. APPROVAL

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Safeguards Advisor ESSA	Nina Chee (SAESSA) Cleared on 20-Jul-2020 at 10:08:58 EDT

Public Disclosure