



Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 03/07/2019 | Report No: ESRSC00249



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Vietnam	EAST ASIA AND PACIFIC	P167595	
Project Name	Transforming the Mekong Delta GCF Program for Vietnam		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Environment & Natural Resources	Investment Project Financing	10/23/2019	12/16/2019
Borrower(s)	Implementing Agency(ies)		
Government of Vietnam	Ministry of Agriculture and Rural Development (MARD)		

Proposed Development Objective(s)

Financing (in USD Million)	Amount
Total Project Cost	0.00

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

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 proposed project focuses on the upper delta provinces (Dong Thap, Long An, Tien Giang, Vinh Long, Kien Giang, An Giang, Hau Giang and Can Tho) of Vietnam’s Mekong Delta. This project has three components, and except for Component 3 on Project Management and Monitoring, application of ESSs will be screened and confirmed for Component 1 and 2, Policy Implementation Support for PM Resolution 120 and Scaling up Climate Change for



Interprovincial Projects. The upper delta area is characterized by natural occurring deep floods in the wet season. The development of an extensive agricultural flood control system has shifted the flood waters to other areas in the Delta and also reduced the beneficial effects of flooding which historically included replenishment of soil fertility, groundwater recharge, and the preservation of aquatic eco-systems. In An Giang Province, a large bird sanctuary exists at Tra Su, which is also home to Tra Su Forest. With an area of 850ha, Tra Su Forest is home to 70 species of birds including two rare species of birds recorded in Vietnam's Red Book: *Mycteria leucocephala* and *Anhinga melanogaster*. Tràm Chim National Park is a national park in Dong Thap Province. This national park was created to protect several rare birds, in particular the Sarus Crane (*Grus antigone*), a species listed in the IUCN Red Book. In Kien Giang, U Minh Thuong National Park contains over 243 plant species and has a rich mammalian population, including hairy-nosed otters and fishing cats. A total of 187 birds have been recorded here, including the oriental darter, spot-billed pelican, black-headed ibis, glossy ibis, greater spotted eagle and Asian golden weaver. There are also a total of 39 amphibian species and 34 species of fish in the park. Riverbank erosion has been a critical issue of the Mekong region, especially the upper and middle delta (An Giang, Dong Thap, Vinh Long, Can Tho). Serious landslide incidents happen more frequently, creating horrendous damages to communities and livelihoods along the river banks. Despite the urgency and seriousness of the riverbank erosion challenge in the region over the last few years, efforts have largely been focused on dealing with the incidents of landslides and resettlement of affected households as emergency reaction. The Mekong Delta has been critical for Vietnam's development and also for regional food security. It produces 50% of Vietnam's rice (90% for export) and 70% of its aquaculture products. However, over the last decade, a number of natural and anthropogenic changes are placing significant development pressures on the Mekong Delta. Intensified production has taken its toll on the natural resources and environments of the Delta. Furthermore, climate change is expected to further threaten lives, livelihoods and assets in the Mekong Delta. Rice yields in the Mekong Delta are expected to decline from 6-12% due to resulting inundation and salinity intrusion, while aquaculture production will also be affected. Socio-economic stresses are also apparent. Under stress from multiple economic and environmental pressures and risks, small-scale farmers increasingly have difficulties securing a minimum level of profitability and a stable livelihood base (World Bank, 2014). While both the poverty rate and income inequality in the Mekong Delta is lower than the national average, the gap between the poor and rich has been growing over the last decade in the Mekong Delta. The gap between the lowest income quintile and the highest income quintile in 2004 was 6.7 times and this had grown to 7.7 times by 2012. Ethnic minorities (Khmer, Chinese and Cham) are unevenly distributed across the Mekong Delta Provinces. Within the project provinces, Soc Trang, Tra Vinh and Kien Giang have the largest populations of ethnic minorities (36%, 32%, 15% respectively).

D. 2. Borrower's Institutional Capacity

At the central level, the Ministry of Agriculture and Rural Development (MARD), responsible for rural development and the governance, promotion and nurturing of agriculture and the agriculture industry, is the lead implementing agency. The purview of the Ministry includes forestry, aquaculture, irrigation and the salt industry; it is also involved in water management and flood control. MARD has considerable experience in the implementation of World Bank-financed projects, and has experience managing environmental and social risks under the previous Bank's safeguards policies. Other governmental agencies that are involved in the project implementation include the Ministry of Natural Resources and Environment (MONRE), the Ministry of Planning and Investment (MPI), and the Ministry of Finance (MOF). These agencies also have experience in implementing Bank-financed projects, and in applying Bank's environmental and social safeguards. At provincial level, the provincial authorities of Dong Thap, Long An, Tien Giang, Vinh Long, Kien Giang, An Giang, Can Tho, Hau Giang, especially Provincial People's Committee and its departments (DPI, DARD, DONRE, DOF) will be responsible for project implementation at local level. All the 8 project provinces have experience in implementing a World Bank funded project, and their relevant departments are with Bank safeguards requirements. However, none of these agencies have experience in preparing and implementing a project



under the Environmental and Social Framework (ESF), implying that, training and capacity building is required. For example, they are not familiar with the concept of proportionality and adaptive management of the ESF. Also, as most Borrowers, the project counterparts will need to familiarize on new content and concepts of the ESF, e.g. on labor management, community health and safety, environment, health and safety (OHS), modified natural habitats and the requirements for systematic stakeholder engagement. Their capacity for ESF implementation will need to be strengthened on the institutional level (inter-agency coordination and additional human resources) and targeted training programs focused on environmental and social risk management professionals. The task team also expects a significant increase in Borrower’s demand for continuous support in environmental and social risk management during preparation and implementation, as compared to the previous safeguard policies, 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)

Substantial

Environmental Risk Rating

Substantial

The project environmental and social risks and impacts are related to the implementation of policy support (Component 1) and investments planned under Component 2. The main activities under Component 1 support (i) implementation of legislation, guidelines relating to inter-provincial and regional coordination; implementation of sustainable financing mechanism for the Mekong Delta; (ii) improving enabling environment for private sector financing and entrepreneurship; and (iii) enhancing climate information services and transboundary collaboration in the Mekong Delta.

The main activities under Component 2 of the project focus on the preparation of feasibility studies related to flood ‘friendly’ and small-scale nature-based infrastructure, climate-resilient investments, and potential investments in floodplain eco-tourism. Component 2 also include technical assistance (TA) which will help preparation of feasibility studies (FS) for future projects. The objective to leverage significant government and private sector funding in connection with the project. These may be moderate scale provincial or interprovincial infrastructure projects such as low dyke reinforcement, on-farm sluice gate construction, construction or rehabilitation of roads, or a combination of transformative infrastructures.

The project is expected to bring about significant positive impacts for enhancement of climate resilience, and contribution to long-term planning, regional coordination, and sustainable financing efforts in Vietnam's Mekong Delta. The potential adverse environmental and social risks and impacts would be associated with policy revision and development activity under Component 1 that may have environmental and social implications, and the activities under Component 2. There is medium to low probability of serious adverse effects to the environment and human health (e.g., due to accidents, improper use and disposal of pesticides, etc.) due to activities of the project. Although sensitive areas such as national parks and a bird sanctuary exist in the project area. However, no project activities will be allowed in these sensitive areas. In addition, given the nature and small scale of the project activities the adverse impacts on them are expected small.

The TA activities themselves do not have adverse environmental or social impacts. However, the outcomes of the TA support would have environmental and social implications going forward, entailing risks and potentially inducing adverse impacts. Given the type, location, sensitivity and scale of the future projects with their FS prepared by the

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project, they may pose substantial risk for the environment. This future risk of potential investments resulting from this TA activities of this project is considered in the environmental and social risk classification (ESRC). The environmental and social (ESS) instruments planned for this project will be prepared with a perspective to potential environmental risks and impacts result in adverse effects on human health and safety due to construction activities, waste generation, disturbance of water quality and aquatic species, spoil disposal, piling works for structures built in the water, and effects on areas of sensitivity such as natural habitats and modified natural habitats. Given that the TA project might result in a portfolio of various projects in a geographically homogeneous area, a cumulative assessment might be recommended as one of the possible instruments to manage downstream risks and impacts.

Social Risk Rating

Moderate

The social risks/impacts of the project are rated as Moderate. First, for component 1, although the policy implementation support (resolution 120/NC-CP of the Government and Decision 593/QD-TTg) may have social implications across a wide geographic area (the whole Mekong Delta region), relevant provisions will be included to ensure that any subsequent interventions are tailored making in accordance to, among others, local culture with priorities given to vulnerable groups such as poor, and ethnic minority people. The policy also emphasizes the importance of close collaboration among provinces, especially in interprovincial projects. Second, the site-specific impacts due to the construction of small livelihood related infrastructures would be mostly temporary, predictable and manageable. The infrastructure to be financed, will mainly located in the area where population density is very low, hence the land acquisition and relocation impact would be minor. In addition, given the small scale of the proposed infrastructure, no major labor influx to project area is expected. Third, the social risks/impacts associated with interprovincial investments, for which the project will finance feasibility studies, are considered moderate. This largely because of the moderate scale of the infrastructure that will be financed (dyke re-enforcement, farm to market roads, sluiceways). Relevant provisions will be included in the TORs to ensure that social impacts/risks (especially on land and livelihoods) are properly taken into account. That said, there are concerns over the capacity of implementing agencies in managing social risks under the ESF. Also, there is a possibility that some livelihood models (especially if shrimp farming is promoted) having negative consequences for neighboring farmers who continue rice production, and do not adopt these livelihoods. In that case, the likelihood and scale of adverse impacts might change. Similarly, it will be important during preparation to fully assess whether or not the activities to be financed under this operation could be linked with the activities of the IDA financed Mekong Delta Integrated Climate Resilience and Sustainable Livelihood Project. Therefore, the social risks classification, will be reviewed regularly, during preparation.

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:

As part of E&S screening, the team has reviewed a number of relevant documents, including project concept note, resolution 120 of the Government on sustainable development of Mekong Delta, decision 593 of the Prime Minister on piloting the socio-economic linkage for Mekong Delta development, land law, labor code. In addition, documents (e.g. regional environmental and social assessment, PAD, ISRs) prepared under Mekong Delta Integrated Climate Resilience and Sustainable Livelihood Project (MDICRSLP) have also been reviewed to inform E&S risks and impacts of



GCF funded operation. During preparation of the MDICRSLP a Regional Environmental Assessment (REA) was conducted. The REA confirmed that rapid population growth and intensive agricultural and aquaculture development over the past decades have significantly reduced the natural values in the delta area, and found that (a) highly controlled multi-crop farming systems have depleted soil fertility and cut off agricultural areas from natural fertilization processes of the Mekong River, (b) shrinking Mekong Floodplain area has exacerbated flooding in unprotected areas, (c) draining of wetland depressions in the delta for agricultural expansion; (d) dry season agriculture is shifting the delta's balance between fresh and marine environments; and (e) centralized water control initiatives such as the saline control structures in the coastal areas of the delta often limit the livelihood and economic opportunities for farmers seeking to take advantage of market driven opportunities. The REA, however, found no major adverse regional negative impacts resulting from this project and that the adverse impacts are likely to be only local or sub-regional and can be managed through implementation of the subproject safeguards instruments and the ESMP. The main environmental risks and impacts are related to Component 1, Component 2, and potential impacts of interprovincial investment of which the feasibility studies will be financed by the project. The main environmental risks and impacts during pre-construction, construction, and preparation of the potential future climate resilience infrastructure resulting from TA provided under this project include: (i) safety risk due to UXOs; (ii) exposure of acid sulfate soil from excavation activities causing water pollution in the surrounding areas; (iii) risks to health and safety of local people and construction workers; and (iv) water use conflict among rice farming and aquaculture. The main environmental adverse impacts during operation would include: i) impacts on water quality and aquatic life as a result of increasing use of agrochemicals due to provision of more freshwater for rice irrigation; ii) impacts of solid waste and waste water from pilot of agriculture and aquaculture models; and iii) Potential environmental risks such as epidemic of fish or shrimp disease, structure damage. The future projects with the FSs prepared under the TA activities may have potential substantial risks and impacts on the environment and human health. The main social risks and impacts are related to the policy implementation support (component 1), site specific impacts due to the construction of livelihood related infrastructures (component 2), and potential impacts of interprovincial investment of which the feasibility studies will be financed by the project. These would include: (i) loss of crops, trees, livelihoods, and other properties due to permanent and temporary land acquisition and relocation of households; (ii) disruption in the livelihood activities of farmers and fishers (due to construction and operation of infrastructure); (iii) modest levels of labor influx and related risks of community safety and disruption; (iv) increase of water use conflict between rice farming and brackish water aquaculture; (v) farmers' resistance to adapting in livelihood models; (vi) risk that failure of livelihood models adversely impacting welfare of beneficiary households (vii) uneven access to project benefits among vulnerable groups such as poor households, female headed households, and ethnic minority household (viii) relocation of graves; and (ix) risks to human health due to potential use of pesticides in livelihood activities. There are also the risks of inadequate horizontal and vertical inter-coordination among implementing agencies at central and provincial levels. Although the potential impacts/risks of the proposed project are diverse, they are all manageable and could be mitigated/compensated through appropriate environmental and social assessment and mitigation plans to be developed during the project preparation or implementation. Hence, there is no need for independent third-party assessment. Since the project will involve activities/subprojects, and the risks and impacts cannot be determined during project preparation until the activity/subproject details have been identified, an Environmental and Social Management Framework (ESMF) will be prepared during preparation. The ESMF will set out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts and preparation of safeguards instruments during implementation. During implementation, the identified activities/subprojects directly funded by the GCF fund and the identified projects under the TA support will be screened for their environmental and social issues, risk classification, applicable ESSs, and the necessary safeguard



instruments such as Environmental and Social Management Plans (ESMPs) or Environmental and Social Impact Assessment (ESIAs) will be prepared following the requirements in the ESMF, proportionate to the nature and scale and the potential risks and impacts of the project, and consistent with the requirements of the Bank Environmental and Social Framework (ESF). The terms of reference, work plans, and documents defining the scope and outputs of the TA activities will be drafted so that the advice and other support provided is consistent with ESSs1-10. The ESA process will follow requirements of the relevant ESSs in identifying and managing the environmental and social risks and impacts including direct, indirect, cumulative, and residual impacts.

Areas where reliance on the Borrower’s E&S Framework may be 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. 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

Along with beneficiary communities and households, the project affected parties include implementing agencies at the national level (MARD, MPI, MONRE, MOF), the local authorities of participating provinces (including PPC, DARD, DONRE, DPI, DOF and relevant district people’s committee). In addition, other interested parties include media, local/international NGO and development partners (GIZ, JICA, IUCN, USAID, DFAT) working in the same region; mass organizations such as the Fatherland Front, the Women’s Union and the Farmer’s Union. The Bank team will collaborate with client in identifying “disadvantaged or vulnerable” project-affected individuals or groups during stakeholder identification and analysis. A stakeholder engagement plan (SEP) will be developed for this project, to ensure transparency and meaningful consultation with the affected and interested parties. Stakeholder engagement and consultations will be conducted throughout the project cycles. This will include discussions of project design and impacts among potential beneficiary communities, as well as provincial level multi-stakeholder discussions on these issues during the preparation phase. 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.

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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

With the current design, it is expected that project activities will require the use of project workers (mostly locally sourced) to support the project management, and the construction of small scale infrastructure. Project workers may include direct workers, contracted workers, primary supply workers, and community workers (for small scale infrastructure). However, given the small scale of the interventions to be financed by the project, it is not anticipated that a significant number of workers will be required for construction sites and that the majority will be sourced locally. Most risks relate to health and safety issues associated with the construction and operation of climate resilience infrastructure and livelihood models. Additional aspects of the implementation of ESS2 (e.g. the possible use of community workers) will be further assessed during the project preparation as part of ESA process. A labor



management procedure applicable to the project will be required, and prepared prior to start of works. These procedures will set out the way in which project workers will be managed in accordance with requirements of national laws and the ESS2.

ESS3 Resource Efficiency and Pollution Prevention and Management

Given the type and small scale of the project, a limited amount of resources and materials will be required, and the adverse impacts on human health and environment are expected to be small to moderate. Nevertheless, risks and impacts related to the release of pollutants, waste generation, the management of pesticides and hazardous wastes, impact on community, and resource use efficiency will be assessed, mitigation measures proposed during project preparation. The project may involve pesticide use due to potential land-use development or changed cultivation practices in project area. However, it is not expected that project would involve significant pest management issues or any contemplating activities that may lead to significant pest and pesticide management issues; therefore, a Pest Management Plan is not needed. Measures to address impacts of pesticides will be included as part of the ESMF and ESCP as per Paragraphs 22,23 & 25 of ESS3 and ESHGs. During the environmental and social assessment process, if it is determined that the project will produce significant emissions, an estimate of gross GHG emissions resulting from the project will be required, providing that such estimation is technically and financially feasible. To the extent technically and financially feasible the project will adopt measures, specified in the WB Group ESHG and other Good International Industry Practice, for efficient use of raw materials and for optimizing energy use.

ESS4 Community Health and Safety

Given its nature and scale, the project is not expected to exert large amount of hazardous materials affecting community health, to cause significant road safety issues, or to cause substantial adverse impacts on the community due to labor influx. The project does not involve construction or rehabilitation of dams, or depend on existing dams. The type water retaining structures under the GCF funded activities and the feasibility studies for medium scale inter-provincial investments under the TA component will be in the form of sluice gate not requiring dam safety measures. Therefore, standard measures in the World Bank Group Environment, Health, and Safety Guidelines (EHS) to ensure the community health and safety of communities during the construction of operation of project financed infrastructure should suffice. These include the measures in general facility design and operation, communication and training, and the measures to address physical hazards, chemical hazards, personal protective equipment, special hazard environments, and Monitoring. However, the need for additional measures of this ESS will be further assessed during project preparation as part of ESA process.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

It is possible that some of the project activities to be financed under this operation will require minor amounts land acquisition at the household level for the construction of small livelihood related infrastructures. Also, the construction of flood mitigation measures and nature based solutions may have minor impacts on water dependent livelihoods. At this point, the land acquisition requirements for small scale infrastructure financed by the proposed project would be moderate. This means that it would be limited to the acquisition of small amounts of land, and land affixed assets in rural areas, and would not require the displacement of households, whole-sale acquisition of agricultural plots, or the permanent disruption of business activities. The land acquisition impacts of cross-regional



(inter-provincial) infrastructure, for which the project would finance feasibility studies, is currently unknown. Once the scope of these studies become available, the ESRC will be revisited and updated (if necessary) accordingly. A Resettlement Policy framework will be prepared during the project preparation and resettlement plans will be prepared when the project location and impacts are known.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

In general, the project is located in an ecologically sensitive area with some high conservation value spots. Care will be taken to ensure that the project activities do not take place in, or in close proximity to natural reserves and wildlife and bird sanctuaries. These include the following: In An Giang Province, a large bird sanctuary exists at Tra Su, which is also home to Tra Su Forest. With an area of 850ha, Tra Su Forest is home to 70 species of birds including two rare species of birds recorded in Vietnam's Red Book: Mycteria leucocephala and Anhinga melanogaster. Tràm Chim National Park is a national park in Dong Thap Province. This national park was created to protect several rare birds, in particular the Sarus Crane (Grus antigone), a species listed in the IUCN Red Book. In Kien Giang, U Minh Thuong National Park contains over 243 plant species and has a rich mammalian population, including hairy-nosed otters and fishing cats. A total of 187 birds have been recorded here, including the oriental darter, spot-billed pelican, black-headed ibis, glossy ibis, greater spotted eagle and Asian golden weaver. There are also a total of 39 amphibian species and 34 species of fish in the park. Wetlands/Biodiversity impacts. Dong Thap: It is suggested that a wetland in Gao Giang be developed as a water reservoir to provide fresh water for aquaculture, and also to serve as an ecotourism site. Mitigation measures must be in place to protect or rehabilitate the melaleuca forests and species in the wetlands, especially during construction. The livelihood activities under the project will involve agriculture, forestry, and aquaculture activities. However, the establishment / promotion of commercial agriculture, forestry, animal husbandry or aquaculture is not supported by project financing. Primary production and harvesting, if any under the project, will be assessed for the overall sustainability of these activities as well as their potential impacts on local or nearby communities. The Borrower will conduct the environmental and social assessment in accordance with requirements of ESS6 during project preparation and implementation. At minimum the environmental and social assessment process during project preparation will assess potential risks and impacts to natural habitats from the various project activities, including potential direct and indirect impacts on key biodiversity receptors.

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

An initial screening of the provinces where the project activities will take place confirmed the presence of ethnic minority groups (details in below table). Provinces Population EM Population Percentage Long An 1,436,066 4,422 0.3 Tien Giang 1,672,271 4,812 0.3 Kien Giang 1,688,248 241,793 14.3 An Giang 2,142,709 112,821 5.3 Dong Thap 1,666,467 2,749 0.2 Can Tho 1,188,435 36,180 3.0 Hau Giang 757,300 27,798 3.7 Vinh Long 1,024,707 26,915 2.6 In the project area, Cham and Khmer ethnic communities are somewhat more vulnerable on a number of aspects (MDRI, 2015). The Khmer are the fifth largest ethnic groups in Vietnam, and have recently made significant gains in terms of poverty reduction, with the Poverty rate decreasing from 60.2% in 1999 to 26.3% in 2011. The majority (64%) of Khmer work in the agriculture sector with the agricultural land area per capita of 1,118.2 square meters. The primary and secondary enrollment rates of Khmer people are lower than other groups, being 85.2% and 61.2% respectively. For the Cham people, this group was among the ten best performed in improving household living standards (World Bank 2018). School enrollment rates were at a level close to other ethnic groups with 91.2% (for primary school) and 72.6% (for secondary school) in 2009. Agriculture continues to be the dominant livelihood

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activity, employing 69.1% of labor force. Access to clean water has been substantially improved with an increase from 43.5% in 2009 to 73.9% in 2015. Health insurance coverage remains low at 64.6% of the population (although better than the Khmer which is 44%). Both ethnic groups have challenges in closing gender gaps in education (average schooling years, literacy rate, education attainment) with lower rate for women compared to men. Given the importance of agriculture for the livelihoods for both groups, and the disparities in educational attainment, project activities may need to be adapted when implemented in these communities. Given the (sub-)project activities are not known by appraisal. The ethnic minority framework will be prepared, describing the provisions and procedures for implementing ESS7, including the screening process for the presence of ethnic minority people for specific sub-projects. Subsequently, an Ethnic Minority Development Plan(s) can be prepared during implementation. This will be further assessed during project preparation.

ESS8 Cultural Heritage

Given the nature, scale, and location of the project, it is not expected to cause significant adverse impacts on tangible and intangible cultural heritage. However, the presence of cultural heritage in the project area is likely, especially in the form of family shrines, cemeteries or temples. Hence the scope of applicability of this ESS will be further assessed during project preparation as part of ESA process. 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, as well as a screening process to minimize possible impacts on cultural heritage such as family shrines and temples.

ESS9 Financial Intermediaries

At this stage no financial intermediaries are expected to be involved in the project. Relevance of this ESS will be further assessed during project preparation as part of ESA process.

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

OP 7.60 Projects in Disputed Areas

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?

No

Financing Partners

No common approach is considered.

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

Actions to be completed prior to Bank Board Approval:

Actions to be completed prior to Bank Board Approval:

- Complete Environmental and Social Management Framework (ESMF)
- Complete the Resettlement and Ethnic Minority Development Frameworks
- Complete the Stakeholder Engagement Plan (SEP)
- Complete the Labor Management Procedures (LMP) and Grievance Mechanism for project workers
- Complete the Environmental and Social Commitment Plan (ESCP)
- Prior to project appraisal, disclose the SEP, RPF, EMPF, ESMF, and ESCP 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.

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

Possible issues to be addressed in the Borrower 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
- Complete the Ethnic Minority People Plan and a dedicated Grievance Mechanism per requirement of ESS7 (para 13)
- Preparation of Site Specific Resettlement Plans and establish associated grievance redress mechanism
- Develop and Implement a Project Level Grievance Redress Mechanism.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

20-Aug-2019

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Government of Vietnam

Implementing Agency(ies)

Implementing Agency: Ministry of Agriculture and Rural Development (MARD)

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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