Environmental and Social Management Framework (ESMF)

Project title: Reduce the impact and release of mercury and POPs in Viet Nam through lifecycle approach and Ecolabel		
Country: Viet Nam	**Implementing Partner (GEF Executing Entity):** Ministry of Natural Resources and Environment	**Execution Modality**: National Execution (NIM)
Contributing Outcome (UNDAF/CPD, RPD, GPD): **UNDAF Outcome**: OUTPUT 2.2 Accelerated implementation of policies and measures and enhanced awareness and engagement of stakeholders for low-carbon development, circular economy, environmental protection, and reduced environmental pollution. **UNDP Country Program Outcome:** OUTPUT 2.2: Policies and solutions designed and implemented for transformation to low-carbon development, circular economy, and environmental protection		
UNDP Social and Environmental Screening Category: SUBSTANTIAL	**UNDP Gender Marker:** GEN2	
Atlas Award ID: 00128574	**Atlas Project/Output ID:** 00122537	
UNDP-GEF PIMS ID number: 6491	**GEF Project ID number:** 10519	
Project duration in months: 48 months		
Planned start date: July 2022	**Planned end date:** July 2026	
Expected date of Mid-Term Review: July 2024	**Expected date of Terminal evaluation:** May 2026	

Public Consultation/Disclosure Notice

Date: May 27, 2022 / Vehicle: UNDP Country Office Webpage

The United Nations Development Programme (UNDP) requests feedback on Environmental and Social Management Framework and associated Social and Environmental Screening Procedures for the GEF Project 6491, "Reduce the impact and release of mercury and POPs in Viet Nam through lifecycle approach and Ecolabel". The public consultation period will be opened for 120 days (The last date for receiving of comments is September 26th). Comments and questions can be sent to the following address:

United Nations Development Programme – UNDP
Physical Address: Green One UN House. 304 Kim Ma, Ba Dinh, Hanoi, Viet Nam
Tel: +84 24 385001000
Email: Registry.vn@undp.org

Note: *UNDP takes note of the SES Guidance that applies to this ESMF disclosure procedure: "If undertaken as part of project implementation, must be disclosed and consulted on at least 120 days prior to implementation of any activities that may cause adverse social and environmental impacts*".

CONTENTS

Tables

EXECUTIVE SUMMARY

Over the past 15 years, the manufacturing sector in Viet Nam has been rapidly developing. However, development has been increasing at such a rate that cannot be properly supported by the necessary regulatory tools. Hence product quality, reduction of hazardous chemicals in the manufacturing and protection of the consumers, workers and environment have been compromised at various levels. Thus, the project to "Reduce the impact and release of mercury and POPs in Viet Nam through lifecycle approach and Ecolabel" was designed to respond to the requirements of the Stockholm Convention (to reduce the the use and risks associated with POPs) and the Minamata Convention (to eliminate/replace the use of Mercury and mercury-containing equipment) for the benefit of human health and the environment.

The project encompasses three distinct components as follows:

- Component 1: Address chemical waste at the end of life. This includes chemicals that are used or emitted from processes or products, and waste management through interventions and regulatory, institutional and financial levels, and mainstream environmental sustainability by reducing the use and release of mercury and POPs.
- Component 2: Eliminate the use of POPS in products through the introduction of alternatives products with a preference to non-toxic chemicals, and introduction and use of BAT and BEP to minimize and ultimately reduce releases of UPOPs.
- Component 3: Prevent the generation of waste/products containing POPs from entering material recovery supply chains, and mercury from the major source categories included in both the Stockholm and Minamata Convention.

Therefore, the Environmental and Social Management Framework (ESMF) has been prepared based on the Social and Environment Screening Procedure (UNDP's SESP) for submission of the project to the GEF for CEO Endorsement. This ESMF was completed as part of the project design phase that included consultations with the Implementing Partner, local communities, private sector and civil society entities.

This Social and Environmental Screening Procedure (SESP), that underpins the ESMF, identified 8 risks related to this project, one categorized as Low (Risk 8) and seven categorized as Moderate (Risks 1 to 7). It was concluded that these risks relate to activities with potential adverse social and environmental risks. Along with impacts that are more varied or complex but remain limited in scale and are of lesser magnitude and can be reversible, predictable, have smaller and contained footprint, with less risk of cumulative impacts. Hence, the overall SESP for the project is categorized as **SUBSTANTIAL RISK**.

The broad scope of project activities and outputs is well established. However, additional assessment is required due to the lack of certainty about pilot demonstrations that could not be formally selected during PPG Phase (under Outputs 2.1.2; 2.1.3, 3.1.2;). During the initial six months of the implementation phase, the companies/healthcare units selection process will be carried out including the development of the targeted risk management plans. No activities related to these Outputs will be initiated while the selection process is completed.

Therefore, the scope of the ESMF covers activities in Components 1, 2 and 3. The co-financing for the replication activities related to Components 2 and 3 are also covered under this ESMF consistent with UNDP SES, noting that all works related to these activities are limited to retrofitting of existing enterprises, and no new construction or expansion is planned. The ESMF will follow precautionary actions during the project implementation stage including:

- Confirm risks/mitigation requirements during inception phase
- Undertaking SESA and ESIAs
- Development of ESMPs
- Preparation additional targeted risk management plans
- Conduct annual reviews of safeguard instrument performance
- Development and implement a Grievances Redress Mechanism (GRM)

In line with UNDP SES requirements, based on the risk assessment, a series of risk mitigation/avoidance mechanisms (Targeted Plans) are proposed:

- Preparation of Environmental and Social Impact Assessments (ESIAs) to assess potential social and environmental impacts of a proposed project demonstration activities under Components 2 and 3 (Risks 5, 6 and 7).
- Scope Environmental and Social Management Plan (ESMPs) to mitigate and monitor any potential interconnections of risks (Risks 2, 4, 5, 6, 7 and 8).
- Spill Prevention and Management Plan (Risks 5 and 6).
- Occupational Health and Safety Assessment (Risk 7).
- Risk Management Strategy sound management of mercury stockpiles and obsolete mercury-containing equipment (Risk 5).
- Restructuring (Retrenchment) Plan, if retrenchment is found to be unavoidable for certain industries, will be developed and implemented (Risk 2).

Finally, this ESMF also details the roles and responsibilities for its implementation and includes a framework for a Grievance Redress Mechanism (GRM), budget and monitoring and evaluation plans. The GRM will provide a formal avenue for affected individuals or communities to engage with the Project implementers or sponsors on issues of concern or unaddressed environmental and social impacts. It aims to manage and satisfactorily respond to the complaints of individuals or groups of people regarding the environmental and social performance of the Project. The GRM process will be managed by a Grievance Redress Committee (GRC). None of the members of the Committee shall have a conflict of interest involving any complaint lodged.

Abbreviations and Acronyms

APCS	Air Pollution Control System
BAT/BEP	Best Available Techniques and Best Environmental Practices
BDE	Bromo Diphenyl Ether
BFR	Brominated Flame Retardants
BIDV	Bank for Investment and Development of Vietnam
CAAP	Clean Air Action Plan
CSO	Civil Society Organisation
DONRE	Department of National Resource and Environment
EOL	End of Life
EPR	Extended Producer Responsibility
EPS/XPS	Expanded or Extruded Polystyrene
ERC	UNDP Evaluation Resource Center
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
FSP	Full Sized Project
GEF	Global Environment Facility
GEFSEC	Global Environment Facility Secretariat
GHG	Greenhouse Gases
GM	Gender Mainstreaming
GRM	Grievance Redress Mechanism
GRSC	Grievance Redress Sub-committee
GoV	Government of Vietnam
HBB	Hexa Bromo Biphenyl
HBCDD	Hexabromocyclododecane
HCBD	Hexachlorobutadiene
IA	Implementing agency
IP	Implementing Partner
LEP	Law on Environmental Protection
M&E	Monitoring and Evaluation
MCCP	Medium Chain Chlorinated Paraffins
MOC	Ministry of Construction
MOF	Ministry of Finance
MOH	Ministry of Health
MOIT	Ministry of Industry and Trade
MOLISA	Ministry of Labour - Invalids and Social Affairs
MONRE	Ministry of Natural Resources and Environment
MPI	Ministry of Planning and Investment
MTR	Mid-Term Review
NAP	National Action Plan
NGO	Non-Governmental Organisation
NIM	National Implementation Modality
NIP	National Implementation Plan
NPD	National Project Director

NPM	National Project Manager
NSEP	National Strategy on Environment Protection
NTP SPR	National Targeted Program on Sustainable Poverty Reduction
ODA	Official Development Aid
PB	Project Board
PBDEs	Polybrominated Diphenyl Ethers
PCDD/F	Polychlorinated Dibenzo Dioxins / Furans
PCP	Pentachlorophenol and its salt and esters
PFAs	Polyfluoroalkyl substances
PFOAs	Perfluorooctanoic acid
PFOS	Perfluorooctane sulfonic acid
PIF	Project Identification Form
PIMS	Project Information Management System
PIR	GEF Project Implementation Report
PMU	Project Management Unit
POPP	Programme and Operations Policies and Procedures
POPs	Persistent Organic Pollutants
PPE	Personal Protection Equipment
ProDoc	Project Document
PTS	Persistent and Toxic Substances
SCCP	Short Chain Chlorinated Paraffins
SECU	Social and Environmental Compliance Unit
SES	Social and Environmental Standards (UNDP)
SESA	Strategic Environmental and Social Assessment
SESP	Social and Environmental Screening Procedure (UNDP)
SMEs	Small and Medium Enterprises
SRM	Stakeholder Response Mechanism (UNDP)
TE	Terminal Evaluation
TOR	Term of References
UNDP	United Nations Development Programme
U-POPs	Unintentional Persistent Organic Pollutant
VEA	Vietnam Environment Administration
VEPF	Vietnam Environmental Protection Fund
VIHEMA	Vietnam Health Environment Management Agency
VINACHEMIA	Vietnam Chemicals Agency

INTRODUCTION

An Environmental and Social Management Framework (ESMF) is an instrument that examines potential risks and impacts when a project consists of a series of sub-projects/activities or subsequent implementation of policies, plans, and programmes (PPP) that cannot be fully assessed until the details of the PPP and/or activities have been identified (often later in the project cycle). The ESMF sets out the principles, rules, guidelines and procedures to ensure the social and environmental risks and impacts of the forthcoming but as yet unspecified activities are fully identified (screened) and assessed. This is done to ensure the required management measures are in place prior to implementation of the relevant activities with potential social and environmental risks and impacts. It contains measures for estimating and budgeting the costs of such measures, and information on responsibilities for addressing project risks and impacts (UNDP, 2020, p. 5).

This ESMF was prepared as a response to the Social and Environmental Safeguards Procedure (SESP) screening as a "Substantial Risk Project" for the CEO Endorsement Request "Reduce the impact and release of mercury and POPs in Viet Nam through lifecycle approach and Ecolabel" by the Government of Viet Nam to the Global Environment Facility (GEF).

1.1 BACKGROUND

Currently, at the global level the production of several Persistent Organic Pollutants (POPs) has been discontinued since 2000. Some examples include commercial penta, octa-BDE mixtures, deca-Brominated Diphenyl Ethers (deca-BDEs), Polyfluoroalkyl substances (PFAs), Hexa-bromocyclododecane (HBCDD) and short chain chlorinated paraffins (SCCP). Some of these chemicals have been produced in large quantities until recent years, whereas others are still being manufactured and commercialized as additives in industrial processes such as the manufacturing of paint, plastic components, polymers, foams (extruded and expanded polystyrene - EPS/XPS) and special purpose textiles and upholstery.

The fast development of the manufacturing sector in Viet Nam that has been occurring the past 15 years is not being properly supported by regulatory tools. Hence, this does not allow the sector to ensure product quality, reduction of hazardous chemicals in the manufacturing and protection of the consumers, workers and environment especially in industries using the above mentioned chemicals.

The structure of the manufacturing industry in Viet Nam, although slowly shifting towards large-scale organizations, is still based in small and medium sized enterprises (SMES) with an estimated 120,000 SMEs in 2015.

In addition to the safety aspects for consumers, workers, and the environment, the contamination by mercury and POPs is also currently hindering the full development of circular economy in Viet Nam as the articles potentially contaminated by POPs and mercury are unsafe for reuse or recycling.

Hence, to combat the issues pertaining to POPs and mercury, the Government of Viet Nam with support from UNDP, formulated the project to "Reduce the impact and release of mercury and POPs in Viet Nam through lifecycle approach and Ecolabel" for submission to the GEF.

The project is designed to respond to the requirements of the Stockholm Convention (to reduce the risks of POPs) and the Minamata Convention (to eliminate/replace the use of Mercury and mercury-containing equipment) for the benefit of human health and the environment. The project also aims to ensure the implementation of Best Available Techniques and Best Environmental Practices (BAT/BEP) in selected demonstration enterprises. The project activities will become an integral part of an effective sound chemicals management scheme with institutional, financial and environmental long-term sustainability. The project will address chemical waste at the end of life, chemicals that are used or emitted from processes or products, and waste management. The project aims to mainstream environmental sustainability by reducing the impact and release of mercury and POPs, to protect human and environmental health. Thus, the project contributes to the prevention of waste/products containing POPs from entering material recovery supply chains; elimination of the use of mercury and POPS in products through the introduction of alternatives in the products with a preference to non-toxic chemicals; and introduction and use of BAT and

BEP to minimize and ultimately reduce releases of UPOPs and mercury from major source categories included in both the Stockholm and Minamata Convention.

1.2 Purpose and Scope of ESMF

The ESMF is a management tool to assist in managing potential adverse social and environmental impacts associated with project activities, in line with the requirements of UNDP's Social and Environmental Standards (SES). The Implementing Partner of the project and the relevant members of the project management unit will follow this ESMF during the start of the project implementation to ensure the environmental and social risks and impacts are fully assessed. Management measures are also in place prior to the implementation of the relevant project activities.

This ESMF identifies the steps for detailed screening and assessment of the project's potential social and environmental risks, and for preparing and approving the required management plans for avoiding, and where avoidance is not possible, reducing, mitigating, and managing the identified adverse impacts. It also sets out the additional safeguard measures that apply to the project during the inception phase, including but not limited to:

- SESA and ESIAs
- ESMPs
- Gender Action Plan
- Stakeholder Engagement Plan
- Restructuring (Retrenchment Plan)
- Risk Spill Prevention and Management Plan
- Occupational Health and Safety Assessment
- Risk Management Strategy
- Occupational Risk Assessment

This ESMF forms the basis upon which the Implementing Partner will develop Environmental and Social Management Plan(s) or other plans, in compliance with the UNDP SES, to ensure that significant adverse environmental and social impact mitigation and management measures are implemented and monitored.

The co-financing for demonstration activities is also covered under this ESMF such that they will need to be consistent with SES, noting that all works related to these activities are limited to retrofitting of existing enterprises such that no new construction or expansion is planned.

This ESMF will be publicly disclosed according to UNDP's Information Disclosure Policy and SES. The ESMF will be updated from time to time by the implementing Project Management Unit (PMU) in consultation with the UNDP to incorporate changes in the detailed design phase of the projects.

1.3 Project Description

The objective of the project is to protect human health and the environment, as well as, promote sustainable production and consumption through the reduction of the use of POPs, new POPs and mercury and the release of POPs, U-POPs, and mercury throughout the lifecycle in key industrial sectors supported by Ecolabel system, Green Financing, and Procurement mechanisms.

The project intends to speed up the elimination of industrial POPs (SCCP, PFOS, PFOAs, HBCDD, PBDEs) from import and use; reduce the release of mercury and U-POPs from industrial sources; and eliminate the manufacturing and use of mercury containing devices.

The project will establish a Green Financing Mechanism (Grant and Loans) and a Green Procurement Scheme, Ecolabels and Environmentally friendly production; demonstrate the application of POPs-free manufacturing and design; demonstrate air pollution treatment devices for the abatement of U-POPs and mercury from the stack of industrial processes; reduce/replace at least 35 tons of POPs, 20,000 fluorescent lamps, and 10,000 medical devices, promoting their environmentally sound disposal; and improve the regulatory framework concerning POPs and mercury control.

The project builds on the experience gathered by the previous projects: GEF ID9379 “Application of Green Chemistry in Viet Nam to Support Green Growth and Reduction in the Use and Release of POPs/Harmful Chemicals” and the GEF ID5067 “Viet Nam POPs and Sound Harmful Chemicals Management Project”.

1.3.1 Summary of Activities

The proposed project is structured in three technical components and one management component. The components, outcomes, outputs and activities are listed below.

Component 1: Promote sustainable production - consumption in key sectors through Eco-labelling, Green Financing, and Procurement, and other elements to support a long-term Innovation Ecosystem for greening the value and supply chain across sectors.

Outcome 1.1. Environmental regulation upgraded to include new POPs; Eco-label and related policies on POPs and mercury lifecycle management developed and implemented.

Output 1.1.1. Review amendment of the existing or creation of new legislation related to POPs and new POPs in key sectors (e.g., plastic and polymers, metal plating, paint/solvents, etc.) to ensure inclusion of provisions to support, inter alia exemption register of import for new POPs; concentration limits for POP (BFR, HBCDD, SCCP, etc.) and other POPs/PTS in products and waste; Eco-labelling schemes developed; and new EPR schemes developed and baseline EPR schemes improved.

- Activity 1.1.1.1. Develop and implement the secondary law/regulations related to POPs and Eco-labeling scheme; review and develop the national technical regulation on thresholds for POPs and Eco-labeling criteria for articles and products.
- Activity 1.1.1.2. Develop and implement provision for exemption register of POPs as substance or mixtures to be revised to ensure elimination or restriction of POPs once exemption period expires.
- Activity 1.1.1.3. Develop technical guidance for assessment of Eco-labeling criteria including POP limits and EPR.
- Activity 1.1.1.4. Support and consult the manufacturers in terms of technology improvement to achieve the POPs limits and Eco-labeling criteria including EPR.
- Activity 1.1.1.5. Development of gender-specific sections related to risk management of POPs and mercury to be included in the relevant legal documents.

Output 1.1.2. Roadmap and sectorial plans developed for replacement of mercury thermometers and mercury containing lamps established

- Activity 1.1.2.1. Development of the sectorial plan for the replacement health-care mercury devices.
- Activity 1.1.2.2. Development of the sectorial plan for the replacement of mercury containing lamps.
- Activity 1.1.2.3. Development of the roadmap for the establishing of mercury disposal infrastructures.
- Activity 1.1.2.4. Develop a plan for cleaning mercury contaminated areas and unused mercury or mercury-containing equipment storages.
- Activity 1.1.2.5. Development of the gender mainstreaming section in the mercury roadmap, through consultation of female workers and gender experts.
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Output 1.1.3. Review of the existing legislation related to mercury in products and mercury emission carried out, to help develop and/or strengthen, and ultimately enforce regulations concerning technical standards for mercury waste management.

- Activity 1.1.3.1. Drafting of secondary law/regulations related to mercury concentration limits in articles and products.
- Activity 1.1.3.2. Update national technical regulations related to mercury concentration limits in environment and waste.

- Activity 1.1.3.3. Update secondary law related to the treatment and disposal of waste to include provisions on mercury.
- Activity 1.1.3.4. Development of specific personal protective measures against mercury identified for women at workplace in the relevant legal documents, through consultation with women workers.
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Outcome 1.2. Development of a Green Finance Framework to sustain the shifting of enterprises towards a non-POPs and a non-mercury manufacturing

Output 1.2.1. Green Finance framework designed, funded, and implemented to support private sector incentives policy (e.g., tax, fee, credit fund, investment equity). Eco-label improved, funded, and properly communicated, building on national and other finance institutions (e.g., VEPF).

- Activity 1.2.1.1. Develop regulations on green finance framework to promote POP-free, mercury-free, and emission reduction projects and environmentally friendly production.
- Activity 1.2.1.2. Develop the eligibility criteria for POP-free, mercury-free, and emission reduction projects and environmentally friendly production.
- Activity 1.2.1.3. Develop the technical guidance for evaluation of POP-free, mercury-free, and emission reduction projects and environmentally friendly production.
- Activity 1.2.1.4. Technical support to the VEPF or other financial institution to process applications.
- Activity 1.2.1.5. Development of a specific section of the Green Financing dedicated to the facilitation of women entrepreneurship. Gender experts are consulted during the design, financing, and implementation of the Green Financial Framework.
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Output 1.2.2. Green Procurement scheme designed and implemented at central and local levels.

- Activity 1.2.2.1. Design and pilot the Green procurement scheme for POP-free products in at least one selected sector.
- Activity 1.2.2.2. Design and pilot the Green procurement guidelines for mercury-free products in health-care facilities.
- Activity 1.2.2.3. Develop the draft Green procurement guidelines for MOH and health-care facilities.
- Activity 1.2.2.4. Develop the draft Green procurement guidelines for MONRE and DONRE.
- Activity 1.2.2.5. Development of Green procurement criteria, which include facilitation for women entrepreneurs.

Component 2: Lifecycle management of POPs and PTS containing products

Outcome 2.1 Sustainable manufacture and design of plastic, polymers, paint, metal finishing, and other products improved to prevent the use of POPs and the release of POPs in the environment.

Output 2.1.1. Analysis of the manufacturing sectors for which the use of new POPs has been recently confirmed but not yet included in the NIP is carried out in order to strengthen baseline and select optimum sectors and enterprises for pilot activity to improve POPs management in the value chain.

- Activity 2.1.1.1. Analysis of sectors using HBCD (XPS/EPS foam, etc).
- Activity 2.1.1.2. Analysis of sectors using SCCP (paint, plastic, leather product, etc).
- Activity 2.1.1.3. Analysis of sectors using brominated flame retardants/PBDEs.
- Activity 2.1.1.4. Analysis of sectors using PFOS and PFOAs (metal plating, fire-fighting activities, etc).
- Activity 2.1.1.5. Review of the existing literature on new POPs to identify gender-specific issues related to risk-management in the enterprises and specific risk for female resulting from the exposure of POPs. Gather sex-disaggregated data on accidents at workplace in the manufacturing industry with focus to exposure to chemicals.
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Output 2.1.2. Alternative product and production process are designed to prevent the use of hazardous chemicals additives in general and consequently the use of POPs (e.g., BFR/PBDEs, HBCDD, PFOS, PFOAs, SCCP) in key sectors demonstrated.

- Activity 2.1.2.1. Assist enterprises to design intervention on alternative product design for application under the Green incentive mechanism.
- Activity 2.1.2.2. Select companies that will participate in the demonstration activities, conduct appropriate Environmental and Social Impact Assessments (ESIA) in accordance to UNDP SES Policy, and support selected enterprises under the Green incentive mechanism.
- Activity 2.1.2.3. Assess the results achieved by the piloted enterprises, evaluate results and support the replication potential.
- Activity 2.1.2.4. Consult with female workers and gender experts from consumer associations in the design of substitute products, in line with the Gender Action Plan.
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Output 2.1.3 Design and implementation of modern Air Pollution Control Systems to prevent the release of mercury and U-POPs, suitable also for small enterprises, carried out.

- Activity 2.1.3.1. Assist enterprises to design APCSs installation/retrofit to prevent release of mercury and U-POPs.
- Activity 2.1.3.2. Select demonstration companies, conduct appropriate ESIA, and support the selected enterprises to apply for Loans under the Green incentive mechanism to install the emission control technologies/practices.
- Activity 2.1.3.3. Assess, in comparison with the baseline, the application and results achieved under Output 2.1.3, by project-supported enterprises, after implementation and in view of replication.
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Outcome 2.2 Closure of the gap between recyclers and industry to sustain circular economy and to prevent the contamination of recyclable materials

Output 2.2.1 Interaction, technical exchange, and commercial agreement between formal recyclers and industry promoted to identify and implement solutions for the horizontal and safe recycling of materials and the segregation and safe disposal of POP-contaminated materials.

- Activity 2.2.1.1. Analyze the recycling sector and EOL materials which may be affected by POPs contamination, or which may generate U-POPs during the recycling stage, including at least building materials, packaging, plastic, steel.
- Activity 2.2.1.2. Identify and assess the materials potentially containing POPs in the recycling sector and the current recycling modality.
- Activity 2.2.1.3. Carry the analytical determination of POPs in secondary material and in the environment of recycling facilities.
- Activity 2.2.1.4. Enhance information exchange among recyclers and manufacturers to identify the measures for POP contamination reduction and environmentally safe secondary materials.
- Activity 2.2.1.5. Implement the provisions of the Gender Action Plan (i.e. consult with female workers and gender experts in the development of interactions, technical exchanges, and commercial agreements between recyclers and industry).

Component 3: Mercury: lifecycle management of mercury-containing products

Outcome 3.1 Replacement of mercury products with non-mercury products promoted and sustained by EPR schemes and EOL management

Output 3.1.1. Risk management, technical guidance, and training materials developed for the sound management of mercury stockpiles, mercury waste and obsolete mercury-containing equipment, with specific reference to lamps and medical devices containing mercury

- Activity 3.1.1.1. Review of the management status of mercury equipment, products, and waste in hospitals, clinics, and fluorescent lamp producing companies.

- Activity 3.1.1.2. Develop technical guidance and training materials for the use and calibration of non-mercury medical devices to sustain the replacement of mercury thermometers.
- Activity 3.1.1.3. Develop technical guidance and training material for the replacement of fluorescent lamps in offices.
- Activity 3.1.1.4. Develop specific materials of the risk management, technical guidance on personal protective measures for nurses and doctors at hospital facilities and the safe management of replaced mercury devices, including emergency response.

Output 3.1.2. Capacities of institutions are strengthened to eliminate the use of mercury-containing products (e.g., mercury lamps, thermometers, and cosmetics); road map and plan for using of mercury-free devices developed and implemented.

- Activity 3.1.2.1. Train at least 100 healthcare and clinic facilities through the implementation of at least 4 Training for Trainers event and supervision of the overall training.
- Activity 3.1.2.2. Train at least 200 offices and 50 building management boards and through the implementation of at least 4 Training for Trainers event and supervision of the overall training.
- Activity 3.1.2.3. Deliver technical assistance for the replacement with non-mercury lights and ensure environmentally sound collection of at least 20,000 fluorescent lamps in offices, high-rise apartment buildings and other intensive user of lamps in different areas (industrial facilities, urban area, agriculture, etc.).
- Activity 3.1.2.4. Deliver technical assistance for the replacement of mercury medical devices with non-mercury devices and their use and ensure environmentally sound collection at least 10,000 mercury medical devices (thermometers and sphygmomanometers) in health-care facilities.
- Activity 3.1.2.5. Promote the participation of female trainers and trainees in training events related to the elimination of mercury-containing products.

Output 3.1.3. Technologies for the recycling of mercury-containing equipment with segregation and storage of mercury established

- Activity 3.1.3.1 Existing technology / services for the safe recycling of mercury, glass, metals, and plastic from fluorescent lamps and mercury thermometers improved and demonstrated, after ESIA is carried out, with the environmentally safe disposal of at least 20,000 fluorescent lamps and 10,000 mercury thermometers, including the trial tests.

Component 4: Knowledge management and Monitoring & Evaluation (M&E)

Outcome 4.1. Project management team established, lesson learnt, and knowledge generated by the project properly shared and communicated.

Output 4.1.1 Project inception and inception report carried out

- Activity 4.1.1.1 Project inception workshop carried out
- Activity 4.1.1.2 Project inception report drafted and endorsed
- Activity 4.1.1.3 Detailed project workplan established

Output 4.1.2 Project steering committee and project management unit established

- Activity 4.1.2.1 Recruit and manage PMU staff
- Activity 4.1.2.2 Carry on Gender Mainstreaming coordination and supervision

Output 4.1.3 Knowledge management system including project website established

- Activity 4.1.3.1 Establish a Knowledge Management Unit
- Activity 4.1.3.2. Create the Project website, social media pages and maintain these.
- Activity 4.1.3.3. Project documentation (internet pages, movies, leaflets, technical documentation) developed, collated, and made available

- Activity 4.1.3.4. Develop and implement awareness raising and communication strategies
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Outcome 4.2 Project monitoring, evaluation and audit carried out in compliance with GEF, UNDP and GoV standards

Output 4.2.1. Project and its activities monitored and evaluated on a periodic basis in line with GEF, UNDP, and government requirements.

- Activity 4.2.1.1 Project audit as part of the project management activities
- Activity 4.2.1.2 Project mid-term and final review
- Activity 4.2.1.3 Periodic project reports
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Output 4.2.2 Indicators established to facilitate successful project implementation and sound impact assessment.

- Activity 4.2.2.1. Establish project indicators as part of the project inception activities

POTENTIAL SOCIAL AND ENVIRONMENTAL IMPACTS

UNDP uses its Social and Environmental Screening Procedure (SESP) to identify potential social and environmental risks, as well as opportunities associated with proposed projects. Each project is scrutinized as to its type, location, scale, sensitivity, and magnitude of its potential social and environmental impacts. All project components are screened, including planning support, policy advice, and capacity-building, as well as site-specific, physical interventions. Activities that will be completed under project co-financing are also included in the scope of the assessment.

Risk Categorization and Justification

During project development, the project was reviewed with UNDP's SESP. The SESP prepared for this project (ProDoc Annex 5) details the specific environmental and social risks that apply. The significance of each risk, based on its probability of occurrence and extent of the impact, has been estimated following SES's Guidance Note and ToolKit.

The screening identified 8 risks related to this project, one categorized as Low (Risk 8) and seven categorized as Moderate (Risks 1 to 7). It was concluded that these risks relate to activities with potential adverse social and environmental risks. Along with impacts that are more varied or complex but remain limited in scale and are of lesser magnitude and can be reversible, predictable, have smaller and contained footprint, with less risk of cumulative impacts.

It is also duly considered in the screening the lack of certainty about pilot demonstrations that could not be formally selected during the PPG Phase (under Outputs 2.1.2; 2.1.3, 3.1.2; 3.1.3). During the initial six months of the implementation phase, the companies/healthcare units selection process will be carried out including the development of the targeted risk management plans. No activities related to these Outputs will be initiated while the selection process is completed.

Risks Avoided

Standard 1: Pre-screening procedures carried on during the preparation phase have shortlisted potential demonstration sites. It is concluded that all activities will take place in industries/companies located in legalized industrial areas. The targeted industrial areas are not located within or adjacent to critical habitats and/or environmentally sensitive areas that would entail triggering these risks, nor the project is related to wildlife trading, harvesting, agricultural practices or extractive industries.

Standard 2: The demonstration activities promoted by the project won't be implemented in areas subject to earthquakes, landslides or other areas prone to natural disasters. The project also won't carry on activities that can exacerbate vulnerability to climate change.

Standards 3 and 4: Demonstration activities will be limited to retrofitting of existing facilities, and no new construction or expansion is planned under this project, therefore no influx of workers is expected in the targeted sites nor significant excavations, demolitions, movement of earth, flooding or other environmental changes that can harm cultural heritage sites.

Standard 5: Considering the demonstration, activities will take place in industries/companies located in legalized industrial areas, project won´t lead to temporary or permanent and full or partial physical displacement, risk of forced evictions, or impacts on or changes to land tenure arrangements and/or community-based property rights/customary rights to land, territories and/or resources.

Standard 6: It is pre-screened that all demonstration activities will take place in industries/companies located in legalized industrial areas. The targeted industrial areas are not located within areas where indigenous/traditional peoples are present or are claimed by these.

Standard 7: As part of the Industries/Companies selection criterion, will also only engage with companies that abide by national laws which prohibit under aged employment and forced labour therefore, these are not considered to be a risk under this project as only companies compliant to the national legislation and aligned with UNDP SES will participate in the project.

Standard 8: Viet Nam is Party to the *Montreal Protocol*, *Minamata Convention*, *Basel Convention*, *Rotterdam Convention* and *Stockholm Convention*, and the project is designed to comply with the Stockholm Convention (as it is funded by the GEF the project meets the eligibility criterion of the Convention). Thus the project cannot use any alternative technology that is controlled by the Stockholm Convention. In addition:

i. the concept of BAT to be applied by the project also forbids using such technologies controlled by any of the international conventions regarding chemicals use;
ii. The project does not target any sector controlled under the Montreal Protocol, thus no risk for the project to use substances controlled by this MEA.
iii. The project is also in line with Rotterdam and Basel Conventions, as it is not sponsoring the international movement of hazardous substances or wastes.
iv. The industrial sectors targeted by the project do not use mercury in their process nor products that contain mercury, so it also does not encompass any prerogative of the Minamata Convention.

The project does not have any agricultural activity, this won´t make use of any agri-chemicals

Risks Assessment

The scoped and fit-for-purpose risk management strategy(ies) for the specific risks identified as low and moderate were prepared during the PPG phase to ensure that the SES requirements are appropriately addressed. A Stakeholder Engagement Plan as well as a Gender Action Plan have already been prepared.

The following **Moderate risks** have been identified:

Risk 1. Duty-bearers and other relevant stakeholders do not have the capacity to meet their obligations in the project.

- The project will develop and/or propose an updated regulatory framework in Component 1, thus Officials, responsible for enforcing legislation, may lack capacities to acknowledge and enforce these. Banks and financial institutions may not have adequate competence in establishing green financial mechanisms for mercury and POPs reduction activities. Banks and financial institutions may lack understanding on green financial criteria for chemical industries. Banks and financial institutions may not have ample capital to fulfil their commitments to provide financial support to businesses.

Risk 2: Adverse impacts on workers in the recycling sector who could not be included in the project activities

- Recycling and treatment activities of hazardous (chemicals/mercury contained) wastes can only be carried out by Formal Companies licensed by the Ministry of Natural Resources and Environment to comply with strict regulations. Therefore: a) Workers employed by the Recycling Companies, and with a major risk of exposure, may feel excluded from participating in project decision processes; and b) Individuals (or cooperative) recyclers may feel marginalized by the project and may feel losing opportunities to increase their income as hazardous (chemicals and mercury-contained) waste are not included in their solid waste collection streams.

Risk 3: Adverse economic impacts to small and medium sized industries and their workers due to banning of imports or restricting the use of certain chemicals used as baseline articles

- The new Law on Environmental Protection took effect on January 1 2022. Therefore, is expected that industries may experience technical and economic challenges in finding affordable alternatives, and hence have affected income/revenue.

Risk 4: Inadequate participation of women in consultations, policy decision making and design of modalities for capacity building in uptake of BAT/BEP in the targeted industries

- In general, the recycling industry requires a high level of physical work, which by sex-driven perception is seen as a “work for men”. This perception also exists in other industries that utilize controlled chemicals in their production process, mostly seen as “heavy industries”. In addition, for the recycling sector, women are mainly engaged in initial separation phases of

the products, and may be directly exposed to some harmful substances that are released in this process.

Risk 5: Risk of accidental release of hazardous substances during handling, treatment, transport between facilities, storage, disposal or testing of substances and wastes containing chemicals.

- Transport, storage and disposal operations for mercury thermometers, phased-out fluorescent lamps, amalgams, and APC filters may pose potential human and ecosystem health risks, whether to workers, wider community or the local environment due to accidental release or spills.

Risk 6: Risk of flooding at mercury treatment and storage facilities

- Increased weather events due to climate change may increase the risk of flooding which, in turn, may impact the mercury treatment and storage facilities. Viet Nam is a country that is likely to be greatly affected by climate change, sea level rise and extreme weather events. The country has issued and implemented a National Strategy and National Action Plan to Respond to Climate Change.

Risk 7: Health and safety risk for the workers involved in the activities of handling, treatment, transport between facilities, storage, recycling, disposal or testing of substances and wastes containing chemicals.

- This risk is related to the potential practices and behaviors of workers that do not abide by a safety protocol and use the essential personal protective equipment (PPE) appropriate for the work they perform. In addition, the health and safety of workers may be impacted during the establishment of the treatment facility, if proper measures are not implemented such as proper PPE. If not specifically addressed, persons below 18 years of age in the recycling industry may be engaged in hazardous work, which is classified as the “worst forms of child labour”.

The following **Low risks** have been identified:

Risk 8: Increased GHG emissions or consumption of raw materials, energy, water (Outcomes 2.1 ; 2.2 and Outcome 3.1).

- This risk is related to the potential of increasing GHC emissions or consumption of raw materials, energy or water due to the installation of new environmental protection measures in industries. Changing production lines may lead to using more fuels etc.

1.4 Activities that Require Further Screening

Key activities under Outcome 1.1, Outcome 2.1, Outcome 2.2 and Outcome 3.1 may not proceed until they are screened and assessed, and appropriate management measures are in place. The following assessment/management documents are likely to be required:

- SESAs – Specifically those activities that involve new legislation and/or policy changes (Outputs 1.1.1, 1.1.2, 1.1.3, 1.2.1)
- ESIAs - Specifically, the activities that require ESIAs are associated with activities involving handling, treatment, transport between facilities, storage, recycling, disposal or testing of substances and waste contained-chemicals (Activities 2.1.2.2, 2.1.3.2, 3.1.3.1) as companies and locations have not yet been selected.
- ESMP/s – ESMP/s will be developed for the above activities (based on the outcomes of the SESAs and ESIAs). ESMPs will be required for Outcome 1.1, Outcome 2.1, Outcome 2.2, and Outcome 3.1

LEGAL AND INSTITUTIONAL FRAMEWORK FOR ENVIRONMENTAL AND SOCIAL MATTERS

1.5 LEGISLATION, POLICIES AND REGULATIONS

The following legislation is relevant to the project:

- Constitution of the Socialist Republic of Vietnam (2013)
- Law on Urban Planning (2009)
- Decree Providing Strategic Environmental Assessment, Environmental Impact Assessment and Environmental Protection Commitment
- Law on Cooperatives (2012)
- Law on Gender Equality (2007)
- Law on Environmental Protection 2020 (will be enforced by January 1, 2022) - This defines terms of POPs and PTS (Persistent Toxic Substances) at Article 3. Also, this Law regulates requirements of environmental protection on POPs and articles, products, goods, and equipment containing POPs (Article 69), as well as limits of POPs in articles, products, goods, and equipment (Article 97, 98).
- Decree No 08.2022ND-CP dated 10.01.2022 on the regulation of several articles of the Law on environmental protection
- Circular N0 02.2022.TT-BTNMT dated 10.01.2022 on the regulation of several articles of the Law on environmental protection
- Decision No. 1598/2017/QD-TTg dated October 17, 2017 of the Prime Minister: Promulgates the National Implementation Plan (NIP) on POPs, of which implementation of activities aimed at addressing the key priorities on POPs (updated Decision No. 184/2006/QD-TTg August 10, 2006 of the Prime Minister).
- Decision No. 16/2015/QD-TTg May 22, 2015 of the Prime Minister regulates withdrawal and treatment of disposed products: This makes provision to regulate the EOL collection of products like vehicles, tires, electronic devices, oil, batteries, for a more efficient recycling of materials. This regulation may constitute a valuable resource for setting up an environmentally sound recycling scheme, with benefits also on the reduced release of POPs. The enforcement of this decision is, however, still low.
- Circular No. 10/2021/TT-BTNMT June 30, 2021 of MONRE stipulates environmental monitoring techniques and management of information and data on environmental quality monitoring: This is a new circular combining and updating several previous circulars on environmental monitoring activities covering POPs also. It sets official environmental monitoring techniques and methods, including POPs in environmental components and articles, products, goods, and equipment. It also contains provisions for monitoring techniques of new POPs such as PBDEs, PFOS, and HBCDD.
- QCVN 15:2008/BTNMT - National technical regulation on the pesticide residues in the soils: Includes maximum allowable concentration of HCB, Aldrin, Endrin, DDT, Endosulfan, Dieldrin, Lindane (all were banned for use) in soil.
- QCVN 07:2009/BTNMT - National technical regulation on hazardous waste thresholds: Regulates threshold of several organic hazardous parameters such as Aldrin, Endrin, PCB, and Chlordane.
- QCVN 40:2011/BTNMT - National technical regulation on industrial wastewater: Regulates threshold of PCB and mercury in industrial wastewater.
- QCVN 41:2011/BTNMT - National technical regulation on co-processing of hazardous waste in cement kiln: Regulates maximum allowable concentration of PCDD/F and mercury in emission and PCB in hazardous waste.
- QCVN 07:2009/BTNMT - National technical regulation on hazardous waste thresholds: Regulates threshold of mercury parameter in hazardous waste as an inorganic substance.

- QCVN 02:2012/BTNMT - National technical regulation on solid health care waste incinerators: Regulates maximum allowable limits of PCDD/F and mercury in emission of solid health care waste incinerators.
- QCVN 30:2012/BTNMT - National technical regulation on industrial waste incinerators: Regulates maximum allowable limits of total PCDD/F and mercury in emission of industrial waste incinerator.
- Circular No 34.2017TT-BTNMT on regulations of retrieval and treatment of discarded products
- QCVN 45:2012/BTNMT - National technique regulation on allowed limits of dioxin in soils: Regulates allowable values of PCDD/F in various types of soils.
- QCVN 50:2013/BTNMT - National technical regulation on hazardous thresholds for sludges from water treatment process: Regulates thresholds of Mercury and Lindan, Endrin, etc. in sludges from water treatment process.
- QCVN 54:2013/BTNMT - National technical regulation on remediation target values of persistent organic pesticides per land use: This is a milestone in establishing standard rules for the remediation of sites contaminated by POP pesticides in Vietnam.
- QCVN 56:2013/BTNMT - National technical regulation on waste oil recycling: Regulates allowable values of PCB and Pentachlorobenzene in waste oil recycling process.
- QCVN 43:2017/BTNMT - National technical regulation on sediment quality: Regulates threshold of PCB, DDT, Dieldrin, Endrin, Lindan, PCDD/F, etc. in sediment quality.
- QCVN 51:2017/BTNMT - National technical regulation on emission for steel industry: Regulates allowable limits of total PCDD/F in air emission for steel industry.
- Law on Chemicals 2007: This focuses on 3 groups of chemicals: conditional chemicals, restricted chemicals, and banned chemicals. POPs are not always classified in the right place, as POPs are sometimes put under the restricted list. The Law does not stipulate safety requirements for any specific chemical group that are of global concerns such as POPs, mercury, persistent toxic substances (PTS), etc.
- Decree No. 113/2017/ND-CP dated October 9, 2017 of the GoV regulates details and guides some articles implementation of Law on Chemicals 2007: List of chemicals restricted from production and trading in the industrial sector (Annex II); List of chemicals declaration (Annex V). Most of the POPs that belong to Annex A of the Stockholm Convention are listed under Annex II. In some cases, POPS are put in as POPs should be banned and not restricted.
- Circular No. 30/2011/TT-BCT dated August 10, 2011 of Ministry of Industry and Trade regulates temporary allowable concentrations of some toxic chemicals in electric, electronic products: Provides temporary allowable concentrations of some toxic chemicals such as Polybrominated biphenyl (PBB) and Polybrominated diphenyl ethers (PBDE) in electric, electronic products. However, this is temporary so as to meet the international requirement of import/export. The Circular needs to be updated and supplemented with further substances following a scientific-based approach.
- Circular No. 10/2020/TT-BNNPTNT dated September 9, 2020 of Ministry of Agriculture and Rural Development promulgates list of pesticides used and prohibited for use in Vietnam: This regulates a list of pesticides prohibited for use in Vietnam (Annex II), including several POPs such as Aldrin, Lindane, Chlordane, DDT, Dieldrin, Endosulfan, Endrin, Heptachlor, Pentachlorophenol, and Hexachlorobenzene.
- Circular No. 11/2020/TT-BYT dated June 19, 2020 of Ministry of Health stipulates list of substances prohibited in insecticides and disinfectant chemicals in household and medical field: It regulates some POPs in the list of substances prohibited in insecticides and disinfectant chemicals in household and medical field (Annex 1) such as Aldrin, Chlordance, Chlordecone, DDT, Dieldrin, Mirex, Perflurooctan sulfonic acid and its salt, PCB, Toxaphene.
- Resolution No. 52/NQ-CP dated June 21, 2017 of the GoV on approving the Minamata Convention on mercury: Approving the Minamata Convention on mercury
- QCVN 02:2020/BCT - National technical regulation on mercury content in fluorescent lamp: This regulates mercury content in various types of fluorescent lamps.

- QCVN 06:2009/BTNMT - National technical regulation on hazardous substances in ambient air: This regulates maximum allowable concentration of hazardous substances in ambient air, including mercury (metal and compound).
- QCVN 44:2012/BTNMT - National technical regulation on off-shore water quality Regulates limits of mercury in offshore water quality.
- QCVN 08-MT:2015/BTNMT - National technical regulation on surface water quality Regulates limits of mercury in surface water quality.
- QCVN 09-MT:2015/BTNMT - National technical regulation on ground water quality Regulates limits of mercury in ground water quality.
- QCVN 10-MT:2015/BTNMT - National technical regulation on marine water quality Regulates limits of mercury in offshore marine water quality.
- QCVN 61-MT:2016/BTNMT - National technical regulation on domestic solid waste incinerator Regulates limits of mercury in emission of domestic solid waste incinerator

The following policies and strategies are relevant to the project:

- National Strategy on Environment Protection (NSEP) to 2030, with vision to 2050 (2022).
- National Strategy on Gender Equality 2011-2020 was approved in 2011
- Ten-year Socio-Economic Development Strategy (SEDS) and the Five-year Socio-Economic Development Plans (SEDPs).
- National Action Plan on the Implementation of the 2030 Agenda for Sustainable Development (2017)
- National Targeted Program on Sustainable Poverty Reduction (NTP SPR) 2016-2020
- Master Plan on Economic Restructuring 2013-2020
- Vietnam Green Growth Strategy (2012)

1.6 Environmental Impact Assessment In Viet Nam

The concept of Environmental Impact Assessment (EIA) was first introduced and defined in the Law on Environmental Protection (LEP) 1993 No. 29-L/CTN and the definition had hardly changed until the latest version of the Law on Environmental Protection 2020 No. 72/2020/QH14 (LEP 2020), dated November 17 2020, taking into effect on January 1 2022. The EIA refers to the process of analyzing, assessing, identifying and predicting environmental impacts of an investment project in order to take measures to reduce the project's adverse impacts on the environment.

The EIA process in Vietnam consists of four stages: screening, assessment, review and approval & monitoring. Figure 1 outlines the EIA process in Viet Nam, and the above stages are described below.

Regarding the timing of the EIA process, Article 13 of the SEA and EIA Decree (2019) stipulates that the EIA report shall be made concurrently with the formulation of the feasibility study report of the investment project. The feasibility study is then also part of the dossier of request for the appraisal and approval of the EIA report. Figure 1 provides an overview of the EIA process in Viet Nam.

1.6.1 Screening

In previous versions of LEP, investment projects were mainly classified by the scale, capacity and type of production, business and service. In the LEP 2020, the environmental criteria for investment project classification are further expanded, adding areas and sensitive environmental factors such as high-density residential areas, water sources, agricultural land, types of forests, natural heritage sites, etc. In detail, the LEP 2020 investment projects are classified into 4 groups:

- Group I: investment projects that pose a high risk of adverse environmental impacts
- Group II: investment projects that pose a risk of adverse environmental impacts
- Group III: investment projects that pose a low risk of adverse environmental impacts
- Group IV: investment projects that do not pose a risk of adverse environmental impacts

The above group classification shall be the basis for determining projects subject to the preliminary environmental impact assessment (PEIA), environmental impact assessment (EIA), and environmental license. These are regulated in Articles 28, 29, and 30 of LEP 2020. Specifically, the following projects that belong to Groups I and II involved in production, trading and service are subject to EIA.

- Large-scale and capacity projects
- Medium-scale and capacity projects with sensitive environmental factors
- Projects providing hazardous waste treatment service
- Projects involving the import of scrap as production materials

List of type of production, business and service posing risks of adverse environmental impacts, and details on Groups I, II, and III projects are regulated in the Decree guiding LEP 2020.

Screening decision is made by Appraisal Council or Appraisal Services Organization formulated at the national or provincial level depending on the project.

A preliminary EIA report is presented as part of the starting dossier for EIA license application. This preliminary EIA report alongside a feasibility study (or investment report) of the project acts to inform the screening decision authority on the level of EIA required. Table 1 summarizes the assessments required for different types of projects (refer Articles 28, 29 and 30 of LEP 2020).

Provisions for the protection and conservation of sensitive areas exist. A full EIA is required for any project with likely effects on such areas.

Table 1 Classification of investment project subject to EIA, PEIA, Environmental License (LEP 2020)

Group – Risk of adverse environmental impact	Environmental criteria to determine investment projects										Environmental Impact Assessment (EIA)	Preliminary environmental impact assessment (PEIA)	Environmental license
	No.	Type of production, business, service that pose a risk of adverse environ-mental impact	Not type of production, business, service that pose a risk of adverse environ mental impact	Using land, land with surface water and marine area	Extraction of minerals and water resources	Requiring repurposing of land	Requiring migration and relocation	Scale and capacity	Having sensitive environmental factors	Other criteria			
Group I – High risk	1	○	-	-	-	-	-	Large	-	-	✔	✔	✔
	2	○	-	-	-	-	-	Medium	○	-	✔	✔	✔
	3	-	○	-	-	-	-	Large	○	-	✔	✔	✔
	4	-	-	○	-	-	-	Large	-	-	✔	✔	✔
	5	-	-	○	-	-	-	Medium	○	-	✔	✔	✔
	6	-	-	-	○	-	-	Large	-	-	✔	✔	✔
	7	-	-	-	○	-	-	Medium	○	-	✔	✔	✔
	8	-	-	-	-	○	-	Medium or Large	○	-	✔	✔	✔
	9	-	-	-	-	-	○	Large	-	-	✔	✔	✔
	10	-	-	-	-	-	-	-	-	Providing hazardous waste treatment service; Importing of scrap as production materials	✔	✔	✔
Group II – Have risk	1	○	-	-	-	-	-	Medium	-	-			✔
	2	○	-	-	-	-	-	Small	○	-			✔
	3	-	○	-	-	-	-	Medium	○	-			✔
	4	-	-	○	-	-	-	Medium	-	-	✔		✔
	5	-	-	○	-	-	-	Small	○	-	✔		✔
	6	-	-	-	○	-	-	Medium	-	-	✔		✔
	7	-	-	-	○	-	-	Small	○	-	✔		✔
	8	-	-	-	-	○	-	Small	○	-	✔		✔
	9	-	-	-	-	-	○	Medium	-	-	✔		✔
Group III – Low risk	1	○	-	-	-	-	-	-	-	-			✔
	2	-	○	-	-	-	-	-	-	Generating wastewater, dusts and exhaust gases that must be treated or generating hazardous waste that must be managed			✔
Group IV – No risk	1	-	-	-	-	-	-	-	-	-			

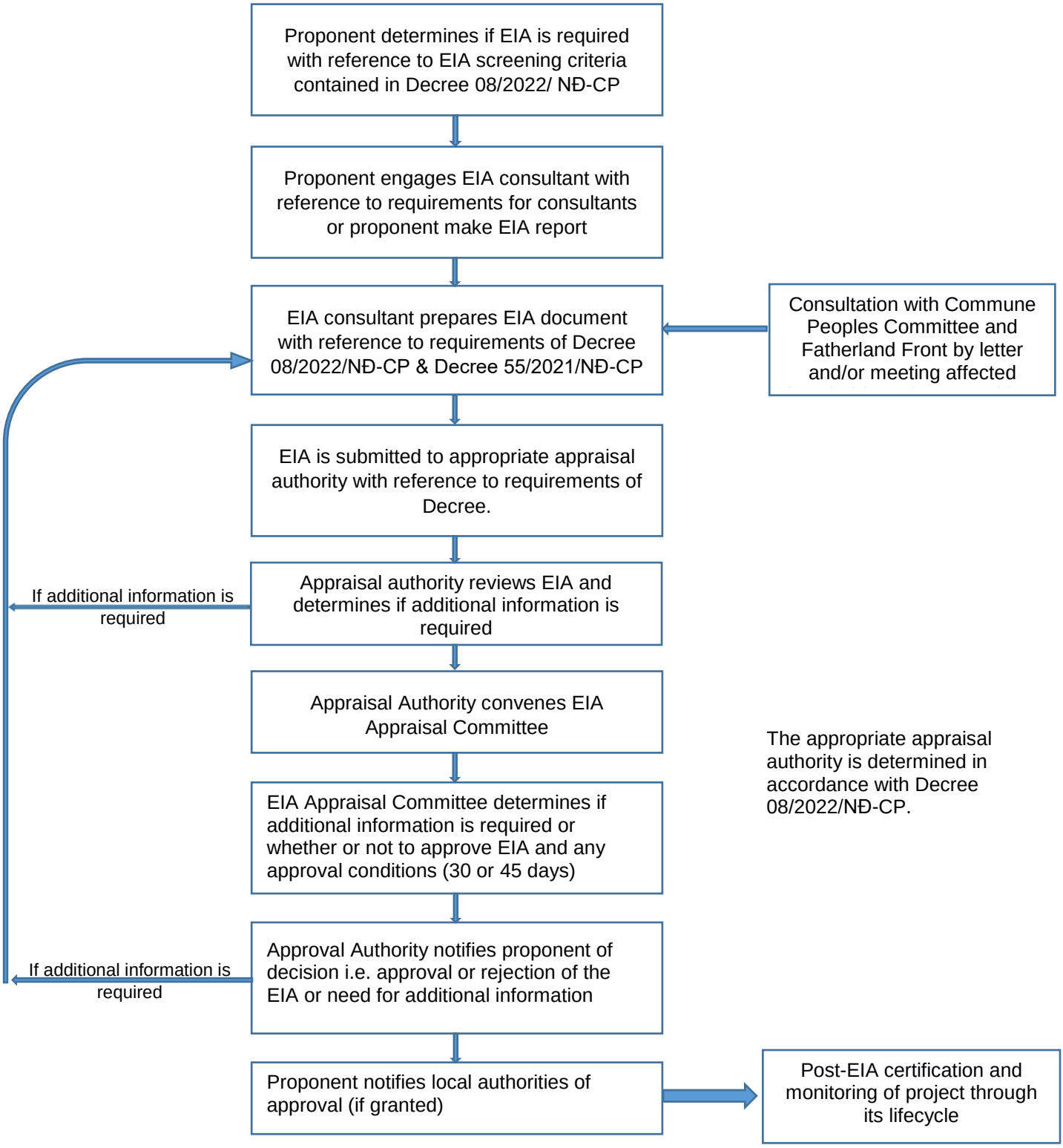

Figure 1 Summary of EIA process in Viet Nam

1.6.2 Assessment process

Investors must conduct EIAs and obtain approval from the authority on their EIA reports before starting any project construction. Basically, an EIA report must include the following contents:

1. Location and current status of the area where the project is implemented.
2. Main production process, technology, and materials of the project.
3. Prediction of elements with impacts on the environment at the project location.
4. Measures to reduce adverse impacts on the environment.

Proponents are required to send the assessment documents to the People's committee and people council at the community level. The council may request public involvement in case of a contentious issue. It is required to record complaints and deliberations during public meetings and include them as part of the EIA report.

According to each type of investment project, EIA report shall be appraised and approved by the Ministry of Natural Resource and Environment (MONRE) or Provincial People's Committees.

1.6.3 Review process

The project owner shall submit a dossier of requests for appraisal of an environmental impact assessment report to a competent agency. An appraisal agency shall check for completeness and then set up an appraisal council or select an appraisal service provider. No further specifications are given regarding the EIA review process.

Based on the appraisal agency's notice of appraisal results of the environmental impact assessment report, the project owner shall carry out one of the following activities:

1. Making another environmental impact assessment report and submitting it to the appraisal agency for appraisal, if the first environmental impact assessment report is not approved. The appraisal time limit and procedures are the same as for the first report.
2. Modifying and supplementing the environmental impact assessment report and submitting it to the appraisal agency for consideration and submission to a competent authority for issuance of an approval decision, if the environmental impact assessment report is approved on condition of modification and supplementation. The time limit for modification and supplementation of the report is not counted in the time limit for appraisal and approval of the environmental impact assessment report.
3. Sending the environmental impact assessment report to a competent agency for issuance of an approval decision under regulations, if the report is approved without modification and supplementation.

1.7 ENVIRONMENTAL LICENSE AND ENVIRONMENTAL REGISTRATIONS

Environmental license was newly introduced and first defined in the LEP 2020. Many enterprises understand that an approved EIA report is a kind of license, meaning that investors can formally operate the project after the construction is completed with a successful EIA report. However, the environmental license is a separate procedure that investors must apply for authorization. The environmental license shall be a legal basis for the operation of waste treatment works of an investment project, including both trial and official operation. According to LEP 2020, an environmental license covers activities such as discharging and managing waste, importing scraps, etc. Implying that an environmental license integrates several permits relating to waste, importing scraps under LEP 2014, and other relevant laws such as license to discharge wastewater into water sources under the Law on Water Resources, license to discharge wastewater into hydraulic structure under the Law on hydraulics, license for hazardous waste management, register of hazardous waste source owners, etc. (called "component environmental licenses"). An environmental license clearly states the scope of permitted activities and requirements for environmental protection of the project. According to each type of investment project, environmental license shall be issued by MONRE, provincial or district-level People's Committees. Each license is valid for 7 to 10 years.

The following investment projects are subject to environmental license:

1. Group I, II and III projects that generate wastewater, dusts and exhaust gases must be treated before being emitted into the environment or generate hazardous waste that must be managed in accordance with regulations on waste management before officially being put into operation.
2. Investment projects that have started operation before the effective date of LEP 2020 and fall under any of the environmental criteria as mentioned above.

An investment project subject to EIA must obtain the environmental license before trial operation of the waste treatment work. If the waste treatment work of the investment project prescribed in the above (2), is currently under trial operation before the effective date of LEP 2020, the project owner is entitled to continue the trial operation to obtain the environmental license after the trial operation is done or prepare an application for the environmental license before the trial operation is done, and not required to carry out the trial operation again.

Conversely, waste-generating investment projects which are not required to obtain an environmental license shall have to conduct other procedure called the environmental registration. This is a simpler procedure than environmental license. For new investment projects after the effective date of the LEP 2020, depending on the type of project, environmental registration must be completed before issuing a construction permit, discharging waste into the environment or putting it into official operation. Investment projects that do not generate waste or only generate a small quantity of waste which can be treated using in-situ waste treatment works or managed in accordance with regulations of the local government shall be exempt from obligation of environmental registration.

1.7.4 Decision-making

EIA report approval is a requirement for, but separate from, the decision on required permits for project approval.

Depending on the scale and level of the project, it may be the Department of EIA and Appraisal-MoNRE or other ministries/ Governmental bodies at national level or the People Committee at the local level which approves the EIA report.

Once the EIA reports are approved, an approval decision is issued, and the EIA reports are certified. Decisions, including the reasons thereof, are communicated to the proponent in writing.

The decision is made public. A report on the decision as well as the certified EIA report are sent to various institutions, depending on which level the approval decision has been taken.

1.7.5 Monitoring, Compliance and Enforcement

An environmental control program is part of the EIA report and then serves as a basis for the development of an environmental control plan after the EIA report has been approved. The agency approving the EIA report is responsible for inspection.

Suspension of permit of operation or other penalizing measures are issued if the proponent does not comply with measures in the already approved environmental protection plan.

1.7.6 Public participation

The new LEP (2020) and the Decree 08/2022/NĐ-CP to implement the LEP include provisions for public consultations at two stages - in preparation phase and in review phase of the EIA report (refer to Figure 1.)

The consultation process during the process of EIA reporting is determined to be as follows: The people to be consulted are the People's Committee of the affected commune and representatives of the affected communities and organizations. The project owner must send them a written request for consultation together with brief documents on the major investment items of the project, environmental issues and on environmental protection measures. When necessary, the People's Committee may then convene the representatives of the affected communities and organizations for a meeting and notify the project owner

of it. The project owner shall be part of the meeting. Its results have to be recorded in writing and signed by the present parties. Within 15 working days after receiving the written request for consultation, the People's Committee should then send a written reply to the project owner and publish it. If it does not do so, it is assumed that the people agree to the project plan. Agreeing and disagreeing opinions will be summarized in the EIA report.

The proponent, public/ NGOs and private parties can appeal against decisions approving EIA reports.

1.8 MULTILATERAL AGREEMENTS

The Government of Vietnam is a signatory to a number of international and regional agreements and conventions, those that are relevant to the project:

- 1971 Convention on Wetlands of International Importance especially as Waterfowl Habitat
- 1985 Vienna Convention for the Protection of the Ozone Layer
- 1989 Montreal Protocol On Substances That Deplete The Ozone Layer
- 1989 Convention On The Control Of Transboundary Movements Of Hazardous Wastes And Their Disposal
- 1992 United Nations Framework Convention on Climate Change
- 1997 Kyoto Protocol to the United Nations Framework Convention on Climate Change
- 1997 Convention On The Law Of The Non-Navigational Uses Of International Watercourses
- 1998 Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade
- 2000 Cartagena Protocol on Biosafety to the Convention on Biological Diversity
- 2001 Stockholm Convention on Persistent Organic Pollutants
- 2012 Agreement on the Establishment of the Global Green Growth Institute
- 2013 Minamata Convention on mercury
- 2015 Paris Agreement under the United Nations Framework Convention on Climate Change

1.9 UNDP SOCIAL AND ENVIRONMENTAL STANDARDS

UNDP's Social and Environmental Standards (SES) underpin the organizations commitment to mainstream social and environmental sustainability into its programs and projects. The SES are an integral component of UNDP's quality assurance and risk management approach to programming. Further details on the UNDP SES are available on the UNDP website.

The UNDP SES have been applied during the development of the project. The SES objectives are to:

- strengthen the social and environmental outcomes of programmes and projects;
- avoid adverse impacts to people and the environment;
- minimize, mitigate, and manage adverse impacts where avoidance is not possible;
- strengthen UNDP and partner capacities for managing social and environmental risks; and
- ensure full and effective stakeholder engagement, including through a mechanism to respond to complaints from project-affected people.

UNDP uses its Social and Environmental Screening Procedure (SESP) to identify potential social and environmental risks and opportunities associated with all proposed projects. Each project is scrutinized as to its type, location, scale, sensitivity, and magnitude of its potential social and environmental impacts. All project components are screened, including planning support, policy advice and capacity-building, as well as site-specific, physical interventions. Activities that will be completed under project co-financing are also included in the scope of the assessment.

Through the GEF Accreditation Process, the SES are acknowledged to be consistent with the GEF's Environment and Social Standards.

The project has been screened against the UNDP SES using the UNDP Social and Environmental Screening Procedure (SESP) template. The screening indicated that the project would trigger nine of the UNDP Social and Environmental Standards.

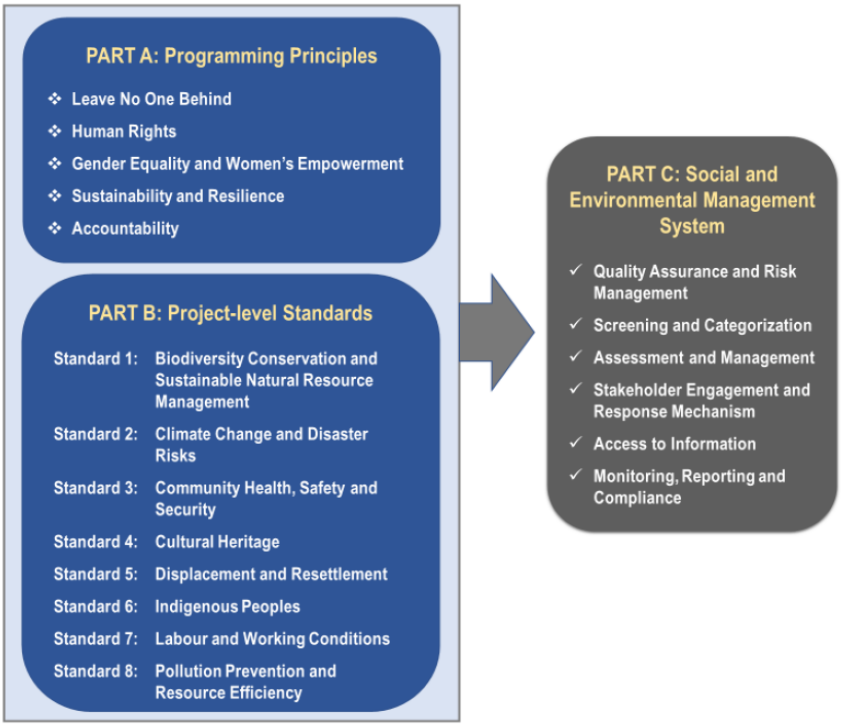

Figure 2: Key Elements of UNDP's Social and Environmental Standards (SES)

The screenings conducted during the PPG phase indicate that up to nine of the twelve social and environmental principles and standards have been triggered due to risks to:

- Human Rights (the required action of duty bearers in meet their obligations with the project since a new set of regulatory frameworks would be generated by the Project)
- Gender Equality and Women's Empowerment (due to potential existing gender disparities that exist at demonstration enterprises and inadequate participation of women in consultations, policy decision making and design of modalities for capacity building in uptake of BAT/BEP))
- Accountability (due to potential exclusion of marginalized communities in decision making processes related to policies and legislation that may affect them and)
- Standard 1: Biodiversity Conservation and Sustainable Natural Resource Management (due to the potential side-effects and impacts from demonstration activities based on the eventual sites)
- Standard 2: Climate Change and Disaster Risks (due to the risk that project outcomes could be vulnerable to impacts of climate change, such as flooding affecting the location of Mercury interim storage facility)
- Standard 3: Community Health, Safety and Security (due to the risk of release and emissions during retrofit of industries and disposal of hazardous waste)
- Standard 5: Resettlement and Economic Displacement (due to potential limited access to financial resources and other economic impacts to industries, particularly SMEs, that are required to adopt POPs-free technologies)

- Standard 7: Labor and Working Conditions (due to potential worker exposure to health and safety risks and hazardous material during the demonstration activities)
- Standard 8: Pollution Prevention and Resource Efficiency (due to the risk of release and emissions of pollutants from demonstration pilots)

A summary of the risk significance under each SES principle and standard, and the project-level safeguard standards triggered by each project (indicated with ticks) are shown in ***Table 1*** below. Table 2 provides a preliminary qualitative analysis of the Social and Environmental risks and impacts of the proposed activities, and applicable SES and possible form of the social and environmental management plans. It should be noted that these preliminary screening are indicative risk analysis

Table 2: Summary of safeguards triggered based on screening conducted during project preparation

Overarching Principle / Project-level Standard	Assessed?	
Human Rights	✓	Moderate
Gender Equality and Women's Empowerment	✓	Moderate
Accountability	✓	Moderate
Standard 1: Biodiversity Conservation and Sustainable Natural Resource Management	✓	Moderate
Standard 2: Climate Change and Disaster Risks	✓	Moderate
Standard 3: Community Health, Safety and Security	✓	Moderate
Standard 4: Cultural Heritage	✓	Not triggered
Standard 5: Displacement and Resettlement	✓	Moderate
Standard 6: Indigenous Peoples	✓	Not Triggered
Standard 7. Labor and Working Conditions	✓	Moderate
Standard 8: Pollution Prevention and Resource Efficiency	✓	Moderate
Number of risks in each risk rating category		
High		0
Substantial		0
Moderate		7
Low		1
Total number of project risks		8
Overall Project Risk Categorization		Substantial
Number of safeguard standards triggered		9

1.9.1 Gaps in Policy Framework

A high-level assessment of the legal and policy frameworks that apply to the project has been undertaken. Table 3 provides a summary of the UNDP standards that are triggered and identifies the relevant Vietnamese legal/policy instruments, along with any gaps that would require to be met by application of UNDP/project level controls.

The SESA and ESIAs will include further analysis of the legal and policy frameworks that apply to the project, detailing gaps and strategies to enable the project's policy-level activities to operate with and alongside state and federal jurisdictional realms. Table 4 provides a comparison of the requirements UNDP SES and Vietnamese law of an ESIA.

Table 3 Summary of UNDP Social and Environmental Standards Triggered by the Project and their Requirements for the Project

	Triggered	Requirements Relevant to Project	Relevant National Polices, Legislation, Regulations	UNDP SES requirements met by national instruments
Programming Principles				
Leave No One Behind				
Human Rights	Yes	Supports universal respect for, and observance of, human rights and fundamental freedoms for all	Constitution of the Socialist Republic of Vietnam. (2013) Civil Code (2015). The code protects personal rights	Yes
Gender Equality and Women's Empowerment	Yes	Promotion of gender equality and the empowerment of women.	Law on Gender Equality (2007)	Yes
Sustainability and Resilience		Precautionary approach to significant social and environmental challenges and requires application of the mitigation hierarchy to first avoid potential adverse impacts to people and the environment, or where avoidance is not possible, to then minimize, mitigate, and as a last resort, offset and compensate for potential residual adverse impacts Enhance climate resiliency and avoid unwarranted increases in greenhouse gas (GHG) emissions, instead enhancing efficiency and reducing GHG intensity	Decree Providing Strategic Environmental Assessment, Environmental Impact Assessment and Environmental Protection Commitment National Action Plan on the Implementation of the 2030 Agenda for Sustainable Development (2017)	Yes
Accountability	Yes	UNDP does not support activities that do not comply with national law and obligations under international law, whichever is the higher standard		
Project Level Standards				
Standard 1. Biodiversity Conservation and Sustainable Natural Resource Management	Yes	Precautionary approach to be applied. Risk identification and assessment: identify and address direct and indirect impacts on natural resources, biodiversity, ecosystems, and ecosystem services. Use of experts. Siting preference – favor areas of low biodiversity/ecosystem. Modified habitats and natural habitats – minimise impacts Risk reduction measures follow a mitigation hierarchy that favors avoidance of potential adverse impacts over minimization, mitigation where adverse residual impacts remain, and, as a last resort, application of offset and compensation measures. Management of ecosystems services – avoid adverse impacts. No adverse impacts on critical habitats. No introduction of invasive into new environments.	Viet Nam Biodiversity Law (2008) and its implementation regulation provides clear framework for "biodiversity conservation and sustainable development; rights and obligations of organizations, households and individuals in the biodiversity conservation and sustainable development". National Biodiversity Strategy and Action Plan	Yes

		Avoid, and where avoidance is not possible, minimize adverse impacts on soils, their biodiversity, organic content, productivity, structure, water-retention capacity.		
Standard 2. Climate Change and Disaster Risks	Yes	Climate change and disaster risk analysis, planning and implementation – assess for climate change and disaster risks and their impacts to project activities and outputs as well as the possibility that project activities could increase exposure to such risks	The Law on Environmental Protection 2020 regulates climate change adaptation as follow: a) Assessment of impacts, vulnerabilities, risks, loss and damage caused by climate change to sectors, regions and residential communities based on the climate change scenario and socio-economic development forecast; b) Climate change adaptation, disaster risk reduction, community- and ecosystem-based climate change adaptation model; response to sea level rise and urban inundation; c) Construction and operation of the system for supervising and assessing climate change adaptation.	Yes
Standard 3. Community Health, Safety and Security	Yes	Protect communities from hazards caused and/or exacerbated by project activities (including flooding, landslides, contamination or other natural or human-made hazards), disease, and the accidental collapse or failure of project structural elements. Assess the risks to, and potential impacts on, the safety of affected communities during the design, construction, operation, and decommissioning of projects and establish preventive measures and plans to address them in a manner commensurate with the identified risks and impacts. Avoid or minimize the potential for community exposure to health risks and diseases that could result from or be exacerbated by project activities. Infrastructure design and safety to be in accordance with national legal requirements, good international practices, and any international obligations and standards. For construction activities, ensure appropriate control of site access, use of appropriate personal protective equipment, safely designed work platforms, appropriate engineering and administrative controls, and safety barriers. Construction personnel will have appropriate qualifications and training. Apply concept of universal access in the design and construction of facilities and services. Avoid, or where avoidance is not possible, minimize potential community exposure to hazardous materials and substances that may be utilized in or released by project activities. Be prepared for emergencies e.g. plans, training, equipment. and resources. Avoid, mitigate, and manage the risks and potential adverse impacts on health and safety of communities arising from the influx of project-related workers. Avoid, or where avoidance is not possible, minimize such adverse impacts and implement appropriate mitigation measures that aim to maintain the value and functionality of ecosystem services of relevance to local communities.	Civil Code (2015). The code protects personal rights in accordance with relevant human rights, include right to life, safety of life, health, and body, which may refer to different articles 25-39 under Section 2 on Personal Rights Protection of properties are regulated under the Chapter VII of the Civil Code In special circumstances, due to national defense and security, social safety and order, social ethics and the community's health, beside the civil code the other law will be applied, including: Law on community health protection (1989, under consideration for revision,) Law on National Security (2004) and related decrees and circulations under the law. Labour Law 2019 Law No. 10/2016/QH13 on Children The transportation, storage and handling of hazardous chemical must comply with Environmental Protection Law and Circular 36/2015/TT-BTNMT on hazardous waste management (applying for Environmental License and Workers certification and training).	Yes

		Emergency preparedness: ensure that all parties involved in the project are prepared to respond to accidental and emergency situations. Risks associated with influx of workers. Impacts on ecosystem services which may result in adverse health and safety risks to communities. Terms and conditions of employment – written labour management procedures. Workers to be advised of conditions of their employment. Non-discrimination and equal opportunity. Workers organizations – freedom of association and recognition of the right to collective bargaining No forced or child labour. Occupational health and safety - protect and promote the safety and health of workers. Workplace grievance mechanism (distinct from project-level grievance)		
Standard 4. Cultural Heritage	No			
Standard 5. Displacement and Resettlement	Yes	Prohibit forced evictions, allowing evictions in exceptional circumstances only Avoid, minimize and mitigate physical and economic displacement Develop plans for displacement, including Resettlement Action Plan and/or Livelihood Action Plan	Equivalent with regulations under the Land Law (2013). Specifically, the standard closely aligns with the Chapter 6 of the Land law on Land Recovery, Land Requisition, Compensation, Support and Resettlement under the Land Law	*Yes*
Standard 6. Indigenous Peoples	No			
Standard 7. Labour and Working Conditions	Yes	Terms of employment are specified. Non-discrimination and equal opportunity: no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation, working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices Worker organizations: workers have rights to form and to join workers' organizations. Recognition of such organizations. No forced labor No child labor OH&S processes and measures supported Workplace grievance redress mechanism Contractor/Third Party Workers: due diligence to ensure that they have minimum requirements in place	Labour Law 2019: Fair treatment, non-discrimination, equal opportunity is specifically stipulated under the Article 4. State policies on labour - defines that "2. Guarantee the legitimate rights and interests of employers, to ensure lawful, democratic, fair and civilized labor management, and to promote corporate social responsibility." Article 90. Salaries - stipulates that "3. Employers shall pay salaries fairly without discrimination against genders of employees who perform equal works". In addition, the Law No. 51/210/QH12 on Persons with Disability also provides complimentary protection of right of people with disability in labour and working conditions Good worker–management relationship is specified under the Article 5 on Responsibility of Employer, provide clear guidance and promote safety and health for workers, especially vulnerable workers. Comply with national employment and labour laws; Protect workers, in particular those in vulnerable categories; (CHAPTER XI); Additional regulations to provide support for labour and working conditions on their safety and hygiene is detailed under the Law No. 84/2015/QH13 on Safety and Hygiene of Labour.	Yes

			Promote safety and health; (See CHAPTER IX). Article 5 on Responsibility of Employer, provide clear guidance and promote safety and health for workers, especially vulnerable workers. Avoid use of forced labour or child labour. (CHAPTER XI). Besides, the Law No. 10/2016/QH13 on Children provide overall legislation framework to protect child rights in different context. The transportation, storage and handling of hazardous chemical must comply with Environmental Protection Law and Circular 36/2015/TT-BTNMT on hazardous waste management (applying for Environmental License and Workers certification and training).	
Standard 8. Pollution Prevention and Resource Efficiency	Yes	Pollution prevention: avoid release of pollutants, where not avoidable, minimize and/or control intensity and mass flow of their release. Ambient conditions: avoid adverse impacts Wastes: seek to avoid generation of waste, where not possible adopt waste management hierarchy (reduce, reuse, recycle). Hazardous materials: avoid or minimize and control release and exposure to hazardous materials. Resource efficiency: design and implement project in manner that promotes efficient use and consumption of resources.	Law on Chemicals 2007 + various decrees listed above. Law on Environmental Protection (LEP, 2020). The transportation, storage and handling of hazardous chemical must comply with Environmental Protection Law, Decree No 08.2022.ND-CPand Circular 02/2022/TT-BTNMT regulation on the several articles of environmental protection, including hazardous waste management (applying for Environmental License and Workers certification and training). Key articles under the Law that directly emphasize UNDP principles include: Article 4 on Principles of environmental protection; Article 6. Course of actions that are advised to take to protect the environment. Many related chapters in the Environmental Law detail out the specific practices and requirement on environment, natural resource and climate change issues. Viet Nam Law on Environmental Protection (LEP) requires Strategic Environmental Assessment for all development policies and plans and Environmental Impact Assessment for all project, to ensure avoid, minimize, reduce environmental pollutions, including demanding implementation of mitigation measure to reduce potential impacts/pollutions.	Yes

Table 4 Comparison of UNDP ESIA requirements with VEIA requirements

UNDP ESIA Requirements	Key Content required in a VEIA report (Circular No.02/2022/TT-BTNMT)	Gaps
Scoping of ESIA Generally, an ESIA is required for Substantial Risk and High Risk projects with "downstream" impacts (e.g. with a physical footprint).	Done as part of Pre-EIA screening process	
Early Consultations	Public consultations at two stages - in preparation phase and in review phase of the EIA report	
Executive summary Concisely discusses significant findings and recommended actions.		Executive Summary can be added to VEIA
	Introduction This section gives an overview on the origin of the project, the legal and technical basis for the EIA study and the organization background for the EIA, comprises of following sections: 0.1 Origin of the project 0.2 Legal and technical framework of the EIA report 0.5 Organisational background for the EIA 0.4. Impact assessment methodology	
Project Description The geographic, ecological, social and temporal context of the proposed project, including any offsite investments (i.e. associated facilities) that may be required (e.g. access roads, power plants, transmission lines, water supply, housing, and raw material and product storage facilities); • Project location, site, and design (e.g. technology/process, facilities design, construction, operation and maintenance, and decommissioning or closure); • Map showing the project site, project's area of influence (as determined during the scoping phase) and sensitive environmental and social features.	**Chapter 1: Project Description** This chapter provides an overview of the conceptual project design and an overview of the site, including following information: 1.1 Project name 1.2 Project owner 1.3 Geographic project location 1.4 Project description 1.4.1. Objective of the Project 1.4.2. Description of the Project Components 1.4.3. Organisation for Construction and Construction Methodology 1.4.4. Operational Technology 1.4.5. List of Equipment 1.4.6. Input materials and Products 1.4.7. Project Implementation Schedule 1.4.8. Investment Budget 1.4.9. Organisational Structure for Project Management and Implementation	
Baseline The current and projected environmental and social, and physical/cultural baseline data must be presented for the project's area of influence. Summarizes the baseline data that is relevant to decisions about project location, design, operation, or mitigation measures; identifies and estimates the extent and quality of available data, key data gaps, and uncertainties associated with predictions; assesses the scope of the area to be studied and describes relevant physical, biological, and socioeconomic conditions, including any changes anticipated before the project commences; and takes into account current and proposed development activities within the project area but not directly connected to the project.	**Chapter 2: Environmental and Socio-economic baseline** The environmental and socio-economic baseline conditions of the study area for this VEIA will be described briefly in this section. 2.1 Natural conditions 2.1.1. Geological and geological conditions 2.1.2. Meteorological and Climate conditions 2.1.3. Hydrological Conditions: 2.1.4. Environmental Baseline 2.1.5. Biodiversity 2.2 Socio-economic conditions	
Policy, Legal/Regulatory and Institutional Framework Review the legal and permitting requirements as well as applicable social and environmental standards from:	Included in Introduction section of VEIA	VEIA would not typically cover international or UNDP

• Applicable laws and regulations of the local and national jurisdictions in which the proposed project will operate. • Applicable international obligations and agreements (e.g. Multilateral Environmental Agreements) that must be complied with. • UNDP Social and Environmental Standards. • Social and environmental safeguard policies and procedures of other donors and project partners.		SES/donor requirements
Project Alternatives Systematically compares feasible alternatives to the proposed project site, technology, design, and operation – including the "without project" situation – in terms of their potential social and environmental impacts; assesses the alternatives' feasibility of mitigating the adverse social and environmental impacts; the capital and recurrent costs of alternative mitigation measures, and their suitability under local conditions; the institutional, training, and monitoring requirements for the alternative mitigation measures; for each of the alternatives, quantifies the social and environmental impacts to the extent possible, and attaches economic values where feasible. Sets out the basis for selecting the particular project design.		Analysis of alternatives not required by VEIA,
Analysis and Evaluation of Risks and Impacts Potential impacts on the following features: • Physical: surface and ground water, air, soil, land use, landform/topography, noise, vibration, geology, seismicity and other natural hazards, resource use, waste, greenhouse gases, etc. • Biological: terrestrial and aquatic flora and fauna, habitat, ecosystems and ecosystem services, endangered species, protected areas, invasive alien species, etc. • Social and socio-economic: impacts on socio-economic conditions, human rights, livelihoods, indigenous peoples, vulnerable or marginalized groups, gender dimensions, risks of physical and/or economic displacement, occupational health and safety, cultural heritage, community health and safety, labour and working conditions. Examine if individuals or groups may be differentially or disproportionately affected because of their disadvantaged or marginalized status, and if so, ensure adverse impacts do not affect them disproportionately. The spatial scope of potential impacts (i.e. area of influence) will encompass: • The primary project site(s) and related facilities; • Associated facilities that are not funded or financed as part of the proposed project but are directly related to the project, are planned to be carried out contemporaneously with the project and whose viability and existence depend on the project; • Areas potentially impacted by cumulative impacts from the incremental adverse impacts of the project when added to other past, existing, planned or reasonably predictable future projects and developments; • Areas potentially affected by impacts from unplanned but predictable developments (indirect and induced impacts) caused by the project that may occur later or at a different location; • Transboundary impacts, such as pollution of international waterways or transboundary river basins, airsheds and ecosystems; migration of populations; international relations; • Global environmental and social impacts, e.g. greenhouse gas emissions, ozone depletion, loss of biodiversity and desertification; loss of cultural diversity and heritage.	**Chapter 3: Assessment of Environmental and Socio-economic Impacts** This chapter describes various environmental and social impacts and the potential risks and incidents identified for the whole project life during the pre-construction, construction, operation and decommissioning phases. 3.1 Impact assessment: divided to impacts related to waste and not related to waste for each phase as follows: 3.1.1. Impacts during preparation phase 3.1.2. Impacts during construction phase 3.1.3. Impacts during Operation phase 3.1.4. Impacts during Decommissioning phase 3.2. Assessment of environmental risks and incidents 3.3 Comments on detail, confidential degree of evaluations	VEIA may not meet all UNDP SES requirements depending upon risks, therefore gap analysis will be required for aspects such as changes in land-uses and land tenure, ethnic minorities (indigenous peoples), visual impacts, GHGs, transboundary impacts, and cumulative impacts.
Mitigation Measures Develop mitigation strategies and management plans (ESMP). The ESMP identifies mitigation measures required to address identified social and environmental risks and	**Chapter 4: Solutions and Measures to Minimise Negative Impacts, to Prevent and Cope with Environmental Incidents**	

impacts, as well as measures related to monitoring, capacity development, stakeholder engagement, and implementation action plan. -	In this section, the measures for mitigation, prevention and response to the negative socio-environmental impacts and environmental incidents as figured out in the previous section will be suggested. The section should also be structured for the 3 phases of the project life, covering following issues: 4.1 Mitigation measures for adverse impacts - Preparation phase - Construction phase - Operation phase - Commissioning phase 4.2 Prevention and response to environmental incidents - Preparation phase - Construction phase - Operation phase 4.3. Implementation plan for environmental protection facilities **Chapter 5: Environmental Management and Monitoring Program** In this chapter, an environmental management program in tabular format and environmental monitoring program will be developed for the whole project lifetime. 5.1 Environmental management program 5.2 Environmental monitoring program	
Stakeholders: Summary of consultations undertaken for development of ESIA. Summary of Stakeholder Engagement Plan or ESMP that includes plan for consultations.	**Chapter 6: Community Consultation** The public consultation as part of the EIA for the project will be presented in this chapter, including following sections: 6.1 Brief description of the community consultation process 6.2 Results of the community consultations	
Conclusions and Recommendations Succinctly describes conclusion drawn from the assessment and provides recommendations. Includes recommendation regarding the project's anticipated benefits in relation to its social and environmental risks and impacts.	**Chapter 7: Conclusions and Recommendations** 7.1 Conclusions 7.2 Recommendations 7.3 Commitments	

PROJECT PROCEDURES FOR SCREENING, ASSESSMENT AND MANAGEMENT OF RISK

As part of implementation, environmental and social risks will continue to be assessed and appropriate management mechanisms will be included. Once activity details are sufficiently known (eg detailed design and/or proposed construction methodology understood), they will then be screened for potential risks using UNDP's SESP. The SESP will assist in identifying the additional safeguard documents and processes that will be required to adequately manage risks associated with the specific activity. Once the risks have been identified, then elaboration of pre-implementation safeguards by PMU will be undertaken.

1.10 SCREENING

The SESP has been conducted based on the scope of project activities currently envisaged. The screening has identified the project to be of potential "Substantial Impact", and as such it requires further Targeted Environmental and Social Impact Assessments. The potential impacts and management strategies are therefore designed to manage the identified impacts in their broadest sense, and the allocated significance rating is based on a precautionary approach.

While jurisdictions, provinces and districts of operation have been established, exact locations and industry partners for on-the-ground activities (and hence the project's direct beneficiaries and project-affected communities), have not been selected at the present stage of project development. Additionally, specific activities with a physical footprint are not currently defined and may present additional risks/impacts.

The relevance of these risks may vary across sites, and the significance or likelihood of the risks or impacts identified by the current SESP will not necessarily be uniform across at all locations. Further screening is required to identify risks' site-specific significance and to effectively target any further impact assessment or management.

Locations and proposed project activities specific to those locations will be defined during the first year of the project. Once the initial project activities are fully specified and exact locations are selected, further screening using the SESP will be required to ground truth and update the SESP. This will also determine whether additional social and environmental impacts may be present that will require further assessment and management.

Screening will be the responsibility of the PMU and the Gender-Safeguards Officer.

1.11 ASSESSMENT

The SESP identified the need for ESIAs to be undertaken for industries that will participate in the demonstration activities for technologies. Specifically, the activities that require ESIAs are associated with activities involving handling, treatment, transport between facilities, storage, recycling, disposal or testing of substances and waste contained chemicals (Activities 2.1.2.2, 2.1.3.2, 3.1.3.1) as companies and locations have not yet been selected.

Potential impacts from "upstream" project activities such as the development and introduction of new policies or legislative reform will be assessed through a Strategic Environmental and Social Assessment (SESA) as required by Vietnamese law (Law on Environmental Protection).

The assessments will develop strategies for avoiding, reducing and managing adverse impacts while enhancing positive impacts, and the outputs of the assessments will inform Environmental and Social Management Plans.

The SESAs and ESIAs will be implemented as follows:

1.11.1 Strategic Environmental and Social Assessments

Prior to the enforcement of roadmaps, assessment of policies and/or laws for upstream policy-level project activities (Outputs 1.1.1, 1.1.2, 1.1.3, 1.2.1) will be undertaken to identify potential impacts and strategies

(Strategic Environmental and Social Impact Assessments). The Law on the Promulgation of Legal Documents 2015 requires the focal point of a policy is to conduct a policy impact assessment before submitting for approval.

The SESAs will evaluate the effect of policy changes on a broad, cross-sectoral basis with the aim of making policy decisions and other upstream actions more sustainable. The assessment of upstream impacts will integrate environmental and social considerations into policies, plans and programmes which will be used to evaluate their interlinkages with economic and sustainability considerations. The SESA process will examine the linkages between the two and anticipate the potentially adverse impacts of policies at the site level/industry level.

Information and strategies identified will inform decision-making and will be used to guide subsequent assessments of downstream activities.

As a high-level document, the SESA is based on the broad scope of envisaged high-level project activities. As these are already identified and broadly defined, work on the SESA will commence at an early stage.

The detailed scope of the SESA will be refined by the experts conducting the assessment. The report will identify strategies for effective management of identified impacts, which will inform the impact management approach adopted.

1.11.2 Environmental and Social Impact Assessment (ESIA):

The ESIAs will commence following project inception as soon as specific companies and locations are selected. They will focus on, but not be restricted to the potential impacts identified during the SESP screening process, which are a result of proposed on-the-ground project activities in their location-specific contexts.

ESIAs will be developed and carried out by independent experts in a participatory manner with stakeholders during the first year of the project and as part of the work plan preparatory activities. This will involve stakeholder consultations and engagement, as well as research, fieldwork, and management planning. See also Stakeholder Engagement and Information Disclosure chapter of this document.

The assessments will be conducted in a manner consistent with national regulations and the UNDP SES which will lead to the development of appropriately scaled management measures and plan to address the identified risks and impacts.

The ESIAs will:

- Screen social and environmental risks and impacts specific to the local context.
- Further clarify the applicable social and environmental standards (including UNDP SES) triggered by the project activities.
- Take the necessary steps in the context of the ESIA to fulfil those requirements and make recommendations on how compliance is to be carried throughout the life of the project.

The UNDP SES requires that in all cases required social and environmental assessments and adoption of appropriate mitigation and management measures must be completed, disclosed and discussed with stakeholders prior to implementation of any activities that may cause adverse social and environmental impacts. Development of the demonstration plants for Activities 2.1.2.2, 2.1.3.2, and 3.1.3.1 cannot commence until the ESIAs and associated ESMPs have been completed.

Assessment of activities will commensurate with the magnitude of the envisaged risk, and targeted specifically at the associated risks, especially considering risks to poor, vulnerable or marginalized communities and individuals. Full stakeholder consultation will be required at all stages.

1.12 MANAGEMENT

1.12.1 Environmental and Social Management Plans

Impact management will adhere to the "mitigation hierarchy" model. Where possible, adverse impacts will be "designed out" i.e. the design of project activities will be amended or adjusted so as to avoid the identified impacts. Where this is not possible, measures will be developed, in conjunction with stakeholders, to reduce, minimize, mitigate, or manage those impacts.

The project will prepare targeted Environmental and Social Management Plans, which will be informed by the revised SESP, Environmental and Social Impact Assessment reports, and other management plans including the Gender Action Plan. The ESMPs will:

1. Provide time-bound specific recommendations for avoiding adverse impacts, and where avoidance is not possible, for reducing, mitigating, and managing those impacts for all project activities.
2. Further identify project activities that cannot take place until certain standards, requirements and mitigation measures are in place and carried out (complementing and updating what has already been identified in this draft ESMF).
3. Develop site-specific management plans, as necessary and as required by the applicable UNDP SES. These will outline the management objectives, potential impacts, control activities and the environmental performance criteria against which projects will be evaluated (e.g. audited). Recommendations will be adopted and integrated into the project activities, monitoring and reporting framework and budget.

The above required assessments and management plans must be prepared and mitigation measures in place as per those plans, prior to the initiation of any project activity that may cause adverse impacts.

An indicative template for EMPs can be found in the UNDP (2020) Guidance Note Social and Environmental Standards Social and Environmental Assessment and Management: https://info.undp.org/sites/bpps/SES_Toolkit/SES%20Document%20Library/Uploaded%20October%202016/UNDP%20SES%20Assessment%20and%20Management%20GN%20-%20FInal%20Nov2020.pdf

1.13 ADDITIONAL SUB-PLANS

The SESP has identified requirements for the following additional stand-alone targeted management plans (also refer Table 5:

1. Stakeholder Engagement Plan: has been developed (ProDoc Annex 8). The plan provides terms of reference and modalities for managing stakeholder engagement in project activities at each site and community.
2. Restructuring Plan (Retrenchment) Plan: will be developed and implemented if retrenchment is found to be unavoidable for certain industries. It will ensure that UNDP SES requirements, best practice standards and mitigation measures are being met, such that program activities involving economic displacement cannot proceed until completion of the full ESIA and Restructuring Plans that are site/industry specific.
3. Gender Action Plan: has been prepared (ProDoc Annex 9). Updates will be informed by the ESIAs, and progress against relevant benchmarks.
4. Spill Prevention and Management Plan: will be developed and implemented at sites for safe handling and disposal of chemicals and mercury-containing obsolete devices and safe cleanup of accidental mercury releases.
5. A Risk Management Strategy: will be developed and include technical guidance and training materials for sound management of mercury stockpiles and obsolete mercury-containing equipment.
6. Occupational Risk Assessment: will consider the occupational health and safety risks and mitigation measures that may be required.

Table 5 Required Targeted Environmental and Social Plans According to Risks Confirmed by Implementation

Component	Outcomes	RISKS	Subject TO THIS ESMF		REQUIRED TARGETED ENVIRONMENTAL AND SOCIAL PLANS
			YES	NO	
Component 1: Promote sustainable production - consumption in key sectors through Ecolabeling, Green Financing, Procurement, and other elements to support a long-term Innovation Ecosystem for greening the value and supply chain across sectors.	Outcome 1.1 Environmental regulation upgraded to include new POPs; and Ecolabel and related policies on POPs and mercury lifecycle management developed and implemented.	Adverse economic impacts to small and medium sized industries and their workers due to banning of imports or restricting the use of certain chemicals used as baseline articles. **Related to :** - Accountability: P13, P14 - Standard 5: Displacement and Resettlement; 5.2. - Standard 8: Pollution Prevention and Resource Efficiency: 8.1; 8.2; and 8.3 Unintended adverse impacts because of the introduction of new legislation or policies. **Related to risks:** - Human Rights: P2, P5 - Accountability: P13, P14 - Standard 7: Labour and Working Conditions: 7.5	**X**		Stakeholder Engagement Plan SESA for new legislation and policies related to POPs prior to implementation SESA for new legislation related to mercury ESMPs
	Outcome 1.2 Development of a Green Finance Framework, to sustain the shifting of enterprises toward a non-POPs and non-Mercury manufacturing.	Inadequate participation of women in consultation, policy decision making and design of modalities for capacity building in uptake of BAT/BEP in the targeted industries. **Related to:** Gender Equality and Women's Empowerment; P.10	**X**		SESA for green finance and procurement schemes Restructuring (jobs) Plan ESMP (if required) GAP
Component 2: Life cycle management of POPs and PTS containing products.	Outcome 2.1 Sustainable manufacture and design of plastic, polymers, paint, metal finishing and other products to prevent the use of POP and the release of POP in the environment.	Adverse economic impacts to small and medium sized industries and their workers due to banning of imports or restricting the use of certain chemicals used as baseline articles. **Related to :** - Accountability: P13, P14 - Standard 5: Displacement and Resettlement; 5.2. - Standard 8: Pollution Prevention and Resource Efficiency: 8.1; 8.2; and 8.3	**X**		ESIAs ESMP GAP

Component	Outcomes	RISKS	Subject TO THIS ESMF		REQUIRED TARGETED ENVIRONMENTAL AND SOCIAL PLANS
			YES	NO	
		Risk of flooding at mercury treatment and storage facilities. **Related to risks:** Standard 2: Climate Change and Disaster Risks, 2.2 Health and safety risk for the workers involved in the activities of handling, treatment, transport between facilities, storage, recycling, disposal or testing of substances and waste contained-chemicals. **Related to risks:** - Standard 3: Community Health, Safety and Security: 3.2 and 3.5 - Standard 7: Labour and Working Conditions, 7.1, 7.2, 7.5, 7.6 Increased GHG emissions or consumption of raw materials, energy, water. **Related to risks:** - Standard 2: Climate Change and Disaster Risks: 2.4 - Standard 8: Pollution Prevention and Resource Efficiency: 8.1, 8.2 and 8.3			
	Outcome 2.2 Closure of the gap between recyclers and industry to sustain circular economy and to prevent the contamination of recyclable materials.	Inadequate participation of women in consultation and policy decision making. **Related to:** Gender Equality and Women's Empowerment; P.10	**X**		GAP
Component 3: Mercury lifecycle management of mercury containing products.	Outcome 3.1 Replacement of mercury products with non-mercury products promoted and sustained by EPR schemes and EOL management.	Risk of accidental release of hazardous substances during handling, treatment, transport between facilities, storage, disposal or testing of substances and wastes contained-chemicals. **Related to risks:** • Standard 1: Biodiversity Conservation and Sustainable Natural Resource Management; 1.1, 1.7, 1.14 • Standard 3: Community Health, Safety and Security: 3.1, 3.4, 3.5	**X**		SEP ESIAs ESMPs Spill Prevention and Management Plan Risk Management Strategy

Component	Outcomes	RISKS	Subject TO THIS ESMF		REQUIRED TARGETED ENVIRONMENTAL AND SOCIAL PLANS
			YES	NO	
		• Standard 7: Labor and Working Conditions; 7.6 • Standard 8: Pollution Prevention and Resource Efficiency; 8.1, 8.2 and 8.3 Risk of flooding at mercury treatment and storage facilities. **Related to risks:** Standard 2: Climate Change and Disaster Risks, 2.2 Health and safety risk for the workers involved in the activities of handling, treatment, transport between facilities, storage, recycling, disposal or testing of substances and wastes contained-chemicals. **Related to risks:** - Standard 3: Community Health, Safety and Security: 3.2 and 3.5 - Standard 7: Labour and Working Conditions, 7.1, 7.2, 7.5, 7.6			Occupational Risk Assessment

STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE PROCESS

1.14 STAKEHOLDER ENGAGEMENT

During the development of the project, a number of discussions occurred with a wide range of stakeholders including relevant government departments, industry groups, NGOs, and individual community members. A list of the stakeholders engaged in these consultations has been Annexed to the Project Documents (ProDoc Annex 8).

A Stakeholder Engagement Plan and a Gender Action Plan have been prepared and are annexed to the Project Documents (ProDoc Annex 08 and Annex 09 respectively). These plans will be followed to ensure that stakeholders are engaged in project implementation and particularly in the further assessment of social and environmental impacts and the development of appropriate management measures. The Project Stakeholder Engagement Plan will be updated during project implementation based on the assessments and management plans conducted in line with this ESMF, as needed.

Potentially affected stakeholders will be engaged during the implementation of this ESMF.

The project will work with the following stakeholders:

1. Governmental stakeholders including the MONRE in charge of project execution as well as other ministries/administrations whose role will be crucial for the implementation of specific project components and establishment of regulation and norms relevant to the restriction of the use and import of POPs in manufacturing processes, the reduction of the release of mercury and U-POPs from industrial sources, and the elimination of manufacturing and use of mercury containing devices.
2. Public and private financial institutions involved in supporting the Green Finance Framework.
3. Private entities with interest in environmental certifications.
4. Enterprises and association of enterprises which may be affected by the restriction of the use and import of industrial POPs.
5. Recyclers including enterprises, communities, and individuals.
6. NGOs operating in the multiple dimensions of environment, communication, people mobilization, and gender mainstreaming.

The project will engage the relevant stakeholders in different ways including:

1. Stakeholders eligible to take an active part in the project (like enterprises and NGO) will be kept informed through direct contact in workshops, awareness raising events and publication of information in the project website.
2. Stakeholders interested in project activity and need to be informed because of potential positive or negative impact that the project will exert on them will be mainly kept informed through communication tools aimed at reaching large audiences, including TV broadcasting and newspapers.
3. Stakeholders who have direct interest in understanding the project achievement and results, including regulatory, technological, scientific and methodological aspects, will be kept informed through regular publication of technical document and project report on the project website.

A mapping of the project engagement methodologies by target audience is reported in Table 6.

Table 6 Mapping of stakeholder engagement methodology by objective and target audience

	Project engagement methodologies, including communication					
Objectives and targeted audiences	Project website	Training AR events, Workshops, online meetings	UNDP Website	Government websites	News papers	TV broad casting
Project management office and consultants (upload/download of project documents; project monitoring and management)	Dedicated access based on user role	Dedicated training and workshops on project management				Movies on project implementation at factories on issues related to POPs and Hg use and emissions
Communication with governmental institution (Meeting -minutes, milestones, relevant regulations, position papers etc.)	Dedicated section for project document upload/down load, with access policies	Training for decision makers, customs, regulators, and researchers	Project summary including key project reports, news, and events.	Project summary. Including national news and events, relevant regulations and links to project website	Interviews with gov Officials, UNDP experts, national experts, industry leaders, NGOs	Interviews with gov Officials, UNDP experts, national experts, industry leaders, and NGOs
Communication with interested bidders (links to national and international bidding events)	Links to the tender section and jobs		Links to the tender section and jobs	Links to the tender section and jobs		
General public	Public section in the Project website, communication on environment, production process, use and emissions of POPs, Hg		The UNDP website is open to the public	Project summary. Including national news and events, relevant regulations and links to project website	Selected news on CE, POPs, Hg industrials sectors and project event	
Industrial partners	Training materials	Dedicated training and workshops	News related to industry and POPs, Hg			
NGOs	All the above except project management section	Dedicated training and workshops	The UNDP website is open to the public			
International expert and gov. from other projects, and other countries	All the above except project management section	Dedicate online and in-person events for experience sharing and lesson learned	The UNDP website is open to the public	Access to the section of the gov. website with English translations		

1.15 MONITORING AND REPORTING

The PMU will monitor the impacts of stakeholder engagement activities. Stakeholder engagement will form a regular agenda item at PMU meetings. Issues and risks identified will be recorded in the project Risk Register for ongoing monitoring and/or action as appropriate.

A summary of all stakeholder engagement activities will be collated and made available to the public e.g., in Project Implementation Report. The summary will contain the following information as a minimum:

1. Implemented stakeholder engagement activities
2. Dates and venues of engagement activities
3. Information shared with stakeholders
4. Outputs including issues addressed

Outcomes of sharing sessions, consultations or responses to issues raised will be reported back to communities as per the Communications Strategy via the project website, newsletters, radio programs, visits, meetings, etc.

The Stakeholder Engagement Programme will be monitored, reviewed, and updated as required.

1.16 DISCLOSURE

Disclosure of relevant project information helps stakeholders effectively participate. The Project will disclose information in a timely manner, that is accessible and culturally appropriate, placing due attention to the specific needs of community groups that may be affected by project implementation (such as literacy, gender, differences in language or accessibility of technical information or connectivity).

UNDP has a Transparency Portal to publicly disclose projects' documentation related to environmental and social safeguards (e.g. environmental and social analyses, ESIAs, ESMFs and ESMPs, Indigenous Peoples, social inclusion plans and other relevant documents). The Transparency Portal can be accessed at https://open.undp.org/

As part of the stakeholder engagement process, UNDP's SES requires that project stakeholders have access to relevant information. Specifically, the SES (SES, Policy Delivery Process, para. 21) stipulates that, among other disclosures specified by UNDP's policies and procedures, UNDP will ensure that the following information be made available:

1. Stakeholder engagement plans and summary reports of stakeholder consultations
2. Social and environmental screening reports with project documentation
3. Social and environmental assessments and associated management plans
4. Any required social and environmental monitoring reports.

To ensure the widest dissemination and disclosure of project information along with any details related to applicable environmental and social safeguards, local and accessible disclosure tools including audio-visual materials such as flyers, brochures, videos, and community radio broadcasts will be utilized in addition to other tools. Furthermore, particular attention will be focused on women, Indigenous Peoples, marginalized minority groups, illiterate or technologically illiterate people, people with hearing or visual disabilities, people with limited or no access to the internet and other groups with special needs. The dissemination of information among these groups will be carried out with the project counterparts and local actors such as municipalities, producers´ associations, indigenous federations, organizations representing marginalized minority groups, women's organizations, government, and other regional actors.

GRIEVANCE REDRESS MECHANISMS

During the implementation phase of any project, a person or group of people can be adversely affected either directly or indirectly due to the project activities. The grievances that may arise can be related to social issues such as eligibility criteria and entitlements, disruption of services, temporary or permanent loss of livelihoods and other social and cultural issues. Grievances may also be related to environmental issues such as excessive dust generation, damages to infrastructure due to construction related vibrations or transportation of raw material, noise, traffic congestion, decrease in quality or quantity of private/ public surface/ ground water resources during irrigation rehabilitation, damage to home gardens and agricultural lands etc.

Should such a situation arise, there must be a mechanism through which affected parties can resolve such issues in a cordial manner with the project personnel in an efficient, unbiased, transparent, timely and cost-effective manner.

1.17 PROJECT GRIEVANCE REDRESS MECHANISM

The Project will establish and implement a transparent, fair, and free-to-access project-level Grievance Redress Mechanism (GRM) at the start of implementation. The full details of the GRM will be agreed upon during the Inception Phase, a process that will be overseen by the Project Manager with the Project Safeguards Specialist. Interested stakeholders may raise a grievance at any time to the Project Management Unit, the Executing Agency (MoNRE), Implementing Agency (UNDP), or the GEF.

The Grievance Redress Mechanism (GRM) is designed to be a problem-solving mechanism with voluntary good-faith efforts. The Grievance Redress Mechanism is not a substitute for the legal process. The Grievance Redress Mechanism will as far as practicable, try to resolve complaints and/or grievances on terms that are mutually acceptable to all parties. When making a complaint and/or grievance, all parties must always act, in good faith and should not attempt to delay and or hinder any mutually acceptable resolution.

1.17.1 GRM Sub-Committee

MONRE will establish a sub-committee for the GRM, and for the development and oversight of the mechanism, including reporting on the work of the Grievance Redress Sub-Committee (GRSC) to all stakeholders. The GRSC will be balanced in composition (government and non-government) and should not include any PB members with a direct interest or role in the grievance/dispute.

The Terms of Reference for the Grievance Redress Sub-Committee are:

1. Provide support to the affected persons in solving their problems.
2. Prioritize grievances and resolve them at the earliest.
3. Provide information to the PMU and VEA on serious cases at the earliest opportunity.
4. Coordinate with the aggrieved person/group and obtain proper and timely information on the solution worked out for his/her grievance.
5. Study the normally occurring grievances and advise PMU and PSC on remedial actions to avoid further occurrences.

The functions of the GRSC will be to:

1. Receive, log and track all grievances received.
2. Provide regular status updates on grievances to claimants, Project Board (PB) members and other relevant stakeholders, as applicable.
3. Engage the PB members, government institutions and other relevant stakeholders in grievance resolution.
4. Process and propose solutions to specific grievances within a period of sixty (60) days from receipt of the grievance.
5. Identify growing trends in grievances and recommend possible measures to avoid the same.
6. Receive and service requests for, and suggest the use of, mediation or facilitation.

7. Elaborate bi-annual reports, make said reports available to the public and more generally work to maximize the disclosure of its work (including its reports, findings, and outcomes).
8. Ensure increased awareness, accessibility, predictability, transparency, legitimacy, and credibility of the GRM process.
9. Collaborate with Partner Institutions and other NGOs, CSOs and other entities to conduct outreach initiatives to increase awareness among Stakeholders as to the existence of the GRM and how its services can be accessed.
10. Ensure continuing education of PB members and their respective institutions about the relevant laws and policies that they will need to be aware of to participate in the development of effective resolutions to Grievances likely to come before the GRM.
11. Monitor the follow-up to Grievance resolutions, as appropriate.

The GRSC will perform the following core functions:

1. Take direct action to resolve the grievance/dispute (e.g. bring the relevant parties together to discuss and resolve the issue themselves with oversight by the PB).
2. Request further information to clarify the issue, and share that information with all relevant parties, or ensure that a government agency represented on the PB took an appropriate administrative action to deal with a complaint.
3. Refer the grievance/dispute to independent mediation, while maintaining oversight.
4. Determine if request is within the scope and mandate of the PB, if not refer to appropriate area (e.g. Ministry of Justice and Police or to the courts).

1.17.2 GRM Processes

1.17.2.1 Communicating a Grievance

A Grievance can be sent by any individual or group of individuals who believe they have been or will be harmed by the Project.

If a Grievance is to be lodged by a different individual or organization on behalf of those said to be affected, the claimant must identify the individual and/or people on behalf of who the Grievance is submitted and provide written confirmation by the individual and/or people represented that they are giving the Claimant the authority to present the grievance on their behalf. The GRM Sub-Committee (GRSC) will take reasonable steps to verify this authority.

The GRSC shall maintain a flexible approach with respect to receiving grievances considering known local constraints with respect to communications and access to resources for some stakeholders. A grievance can be transmitted to the GRSC by any means available (i.e. by email, letter, phone call, meeting, SMS, etc.)

The Grievance should include the following information:

- The name of the individual or individuals making the Complaint (the “Claimant”);
- A means for contacting the Claimant (email, phone, address, other);
- If the submission is on behalf of those alleging potential or actual harm, the identity of those on whose behalf the Grievance is made, and written confirmation by those represented of the Claimant’s authority to lodge the Grievance on their behalf;
- The description of the potential or actual harm;
- Claimant’s statement of the risk of harm or actual harm (description of the risk/harm and those affected, names of the individual(s) or institutions responsible for the risk/harm, the location(s) and date(s) of harmful activity);
- What has been done by Claimant thus far to resolve the matter;
- Whether the Claimant wishes that their identity is kept confidential; and
- The specific help requested from the GRSC.

However, complainants are not required to provide all the information listed above. Initially, the complainant is only required to provide enough information to determine eligibility. If insufficient information is provided, the GRSC has an obligation to make a substantial and good faith effort to contact the complainant to request

whatever additional information is needed to determine eligibility, and if eligible, to develop a proposed response.

1.17.2.2 Logging, Acknowledgment, and Tracking

All grievances and reports of conflict will be received, assigned a tracking number, acknowledged to Claimant, recorded electronically, and subject to periodic updates to the Claimant as well as the office file.

Within one week from the receipt of a Grievance, the GRSC will send a *written* acknowledgement to Claimant of the Grievance received with the assigned tracking number.[1]

Each Grievance file will contain, at a minimum:

- the date of the request as received;
- the date the written acknowledgment was sent (and oral acknowledgment if also done);
- the dates and nature of all other communications or meetings with the Claimant and other relevant Stakeholders.
- any requests, offers of, or engagements of a Mediator or Facilitator;
- the date and records related to the proposed solution/way forward;
- the acceptance or objections of the Claimant (or other Stakeholders);
- the proposed next steps if objections arose;
- the alternative solution if renewed dialogues were pursued;
- notes regarding implementation; and
- any conclusions and recommendations arising from monitoring and follow up.

1.17.2.3 Maintaining Communication and Status Updates

Files for each Grievance will be available for review by the Claimant and other Stakeholders involved in the Grievance, or their designated representative(s). Appropriate steps will be taken to maintain the confidentiality of the Claimant if previously requested.

The GRSC will provide periodic updates to the Claimant regarding the status of the Grievance and current actions to resolve the Grievance. Not including the acknowledgment of receipt of the Grievance, such updates will occur within reasonable intervals (not greater than every thirty days).

1.17.2.4 Investigation and Consensus Building

Within one week of receiving a Grievance, MONRE/VEA will notify the GRSC and any other relevant institutions of the receipt of the Grievance.

The GRSC will promptly engage the Claimant and any other relevant Stakeholders deemed appropriate, to gather all necessary information regarding the Grievance.

Through the PB, the GRSC will have the authority to request relevant Government institutions for any information (documents or otherwise) needed to resolve the Grievance and avoid future Grievances of the same nature. As necessary, GRSC will convene one or more meetings with relevant individuals and institutions.

The objective of all investigative activities is to develop a thorough understanding of the issues and concerns raised in the Grievance and facilitate consensus around a proposed solution and way forward. At any point during the investigation, GRSC may determine that an onsite field investigation is necessary to properly understand the Grievance and develop an effective proposed solution and way forward.

1.17.2.5 Overseeing Implementation - Monitoring and Evaluation

The GRSC will communicate to the Claimant one or more proposed actions or resolutions and clearly articulate the reasons and basis for the proposed way forward.

If the Claimant does not accept the resolution, the GRSC will engage with the Claimant to provide alternative options, which may include mediation.

[1] Oral acknowledgments can be used for expediency (and also recorded), but must be followed by a written acknowledgment.

If the Claimant accepts the proposed solution and way forward, the GRSC will continue to monitor the implementation directly and through the receipt of communications from the Claimant and other relevant parties. As necessary, the GRSC may solicit information from the relevant parties and initiate renewed dialogue where appropriate.

In all communications with the Claimant and other stakeholders, the GRSC will be guided by its problem-solving role, non-coercive principles and process, and the voluntary a good faith nature of the interaction with the Claimant and other stakeholders.

1.17.2.6 Disclosure of GRM and its operations

Stakeholders, including local communities, will be advised of the existence of the GRM and its operation. This shall be done via several mechanisms:

- During stakeholder meetings and workshops.
- A one-page brochure, clearly outlining the existence of the GRM, the processes included and the contact details of the project community focal point/administration officer.
- Public notice boards.
- project website, newsletters, and social media feeds.

Bi-annually, the GRSC will make available to the public, a report describing the operation of the GRM, listing the number and nature of the Grievances received and processed in the past six months, date and description of the Grievances received, resolutions, referrals and ongoing efforts at resolution, and status of implementation of ongoing resolutions. The level of detail provided with regard to any individual Grievance will depend on the sensitivity of the issues and Stakeholder concerns about confidentiality while providing appropriate transparency about the activities of the GRM. The report will also highlight key trends in emerging conflicts, Grievances, dispute resolution, and make recommendations regarding:

- Measures that can be taken by the Government to avoid future harms and Grievances; and
- Improvements to the GRM that would enhance its effectiveness, accessibility, predictability, transparency, legitimacy, credibility, and capacity.

1.17.2.7 Without Prejudice

The existence and use of this GRM are without prejudice to any existing rights under any other complaint mechanisms that an individual or group of individuals may otherwise have access to under national or international law or the rules and regulations of other institutions, agencies, or commissions.

1.18 UNDP'S ACCOUNTABILITY MECHANISMS

In addition to the project-level and national grievance redress mechanisms, complainants have the option to access UNDP's Accountability Mechanism, with both compliance and grievance functions.

UNDP's SES recognize that even with strong planning and stakeholder engagement, unanticipated issues can still arise. Therefore, the SES are underpinned by an Accountability Mechanism with two key components:

- A Social and Environmental Compliance Review Unit (SECU) to respond to claims that UNDP is not in compliance with applicable environmental and social policies; and
- A Stakeholder Response Mechanism (SRM) that ensures individuals, peoples, and communities affected by projects have access to appropriate grievance resolution procedures for hearing and addressing project-related complaints and disputes.

UNDP's Accountability Mechanism is available to all of UNDP's project stakeholders.

The Social and Environmental Compliance Unit (SECU) investigates concerns about non-compliance with UNDP's Social and Environmental Standards and Screening Procedure raised by project-affected stakeholders and recommends measures to address findings of non-compliance.

The Stakeholder Response Mechanism helps project-affected stakeholders, UNDP's partners (governments, NGOs, businesses) and others jointly address grievances or disputes related to the social and/or environmental impacts of UNDP-supported projects.

Further information, including how to submit a request to SECU or SRM, is found on the UNDP website at: http://www.undp.org/content/undp/en/home/operations/accountability/secu-srm/

INSTITUTIONAL ARRANGEMENTS AND CAPACITY BUILDING

1.19 GENERAL MANAGEMENT STRUCTURE AND RESPONSIBILITIES

The project will be implemented following UNDP's National Implementation Modality (Full NIM), according to the Standard Basic Assistance Agreement between UNDP and the Government of Viet Nam, the Viet Nam Government's regulations for ODA project/program management (Decree 56/2020/NĐ-CP), and the Joint Harmonized Project/Program Management Guidelines of the UN and Government of Viet Nam.

A high-level organization structure is shown in Figure 3. The key roles are discussed below.

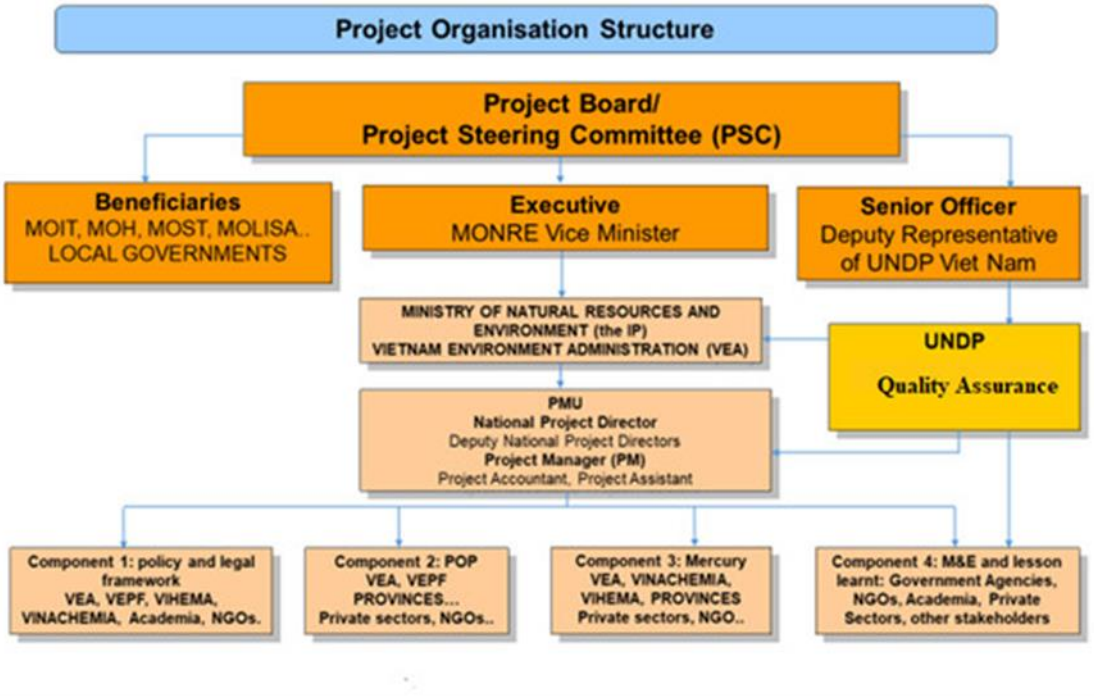

Figure 3 Project organization structure

1.19.1 Project Board / Project Steering Committee

The composition of the Project Board will include the following roles:

- Project Executive: The Project Executive is the Vice-Minister of MONRE.
- Beneficiary Representative(s): Institutions, Individuals or Groups representing the interests of those who will ultimately benefit from the project. This includes Ministry of Industry and Trade (MOIT), Ministry of Health (MOH), Ministry of Planning and Investment (MPI), Ministry of Finance (MOF), representatives from targeted industrial sectors as key beneficiaries and representatives from NGOs.
- Development Partner(s): Individuals or groups representing the interests of the parties concerned that provide funding and/or technical expertise to the project. The Development Partner is UNDP.

1.19.2 Project Assurance

The 'project assurance' function of UNDP is to support the Project Board and Project Management Unit by carrying out objective and independent project oversight and monitoring functions. This role ensures appropriate project management milestones are managed and completed.

UNDP is accountable to GEF for the implementation of this project. UNDP provides a three-tier oversight services involving the UNDP Country Offices and UNDP at regional (UNDP/NCE RTA) and headquarters (UNDP/NCE PTA) levels. Project assurance is totally independent of project execution.

1.19.3 The Project Owner

Project Owner for this project is the Viet Nam Environment Administration (VEA) under MONRE. The project owner is responsible and accountable for direct implementation and management of the project including planning, implementation, monitoring and evaluation of the project intervention, reporting, and achieving project outcomes.

1.19.4 National Project Management Unit

The PMU established by the Project Owner consists of core members including the National Project Director and the Chief Accountant in charge, being a leader and official of VEA. Also National Project Deputy Director(s), and a National Project Coordinator can be nominated by VEA, and other members from key agencies will be involved in the PMU. A National Project Team consisting of a National Project Manager (NPM), Project Accountant, and Project Assistant-cum-Interpreter is recruited to aid the PMU on daily implementation and monitoring of the project interventions.

The PMU will be responsible for the mobilization of human resources, co-financing, planning, and execution of project activities while providing mechanisms and technical inputs to integrate the results of various activities. This will ensure satisfactory performance of the project members and contractors, and will provide official reports to the PSC as needed.

Positions under PMU are:

- National Project Director (NPD): NPD is responsible for the overall management and implementation of the project interventions.
- National Project Deputy Directors (NPDDs): NPDDs will be assigned responsibility to support the NPD in technical aspects of the project, provide direct guidance to project management unit to achieve project results/targets.
- National Project Coordinators (NPCs): NPCs will be assigned to support PMU to supervise NPO, and ensure the project implementation in accordance with government regulations.

National Project Team: will assist the PMU in the project execution and monitoring on a day-to-day basis. The National Project Team consists of:

- National Project Manager (NPM)
- Project Assistant-cum-Interpreter
- Project Accountant

1.20 Roles and Responsibilities for Implementing this ESMF

The roles and responsibilities of the project staff and associated agencies in the implementation of this ESMF is as follows. This ESMF does not cover the roles and responsibilities associated with implementation of the subsequent site-specific ESMPs and/or stand-alone management plans; those will be defined for each demonstration enterprise's subsequent management plan that is developed in the project inception phase, as required per this ESMF.

1.20.1 Implementing Partner

The Implementing Partner is responsible for executing this project. The Implementing Partner for this project is the Ministry of Natural Resources and Environment (MonRE). Specific tasks include:

- Ensuring that the required assessment (scoped ESIA or targeted assessment, as above), assessment report and the required management plan(s) (ESMPs and/or stand-alone

management plans) are developed, disclosed for public consultation and approved, and management measures are adopted and integrated during project implementation;

- Project planning, coordination, management, monitoring, evaluation, and reporting.
- Reporting, fairly and accurately, on project progress against agreed work plans in accordance with the reporting schedule and required formats;
- Maintaining documentation and evidence that describes the proper and prudent use of project resources in conformity to the signed Project Document and in accordance with applicable regulations and procedures (e.g. SES);
- Ensuring all requirements of UNDP's SES and national regulatory/policy frameworks and relevant international standards have been addressed (e.g. mitigation of identified adverse social and environmental impacts);
- Procuring of goods and services, including human resources required to ensure compliance with this ESMF.

1.20.2 Project Management Unit (PMU):

- Supervise and manage the implementation of measures defined in this ESMF;
- Assign specific responsibilities for implementation of this ESMF, including monitoring, and community consultations on the draft management plans to a staff member(s) of the PMU;
- Maintain relevant records associated with management of environmental and social risks, including updated SESPs, impact assessments, a log of grievances together with documentation of management measures implemented;
- Report to the Implementing Partner, the Project Steering Committee, and UNDP CO on the implementation of the ESMF;
- Ensure that all service providers are informed of their responsibilities for the day-to-day compliance with the ESMF.

1.20.3 UNDP

UNDP is accountable to the GEF for the implementation of this project. This includes oversight of project execution to ensure that the project is being carried out in accordance with agreed standards and provisions. UNDP is responsible for delivering GEF project cycle management services comprising project approval and start-up, project supervision and oversight, and project completion and evaluation. UNDP is also responsible for the Project Assurance role of the Project Steering Committee. UNDP's role includes the following:

- Provide oversight on all matters related to safeguards;
- Inform all the stakeholders and right-holders involved in, or potentially impacted, positively or negatively, by the GEF-financed projects, about the UNDP's corporate Accountability Mechanism (described below);
- Ensure that the Compliance Review and the Stakeholder Response Mechanisms are operational during the lifetime of the projects;
- Ensure adherence to the SES for project activities implemented using funds channelled through UNDP's accounts, and undertake appropriate measures to address any shortcomings;
- Verify and document that all UNDP SES requirements have been addressed;
- Provide technical guidance on implementation of this ESMF and administrative assistance in recruiting and contracting expert safeguards services (as required) and monitor adherence of each project to the ESMF and UNDP policies and procedures.

1.21 CAPACITY BUILDING

Delivery organizations have the responsibility for ensuring systems are in place so that relevant employees, contractors, and other workers are aware of the environmental and social requirements for construction, including the ESMF. All project personnel will attend an induction that covers health, safety, environment, and cultural requirements. All workers engaged in any activity with the potential to cause serious environmental harm (e.g. handling of hazardous materials) will receive task specific environmental training.

Specialists with relevant expertise in social and environmental safeguards will be engaged to support the completion of the targeted assessment(s) of economic displacement and other risks, the subsequent development of ESMPs and any stand-alone management plans. These experts will offer an induction session for Project Management Units (and implementing partners as needed) on safeguards responsibilities and approaches.

The UNDP-GEF Unit will provide advice to project teams as needed to support the implementation of this ESMF and the preparation, implementation and monitoring of social and environmental management plans/measures.

During the inception phase, training on the ESMF and relevant SES requirements will be conducted targeting all national stakeholders, with a focus on the public sector and local UNDP staff. In addition, the site-specific ESMPs and/or standalone management plans will also identify capacity building activities to ensure sufficient capacities for implementation.

The Project Board will have the final responsibility for the integration of ESMP/stand-alone management plan(s) in the execution of the project. The integration of those plans will need to consider particular institutional needs within the implementation framework for the application of the ESMP, including a review of the required budget allocations for each measure, as well as the authority and capability of institutions at different administrative levels (e.g. local, regional, and national), and their capacity to manage and monitor ESMP implementation. Where necessary, capacity building and technical assistance activities will be included to enable proper implementation of the ESMP.

VEA/MONRE has been implementing a number of UNDP/GEF funded projects in different areas, including chemical and waste, biodiversity, climate change etc. Most of the projects were completed with an overall assessment of “satisfactory”. VEA/MONRE has strong in-house management and technical capacities as well as proper governance structure to provide the needed oversight and management of the project.

The IP (VEA/MONRE)’s assessment through PCAT (Partner Capacity Assessment Tool) was completed in January 2020, resulting in **Low-Risk rating**. The micro assessment of financial management capacity of Viet Nam Environment Administration issued in December 2019 also concluded the overall risk rating as **Low**.

MONITORING AND EVALUATION ARRANGEMENTS

The project results, corresponding indicators, and mid-term and end-of-project targets in the project results framework will be monitored annually and evaluated periodically during project implementation. Project-level monitoring and evaluation will be undertaken in compliance with UNDP requirements. The UNDP Country Office is responsible for ensuring full compliance with all UNDP project monitoring, quality assurance, risk management, and evaluation requirements.

The ESMF monitoring and evaluation plan is outlined below in Table 7.

Reporting on progress and issues in the implementation of this ESMF will be documented in the project progress reports and annual project implementation reports (PIRs). Until the ESMPs and stand-alone management plans are put in place, the UNDP CO will be responsible for compiling reports on the implementation of this ESMF, for reporting to the Project Steering Committee. Key issues will be presented to the Project Board during each committee meeting.

Implementation of the subsequent ESMPs and/or stand-alone management plans will be the responsibility for the individual project management teams, and other partners as agreed upon and described in those plans.

Table 7 ESMF Monitoring and Evaluation Plan

Monitoring Activity & Relevant Projects	Description	Frequency / Timeframe	Expected Action	Roles and Responsibilities
Track progress of ESMF implementation	Implementation of this ESMF coordinated for each project, and with results reported to each Project Steering Committee on an annual basis.	Quarterly (until ESMPs and management plans are in place)	Required ESMF steps are completed in a timely manner.	Project Manager, with support from and Project Coordinator and Project Safeguards Specialists
SESA for regulation/legislative changes	Strategic assessment of proposed new legislation and policies.	Prior to implementing new laws or policies	Strategic assessment of implications of legislation/policies.	MONRE with assistance from other Ministries as relevant
Development of ESIAs, and ESMPs	Carried out in a participatory manner, in-depth analysis of potential social and environmental impacts, as well as identification / validation of mitigation measures.	Commence in 1st year and to be completed prior to on ground activities commencing.	Risks and potential impacts are assessed with support of external consultants and participation of project team and stakeholders; management actions identified and incorporated into project implementation strategies.	Project Manager/PMU with support from Project Safeguards Specialists and Consultants
Implementation of mitigation measures and monitoring of potential impacts identified in targeted assessment(s) and per the subsequent ESMPs	Permanent and participatory implementation and monitoring of impacts and mitigation measures, in accordance with ESMPs (to be prepared).	Continuous, once ESMPs are in place	Implementation of ESMPs. Monitoring of environmental and social risks, and corresponding management plans as relevant (tendered to national institute, local consultant, CSO or service provider).	Project Manager, Project Coordinator, Local PMO Coordinators, oversight by UNDP CO, PSC
Learning	Knowledge, good practices, and lessons learned regarding social and environmental risk management will be captured regularly, as well as actively sourced from other projects and partners and integrated back into the project.	At least annually	Relevant lessons are captured by the project teams and used to inform management decisions.	Project Manager
Annual project quality assurance	The quality of the project will be assessed against UNDP's quality standards to identify project strengths and weaknesses and to inform management decision making to improve the project.	Annually	Areas of strength and weakness will be reviewed and used to inform decisions to improve project performance.	UNDP CO, with support from Project Manager and NPD

Monitoring Activity & Relevant Projects	Description	Frequency / Timeframe	Expected Action	Roles and Responsibilities
Review and make course corrections	Internal review of data and evidence from all monitoring actions to inform decision making.	At least annually	Performance data, risks, lessons and quality will be discussed by the project steering committee and used to make course corrections.	Project Steering Committee
Annual project implementation reports	As part of progress report to be presented to the Project Steering Committee and key stakeholders, analysis, updating and recommendations for risk management will be included.	Annually	Updates on progress of ESMF/ESMP will be reported in the project's annual PIRs. A summary of the avoidance and mitigation of potential social and environmental impacts will be included in the program annual report, sharing best practices and lessons learned across the program.	UNDP CO, UNDP-GEF RTA, Project Manager
Project review	The Project Steering Committee will consider updated analysis of risks and recommended risk mitigation measures at all meetings.	At least annually	Any risks and/ or impacts that are not adequately addressed by national mechanisms or project team will be discussed in project steering committee. Recommendations will be made, discussed and agreed upon.	Project Steering Committee, Project Manager

IMPLEMENTATION ACTION PLAN

1.22 BUDGET FOR ESMF IMPLEMENTATION

A budget has been prepared for the implementation of the ESMF in Table 7as follows:

Table 8 Budget estimate for ESMF implementation

Item	Cost (USD)
Carrying out ESIAs and SESAs, preparing ESMP/s and other management plans as required	
International Safeguards Expert (advisory support)	$13,000
Chief Technical Advisor (technical support)	$12,000
Gender-safeguards officer (technical support)	$5,000
Safeguards / M&E Consultant(s)	$5,000
Contractual services (carry out ESIAs and SESA, develop ESMP and other plans)	$20,000
ESIA public consultations	
Travel expenses and DSA (for IC, CTA, M&E Officer and consultants)	$3,000
Audio-visual and print production, including translation	$2,000
Sub-total	$60,000
Monitoring and evaluation of the implementation of the ESMP/s and other management plans	
International Safeguards Expert (advisory support)	$10,000
Chief Technical Advisor (technical support)	$12,000
Gender consultant (technical support)	$13,000
Safeguards / M&E Consultant(s)	$10,000
Travel expenses and DSA (for IC, CTA, M&E Officer and consultants)	$10,000
ESMP trainings, workshops during project implementation	$10,000
Grievance Redress Mechanism	
Sub-total	$65,000
Total	**$125,000**

1.23 SCHEDULE

Table 9 provides a high-level schedule associated with undertaking the ESMF activities.

Table 9 High-level multi-year workplan for ESMF

Timeline			Year 1				Year 2				Year 3				Year 4			
Safeguard activities			Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Appointment of project Safeguard staff (safeguard specialists, gender Specialists and support personnel)																		
Review SESP and confirmation of risks/mitigation requirements																		
Inception training/capacity building/inductions																		
Development and implementation of GRM																		
Development of ESMP for known activities																		
Annual review of safeguard instrument performance																		
Output specific activities																		
Component 1: Promote sustainable production - consumption in key sectors through Ecolabeling, Green Financing and Procurement, and other elements to support a long-term Innovation Ecosystem for greening the value and supply chain across sectors.	1.1 Environmental regulation upgraded to include new POPs; Ecolabel and related policies on POPs and mercury lifecycle management developed and implemented.	SESA for new legislation and policies related to POPs prior to implementation																
		SESA for new legislation related to mercury																
		Development of ESMPs (if required)																
	Outcome 1.2. Development of a Green Finance Framework, to sustain the shifting of enterprises toward a non-POPs and a non-Mercury manufacturing.	SESA for green finance and procurement schemes																
		Development of ESMP (if required)																
Component 2: Life cycle management of POPs and PTS containing products.	Outcome 2.1 Sustainable manufacture and design of plastic, polymers, paint, metal finishing and other products improved to prevent the use of POP and the release of POP in the environment.	Undertake ESIAs																
		Development of ESMP																
Component 3: Mercury lifecycle management of mercury containing products	Outcome 3.1 Replacement of mercury products with non-mercury products promoted and sustained by EPR schemes and EOL management.	ESIAs to assess impacts of demonstration plants associated with mercury																
		Development of ESMPs																