

HELPAGE INTERNATIONAL IN VIETNAM
Reducing Income- and Health-Related
Vulnerability of Older Persons in Viet Nam Project

DRAFT

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK



April, 2020

ABBREVIATIONS

ADL	Activities of Daily Living
AE	Association of the Elderly
CD	Country Director
CHC	Commune Health Center
CMB	Club Management Board
EIA	Environmental Impact Assessment
EMDP	Ethnic Minority Development Plan
EMPF	Ethnic Minority Planning Framework
EPP	Environmental Protection Plan
ESCP	Environmental and Social Commitment Plan
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
GIIP	Good International Industry Practice
GoV	The Government of Vietnam
IADL	Instrumental Activities of Daily Living
IGA	Income generating activities
ISHC	Intergenerational Self-help Clubs
LMP	Labor Management Procedures
MONRE	Ministry of Natural Resources and Environment
ODA	Official Development Assistance
OP	Older People
PDO	Project Development Objectives
PMT	Project Management Team
PWD	People with Disability
QCVN	Vietnam national technical regulations
SEP	Stakeholder Engagement Plan
TCVN	Vietnam National Standards
VAE	Vietnam Association for the Elderly
WB	The World Bank

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I. INTRODUCTION

1.1 Sectoral and Institutional Context

Vietnam has one of the most rapidly aging populations in the world. By 2049, nearly one quarter of the population will be aged 60 and older. In 2019, the ratio of working-age people to older persons is about 9 to 1, but by 2049 this ratio will fall to only 4 to 1. Currently, there are about 11.7 million persons aged 60 and older, but by 2049 this number will reach nearly 25 million, of whom nearly 4 million will be aged 80 and older.

Among the population aged 60 years and older, a majority are women, with the share of females increasing with age. In 2014, about 56 percent of people aged 60 to 69 years were female, increasing to 66 percent among those aged 80 and older [2]. While a majority of older persons live with their children (63 percent in 2011), many are in the more vulnerable position of living with other older persons or alone.

About 39.1 percent of older persons are still working, of whom the majority are in government jobs (56.8 percent), followed by self-employed agricultural occupations (22.6 percent) [4]. Among those not working, poor health is cited by a large share of people (39.4 percent in the age group 60-69, rising to 54.7 percent in the 80+ age group) as the reason. The main sources of financial support reported by older persons are their children (31.9 percent), work-related income (29.4 percent), pensions (16.1 percent), and social allowances (9.4 percent). A relatively large share of the elderly (aged 60 and older) report that their financial resources are “insufficient” (26.2 percent) or “sometimes insufficient” (36.2 percent) for daily needs. 17.2 percent of older persons report living in poor households, with only about 30 percent reporting that they receive social allowance payments and 3.7 percent reporting that they receive a pension. The economic situation of older persons in rural areas tends to be worse than in urban areas. Rural older people also tend to need to continue to work in order to support themselves more than urban older people do.

As in other societies, health is an important concern of older persons in Vietnam. In 2015, life expectancy at aged 60 was 25 for women and 20 for men in Vietnam. However, women live seven of those years in poor health and men live five of those years in poor health. When asked about their health, 10.1 percent of older persons report “very weak” health and another 55.3 percent report “weak” health. Among people aged 60 and older, 40 percent of men and 46 percent of women report having some disability. While vision problems are the most prevalent, mobility, hearing and memory/cognition problems are also common. In 2011, 37.6 percent of older persons reported difficulties with activities of daily living (ADLs). 30.8 percent reported difficulty in getting up from a lying position, 15.1 percent struggled with toilet hygiene, and 14.8 percent had trouble feeding themselves. Health problems among older persons tend to be related to chronic diseases, with the burden of disease from cardio-vascular disease and cancer accounting for nearly half of all Disability-Adjusted Life Years (DALYs) among people aged 60 and older.

The Government of Vietnam is increasingly aware of the challenges that an aging population poses and is taking steps to address them. The Law on the Elderly and the Vietnam National Action Plan on the Elderly have laid out some strategic directions. Multiple government agencies have been assigned responsibilities related to caring for the elderly, including the Ministry of Labor Invalids and Social Affairs (MOLISA) and the Ministry of Health (MOH). Quasi-governmental entities, like the Vietnam Association of the Elderly (VAE) and the Red Cross, and non-governmental organizations (like HelpAge International [henceforth, HelpAge]) are implementing community-based interventions to support the elderly and also contribute to policy discussions.

The main direction envisaged by the authorities is to rely on the family's responsibility to care for their elderly members. Financial support from the government is limited to a small monthly pension (about US\$12 per month) and subsidized social health insurance for persons aged 80 and older (although, if living in poverty, people younger than age 80 are also eligible for subsidized social health insurance). Institutionalized care for older persons consists of a small number of state facilities for people who are destitute (without family) and private facilities for those who can afford it.

New models of community-based care, such as intergenerational self-help clubs (ISHCs), are also now being promoted by authorities in order to support families who are caring for older persons or older persons living on their own. The ISHCs are self-managed and financially sustainable community-based organizations that have a membership of 50-70 members and are registered with local commune authorities and supervised by local Associations for the Elderly (AEs).

The Prime Minister's Decision 1533 of 2016 approved the expansion of ISHCs nationwide in order to help care for elderly people and also encourage them to take a more active role in their own care and that of other elderly people. The Decision sets targets for the participation rates of the elderly (55 years and older), access to loans (either in cash or in kind), and improvements in the income of the elderly. There are currently 1,700 ISHCs.

Development partners' support to government and communities in addressing the aging challenge is currently quite limited, but future projects are being explored. The Korean International Cooperation Agency (KOICA) is currently providing some support to ISHCs (including by channeling some financing through HelpAge), but these ISHCs have limited links with government service providers. The United Nations Population Fund (UNFPA) actively supports policy discussions on population aging but is not currently implementing any projects. The Japan International Cooperation Agency (JICA), the Asian Development Bank (ADB) and the World Bank are all exploring the possibility of projects with government (including loans) related to long-term care for the elderly and are actively engaged in policy discussion and analytics related to aging.

1.2 Purpose and Application of the ESMF

The proposed Project is adopting a programmatic approach consisting of a number of activities to be identified during Project implementation and specific locations and activities could not be identified by appraisal. To comply with the WB's Environmental and Social Standards (ESSs) of the Environmental and Social Framework (ESF), and the Environment and Social Assessment (ESA), preparation and disclosure of an Environment and Social Management Framework (ESMF)¹ for the Project before appraisal is required. This is to ensure that the proposed Project has a concrete plan and process in place to avoid, minimize, and/or mitigate the risks and potential adverse environmental and social (E&S) impacts of the Project when the activities are identified, planned, and implemented. In general, the ESMF examines the risks and impacts and set out the principles, rules, guidelines, and procedures to assess the potential risks and impacts of activities including technical assistance (TA). It also provides measures and plans to reduce, mitigate, and/or offset adverse risks and impacts and provide adequate information on the area in which activities are expected to be located (including any potential E&S vulnerabilities of the area) and on the potential impacts that may occur and mitigation measures that might be expected to be used.

¹ The ESMF examines the risks and impacts when a project consists of a program and/or a series of s, and the risks and impacts cannot be determined until the program or details have been identified.

Specific objectives of this ESMF are: (a) to assess the potential environmental and social risks and impacts of the proposed Project, whether positive or negative, and propose mitigation measures which will effectively address these risks and impacts; (b) to establish clear procedures for the E&S planning, review, approval, and implementation of activities, TA, and other activities to be financed under the Project; (c) to specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring E&S issues/ concerns related to s, TA, and activities; (d) to determine the training, capacity building and technical assistance needed to successfully implement the provisions of the ESMF; (e) to address mechanisms for public consultation and disclosure of project documents as well as redress of possible grievances; and (f) to establish the budget requirement for implementation of the ESMF.

This ESMF also provides information on the ineligible item for Project fund, the E&S screening, risks and impacts classification, and identification of various E&S documents to be prepared including the clearance process, the implementation arrangement, training and capacity building, grievance redress mechanism, an estimated cost and sources of budget, and various guidelines and specific forms for preparation of various E&S documents.

1.3 Scope of the ESMF

The ESMF was developed based on desk reviews of the government relevant laws and regulations as well as various reports and documents related to E&S conditions in the proposed project provinces and the potential sites, field surveys, and consultations. The ESMF also follows the requirements of the ESF and ESSs, the WB's Guidance Note for Borrowers on the Application of the ESSs as well as the guideline for preparation of an ESMF for WB-financed projects in Vietnam.

This ESMF describes the Project description (Section II); the policy, legal, and administrative framework (Section III); the potential E&S risks and impacts and proposed mitigation measures (Section IV); the procedures for review, clearance, and implementation of and Project activities (Section V); the ESMF implementation arrangements (Section VI); capacity building, training, and technical assistance (Section VII); ESMF implementation budget (Section VIII); the grievance and redress mechanism (Section IX); and ESMF consultation and disclosure (Section X). Annexes provide more details on project-related information.

II. PROJECT DESCRIPTION

Name of Project: Reducing Income- and Health-Related Vulnerability of Older Persons in Viet Nam

Project objectives: In order to reduce the income- and health-related vulnerabilities of older persons, the project development objective is to increase the participation of older persons in income-generating activities and their use of community-based health and social care services in the selected communities in six provinces.

Project owner: HelpAge International (HelpAge)

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Project duration: 4 years: October 2020 – September 2024 (tentatively)

Total Project Budget: USD \$ 2,750,000 million

2.1 Project components

To achieve the project objectives, the project will implement the following components:

Component 1: ISHC establishment and capacity-building (estimated at around US\$725,000)

This component includes the activities associated with establishing new ISHCs and initial and providing ongoing capacity-building for the ISHCs, local AE, and government health workers where appropriate. This component will finance the following activities: (i) initial and on-going training and capacity-building activities such as project orientation meetings at project sites, institutional set-up of clubs, initial training, review meetings and additional training for the Club Management Boards (CMB), local AE staff, and commune health station staff, (ii) technical support for development of ISHC manuals/guidelines, training materials, materials for information and education campaigns, and regular technical support visits; (iii) printing of ISHC manuals/guidelines, training and IEC materials; and (iv) small monthly grants (around US\$15/month/ISHC) to the clubs to support the clubs' basic operations, monthly meetings, groups' activities, regular events during their first 1-2 years of operation.

Component 2: Income security (estimated at around US\$1,000,000)

This component focuses on strengthening the livelihoods of older persons through access to capital from a revolving fund managed by the ISHC. This component will include grants to the ISHCs (~US\$5,020 per ISHC) to use as self-managed revolving fund schemes; training for ISHC representative and local AE staff on age friendly income generating activities and technique; training by ISHCs for the fund participants (as well as other community members) in techniques and schemes related to their selected livelihoods projects; formation of groups within ISHCs to share knowledge and experience across fund participants and ISHC members; facilitating access to government entitlements related to income security (e.g. old age, disability, widow and veteran social allowances); and small social (hardship) funds maintained at club level (and financed by ISHC club income from the revolving fund, membership fees, and local fundraising) to help club and community members in the event of financial shocks; providing on-going technical support by HAIV in fund management ISHCs.

Most of the funds in this component will be allocated to the revolving fund. Details of the operation of the fund, including criteria for the selection of beneficiaries of the revolving fund, guidelines on fund management, loan amount, loan terms, exit strategy upon closure (among others) will be described in the project operations manual and also in a user-friendly ISHC revolving fund manual. It is currently anticipated that around 40-50 percent of ISHC members (20-30 people) will participate in the revolving fund. Loan amounts are expected to average around US\$250, be repaid over a 12-18 month period and have a monthly interest rate of 1 percent. The livelihood activities to be funded will typically be small scale husbandry (raising chicken, ducks, fish, goats, pigeons, rabbits and pigs), agriculture (rice, vegetable and fruits), or small businesses. Training on environmentally-friendly livelihood schemes or techniques (suitable to adoption by older persons) will be provided to ISHC representatives and local AE staff, who then will provide training for fund participants as well as to others in the community, with the local AEs facilitating links to the local agricultural sector for technical support where appropriate.

The revolving fund is key to the sustainability of the ISHC model: 50 percent of the revolving fund monthly interest (1 percent) will be used to augment the ISHC's total livelihood revolving fund (to grow the fund, as well as to cover the risk of non-repayment) and the remaining 50 percent will be put into ISHCs' fund to cover the costs of ISHC operation and activities (fully replacing the club's

monthly grants after 1-2 years). To enhance local ownership and sustainability, a local contribution to the revolving fund (of VND 15 million per ISHC, equivalent to around US\$640) is required.

Component 3. Community-based health and social care (estimated at around US\$613,000)

This component is to help strengthen linkages between community-level ISHCs' health-related activities and formal primary health care services to enhance the health-related activities of the ISHCs and improve access of older people to basic health care (especially for non-communicable diseases). It also helps to improve older persons healthy behaviors and facilitate the supply and use of community-based and home-based social care services, thus keeping older people healthier and economically active longer. The component will finance the following: i) organizing on-going trainings on health and social care for CMB representatives, local partners and for representatives of homecare volunteers (who will provide home care services to the elderly) and ii) purchasing of health kits, lifelong learning kits, and care kits (e.g. assistive devices to help with physical therapy). Each ISHC will be given a health screening kit (weighing scale, blood pressure gauges, and blood sugar measuring kit, among others), lifelong learning kits, and a package of assistive devices; iii) technical support for development of training materials, undertaking training activities, and regular technical support visits; iv) small monthly grants (around US\$12/month/ISHC) for ISHCs to organize monthly basic health monitoring for ISHC members and older people in the project communities for the first 1-2 years of their operation; v) small grants for ISHCs (around US\$100/every 6 months/ISHC) to collaborate with health care providers to organize health check-ups (2 times per year) for ISHC members and older people in the project communities; and vi) organizing consultation meeting with local health care providers for local health system linkage and improvement. There will be two sub-components under this - health promotion and care and social care.

Health promotion and care: The first sub-component focuses on improving older persons health-related behaviors and use of community-level health care interventions. Concrete activities include: i) on-going training on health promotion and care for ISHC representatives, local AE and local health staff; ii) health awareness activities (provided by commune health station staff or trained club members) on disease prevention, managing chronic conditions, proper nutrition and other health-related issues relevant to older persons through quarterly health and care awareness talks during ISHC monthly meetings and community events, including community health awareness campaigns; iii) basic monthly health monitoring (such as measurement of body mass index, blood pressure, sugar levels) in collaboration with the local CHSs; iv) health check-ups conducted in collaboration with the local district and/or CHSs, and/or private health care providers, to provide more comprehensive check-ups on a semi-annual basis; v) health promotion through physical exercise, sports, and cultural groups to promote healthy and active lifestyles; vi) promoting access of ISHC members to the health insurance benefits to which they are entitled and educating them in how to use them; and vii) organizing consultation meetings between local AE, ISHCs and local health care providers to improve the quality and quantity of the basic health service provided for elderly people in the CHSs and targeted communities.

Social care: This sub-component will support developing, implementing and advocating for appropriate community and home-based long-term care to enhance quality of life and independence for people whose ability to perform ADLs and IADLs is declining. In addition, it will support simple, low-cost interventions to contribute to improving healthy living practices and access to health services and entitlements for the elderly and ISHC members. Concrete activities will include: i) training for ISHCs, local partners, representatives of homecare volunteers and healthcare providers in setting up and managing community-based care services; ii) recruiting and

managing homecare volunteers (drawn mainly from among the ISHC's members) who will deliver care to people who are largely housebound and need assistance with ADLs and IADLs. Depending on the needs, care might include social communication (information-sharing, companionship), personal care (help with housework, food preparation, feeding, personal hygiene), health-related care (monitoring of general health status, purchasing and administering medicine, physical rehabilitation), and support with daily living (including house and farm maintenance, provision of food or other basic necessities); and iii) practicing traditional therapies using locally available herbs, physical rehabilitation using devices that can be made or purchased locally, and help elderly with access to entitlements. For the provision of in-home health-related support, the homecare volunteer will be supported by local healthcare providers (typically retired doctors or nurses or village/commune health workers).

Component 4: Project Management and Administration, Monitoring and Evaluation, and Knowledge Dissemination (estimated at around US\$412,000)

This component will provide support for project management activities, including the establishment of a Project Team and six Provincial Project Implementation Units at provincial AEs to coordinate, manage, and monitor the implementation of the project activities and ensure appropriate fiduciary controls are in place. This component will also support regular monitoring and evaluation of the project as a whole, including preparation of progress reports and audits, as well as knowledge dissemination.

Sub-component 4.1 Project management and administration (US\$295,389): This sub-component will cover the costs associated with project management and administration, including the management of the project by HAIV (including human resources, office and training equipment), the annual mandatory audit, and the project's mandatory Implementation Completion Report. Project management activities will also include activities related to ensuring compliance with the World Bank's fiduciary and safeguards requirements, as well reporting on project implementation progress.

Sub-component 4.2 Monitoring and evaluation (M&E) (US\$28,000): This sub-component will cover the costs associated with project evaluation, and capturing the lessons learned from the project – both to further strengthen implementation of the project and also to demonstrate its results. All assessment and evaluations will be carried out in a participatory manner in order to give voice to beneficiaries' concerns and help create a feedback loop from the findings to the interventions in a way that addresses beneficiaries' needs. The main M&E activities will include the development of an annual participatory work plan, annual participatory project assessments (including at baseline), and a mid-term and end-of-project evaluation carried out by an external evaluator. These activities will be described further in the project operations manual.

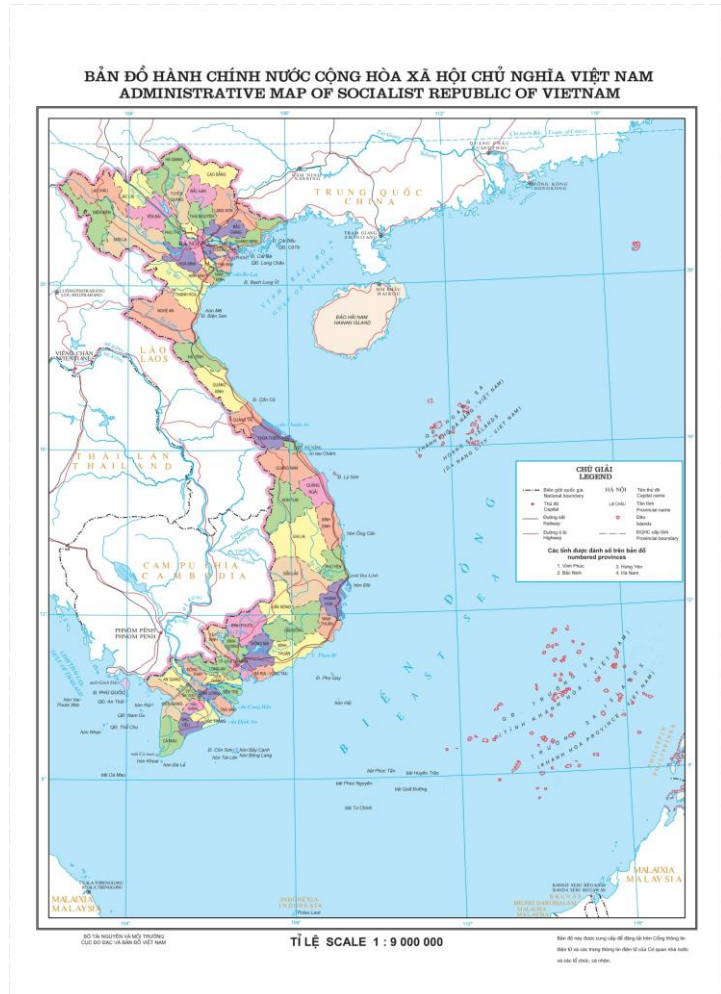
Sub-component 4.3 Knowledge dissemination (estimated at US\$89,123): The sub-component will cover costs associated with knowledge dissemination related to the ISHC model. These include developing materials on the project's best practices, developing an on-line knowledge resource portal on the current HAIV website, to share the project's materials and lessons learned widely throughout the six project provinces and beyond, and activities to advocate and support for the scaleup of the project's ISHC development at national level and in non-project sites; and annual and final project review workshops in 6 project provinces.

2.2 Project location and baseline data

The project will be implemented in around 180 communes in six provinces, clustered within three regions and with variation in socio-economic and aging profiles. They are Hoa Binh (elder-child ratio of 37.3) and Thanh Hoa (57.4) in the North, Quang Binh (50.3) and Da Nang (38.5) in the central coast, Khanh Hoa (42.9%) and Ninh Thuan (30.9%) in the South Central coast.

Thanh Hoa is located in the North Central region, with the area of 11,133.4 km², 3.5 million population, the per capital GDP of 1,705 USD.

Thanh Hoa has diverse terrain, lower from the West to the East. Thanh Hoa is located in a tropical monsoon climate region with 4 distinct seasons. The average annual rainfall is about 1,600-2,300 mm, each year there are about 90-130 rainy days. Relative humidity is from 85% to 87%, the average number of sunny hours is about 1600-1800 hours. The average temperature is 23°C - 24°C, the temperature decreases gradually when going to high mountains.



Thanh Hoa is one of the provinces with large forest resources with 484,246 ha of forested land, with a reserve of about 16.64 million m³ of timber, which can be exploited 50,000 - 60,000 m³ annually. Thanh Hoa forest is mainly broad-leaved forest with rich flora of species and species. There are precious and rare timber types such as: sliced, po mu, sa mu, green lim, tau, cheeses, yellow heart, amaranth, de, and cho cha. Types of bamboo family include: luong, neohouzeaua, vau, giang, and bamboo. There are also: rattan, rattan, medicinal herbs, cinnamon, red ants ... Plantations with luong, pine resin, fat, eucalyptus, casuarina, cinnamon, rubber. Thanh Hoa is the province with the largest luong area in the country with an area of over 50,000 ha. Thanh Hoa has 102 km of coastline and 17,000 km² of territorial waters, with large fish and shrimp beaches. Along the coast, there are 5 large creeks, convenient for fishing boats to enter and exit. These are also fishery centers of the province. At the mouth of the creek are thousands of hectares of sandy mudflats, which are favorable for aquaculture, seagrass growing, wave breaking trees and salt production. The area of salt water in the waters of the islands of Me and Bien Son can raise grouper, pearl oysters, lobsters and tens of thousands of hectares of coastal saltwater favorable for raising hard shell molluscs such as clams, oysters ...

Thanh Hoa is one of the few provinces in Vietnam with abundant and diversified mineral resources; There are 296 mines and mineral spots with 42 different types, many of which have large reserves compared to the whole country such as granite and marble (reserves of 2 -3 billion m³), limestone for cement production (over 370 million tons), clay for cement (85 million tons), chromium (about

21 million tons), iron ore (2 million tons), secpentine (15 million tons), dolomite (4.7 million tons), in addition to mineral gold and other minerals. Thanh Hoa has 4 main river systems: Hoat, Ma, Bang and Yen rivers with a total length of 881 km, total catchment area of 39,756 km²; The total annual average water volume is 19.52 billion m³. Thanh Hoa river and stream flows through many complex terrain areas, which is a great potential for hydropower development. Groundwater in Thanh Hoa is also rich in reserves and types because there is a full range of sedimentary rocks, metamorphic, magma and eruptions.

The main income sources are agriculture, forestry and fishery (4.2%); industry and construction (42.4%); services (39.3%). Thanh Hoa has long coast, large farming land, large track of mountainous districts. Ethnic Minority population make up 18.6%. Thanh Hoa has 635 communes, 100% of which have a commune health station (CHS). Of 635 CHSs, 60% meet the national benchmarks, 74% have a physician, 90% have a midwife or obstetric assistant.

Hoa Binh is mountainous province in the Northwest region, with the area of 4,662.5 km², 976,699 population, the per capital GDP of 1,002 USD. Hoa Binh has medium mountainous terrain, complex division, large slope and in the northwest - southeast direction, divided into two regions: high mountains to the northwest have an average elevation of 600 - 700 m, rugged terrain, an area of 212,740 ha, accounting for 44.8% of the area; low mountainous area is located in the southeast, with an area of 262.202 ha, accounting for 55.2% of the province's area, the terrain consists of low mountain ranges, less fragmented, the average slope is from 20 - 250, the average height from 100 - 200 m. In addition, the river system in the province is relatively evenly distributed with the big rivers such as Da, Buoi, Lang, Bui ... Hoa Binh has a humid subtropical climate, cold, non-tropical winter with little rain; hot summers, lots of rain. The average annual temperature is above 23°C. July has the highest temperature of the year, averaging 27 - 29°C, whereas January has the lowest temperature, averaging 15.5 - 16.5°C. In Hoa Binh province, the forestry land area is about 250,000 ha. In which, natural forest is about 150,000 ha, afforestation land is about 100,000 ha. In addition to protection forests, most of the planted forest area under the current economic afforestation projects has reached the exploitation period and continues to be newly expanded, promising the ability to build large-scale processing plants. In addition, the output of crops such as sugarcane, maize, cassava, tea ... and fruit trees such as oranges, grapefruit, pineapple ... is very large.

Hoa Binh province has abundant and diverse natural tourism resources, including rivers, lakes, mineral springs, nature reserves (NRs), national parks (national parks). For Hoa Binh tourism, the Hoa Binh hydroelectric lake with an area of over 8,000 ha must be mentioned. With a capacity of over 9 billion m³ of water and over 40 floating islands in the lake, this is a place with favorable conditions for fisheries development, ecotourism, sightseeing and convalescence. There is abundant mineral water (Kim Boi mineral spring); Other Hang Nature Reserves - Pa Co, Thuong Tien Nature Reserve, Pu Luong Nature Reserve, Phu Canh Nature Reserve, Ngoc Son - Ngo Luong Nature Reserve; Cuc Phuong National Park has valuable advantages for tourism development.

The main income sources are agriculture, forestry and fishery; industry and Construction; services; Ethnic Minority population make up 69.4%. Hoa Binh has 210 communes, 100% of which have a CHS. Of 210 CHSs, 41% meet the national benchmarks, 79% have a physician, 83% have a midwife or obstetric assistant.

Quang Binh is located in the North-central region, with the area of 8,000 km², 882.505 population, the per capital GDP of 1,287 USD.

The province has a coastline of 116.04 km in the East and has a border with Laos 201.87 km in the West, including Hon La Port, Dong Hoi Airport, National Highway 1A and Ho Chi Minh Road, North

Railway South, National Road No. 12 and Provincial Road No. 20 and 16 run from East to West through Cha Lo International Border Gate and a number of other secondary border gates connected to Laos.

Quang Binh terrain is narrow and sloping from the West to the East. 85% of the total natural area is mountainous. The whole area is divided into basic ecological regions: high mountains, hills and midlands, plains and coastal sandy areas. Quang Binh is located in the tropical monsoon region and is always affected by the climate of the North and the South and is divided into two distinct seasons: The rainy season is from September to March next year. The average annual rainfall is 1,500 - 2,000 mm / year. Rainy months focus on September, October and November. The dry season is from April to August with an average temperature of 24°C - 25°C. The three months with the highest temperatures are June, July and August.

Soil resources are divided into two main systems: alluvial soils in the plains and pheralite in hilly and mountainous areas with 15 types and main groups as follows: sandy soils, alluvial soils and yellow red soil. In particular, the group of red and yellow soil occupies more than 80% of the natural area, mainly in the mountainous terrain in the West, sandy soil accounts for 5.9% and alluvial soil accounts for 2.8% of the area.

Quang Binh is located in the North Truong Son biodiversity area - home to a diverse and unique flora and fauna with many rare genetic resources. Characteristic for biodiversity in Quang Binh is Karst Phong Nha - Ke Bang region. About animals: 493 species, 67 species of mammals, 48 species of reptiles, 297 species of birds, 61 species of fish ... there are many rare and precious species such as Langur, Bear, Tiger, Sao La, Mang Lon, Pheasant white tail, Black Pheasant, Black Pheasant ... Regarding plant diversity: With forest area of 486,688 ha, of which natural forest is 447,837 ha, planted forest is 38,851 ha, including 17,397 ha of pine forest, non-forest area of 146,386 ha. Plants in Quang Binh are diverse in species: there are 138 families, 401 genera, 640 different species. Quang Binh forest has many kinds of valuable timber such as ironwood, mahogany, ebony, mandarin, pine and many other valuable rattan and forest products. Quang Binh is one of the provinces with high wood reserves in the country. Currently the timber reserve is 31 million m³.

Quang Binh has a coastline of 116.04 km with 5 estuaries, including two large estuaries. The province has Nhat Le Port, Gianh Port, Hon La Port and Hon La Bay with a water surface of 4 km² and a depth above 15 meters and surrounded by islands: Hon La, Hon Co, Hon Chua can allow vessels of 3-5 thousand tons to enter the port without dredging. On the mainland, a fairly large area (over 400 hectares) is convenient for the construction of industrial parks associated with deep-sea ports.

Quang Binh has a fairly large system of rivers and streams with a density of 0.8 - 1.1 km/km². There are five main rivers, namely Roon, Gianh, Ly Hoa, Dinh and Nhat Le. There are about 160 natural and artificial lakes with an estimated capacity of 243.3 million m³.

Quang Binh has many kinds of minerals such as gold, iron, titanium, pyrite, lead, zinc ... and some non-metallic minerals such as kaolin, quartz sand, limestone, marble stone, granite ... In which, limestone and kaolin have large reserves, which are sufficient to develop the cement and construction materials industry on a large scale. There are 105°C hot mineral springs. Gold reserves in Quang Binh have the potential to develop gold mining and processing industry.

Ethnic Minority population make up 2.7%. The main income sources are agriculture, forestry and fishery: 18.79%; industry and Construction: 26.75%; services: 54.46%. Quang Binh has 159

communes, 100% of which have a CHS. Of 159 CHSs, 82% meet the national benchmarks, 98% have a physician and 100% have a midwife or obstetric assistant.

Da Nang is the center of politics and socio-economic of the Central and Highlands, with the area of 1,284.7 km² and 1.05 million population.

The topography of Da Nang City is both plains and mountains, high mountains and slopes are concentrated in the West and Northwest, from here there are many mountain ranges running to the sea, some low hills alternating with narrow coastal plains. The hilly and mountainous terrain occupies a large area, the height ranges from 700 - 1,500 m, with a large slope (> 40°), where many watershed forests are concentrated and meaningful to protect the ecological environment of the city. The river system is short and steep, originating from the west, northwest and Quang Nam province. The coastal plain is a lowland affected by sea water, and is where has a concentration of many agricultural, industrial, service, military, residential and other functional areas of the city.

Da Nang is located in a tropical monsoon climate region with high temperature and little change. Da Nang's climate is the transition place between the northern and southern climates, with the predominant tropical climate in the south. There are two distinct seasons each year: the rainy season lasts from August to December and the dry season from January to July, with occasional winter cold spells but not heavy and not lasting. The average annual temperature is about 25.9°C; highest in June, July and August, averaging from 28 - 30°C; lowest in December, January and February, average from 18 - 23°C. Particularly in Ba Na mountainous area, the altitude is nearly 1,500 m, the average temperature is about 20°C.

The average air humidity is 83.4%; highest in October, November, average from 85.67 - 87.67%; lowest in June and July, an average of 76.67 - 77.33%. The average annual rainfall is 2,504.57 mm/year; the highest rainfall in October and November, on average from 550 to 1,000 mm/month; lowest in the months 1, 2, 3, 4, an average of 23-40 mm/month. The average number of sunny hours in a year is 2,156.2 hours; at most in May and June, an average of 234 to 277 hours/month; at least in November and December, averaging from 69 to 165 hours/month. The forestry land area in Da Nang city is 67,148 ha, distributed mainly in the West and Northwest of the city, including 3 types of forests: special-use forests, protection forests and production forests. Forest coverage rate is 49.6%. Wood reserve is about 3 million m³. In addition to economic significance, the city's forests also serve scientific research, ecological environment protection and tourism development with special nature conservation areas such as Ba Na Nature Reserve, Son Tra Nature Reserve and Nam Hai Van Cultural and Historical Area.

The coastal area of Danang has a fishing ground of over 15,000 km², rich marine animals on 266 species, of which seafood has high economic value including 16 species. Total reserves of seafood of all kinds are 1,136,000 tons. Every year it is possible to exploit 150,000 - 200,000 tons. Da Nang also has a long coastline with many beautiful beaches such as Non Nuoc, My Khe, Thanh Khe and Nam O with many interesting natural landscapes. Around the area of Son Tra peninsula, there are large coral beaches, which are convenient in developing types of business, services and marine tourism. In addition, Da Nang sea area is being conducted to explore oil and gas, fuel ... Minerals in Da Nang include: white sand, granite, construction stone, roofing slate, sand, gravel, construction gravel, laterit, backfilling materials, clay, mineral water. In particular, the continental shelf has many prospects for oil and gas.

Ethnic Minority population make up less than 0.5% of the population. Da Nang has 56 communes, 100% of which have a CHS that meet the national benchmarks and have a physician.

Khanh Hoa is a coastal province in the south central, with the area of 5,217.6 km², 1,3 million population, the per capital GDP of 1,495 USD. The province makes up of the mainland area and over 200 islands, archipelagoes.

Khanh Hoa is a province adjacent to the Truong Son mountain range, most of which are mountains, very narrow plains, only about 400 km², accounting for less than 1/10 of the province. The delta is divided into cells, separated by mountains that feed into the sea. Mountains in Khanh Hoa, though rare towering peaks, most of which are only about a thousand meters high but are associated with the Truong Son mountain range, are the southernmost end, so the mountain terrain is quite diverse. The highest peak is Hon Giao Peak (2,062m) in Khanh Vinh district. The major plains in Khanh Hoa include the Nha Trang and Dien Khanh plains on both sides of the Cai River with an area of about 135 km²; Ninh Hoa delta is covered by Dinh river, covering an area of 100 km². In addition, Khanh Hoa also has two narrow deltas, the Van Ninh plain and the Cam Ranh delta on the coast, along with a small amount of cultivated areas in the valleys of the mountainous districts of Khanh Son and Khanh Vinh.

Khanh Hoa is one of the provinces with beautiful coastline of Vietnam. The coastline extends from Dai Lanh commune to the end of Cam Ranh bay, with a length of about 385 km along the water's edge with many canals, lagoons and bays, along with about 200 large and small islands along the coast. Khanh Hoa has six lagoons and large bays: Van Phong, Nha Trang, Cam Ranh, Hon Khoi, Nha Phu, Dai Lanh. Among them, the most prominent is Cam Ranh Bay with a length of 16 km, a width of 32 km, connecting with the sea through a strait of 1.6 km wide, a depth of 18 - 20m and often considered a conditional seaport. The best natural Southeast Asia.

Rivers and streams in Khanh Hoa are generally short and steep, the whole province has about 40 rivers with the length of 10 km or more, forming a fairly dense river network. Most of the rivers originate in the western mountains of the province and flow into the East Sea. Along the coast, there is an estuary every 5 - 7 km. The major rivers in Khanh Hoa include: Cai Nha Trang River, Dinh River (also called Cai Ninh Hoa River), To Hap River (Khanh Son District).

Khanh Hoa is a province in the southernmost coastal region of Central Vietnam, located in the tropical savanna climate region. But the climate of Khanh Hoa has unique changes with specific characteristics. Compared to other provinces and cities in the North from Ca pass, and south from Ghenh Da Bac, Khanh Hoa's climate is relatively more temperate due to the nature of oceanic climate. There are usually only two distinct seasons: rainy and dry seasons. The short rainy season, from about mid-September to mid-December, focuses on 2 months of October and November, the rainfall usually accounts for over 50% of the annual rainfall. The remaining months are the sunny season, with an average of 2,600 hours of sunshine annually. The average annual temperature in Khanh Hoa is about 26.7°C.

Khanh Hoa has many mineral resources such as peat, kaolin, clay, refractory clay, placer gold, glass sand, coral, granite, ilmenite ore, mineral water, serving the production of construction materials and mining industry. There are also many marine resources, including algae, plant algae, and large seafood reserves providing raw materials for the seafood processing industry; favorable conditions for exploitation of marine life and aquaculture.

The geological structure of Khanh Hoa is mainly granite and rhyolite, dacite of new type of intrusive magmatic intrusions. There are also sand and sedimentary rocks in some places. In terms of tectonic terrain, the land of Khanh Hoa province was formed very early, is a part of the southeastern edge of the ancient Kom Tom mass, rising from the sea surface from the Paleozoic, about 570 million years ago.

Ethnic Minority population make up 5.7%. The main income sources are: agriculture, forestry and fishery (9.81%); Industry and Construction (31.06%); Services (47.4%) and product taxes (11.73%). Khanh Hoa has 140 communes, 98% of which have a CHS. Of 140 CHSs, 86% meet the national benchmarks, 91% have a physician, 95% have a midwife or obstetric assistant.

Ninh Thuan is a coastal province in the south central, with the area of 3,355.2 km², 601,400 population, the per capital GDP of 1,210 USD.

Ninh Thuan's terrain is lower from northwest to southeast, with three types of terrain: mountains accounting for 63.2%, hilly terrain with 14.4% semi-hilly terrain, coastal plain accounting for 22.4% of the natural area of the whole province.

Ninh Thuan has a typical monsoon tropical climate with hot, dry wind, strong evaporation, the annual average temperature from 26-27°C, average rainfall of 700-800 mm in the coastal plain and gradually increases to more than 1,100 mm in the mountains, the air humidity is from 75-77%. The weather has 2 distinct seasons: The rainy season is from September to November; dry season from December to August next year. Ninh Thuan's water resources are unevenly distributed, concentrated mainly in the northern and central areas of the province. Groundwater is only 1/3 of the national average.

The coast is 105 km long, the province's fishing ground is in upland water with rich and diverse seafood resources with over 500 kinds of seafood. There is also a rich and diverse coral ecosystem with over 120 species. Of which, Ninh Thuan's sea has some particularly rare sea turtles. The coastal area has a large area of land, many bays are suitable for tourism development with domestic and international stature. Aquaculture development and shrimp hatchery production are a strength of the fisheries sector.

Metallic minerals include Wofram, Molybdenum, tin. Titanium in coastal areas with reserves of millions of tons. Non-metallic minerals with crystal quartz, granite, glass sand, ceramic clay ... Raw materials for production of construction materials include granite with a total reserve of about 850 million m³, a limestone sandstone of about 1.5 million m³; concentrated limestone in coastal areas with reserves of about 2.5 million tons of CaO; clay additives, stone for construction.

Ninh Thuan's forests are very important for socio-economic development and ecological environment improvement, which is an advantage to be exploited in the coming period. Ninh Thuan has forestry land of 157.3 thousand hectares, including 152.3 thousand hectares of natural forest, 5,000 hectares of planted forests, and 46.8% of the forest cover. The province's timber reserve is nearly 11 million m³ and contains 2.5 million bamboo. Production forest has 58.5 thousand ha, reserves of 4.5 million m³ of timber, watershed protection forest has 98.9 thousand ha, wood reserve of about 5.5 million m³.

Ethnic Minority population make up 23.1%.; The main income sources are: Agriculture, forestry and fishery (35.77%); Industry and Construction (20.28%); services (38.08%). Ninh Thuan has 65 communes, 100% of which have a CHS. Of 65 CHSs, 72% meet the national benchmarks, 49% have a physician, 95% have a midwife or obstetric assistant.

The following table summarizes the socio-economic conditions of six project provinces.

Table 2.1 Social and Economic Data of Six project provinces

#	Description	Province						TOTAL
		Hoa Binh	Thanh Hoa	Da Nang	Quang Binh	Khanh Hoa	Ninh Thuan	
A	General information							
A1	Region	North West	North Central	Central	Central	South Central	South Central	
A2	Population	832,543	3,600,000	1,215,000	936,607	1,326,500	608,000	8,518,650
A3	% OP	10.9	12.5	9.2	11.2	9.3	8.5	10.9%
A4	#OP	90,747	450,000	111,780	104,900	123,365	51,680	932,472
A5	# of District	11	27	8	8	8	7	69
A6	# of commune/ward	210	635	56	159	137	65	1,262
A7	AE provincial staff	8	7	5	5	4	2	31
A8	% of EM in the province	69.4%	18.6%	0.5%	2.7%	5.7%	23.1%	17.5%
A9	# of EM in the province	577,785	669,600	6,075	25,288	75,611	140,448	1,494,807
A10	EM groups in the province	Muong, Tay Thai & Dao	Muong, Thai, Tho, Dao & H'mong	Co-tu & Tay	Bru-Van Kieu, Chut & Tày	Ragalai, Hoa, Co ho	Cham, Ragalai, Co Ho, Hoa	13 EM groups
A11	% of PWD	8.04%	10.22%	8.84%	9.10%	8.25%	6.99%	9.2%
A12	# of PWD	66,936	367,920	82,796	110,565	109,436	42,499	780,153
B	Assessing AE organization capacity							
B1	AE's staffing in the province	450	1,331	133	338	295	147	2,694

B2	% of village/community have AE	100%	100%	100%	100%	100%	100%	100%
B3	% of OP that are members of AE	96%	98%	84%	88%	85%	78%	92%
B4	% of OP that are members of AE	87,117	441,000	93,895	92,312	104,860	40,310	859,495
B5	Relationship with DoH and DoLISA	Very good	Very good	Very good	Good	Very good	Very good	100% have good or very good relationship
B6	Support from PC to AE work	Very good	Very good	Very good	Good	Very good	Good	100% have good or very good support
B7	Has experience working with HelpAge	Yes	Yes	No	Yes	Yes	No	4/6 have worked with HelpAge
C	Health and Social Pension Assessing							
C1	% of Commune or Ward have CHS	100%	100%	100%	100%	100%	100%	100%
C2	% OP have health Insurance	90%	85%	91%	85%	85%	80%	80% to 91%
C3	SP amount	270,000	270,000	350,000	270,000	300,000	270,000	

III. POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

3.1 Vietnamese regulations

National Laws

- Environmental Protection Law No. 55/2014/QH13 of the National Assembly of Vietnam dated 23 June 2014. This law stipulates environmental protection activities; policies, measures and resources for environmental protection; right and obligations of organizations, households and individuals in environmental protection. Article 7 of Chapter 1 prescribes prohibited actions such as destroying and illegal exploiting natural resources; transportation and dumping of toxic product, radioactive substances, waste and hazardous waste not following technical regulations on environmental protection; disposal of untreated wastes, toxic product, radioactive substance, and other hazardous materials into land, water and air; generating noise and vibration that exceeds national technical regulation on noise and vibration; emitting dust, smoke and gases containing toxic chemicals and offensive smell into air; emitting radiation and radioactivity and ionization substances that exceeds national technical regulations. Article 18 of Chapter 2 stipulates Environmental Impacts Assessment (EIA) for investment projects.
- Law on Biodiversity No. 20/2008/QH12 of the National Assembly of Vietnam dated 13 November 2008 provides for the conservation and sustainable development of biodiversity; rights and obligations of organizations, households and individuals in the conservation and sustainable development of biodiversity. Article 7 of Chapter 1 prescribes prohibited actions such as hunting, poaching and exploiting wildlife in strictly protected sub-region of protected areas, except for scientific research purposes; encroaching land, destroying landscape, degrading natural ecological systems and raising and growing alien species in protected areas; constructing works and houses in in strictly protected sub-region of protected areas, except for works for defense and security purposes; illegal construction of works and houses in ecological recovery sub-region of protected areas.
- Law on Water Resources No. 17/2012/QH13 of the National Assembly of Vietnam dated 21 June 2012 provides on management, protection, exploitation and use of water resources, as well as the prevention of, combat against and overcoming of harmful effects caused by water in the territory of the Socialist Republic of Vietnam. Chapter 3 of this law stipulates Protection of Water Resources. Extraction and use of water resources must comply with the water resources planning. Article 9 of Chapter 1 describes prohibited actions, such as discharge of wastes and illegal exploitation of sand and gravel in stream, river, channel, and reservoir.
- Law on Construction No. 50/2014/QH13 approved on 18 June 2014 by 7th National Assembly of the Socialist Republic of Vietnam. Article 12 of Chapter 1 prescribes prohibited actions such as use of materials to cause harm to the public health and environment. Article 16 of Chapter 2 stipulates environmental protection in construction. During construction, contractors are responsible for (i) establishing and implementing environmental protection measures, including air and water environment, solid wastes, noise and other requirements in accordance with Law on Environmental Protection, and (ii) compensating for damages caused by contractors.
- Law on Complaint No. 02/2011/QH13 dated 11 November 2011. This law stipulates complaint and handling complaint; management and monitoring of complaint handling.

Article 6 of Chapter 1 prescribes prohibited actions such as limited responsibility for handling complaint; creating wrong information and documents of compliant cases; intentionally handling complaint not following legal regulation; impeding and causing inconvenience for people who conduct complaint right; threatening, revenging, and victimizing complainant. Article 7 of Chapter 2 stipulates complaint procedures; Article 8 of Chapter 2 stipulates complaint form; Article 9 of Chapter 2 stipulates complaint prescription.

- Law on Denunciation No. 25/2018/QH14. This Law stipulates denunciations and settlement of denunciations regarding acts of law violation in the performance of tasks, official duties and other violations of state management in the fields; protection of whistleblowers; responsibilities of agencies and organizations in the management of the settlement of denunciations.
- Labor Law No.10/2012/QH13 dated 18 June 2012. This law stipulates labor standard; right and obligation of employee, employer, representative organization of employee, representative organization of employer in labor relations and other relations directly related to labor relations; state management of labor. Article 8 of Chapter 1 prescribes prohibited actions such as discrimination of gender, ethnicity, skin color, social status, belief, religion, disability; labor forcing; use of untrained employee; use of employee with age not following legal regulation.
- Law on Culture Heritage No. 28/2001/QH10 dated 29 June 2001. This law aims to (i) reinforce the state management effectiveness and (ii) raise responsibility of people for participation, protection and promotion of the value of cultural heritages. Article 13 of Chapter 1 prescribes prohibited actions such as destroying and causing potential destruction of cultural heritage; illegal excavation of archaeological sites; illegal construction and encroaching land of historical relics and famous landscape; appropriating of cultural heritage and making of untrue cultural heritage. Article 37 of Chapter 4 stipulates chance find procedures.
- Law on Labor Safety and Hygiene No. 84/2015/QH13 dated 25 June 2015. This law stipulates ensuring safety and labor sanitation; policy and regulation for labor accident and occupational diseases; responsibility and right of organizations and individuals in safety and labor sanitation and state management of safety and labor sanitation. Article 12 of Chapter 1 prescribes prohibited actions such as cheating at verification, safety training, labor sanitation, monitoring labor environment; discrimination of gender in safety insurance, labor sanitation; hiding or reporting untrue labor accidents; not implementing requirements and measures for safety insurance, labor sanitation to cause harm or potential harm to human, assets and environment; use of equipment and machinery requiring strictly requirements on safety and labor sanitation but not verified or verified results not satisfying requirements. Article 14 of Chapter 2 stipulates training in safety and labor sanitation for employee. Article 16 of Chapter 2 stipulates employer's obligation in ensuring safety and labor safety at workplace.
- Law on Roadway Traffic No. 23/2008/QH12 dated on 13 November 2008. Articles 8 of Chapter 1 prescribes prohibited actions such as driving vehicles without license; driving vehicles with speed exceeding allowed speed; sounding horn between 10 p.m. and 5 a.m.; driving vehicles while the body is positive with drug. Article 55 of Chapter 4 stipulates

ensuring technical safety quality and environmental protection for vehicles moving on roadways.

- Law on Efficient Energy Use and Saving No. 50/2010/QH12 dated 17 June 2010. This law stipulates saving and using energies effectively; policies, measures for promotion of saving and using energy effectively; rights, obligations and responsibilities of organization, households, individuals in saving and using energy effectively. Item 5, Article 8 Chapter 1 describes the prohibited action of production, importation and distribution of means, equipment using energy listed as abandoned devices/means by the national competent agencies.
- Law on Forestry No. 16/2017/QH14. This law stipulates forest management, protection, development, use, and processing and trading of forest products. Article 9 of this law stipulates activities to be prohibited in forestry activities.
- Law on Plant Protection and Quarantine (No 41/2013/QH13). This law stipulates activities of prevention and control of harmful insects, plant quarantine, and management of pesticides. Article 13 stipulates activities to be prohibited.
- Law on Fisheries No. 18/2017/QH14. This law stipulates fisheries activity, right and duty of organization and individual working on or relating to fisheries activity, and state management of fisheries. Article 7 stipulates activities to be prohibited.
- Law on Veterinary No. 79/2015/QH13. This law stipulates disease prevention, treatment and fight against animal diseases; quarantine of animals and animal products; controlling slaughtering of animals, preliminary processing and processing of animals and animal products; veterinary hygiene inspection; veterinary drug management; Veterinary practice.
- Law on People's Health Protection 1989. This law stipulates People's Health Protection. Article 1 stipulates Citizens have the right to health protection, rest, recreation and physical exercise; ensure labor hygiene, nutrition hygiene, sanitation of the living environment and be served with medical expertise.
- Law on Breeding No.32/2018/QH14. This law stipulates animal husbandry activities; rights and obligations of organizations and individuals in livestock activities; State management on breeding. Article 12 stipulates activities to be prohibited in breeding.

National Decrees and Circulars

- Decree No. 18/2015/ND-CP of Vietnam Government issued on 14 February 2015 on Environmental Protection Planning, SEA, EIA and Environmental Protection Plans.
- Decree No. 19/2015/ND-CP of Vietnam Government issued on 14 February 2015 on detailing some articles of Law of Environmental Protection.
- Decree No. 201/2013/ND-CP dated 27 November 2013 of the Government detailing the implementation of some articles of the Law on Water Resources.
- Decree No. 80/2014/ND-CP dated 6 August 2014 of the Government stipulating drainage and wastewater treatment.
- Decree No. 40/2019/ND- CP dated 13 May 2019 and took effect on 01 July 2019 on adjusts and supplements several articles of the Decrees regulating in details and guiding on implementation of Law on environmental protection.

- Decree No. 117/2009/ND-CP dated 31 December 2009 on sanction of violations in the field of environmental protection.
- Decree No. 59/2007/ND-CP dated 9 April 2007 on solid waste management.
- Decree 174/2007/ND-CP dated 29 November 2007 of GoV on environmental protection charges for solid wastes.
- Decree No. 38/2015/NĐ-CP of the Government dated 24 April 2015 on waste management including hazardous wastes, daily-life solid waste, ordinary industrial solid waste, wastewater, industrial emissions and other particular wastes; environmental protection in discarded material imports.
- Decree No. 98/2010/ND-CP of the Government dated 21 September 2010 on detailing the implementation of some articles of the Law on Cultural Heritage and the Law amending and supplementing some articles of Law on cultural heritage.
- Decree No. 16/2016/ND-CP dated 16 March 2016 of the Government on the management and use of official development assistance (ODA) and preferential loans from donors
- Circular No. 27/2015/TT-BTNMT dated 29 May 2015 on SEA, EIA and EPP.
- Circular No. 36/2015/TT-BTNMT dated 30 June 2015 on Hazardous Waste Management.
- Circular No. 50/2014/TTLTBTNMT-BNN dated 28 August 2014 on function, responsibility, right, and organization structure of agency in charge of natural resources and environment in provinces, cities, districts.
- Decision No. 3733/2002/QĐ-BYT dated 10 October 2002 of Ministry of Health on issuance of 21 labor sanitation standards, 05 principles and 07 parameters of labor sanitation.

National Technical Regulations

- QCVN 05:2013/BTNMT- National technical regulation on ambient air quality.
- QCVN 06:2009/BTNMT - air quality -specified maximum allowable concentrations of certain hazardous substances in ambient air.
- QCVN26:2010/BTNMT- National technical regulation on maximum noise limit in public and residential areas.
- QCVN 27:2010/BTNMT- National technical regulation on vibration.
- QCVN 08-MT:2015/BTNMT - National technical regulation on surface water.
- QCVN 09-MT:2015/BTNMT - National technical regulation on groundwater.
- QCVN 03-MT:2015/BTNMT - National technical regulation on the allowable limits of heavy metals in the soils.
- QCVN 14:2008/BTNMT- National technical regulation on domestic wastewater.
- QCVN 40:2011/BTNMT- National technical regulations on industrial wastewater.
- QCVN 07:2009/BTNMT - National Technical Regulation on Hazardous Waste Thresholds.
- QCVN 01:2009/BYT- National technical regulation on drinking water quality.
- QCVN 02:2009/BYT- National technical regulation on domestic water quality.
- QCVN 18:2014/BXD - National technical regulation on safety in Construction.

- Other relevant sector technical regulation and standards.

3.2 World Bank's Environmental and Social Standards (ESS) and Guidelines

Project involve livelihood activities such as small scale husbandry (raising chicken, ducks, fish, goats, pigeons, rabbits and pigs), agriculture (vegetable and fruits), or small businesses (selling snacks, vegetables, grocery, foods or drinks, dress making, and others), and thus good practice in management of these activities and wastes generated should be referred to. Specifically, the IFC Good Practice Note on Improving Animal Welfare in Livestock Operations. The Good practice note will be included in the project operation manual.

Environmental and Social Risk Classification

The main adverse environmental and social risks and impacts associated with livelihoods program such as environmental pollution and human health risk by waste generation and exposure to pathogens and chemicals would be manageable. Adverse impacts are considered small in magnitude and localized given the nature and very small scale of the investment about US\$250 per each livelihood activity. The civil works would not involve construction and building of new infrastructure but would focus on rehabilitation of small assets implemented by ISHC members. However, exposing to age-unfriendly jobs under the livelihoods program and unqualified health workers under the health promotion program will be a concern about the safety for older people. Under the livelihood program for needy ISHC members, there is a risk that the older persons may not be able to pay back their loans to the revolving fund if they fail to generate incomes through the project's livelihood activities for various reasons, which may undermine their self-esteem and self-confidence and add to their socio-economic vulnerability. For activities focused on the health of older persons, there may be risks of failure to familiarize older persons from remote rural areas and from ethnic minority groups with the proposed health promotion models given their cultural differences. For activities focused on personal care, it is concerning that it may be impossible to mobilize enough volunteers who can work on a part-time and unpaid basis to meet the increasing demand for basic personal care from older persons. Also, this approach may result in weak commitment and poor services provided by volunteers to the project's beneficiaries. On a basis of the nature of these implementation risks and the client's capacity in the application of the relevant standards from the Bank's ESF, the project's environmental and social risk is classified as **Moderate**.

Environmental policies applicable to the project. In addition to the above listed national regulations the ESMF will provide a gap analysis between the relevant national regulations and the ESSs relevant to the project and how to address the gap. Information related to the ESSs and WBG EHSR relevant (e.g., ESS1, ESS2, ESS3, ESS4, ESS7, and ESS10) to the project are as follows.

ESS1 Assessment and Management of Environmental and Social Risks and Impacts: The adverse impacts would be expected from implementation of the activities under the project livelihoods generation program. Operated as a revolving fund, a member of the ISHCs can get capital to start livelihoods activities (e.g. small-scale agriculture, animal husbandry, handicrafts, or small business) to provide much needed income in old age. These activities, although small, may have moderate health risks for the old people given their vulnerable health status at the old age. These health risks include those associated with pesticide use in small-scale agriculture activities, animal waste generated by animal husbandry, and safety risks in handicrafts and small business activities. In addition to the health risks, improper management of the wastes generated during implementation of these activities would cause adverse impacts on the environment. These potential impacts are assessed to be of small scale, localized, in short-term period and

manageable. It is anticipated that the project activities will not cause long-term, cumulative impact to environment and human health if good design and construction practices are followed. Since the scope and sites of project activities are not yet defined nor identified, the implementing agency, HelpAge, has prepared an Environmental and Social Management Framework (ESMF) for the assessment and management of E&S risks and impacts at the framework level during project preparation. The ESMF has established the principles and procedures to screen, assess, manage and monitor the mitigation measures of environmental and social impacts during implementation. During implementation, the identified activities will be screened for their environmental and social issues. Given the nature and scale of the project investment activities, it is not expected that an Environmental and Social Impact Assessment (ESIAs) or Environmental and Social Management Plans (ESMPs) would need to be prepared. Instead, Environmental Codes of Practice (ECOPs) have been prepared to manage the potential risks and impacts of the livelihood activities. The ECOP describes mitigation measures to address identified environmental issues such as solid waste generated from animal husbandry; pesticides used in agriculture activities, safety issues due to exposure to age-unfriendly jobs and unregulated health services; chance finds and animal welfare. The final ESMF including ECOPs was locally disclosed on the HelpAge/project website and on the Bank external website before the Project Appraisal and will be a part of the Project Operational Manual.

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

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

ESS10 Stakeholder Engagement and Information Disclosure:

The Borrower and the World Bank's task team recognize the importance of engagement with relevant stakeholders, beneficiary communities and project affected parties throughout the project cycle. During the development of the Idea Proposal for JSDF, HelpAge has already conducted consultations with potential beneficiaries to identify the needs not yet met by the current ISHC

model. The World Bank's task team has also joined HelpAge on fieldtrips to learn more about the needs of beneficiaries. These consultations have revealed the need for greater collaboration between formal health and social protection services, on the one hand, and community-based organizations for the elderly, on the other hand. In addition, it was found that the current ISHC model has not yet fully met health and care needs of older persons with chronic or terminal diseases, or who need rehabilitation services to regain physical or cognitive capacity after illness. Consultations also confirm the need for support to livelihoods of older persons and the benefit provided to older persons and their family caregivers by the livelihoods/income generation activities of the ISHC.

HelpAge has prepared and implemented an inclusive Stakeholder Engagement Plan (SEP) proportional to the nature and scale of the project and associated risks and impacts. The SEP involves all project affected parties including HelpAge, the World Bank and JICA, the association of the elderly at all levels, commune health stations, and particularly targeted ISHCs and communities. The SEP also involves other interested parties including local authorities, community leaders (village heads and others), local women's unions, local farmer's unions, local Red Cross, local Father Land Front, and local media.

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

ESS2 Labor and Working Conditions: Project will include direct workers, contracted workers and community workers. The direct workers are HelpAge's employees, working specifically for the project. The contracted workers are employees working at Associations of the Elderly (AEs – both national level and provincial level), working specifically for the project. The community workers would include the ISHCs' management board, voluntary health educators, health workers and caregivers who provide health services and basic personal care to the older people. There will be no government project management unit, therefore, there would not be government workers involved in the project.

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

The Implementing Agency has, therefore, prepared Labor Management Procedures (LMP) which set out the way in which project workers (including community workers) will be managed in accordance with the requirements of the national laws and ESS2. This includes terms and working conditions and occupational health and safety (for community workers), as well as non-discrimination and equal opportunity. The LMP has included measures to ensure that community labor is provided on a voluntary basis, has established work hours, and to further ensure that the

occupational health and safety of the community workers, especially women and ethnic minorities are given adequate attention. Measures relating to Occupational Health and Safety (OHS) are for protecting workers from injuries, illness or impacts associated with exposure to hazards encountered in the work place or while working. Such OHS measures include provision of PPE, awareness raising and guidance on how to prevent accidents at work place. The LMP assess whether there is risk of child labor within the community labor and identify and manage those risks by taking appropriate steps to remedy the situation in a manner consistent with ESS2. The LMP also has the details of the grievance redress mechanism (GRM) for direct workers and contracted workers to raise their concerns. The LMP specifies the way in which community workers can raise grievances in relation to the project (project level GRM or other possible grievance mechanisms). The LMP also takes into consideration that proper training is provided to community workers, tailored to needs and potential risks and impacts of the project.

ESS3 Resource Efficiency and Pollution Prevention and Management: The nature and scale of the proposed project's activities will not cause significant water and energy use. However, the project will support a livelihood program, in which ISHCs' members can receive capital to start livelihood activities (e.g. small-scale agriculture and husbandry). These activities will likely cause adverse risks and impacts by generation of hazardous and non-hazardous waste, and exposure to agro-chemicals especially pesticides. The ESMF has included ECOPs which set out mitigation measures to address the adverse risks and impacts.

ESS4 Community Health and Safety: The project is anticipated to have positive impact on the community health thanks to health and social care activities. Risks and negative impacts related to labor influx are not expected as the project involves in minor renovation of small assets that can be conducted by community members. Given its nature and scale, the project is not expected to exert substantial amount of hazardous materials affecting community health, to cause substantial road safety issues, or to any cause adverse impacts on the community due to labor influx. Therefore, standard measures in the World Bank Group Environment, Health, and Safety Guidelines (EHS) to ensure the community health and safety of communities during implementation should suffice. The ESMF has included ECOPs with measures to address issues related to community health and safety during implementation of the livelihood activities in line with the relevant GoV's regulations and WBG EHS Guidelines.

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

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement: The project includes only minor renovation of small assets and thus will not require any land acquisition, restriction on land use and involuntary resettlement.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources: Given its location, nature, and scale, the project is not expected to have potential adverse impacts on biodiversity and natural habitats. Nevertheless, the ESMF provides a guidance on eligible screening including the exclusion list and mitigation measures in ECOP to ensure that project's livelihood activities will not adversely affect biodiversity and natural habitats. Despite that fact that animal welfare is an issue of the large-scale commercial farming, including breeding, rearing, housing, transport and slaughter of animals for meat or other animal products, the project's livelihood

activities of small-scale animal raising take into account GIIP in animal husbandry techniques with due consideration of religious and cultural principles.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities: Although names of specific beneficiary communities may not be determined by appraisal, it is known that some of the identified project provinces have a high proportion of ethnic minority populations, such as Hoa Binh, Thanh Hoa, Quang Binh, Khanh Hoa, and Ninh Thuan. These groups include Muong, Thai, Tay, Dao, Mong, Bru Van Kieu and Chut. Among them, Muong, Thai and Tay generally have a higher level of economic development and a better command of the Vietnamese language than the remaining groups. As the proposed ISHC model is designed to focus on vulnerable older persons, it is likely that the project activities will take place in some poor communes with high rates of ethnic minority older persons, although the names of the project communes remain unknown at this stage. The SA identifies the existing barriers against the ethnic minority older persons to participate in and benefit from the project's activities to improve their quality of life and well-being. These barriers may be related to languages, cultural practices, institutional arrangements, and religious or spiritual beliefs. Different needs and preferences of older men and women from ethnic minority groups in the project communes will be considered in the design of the project's activities and organization of consultations. An engagement process with older persons from the ethnic minority groups in the project communes will be undertaken, including stakeholder analysis and engagement planning, disclosure of information, and meaningful consultation, in a culturally appropriate and gender and inter-generationally inclusive manner. On a basis of the findings from the SA and the engagement process, an EMPF has been prepared prior to appraisal. This EMPF provides guidance on how an Ethnic Minority Development Plan should be prepared during implementation to set out the measures or actions proposed with a clear timeframe.

ESS8 Cultural Heritage: Given its location, nature, and scale, the project is not expected to have potential adverse impacts on tangible and intangible cultural heritage. However, the project's livelihood activities will likely involve small-scale soil excavation, so ECOP has included a procedure to address chance finds.

ESS9 Financial Intermediaries: The project is not expected to use any financial intermediary.

The World Bank Group Environment, Health and Safety (EHS) General Guidelines: World Bank-financed projects should also take into account the WBG EHS guidelines². The EHS Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). The EHS Guidelines contain the performance levels and measures that are normally acceptable to the World Bank Group and are generally considered to be achievable in new facilities at reasonable costs by existing technology. The environmental assessment process may recommend alternative (higher or lower) levels or measures, which, if acceptable to the World Bank, become project- or site-specific requirements. This project should conform to the General EHS Guidelines.

The World Bank policy on Access to Information³: The World Bank Access to Information Policy is intended to ensure that persons and groups affected by the project are kept informed of the project objectives and impacts, and are consulted throughout the project to ensure that their interests are represented. Safeguards documents are disclosed locally in the project areas and the World Bank external website, which includes a resource center in Washington DC and an electronic

²The EHS Guidelines can be consulted at IFC website www.ifc.org/ifcext/enviro.nsf/Content/EnvironmentalGuidelines

³Detail of World Bank Policy on Access to information is available at <http://www.worldbank.org/en/access-to-information>

database, offering access to information on World Bank projects and program to the public. The Bank policy requires that during EA process the Recipient conducts meaningful consultations with stakeholders such as project-affected groups and local NGOs about the project's environmental and social aspects, and takes their views into account in the design of the project. All draft and final safeguard instruments are disclosed locally in an accessible place and in a form and language understandable to key stakeholders, and in English at the Bank external website before the project appraisal begins.

3.3 Gap Analysis and Filling Measures

The application of environmental assessment policies in Vietnam, as well as various efforts directed to policy harmonization between GoV and donors, has gradually narrowed the gap between the two systems. However, starting October 2018, the WB applies the Environment and Social Framework (ESF) to all WB-financing projects. The ESF describes the WB E&S policy to ensure that all WB's financing investment projects will meet the 10 Environmental and Social Standards (ESSs) which were designed to avoid, minimize, reduce or mitigate the adverse E&S risks and impacts of projects. These ESSs⁴ are:

- ESS1 - Assessment and Management of Environmental and Social Risks and Impacts);
- ESS2 - Labor and Working Conditions;
- ESS3 - Resource Efficiency and Pollution Prevention and Management;
- ESS4 - Community Health and Safety;
- ESS5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
- ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- ESS7 - Indigenous Peoples/Sub-Saharan Africa Historically Underserved Traditional Local Communities;
- ESS8 - Cultural Heritage;
- ESS9 - Financial Intermediaries; and
- ESS10 - Stakeholder Engagement and Information

The WB classifies projects/s into one of the four classifications: *high risk (H)*, *substantial risk (S)*, *moderate risk (M)* or *low risk (L)* ([see Annex](#)) and will disclose the project's classification and the basis for that classification on the WB's website and in project documents.

In late 2018 - early 2019, the WB team conducted a full Country System Framework Assessment for Vietnam to identify key gaps between the country legal system and the ESSs and priority needs to ensure full compliance of the ESSs. The conclusion is that Vietnam has a comprehensive regulatory framework that in many cases meets the requirements of the 10 ESSs and key issues are more associated with implementation and the different capacity between the central and provincial project management units and between the provinces. There are opportunities to accelerate

⁴ The ESSs are applied to enhance consistency of the WB Group and the main difference between the previous WB' safeguard policy (OP/BP) and the ESSs is that the ESSs gave explicit priority to address the issues related to labor and working conditions; environmental health and safety; community health and safety; resources efficiency and pollution control; and stakeholder engagement. The previous policies related to natural habitats, forest management, pest management, and dam safety have been integrated in to the ESS6, ESS3, and ESS4.

implementation of recent improvements in the country system, especially on labor, community safety and stakeholder engagement.

Table 3.1: Summary of the World Bank (WB) ESA and National EIA Processes and proposed gap mitigation for the Project

EA Process Stage	WB (stipulating in the ESF and ESSs)	Viet Nam (stipulating in Decree 40/2019/ND-CP, 18/2015/ND-CP, Circular 27/2015/TT-BTNMT)	Gap Filling Measures
Objectives	Starting October 2018, the WB applies the Environment and Social Framework (ESF) describing the 10 Environmental and Social Standards (ESSs) which were designed to avoid, minimize, reduce or mitigate the adverse E&S risks and impacts of projects. The WB will assist Borrowers in their application of the ESSs to projects with WB support.	Investment projects are required to submit EIA or EPP for approval	+To be eligible for WB financing, the WB ESF will be applied.
Screening	<p>The WB will classify all projects into one of four classifications: <i>high risk</i>, <i>substantial risk</i>, <i>moderate risk</i> or <i>low risk</i>.</p> <p>In determining the appropriate risk classification, the WB will take into account relevant issues, such as the type, location, sensitivity, and scale of the project; the nature and magnitude of the potential E&S risks and impacts; and the capacity and commitment of the Borrower (including any other entity responsible for the implementation of the project) to manage the E&S risks and impacts in a manner consistent with the ESSs.</p> <p>Other areas of risk may also be relevant to the delivery of E&S mitigation measures and outcomes, depending on the specific project and the context in which it is being developed. These could include legal and institutional considerations; the nature of the mitigation and technology being proposed; governance structures and legislation; and considerations relating to stability, conflict</p>	<p>The project types are indicated in annexes II, III and IV of Decree 40/2019/ND-CP. Annexes I, II and III stipulate environmental impact assessment (EIA) and environmental protection plan (EPP) for proposed projects. Annex I of Decree 40/2019/ND-CP stipulates Strategic Environment Assessment (SEA) for strategy and planning. Thus, the project owner shall prepare EA instruments based on annexes I, II and III in consultation with the Provincial Department of Natural Resources and Environment (DONRE) or Vietnam Environment Administration (VEA) for the appropriate EA instruments.</p> <ul style="list-style-type: none"> ▪ Projects falls into Annexes II, III: EIA is required. ▪ Project falls into Annex IV or Column 	+Since the Project is classified as “moderate” to “substantial risk”, use the national laws and specific WB’s ESS as agreed with WB will be applied.

	or security. The WB will disclose the project's classification and the basis for that classification on the WB's website and in project documents.	5 of Annex II: EPP is required	
ESA instrument	<p>Depending on the project risks and impact, a range of instruments and procedures required to meet the ESSs' objectives, these include: ESIA; ESMF; ESMPs, sectoral & regional ESIA; SESA; hazard or risk assessment; environmental and social audit; cumulative impact assessment; and social and conflict analysis. The WB provides general guidance for implementation of each instrument.</p> <p>Based on information provided by the Borrower, the WB will conduct E&S due diligence for all projects requesting for WB support.</p> <p>The Borrower will be required to prepare, submit, and disclose the Environmental and Social Commitment Plan (ESCP) and the Stakeholder Engagement Plan (SEP) to WB before appraisal.</p>	The type of EA instruments such as SEA, EIA or EPP is decided based on Annexes I, II, III and IV of Decree 40/2019/ND-CP.	+Preparation of an ESMF, ESMP, RPF, RAPs, EMPF, EMDP, ESCP, SEP, and LMP for the Project will be required to meet the ESSs1, 2, 3, 4, 5, 6, 7, 8, and 10 while an EIA, IEE, of EP will be prepared to meet GOV requirements, if applicable.
Scope and clearance	<p>The WB will require the Borrower to carry out appropriate E&S assessment (ESA) of s, and prepare and implement such s, as follows: (a) <i>high risk</i> s, in accordance with the ESSs; and (b) <i>substantial risk, moderate risk</i> and <i>low risk</i> s, in accordance with national law and any requirement of the ESSs that the Bank deems relevant to such s.</p> <p>If the WB is not satisfied that adequate capacity exists on the part of the Borrower, all <i>high risk</i> and, as appropriate, <i>substantial risk</i> s will be subject to prior review and approval by the WB until it is established that adequate capacity exists.</p>	<p>TORs for EIA are not required.</p> <p>Normally after consultation with the local DONRE or VEA for the EIA category, the project owner will proceed with EIA report preparation.</p>	+ The ESMF, RPF, EMPF, ESCP, SEP and LMP for the Project and the ESMPs, ARAP, EMDP for the project will be submitted to WB for clearance, if applicable

	<p>If the risk rating of an increases to a higher risk rating, the WB will require the Borrower to apply relevant requirements of the ESSs in a manner agreed with the WB. The measures and actions agreed will be included in the ESCP, and will be monitored by the WB.</p> <p>The WB helps Borrower draft the TOR for ESA report and identify the scope of ESA, procedures, schedule and outline of the ESA report.</p> <p>For <i>high risk</i> project, the ESS1-10 applied.</p> <p>For <i>substantial, moderate, and low risk</i>, the national system can be applied with some specific ESSs as deem necessary by WB.</p> <p>WB prior clearance is required if the implementing agency do not have adequate capacity to ensure effective implementation of the required mitigation measures.</p>		<p>+To comply with GOV requirements, the EIA, IEE, and/or EP for the will be submitted to GOV for approval, if applicable.</p>
<p>Public consultation, stakeholder engagement, and grievance redress mechanism (GRM)</p>	<p>During the ESA process, the Borrower consults project affected groups and local NGOs about the project's environmental aspects and takes their views into account.</p> <p>In line with ESS10, preparation of a Stakeholder Engagement Plan (SEP), information disclosure, and establishment and operations of a GRM are required to ensure adequate consultation and transparency.</p> <p>ESS2 also require the preparation of the labor management procedures (LMP) and an establishment and operation of a GRM for project workers.</p> <p>If ethnic minority is presence and adversely impacts, free, prior, and meaningful consultation (FPIC) is required.</p> <p>For meaningful consultations, the Borrower provides</p>	<p>The project owner shall consult with the People's Committee of communes, wards and towns (hereinafter referred to as communes) where the project is carried out, with organizations or community under the direct impact of the project; research and receive objective opinions and reasonable requests of relevant entities in order to minimize the negative effects of the project on the natural environment, biodiversity and community health.</p> <p>The People's Committee of the commune where the project is carried out and the</p>	<p>+ Conduct, if applicable, EIA consultation as per GOV regulation taken into account the WB requirements regarding the ESMF, RPF, EMPF, ESCP, SEP, and LMP during consultation.</p>

	<p>relevant project documents in a timely manner prior to consultation in a form and language that are understandable and accessible to the group being consulted.</p> <p>Minutes of the public meetings are included in the reports.</p>	<p>organizations under direct impact of the project shall be consulted. The project owner shall send EIA reports to the People's Committee of the commune where the project is carried out and organizations under the direct impact of the project together with the written requests for opinions. Within 15 working days, from the date on which the EIA reports are received, the People's Committee of the commune and organizations under the direct impact of the project shall send their responses if they do not approve the project.</p> <p>The consultation with the community under the direct impact of the project shall be carried out in the form of community meeting co-chaired by project owner and the People's Committee of the commune where the project is carried out together with the participation of representatives of Vietnamese Fatherland Front of communes, socio-political organizations, socio-professional organizations, neighborhoods, villages convened by the People's Committee of the commune. All opinions of delegates attending the meeting must be sufficiently and honestly stated in the meeting minutes.</p>	<p>The results from consultation will be incorporated into the ESMF or can be submitted as a standalone report.</p> <p>+ If consultation with ethnic minority is required, consultation with WB specialist will be made to ensure that the consultation is adequate.</p>
Disclosure	The WB will disclose documentation relating to the E&S risks and impacts of high risks and substantial risks projects	After an EIA report is approved, the project owner shall formulate, approve and	+Follow GoV requirements and

	<p>prior to project appraisal. Once the WB officially receives the report, it will make the EA report in English available to the public through the Bank's external website.</p>	<p>publicly display its EMP at the office of the commune-level People's Committee of the locality in which consultation of the community is made for people's information, examination and oversight. (Article 16, Decree 18/2015).</p>	<p>WB requirements, if applicable.</p> <p>All ESMF, RPF, EMPF, ESMPs, ARAPs, EMDP, ESCP, SEP, and LMP, if any, will be publically disclosed</p>
<p>Independent Expert</p>	<p>For high risk and complex project, the Borrower may be required to retain independent ESA experts not affiliated with the project to carry out ESA.</p> <p>For high risk projects, especially those related to dam safety, the Borrower should also engage an advisory panel of independent, internationally recognized environmental specialists to advise on aspects of the project relevant to ESA.</p> <p>Experts/consulting firm will be selected through bid process under strict observation of the WB.</p>	<p>Not regulated in Vietnam policies.</p> <p>Project owner shall make, or hire an institution meeting the conditions provided in Clause 1, Article 13 (Decree 18/2015) to prepare an EIA report. Project owner or consulting service provider must fully meet the following conditions: (i) Having staff members in charge of EIA must obtain at least Bachelor's degrees and Certificate in EIA consultancy; (ii) Having specialist staff members related to the project obtaining at least Bachelor's degrees; (iii) Having physical-technical foundations and special-use devices for measuring, taking, processing, and analyzing environmental samples, which meet technical requirements. In case of unavailability of qualified special-use devices, having a contract to hire a capable institution.</p>	<p>+Risk of the proposed Project is low to moderate and dam safety will not be involve. The Project will not require any independent experts.</p>
<p>Clearance procedure</p>	<p>Review responsibility is internal to the WB. If the ESA report is satisfactory, the WB will issue its clearance memo. If the ESA report needs to be improved the WB will issue a</p>	<p>The Ministry of Natural Resources and Environment shall assess and approve the EIA reports on projects prescribed in</p>	<p>+ GoV's approval of the EIA, IEE, or EP</p>

	conditional clearance with the understanding that the Borrower will revise the EA to satisfy the WB for the final clearance.	<p>Appendix III of this Decree, except for projects subject to national defense and security secrets.</p> <p>Ministries, ministerial agencies shall assess and approve the EIA reports on projects under their competence in approval for investment, except for projects in Appendix III of this Decree;</p> <p>The People's Committee of the province shall assess and approve EIA reports on projects in the province, except for projects prescribed above.</p> <p>The appraisal will take place no later than working 45 days at MONRE level and 30 working days at DONRE level and 5 working days at district level for after receipt of a full eligible EIA or EPP.</p>	<p>will be required, if applicable.</p> <p>+ WB's review and clearance of the ESMF, ESMP, RPF, ARAPs, EMPF, EMDP, ESCP, SEP, and LMP, if any, will be required before implementation of the Project.</p>
Number and ,language of ESIA required for appraisal	<p>Number of copies not specified.</p> <p>Language requirement: English for Vietnam</p> <p>No requirement for feasibility survey: the WB does not advance discussions on any investments without the preparation by the Borrower of the minimum required technical studies that prove the investments are feasible from socio-economical and technical point of view.</p>	The project owner has to submit at least seven copies of EIA report (depend on the number of appraisal council members) and one copy of the Feasibility Study or the Economic-Technical argument for the proposed project.	+Follow the GoV requirements and WB requirements, as applicable
Content of ESIA report	<p>According to the ESS1</p> <p>Due attention will be given address labor and working conditions as well as community health and safety</p>	EA report should be in line with Circular 27/2015/TT-BTNMT	+ Prepare 2 documents: one follow GOV requirement and one follows WB

			requirement, as applicable.
ESA supervision	During project implementation, the WB supervises the project's environmental aspects on the basis of the environmental provisions and the Borrower's reporting arrangement agreed in the loan agreement and described in the other project documentation, to determine whether the Borrower's compliance with environmental covenant (primarily with EMP) is satisfactory. If compliance is not satisfactory, the WB will discuss with the Borrower action necessary to comply.	<p>The local DONRE is entrusted to supervise the environmental compliance of the project.</p> <p>By the end of project construction stage, the Environmental Management Agencies will coordinate with Construction Management Agencies to supervise the compliance of environmental management activities stated in EIA study.</p>	+ Follow the ESCP and the approved ESMF/ESMP, RPF/ARAP, EMDF/EMDP, SEP, LMP of the Project

IV. POTENTIAL ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

4.1 Potential positive environmental and social impacts

The proposed project will contribute to livelihood-and income-generating activities through the livelihoods activities for older people, of whom the majority are women that are organized by the ISHCs. It also broadens the economic participation of ethnic minorities, women and vulnerable groups, and improve access to quality public and private health services and reduce malnutrition and, within this, focuses especially on access to primary (commune- level) health care services. Under the proposed project, one activity of the ISHCs is to help to ensure that older people receive regular basic health check-ups (including preventive screening) from their local commune health stations. The proposed project is also to improve integration and efficiency of social assistance, pension, and health insurance systems. In this area, the proposed project contributes especially to the social assistance dimension, with the ISHCs helping to arrange for in-kind support to help older people with ADLs, and also helps to ensure that older persons can access the entitlements (including pensions and health insurance) for which they are eligible. Taken together, the project's investments in preventing the deteriorating of the human capital of older people will contribute to the World Bank's overarching goals of reducing poverty and promoting shared prosperity.

The proposed project also brings about an opportunity for beneficiaries in the GIIP approach in agricultural production that would help improve the quality of agricultural products and reduce environmental pollution and human health risks in agricultural production, as well as raise their knowledge of environmental protection in agricultural production towards sustainable development goal.

4.2 Potential adverse environmental and social risks and impacts associated with livelihoods

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

promotion program can raise a concern about the safety of older people. Social care activities themselves do not have adverse environmental impacts.

Since the scale of livelihood activities to be financed under the project is very small and these activities will take place on home gardens, adverse impacts are considered small, localized and manageable through application of GIP, the GoV's regulations on environmental and human health protection and hands-on training for workers of elderly people. Adverse impacts are direct impacts, and no indirect and cumulative impacts are envisaged to be generated by the project implementation. However, given that all livelihood activities will be implemented by old persons in addition to the low to medium probability of adverse effects on the human health and environment, and the unfamiliarity of the client with the application of Bank's ESF and relevant Environmental and Social Standards, the environmental and social risk is classified as Moderate.

The following sections will analyze and assess potential adverse environmental and social risks and impacts associated with livelihood activities under Component 2.

4.2.1 Livestock and Poultry Raising Livelihoods: The activity is envisaged to cause potential environmental pollution and human health risk due to exposure to animal waste, pathogens, and chemicals such as pesticides. Farmers are easily infected by pathogens if they are not aware and equipped with health protection measures and disease prevention approach. In case of absence of good management practices, the animal waste and pesticides will cause pollution to air, soil and water, and human health impacts.

Livestock and poultry production operations generate significant quantities of animal waste, mainly in the form of un-metabolized nutrients excreted as manure. A mature pig, for example excretes on average 67 percent of the protein in feed via its urine and feces. Manure contains nitrogen, phosphorus, and other excreted substances which may result in air emissions of ammonia and other gases and may pose a potential risk of contamination to surface or groundwater resources through leaching and runoff. Manure also contains disease-causing agents such as bacteria, pathogens, viruses, parasites, and prions which may also potentially affect soil, water, and plant resources (for human, livestock, or wildlife consumption). Most of the animal waste is generated at housing, feeding, and watering locations. Animal wastes can be either liquid, slurry, or solid, depending on the solids content. Animal waste management systems involve the collection, transport, storage, treatment, and utilization (rather than disposal) of the waste to reduce such adverse impacts.

Livestock and poultry operations most commonly generate non-point source effluents due to runoff from feed (including silage) storage, loading, and unloading, livestock housing, feeding, and watering, waste management facilities, and areas of land application of manure. Depending on the type and intensity of the operation, as well as the nature of storm-water management features, some facilities may also include point sources which typically require collection and treatment prior to final discharge. In either case, effluents have the potential to contaminate surface water and groundwater with nutrients, ammonia, sediment, pesticides, pathogens and feed additives, such as heavy metals, hormones, and antibiotics. Effluents from livestock operations typically have a high content of organic material and consequently a high biochemical oxygen demand (BOD) and chemical oxygen demand (COD), as well as nutrients and suspended solids (TSS).

Pesticides may be applied directly to livestock and poultry or to structures (e.g. barns and housing units) and to control pests (e.g. parasites and vectors) using dipping vats, sprayers,

and foggers. Pesticides can also be used to control predators. The potential pollutants from pesticides include the active and inert ingredients, diluents, and persistent degradation products. Pesticides and their degradation products may enter groundwater and surface water in solution, in emulsion, or bound to soil particles. Pesticides may, in some instances, impair the uses of surface waters and groundwater. Some pesticides are suspected or known to cause chronic or acute health hazards for humans as well as adverse ecological impacts.

The most potential ecological impacts resulting from livestock and poultry production are associated with water and air emissions, as discussed above. In addition, livestock with access to creeks, rivers, and other natural water sources may cause environmental damage by contaminating the water with animal waste, destroying riparian habitat, and eroding the stream banks. In addition overgrazing may contribute to soil losses because of severe erosion, and a reduction in soil productivity caused by alteration of the vegetation composition and associated organisms in rangelands.

Animal disease-causing agents can spread rapidly, especially in intensive livestock operations. Animal diseases can enter a facility with new animals, on equipment, and on people. Some diseases can weaken or kill large numbers of animals at an infected facility. In some cases, the only remedy available to an operation is to sacrifice an entire group of animals to prevent the spread of the disease to other parts of the facility or to other facilities. The procedures to protect against the spread of animal diseases will depend on the type of animal at a facility, the way the diseases of concern spread to and infect animals, and the vulnerability of the animals to each specific disease. Animal waste is another common way in which zoonotic diseases are spread. Pathogens in animal waste can contaminate food or water, or enter the body directly through inhalation, skin lesions, and other routes vulnerable to pathogen entry.

Although animal welfare is an issue in the large-scale commercial farming, including breeding, rearing, housing, transporting, and slaughter of animals for meat or other animal products such as milk, eggs, wool, this issue is taken into account during project preparation and implementation regardless of small scale of livestock raising livelihood under the project. Welfare risks can be associated with limitations on space in individual stalls restricting the movement of animals, high stocking densities in groups increasing the potential for disease transmission and injurious contact with others, barren/unchanging environments leading to behavioral problems, feeding diets that do not satisfy hunger, injurious husbandry procedures that cause pain, and breeding for production traits that heighten anatomical or metabolic disorders. The project will employ GIIP to address these risks plus the small scale of animal breeding, so animal welfare risks are considered low.

In summary, main environmental and social risks and impacts relating to the animal breeding activities are of environmental pollution by animal waste, and human health problem due to exposure to pathogens from animal waste, animal diseases especially avian flu and African swine fever (ASF) viruses, and pesticides. These adverse risks and impacts are manageable through application of GIIP and the GoV's regulations on environmental and human health protection, and training for workers. Given the small scale of livelihood activity, and these activities are at household level and will take place on home garden, adverse impacts are considered small. However, these activities are implemented by elderly people, so environmental and social risk is considered *Moderate*.

4.2.2 Vegetables, Crops and Fruits Livelihoods: The activity is envisaged to cause potential environmental pollution and health risks due to potential use of chemical fertilizers and pesticides. Use of chemical fertilizers and pesticides will likely cause soil and water pollution.

Nitrogen and phosphorus become pollutants when they are applied in excess to agricultural soils in the form of fertilizers. These nutrients are able to leach into the groundwater or be transported to surface water bodies by runoff, causing eutrophication or leading to high nitrate concentrations and related environmental and human health problems. While nutrients are essential to crop production, when they are applied in excess they can have negative effects on yields. Nitrogen increases chlorophyll production, and energy for flower growth and root elongation is redirected to foliage proliferation, causing disorders in plants and making them more vulnerable to pathogen attacks. It can also affect crop nutrient balance. Nitrogen pollution influences soil organic matter decomposition, as it affects microbial community composition and activities as well as soil acidity and salinity. Some pesticides are also associated with heavy metal contamination of soils. The recent report by the Intergovernmental Technical Panel on Soils (ITPS) on the impact of plant protection products on soil functions and ecosystem services highlighted the severe impact of copper-based fungicides on earthworms and microbial biomass. These fungicides are widely used in organic viticulture to control vine fungal diseases. Pesticide persistence, behaviour and mobility are also extremely varied as are the mechanisms involved in their degradation and retention in soils: sorption– desorption, volatilization, chemical and biological degradation, uptake by plants and leaching.

Farmers apply nutrients on their fields in the form of chemical fertilizers and animal manure, which provide crops with the nitrogen and phosphorus necessary to grow and produce the food we eat. However, when nitrogen and phosphorus are not fully utilized by the growing plants, they can be lost from the farm fields and negatively impact air and downstream water quality. This excess nitrogen and phosphorus can be washed from farm fields and into waterways during rain events and when snow melts, and can also leach through the soil and into groundwater over time. High levels of nitrogen and phosphorus can cause eutrophication of water bodies. Eutrophication can lead to hypoxia (“dead zones”), causing fish kills and a decrease in aquatic life. Excess nutrients can cause harmful algal blooms (HABs) in freshwater systems, which not only disrupt wildlife but can also produce toxins harmful to humans.

Farmworkers suffer serious short- and long-term health risks from pesticide exposure. Short-term (acute) effects may include stinging eyes, rashes, blisters, blindness, nausea, dizziness, headaches, coma, and even death. Some long-term health impacts are delayed or not immediately apparent such as, infertility, birth defects, endocrine disruption, neurological disorders, and cancer. Farmworkers are usually unaware of the pesticides to which they are exposed, the health effects of such exposure, or the laws meant to protect them from exposure. They are ill equipped to take the necessary precautions to guard against associated risks. Even physicians can experience difficulty determining whether flu-like symptoms resulted from acute pesticide exposure. Workers often do not know the nature of their illness and are motivated to keep working to support their families. Farmworkers are exposed to pesticides in a variety of ways – direct spray, spray that drifts from its target, contact with pesticide residues on the crop or soil, spills, splashes, or defective, missing or inadequate protective equipment. Farmworkers’ children and other family members are often indirectly exposed to pesticides through residue on workers or through pesticide drift. Pesticide handlers – the workers who mix, load, and apply pesticides— are at especially high risk of coming into direct contact with pesticides.

Physical and chemical degradation of soils may result from unsuitable management techniques, such as use of inappropriate machinery or earthworks associated with plantation preparation and infrastructure development. Chemical degradation of soil may

result from insufficient or inappropriate use of mineral fertilizers, failure to recycle nutrients contained in crop residues, and failure to correct changes in soil pH that result from long-term use of nitrogen fertilizers and excessive use of poor-quality water, resulting in salinization. Soil erosion may result from poor crop canopy closure after land preparation and lack of soil conservation structures on sloping land planted with perennial crops.

Crop production has the potential to have a direct and indirect impact on biodiversity and ecosystems. Key direct impacts relate to habitat conversion or degradation, water usage, pollution, introduction of invasive species, inappropriate cultivation techniques, and quality and or availability of priority ecosystem services. Indirect impacts relate to in-migration, and induced changes to access for traditional land uses (including hunting, fishing, and recreation).

Overall, main adverse risks and impacts are of environmental pollution and human health risks due to exposure to chemicals, especially pesticides. Since the scale of the livelihood activity is very small, the adverse impacts are considered direct, localized, small and manageable through application of GIIP, the GoV's regulations on environmental and human health protection, and training for workers. Indirect and cumulative impacts are not expected to be involved in the project. However, the livelihood activity is implemented by old persons, so environmental and social risk is considered *Moderate*.

4.2.3 Aquaculture: Aquaculture activities, particularly pond-based systems, may affect aquatic systems due to construction and operation activities, primarily the mobilization of soils and sediments during construction and through the release of effluents during operation. Earth excavation and moving activities conducted during construction of some types of aquaculture projects may result in soil erosion and the subsequent sedimentation of nearby water bodies. Sedimentation of aquatic resources may contribute to eutrophication and overall degradation of water quality. The effluent released from aquaculture systems typically contains a high organic and nutrient load, suspended solids, and may also contain chemical residues including feed supplements and antibiotics. The possible impacts include contamination of groundwater and surface water from release of effluents or communication to receiving water from unconfined process and storage tanks (such as ponds and lagoons). Impacts on aquatic systems include creation of eutrophic zones within receiving waters, increased fluctuation of dissolved oxygen levels, creation of visible plumes, and accumulation of nutrients within the receiving waters. Pond ecosystems have a limited capacity to recycle organic matter and nutrients, and increasing the stocking rate removes this capacity, resulting in the build-up of organic matter, nitrogenous waste, and phosphorus both in the water mass and on the bottom of the pond or pen / cage. The suspended solids are derived from particulate organic matter and erosion of pond floor, walls, and discharge channels. The chemical residues may include the remains of veterinary drugs (e.g. antibiotics) that may have been applied to the cultivated species, and toxic substances such as formalin and malachite green, a cancer causing agent, that may have been that are used to treat finfish for parasites and their eggs for fungal growth. Malachite green is banned in most countries and must not be used. Formalin should only be used under controlled conditions (e.g. in dipping containers) and with proper care – it should not be introduced directly into production systems.

Given very small scale of activities, impacts are mainly direct impacts and no indirect and cumulative impacts are expected to be generated by the project implementation. Adverse impacts are considered localized, small and manageable through application of GIIP, the GoV's regulations on environmental and human health protection, and training for workers.

However, these livelihood activities will be implemented by elderly people, so environmental and social risk is considered *Moderate*.

4.2.4 Civil works would not involve construction and building of new infrastructure but would focus on rehabilitation of small assets, which are developed by small age-friendly and pro-poor income-generating enterprises. Since the revolving fund by each beneficiary (who borrows ISHC's fund for income generating activity (IGA)) is very small, most of this revolving funding would be used to purchase IGA assets (animal, feeds, plants or seeds) and or tools. In some cases, they might use the revolving fund to improve or build animal husbandry pen, shed, cage or expand or dig deeper fishponds. These activities are envisaged to likely cause some potential environmental and social risks and impacts such as environmental pollution due to generation of waste, child and forced labor risk, and OHS incidents. Given nature and very small scale of civil works, adverse impacts associated with civil works are considered temporary, localized, small and manageable through application of GIIP, the GoV's regulations on environmental and human health protection, and training for workers. Indirect and cumulative impacts are not expected to be generated by the project implementation. Notwithstanding small scale of civil works and small impacts, these activities will be implemented by elderly people so the environmental and social risk is considered *Moderate*.

4.3 Labor Management Procedures

The project will include direct workers, contracted workers and community workers. The direct workers are HelpAge's employees, working specifically for the project. The contracted workers are employees working at Associations of the Elderly (AEs – both national level and provincial level), working specifically for the project. The community workers would include the ISHCs' management board, voluntary health educators, health workers and caregivers who provide health services and basic personal care to the older people. There will be no government project management unit, therefore, there will not be government workers involved in the project. Since the project will involve community workers in different circumstances, including where labor is provided by the community as a contribution to the project, the requirements relating to working conditions and occupational health and safety will apply to this category.

HelpAge has, therefore, prepared the Labor Management Procedures (LMP) which sets out the way in which project workers (including community workers) will be managed in accordance with the requirements of the national laws and ESS2. This includes terms and working conditions and occupational health and safety (for community workers), as well as non-discrimination and equal opportunity. The LMP includes measures to ensure that community labor is provided on a voluntary basis, has established work hours, paid as agreed and in a timely manner, and also to ensure that the occupational health and safety of the community workers, especially women and ethnic minority people, are given adequate attention. Measures relating to Occupational Health and Safety (OHS) are for protecting workers from injuries, illness or impacts associated with exposure to hazards encountered at the work place or while working. Such OHS measures include provision of PPE, awareness raising and guidance on how to prevent accidents at the workplace. The LMP assesses whether there is risk of child labor within the community labor and identifies and manages those risks by taking appropriate steps to remedy the situation in a manner consistent with ESS2. The LMP also has the details of the GRM for direct workers and contracted workers to raise their concerns. The LMP specifies the way in which community workers can raise

grievances in relation to the project (project-level GRM or other possible grievance mechanisms). The LMP also takes into consideration that proper training is provided to community workers, tailored to needs and potential risks and impacts of the project. More details can be obtained from the full LMP of the project.

4.4 Social Assessment

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

In the context of the Bank's ESS7, is a study that aims to explore how planned project activities under a Bank financed project would affect the life of poor and disadvantaged people in the target communities, such as the poor, OP (older people), women, EM (ethnic minority) and PWD (personal with disability) present in the project areas. The purpose of the SA is to ensure if there is any potential adverse impact as a result of the project, appropriate measures are in place (in advance of project implementation) to avoid, mitigate, minimize such potential adverse impacts for affected population, if unavoidable. The SA also aims to explore, based on the understanding of local cultural, socio-economic characteristics of the target communities, possible development activities that the project can implement (in relation to the project goal/objectives) to ensure the poor, OP, Women, EMs and PWD in the project area receives socio-economic benefits that are culturally appropriate to them.

Relevant information has been collected regarding demographics of target communities, socio-economic status and prioritizing the top twenty highest needs for old and near old in the target provinces were also collected in Hoa Binh, Thanh Hoa and Khanh Hoa Provinces. A total of 167 community representatives (OP, Women, and EM) were consulted. 35.9% of the respondents were from EM groups and of which 72.2% of EM respondents were female EM.

Consultations were carried out from August to November 2019. Apart from community consultations, including those with various EM groups, meetings were held with AE representatives from village, commune, district, provincial and national levels. In Hoa Binh, Khanh Hoa and Ninh Thuan, the consultations also conducted for representatives from related sectors such as DOLISA (Department of Labor, Invalid and Social Affairs) and DOH (Department of Health) at provincial level. The SA reviews have confirmed a general interest amongst the stakeholders in the objectives of the project. The SA also identified a potential

risk that the poor and remote areas could be excluded from project activities and benefits. To address this, the project would undertake targeted activities to reach out and ensure participation of/consultation with poorer communities, women, Older People, PWD, EM communities and other vulnerable groups to ensure that they will be well-informed and can have access to the project benefits.

Main findings of the SA. The SA was conducted between August to November 2019 January in Hoa Binh, Thanh Hoa and Khanh Hoa Provinces to understand types of social, economic, health and care needs, prioritizing those needs and find any gaps between the Kinh and EM groups, Male and Female groups and between Female Kinh and Female EM groups.

Generally, the project will bring positive benefits in social, economic, health and care benefit to the local people in the project sites, especially poor and disadvantaged people in the 180 target communities. The SA demonstrates the broad support to the project benefits from various stakeholders and communities, including those from the EM and Kinh groups and Male and Female groups, young and older groups. Respondents value the important role of ISHC (Intergenerational Self-help Clubs) in having very wide range of community-led interventions that would meet the needs of their communities, especially older people and people with disability, such as on social and cultural, income security, health living, health, care, right and entitlement, resource mobilization and life-long learning. As ISHC is the community led organization, all the activities will be designed by the local people responding to their needs and relevant to their local context. What the respondents like most is these multi-functional ISHCs are in their own villages, very near to their house so there is no distance problem. Also, all the ISHC activities are designed by the club management board members, most of whom are senior older people in the community, in agreement with the club members, so they find it is easy for them to participate in, as the board members will use their own local language, they understand the local customs and practices and therefore there are no barriers.

They said that they have strong confidence that if the project is implemented in their provinces that the people and authorities would warmly welcome and support project initiatives. In addition, they also confirmed that they are ready to contribute at least 15,000,000 VND (equivalent to more than 600 USD) per each community, totally about 100,000 USD co-funding requirement (of all 180 ISHCs) of the ISHC self managed revolving loan fund.

The EM respondents also said that if the ISHCs can link/partner with commune health stations to provide health check up and provide self care awareness and basic health screening for them in their village it would be very good. Though there is medical doctor in the commune health center, but in many cases the center is very far from their house (6 km for example in the village that the team consulted), thus it is very difficult for them, especially older people, to travel there for regular basic health screening or consultation, in the context that most of them do not travel by motorbike and depends on their children to take them there. Thus, if the club management boards members can be trained on how to measure blood pressure or monitor weight, as well as simple health and care topics to provide this knowledge back to the people than it would be great. Or if the ISHC can use the retired doctors or village health volunteers or any one having health background to be in the CMB (Club Management Boards) to be in charge of club health and care activities, then the people will be benefited greatly. The respondents also want to have basic vital signs (blood pressure, weight) monitored regularly by the ISHCs and commune health center, based on the results they want to receive medication and advice including appropriate diet from

health professional. Experience from existing ISHCs in EM areas show that the CMB, being trained, can do basic health monitoring properly, and can refer the cases of abnormal results to the CHS for further examination. In addition, they want to have periodical health check organized jointly by ISHCs and CHS (Commune Health Station), as this would reduce their waiting time, (as the club will be in charge of inviting the members to come and do all the arrangement while the CHS will be in charge of professional part including the check up and consultation). However, they expressed that as there is only one medical doctor in the CHS, it is a need to invite doctor from district and/or provincial level to come and support to reduce the waiting time more, and ensure the quality. The leader from Hoa Binh Health Department shared that to organize the health check up for older people, they need as least 5 people, so only CHS alone can not manage. To invite people from district or provincial level to come, there should be budget to cover some of their travel and equipment cost. Also these joint activities should be discussed between local AE (Association for the Elderly) and health sector to be put in the annual plan of the health department.

In term of social care, there is almost no thing provided in the community for home bound and bed bound older people, except some voluntary, irregular and unorganized home care services, as the practice in the good neighborhood. Very common that in each of EM villages, there are about 4-5 home bound and bed bound older people, most of them are older women. Most of the care will be provided by their family members who lack of care knowledge and skills. The situation is more difficult when the older people live alone.

In term of income, many correspondents reported they have the need to borrow small loans from ISHCs. While asking why they have not accessed to the government loan provided by the bank/mass organization like Women's Union or Farmers' Union, the common response is that these channels have either complicated paper works (for older people), or too big amount (older people just want to borrow some hundreds USD to invest in simple planting and husbandry), and many reported that they are hard to access to the loans due to ageism. In some cases, older women are not confident to borrow due to their low self esteem and/or lack of age friendly income generating activities. Also, they wish to receive knowledge and skills about the age friendly techniques how to improve their income generating activities.

To address the above, the project will have component 1 on ISHC establishment and capacity building, health and social care and component 2 on livelihood to enable the ISHCs to provide community based health and social care services as well as small loans for their members in need. For more details about how the project address the needs of the target groups, especially EM people, please refer to the full report of the Social Assessment and the EMPF.

4.5 Mitigation Measures

Mitigation measures have been developed in line with WBG EHS Guidelines and the GoV's regulations, and are in a manner proportionate to the risks and impacts and scale of activities supported by the project. Given small scale and simplicity of livelihood activities, and low or moderate environmental and social risks and impacts, an Environmental and Social Impact Assessment (ESIA) or Environmental and Social Management Plan (ESMP) is not expected to be prepared to manage environmental and social risks and impacts. Instead, mitigation measures are developed in the form of an Environmental Codes of Practice (ECOP). The following ECOPs have been prepared for each type of livelihood activity and will be further adjusted as necessary so that it is more corresponding to specific environmental and social risks and impacts associated with a livelihood activity identified during project implementation.

Table 4.1: Environmental Codes of Practice for Livestock and Poultry Raising Livelihood

No.	Environmental and Social Issues	Suggested Mitigation Measures	Applicable Regulations and Guidelines
1.	Waste feed	<p>Protect feed from exposure to rain and wind during processing, storage, transport and feeding</p> <p>Maintain feed storage , transport and feeding systems in good working condition</p> <p>Maintain records of livestock feed use</p> <p>Consider mixing of waste feed with other recyclable materials destined for use as fertilizer; and</p> <p>For waste feed which cannot be recycled due to potential biosecurity issues, alternative disposal methods should be secured in consultation with local health authorities</p>	<p>Law on Environmental Protection 2014</p> <p>Law on Breeding 2018</p> <p>WBG EHS Guidelines</p>
2.	Animal waste	<p>Ensure production and manure storage facilities are constructed to prevent manure contamination of surface water and ground water (e.g. use of concrete floors, use of roof gutters on buildings to collect and divert clean storm water, and covering manure storage areas with a fixed roof or plastic sheeting)</p> <p>Keep waste as dry as possible by scraping wastes instead of or in addition to flushing with water to remove waste, minimize amount of water used during cleaning (for example, by using high-pressure, low-flow nozzles)</p> <p>Further reduce the moisture content of dry poultry excreta (e.g. by blowing dry air over it or by conveying ventilation air through the manure pits)</p> <p>Minimize the surface area of manure in storage</p> <p>Locate manure piles away from water bodies, floodplains, wellheads or other sensitive habitats</p>	<p>Law on Environmental Protection 2014</p> <p>Law on Breeding 2018</p> <p>WBG EHS Guidelines</p>

		<p>Place dry manure or litter in a covered or roofed area</p> <p>Manure storage facilities should have sufficient capacity for 9–12 months of manure production to so that manure can be applied to agricultural land at appropriate times</p> <p>Remove liquids and sludge from lagoons as necessary to prevent overtopping</p> <p>Apply biogas facilities and composting to treatment of waste where appropriate</p>	
3.	Carcasses	<p>Reduce mortalities through proper animal care and disease prevention</p> <p>Collect carcasses on a regular basis to prevent putrefaction</p> <p>Compost only disease-free carcasses and ensure that the composting process is managed to prevent leachate and odors (e.g. sufficient cover material, proper temperature and moisture content)</p> <p>Use reliable commercially available options approved by local authorities that dispose of carcasses by rendering or incineration, depending on the cause of fatality. Incineration should only be conducted in permitted facilities operating under international recognized standards for pollution prevention and control</p> <p>Where no authorized collection of carcasses is available, on-site burial may be one of the only viable alternatives, if allowed by the authorities. Whether on-site or off-site, the burial area should be accessible to earthmoving machinery and be designed and located so as to avoid contamination by vapors or leachate from buried, decaying carcasses; Open burning should be avoided.</p>	<p>Law on Environmental Protection 2014</p> <p>Law on Breeding 2018</p> <p>WBG EHS Guidelines</p>
4.	Ammonia and Odor	<p>Consider the siting of new facilities taking into account distances to neighbors and the propagation of odors</p> <p>Control the temperature, humidity, and other environmental factors of manure storage to reduce emissions</p> <p>Consider composting of manure to reduce odor emissions</p>	<p>Law on Environmental Protection 2014</p> <p>Law on Breeding 2018</p> <p>WBG EHS Guidelines</p>

		<p>Reduce emissions and odors during land application activities by applying a few centimeters below the soil surface and by selecting favorable weather conditions (e.g. wind blowing away from inhabited areas)</p> <p>If necessary, apply chemicals (e.g. urinase inhibitors) weekly to reduce conversion of nitrogen to ammonia</p>	
5.	Use of pesticides	<p>Train personnel to apply pesticides according to planned procedures, while using the necessary protective clothing. Where feasible or required, pesticide application personnel should be certified for this purpose</p> <p>Review the manufacturer's instructions on the maximum recommended dosage and treatment, as well as published experiences on the reduced rate of pesticide applications without loss of effect, and apply the minimum effective dose</p> <p>Avoid the use of pesticides that fall under the World Health Organization Recommended Classification of Pesticides by Hazard Classes 1a and 1b</p> <p>Avoid the use of pesticides that fall under the World Health Organization Recommended Classification of Pesticides by Hazard Class II if the project host country lacks restrictions on distribution and use of these chemicals, or if they are likely to be accessible to personnel without proper training, equipment, and facilities to handle, store, apply, and dispose of these products properly</p> <p>Avoid the use of pesticides listed in annexes A and B of the Stockholm Convention, except under the conditions noted in the convention</p> <p>Use only pesticides that are manufactured under license and registered and approved by the appropriate authority and in accordance with the GoV's regulations on pesticides use</p> <p>Use only pesticides that are labeled in accordance with international standards and norms, and the GoV's regulations</p> <p>Select application technologies and practices designed to reduce unintentional</p>	<p>Law on Environmental Protection 2014</p> <p>Law on Breeding 2018</p> <p>Law on Plant Protection and Quarantine 2013</p> <p>WBG EHS Guidelines</p>

		<p>drift or runoff, only as indicated in an IPM program, and under controlled conditions</p> <p>Maintain and calibrate pesticide application equipment in accordance with the manufacturer’s recommendations</p> <p>Store pesticides in their original packaging, and in a dedicated location that can be locked and properly identified with signs, with access limited to authorized persons. No human or animal food should be stored in this location</p> <p>Mixing and transfer of pesticides should be undertaken by trained personnel in ventilated and well lit areas, using containers designed and dedicated for this purpose</p> <p>Used pesticide containers should not be used for any other purpose (e.g. drinking water) and should be managed as a hazardous waste. Disposal of containers contaminated with pesticides also should be done in a manner consistent with the current GoV’s regulations on waste management</p> <p>Purchase and store no more pesticide than needed and rotate stock using a “first-in, first-out” principle so that pesticides do not become obsolete. Additionally, the use of obsolete pesticides should be avoided under all circumstances</p> <p>Maintain records of pesticide use and effectiveness</p>	
6.	Animal Disease	<p>The husbandry area is far away from houses and fences are separated from other areas</p> <p>Minimize strangers entering and leaving the breeding area; in front of the breeding area gate and in each row of stables there must be disinfecting pits; must regularly, periodic detoxification, disinfecting tools and breeding areas</p> <p>Livestock waste must be collected and treated by appropriate measures</p> <p>Caring, nurturing and managing animals well by providing adequate quality food, clean water for pets; cages ensure proper specifications, reasonable rearing</p>	<p>Law on Environmental Protection 2014</p> <p>Law on Veterinary 2015</p> <p>Law on Breeding 2018</p> <p>WBG EHS Guidelines</p>

		<p>densities and animals are vaccinated periodically, fully deworming</p> <p>The breeding area is strictly controlled. Must know the background, origin, disease status of newly imported animals; Before importing animals, they must be kept in isolation according to regulations. Control feed, supplies and tools brought into the farm; Control not to leave wild birds, rodents, dogs, cats and strangers in and out of the breeding area</p> <p>To prevent avian flu, strengthening the resistance of the animals by adding nutrients in the food, and keeping poultry house warm by using a heat lamp, covering the windows with canvas. Do not graze poultry in wet and drizzly days. In addition, to fully vaccinate chickens at age. Disinfect cages and pens.</p> <p>To prevent and control Africa swine fever (ASF), the following measures should be taken into account:</p> <ul style="list-style-type: none"> • Well implementing biosafety measures, disinfecting and destroying pathogens to ensure the maintenance of breeding pigs to re-breed when epidemic is controlled. At the same time, propagandizing the farmers to re-herd and organize animal husbandry towards organic and biosafety • Building moderate-scale raising models • Applying high technologies • Building up standard pens • Using bio-cushions • Vaccinating when appropriate • Ensuring the conditions for temperature, light, and environmental sanitation • Strictly following the technical procedures <p>Control farm animals, equipment, personnel, and wild or domestic animals</p>	
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		<p>entering the facility (e.g. quarantine periods for new animals, washing and disinfecting crates, disinfection and coverage of shoes before entry into bird housing zones, providing protective clothing to personnel, and closing holes in buildings to keep out wild animals)</p> <p>Prevent the interaction of wild birds with feed, as this interaction could be a factor in the spread of avian influenza from sparrows, crows, etc.</p> <p>Vehicles that go from farm to farm (e.g. transport of veterinarians, farm suppliers, buyers, etc.) should be subject to special precautions such as limiting their operation to special areas with biosecurity measures, spraying of tires and treating parking areas with disinfectants</p> <p>Sanitize animal housing areas</p> <p>Identify and segregate sick animal and develop management procedures for adequate removal and disposal of dead animal.</p> <p>Where possible establish all in- all out systems with only one age group per farm</p> <p>Workers on multiple age animal farms should always work with the youngest animal first before moving on to the older animal;</p> <p>Train workers in the application of animal health products</p>	
7.	Occupational Health and Safety	<p>General requirements for Elderly Workers</p> <p>Worker’s health should be regularly checked at least twice a year to make sure that they are in a good health condition for working</p> <p>Do not employ elderly employees to do heavy, hazardous and dangerous jobs that adversely affect the health of elderly workers, except for special cases prescribed by the Government</p> <p>Shorten daily working hours</p> <p>Apply part-time work regime</p>	<p>Law on Environmental Protection 2014</p> <p>Law on Labour 2019</p> <p>Law on Labor Safety and Hygiene 2015</p> <p>Law on People Health Protection 1989</p> <p>WBG EHS Guidelines</p>

		<p>Get interested health care at workplace</p> <p>Exposure to Physical Hazards</p> <p>Prevention of falls into openings for water supply systems, underground manure storage tanks, and other confined spaces through installation of covers, fences, and other fall prevention methods</p> <p>Training on correct animal handling techniques and provision of appropriate personal protective equipment (PPE), such as gloves and aprons, to prevent scratches</p> <p>Confined Spaces</p> <p>Entry to all confined spaces should be restricted and should be subject to permitted supervision by properly trained persons</p> <p>Chemical Hazards</p> <p>Potentially hazardous substances used in livestock and poultry production activities may include pesticides, disinfecting agents, minerals, antibiotic and hormonal products. Potential exposures to pesticides should be managed according to the recommendations provided above.</p> <p>Train personnel to apply pesticides and ensure that personnel have received the necessary certifications, or equivalent training where such certifications are not required</p> <p>Respect post-treatment intervals to avoid operator exposure during reentry to crops with residues of pesticides</p> <p>Respect preharvest intervals to avoid operator exposure to pesticide residues on products during harvesting</p> <p>Ensure hygiene practices are followed to avoid exposure of family members to pesticides residues</p>	
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		<p>Exposure to Biological Agents</p> <p>Inform workers of potential risks of exposure to biological agents and provide training in recognizing and mitigating those risks</p> <p>Provide personal protective equipment to minimize all forms of exposure to materials potentially containing pathogens</p> <p>Ensure that those that have developed allergic reactions to biological agents are not working with these substances</p>	
8.	Community Health and Safety	<p>Community health and safety hazards specific to livestock and poultry operations include the potential spread of animal diseases already addressed above as well as the following food safety issues</p> <p>Food Safety Impacts and Management</p> <p>Facilities involved in livestock and poultry production should use a veterinary service on an annual or more frequent basis to review and assess the health of the stock and employees' competence and training. With the assistance of the veterinary service, facilities should develop a veterinary health plan to include the following aspects:</p> <ul style="list-style-type: none"> + Summary of major diseases present and potentially present + Disease prevention strategies + Treatments to be administered for regularly encountered conditions + Recommended vaccination protocols + Recommended parasite controls + Medication recommendations for feed or water <p>If antibiotics are recommended, the following measures should be considered:</p>	<p>Law on Environmental Protection 2014</p> <p>Law on Labour 2019</p> <p>Law on Labor Safety and Hygiene 2015</p> <p>Law on People Health Protection 1989</p> <p>WBG EHS Guidelines</p>

		<ul style="list-style-type: none"> + Apply only approved antibiotics in strict accordance with the manufacturer’s instructions to ensure responsible and correct use + Apply approved antibiotics that are purchased and utilized on prescription and under the guidance of a qualified professional even where no prescription is required + Prepare a contingency plan that specifies how antibiotics should be applied following the identification of disease outbreaks + Store antibiotics in their original packaging, in a dedicated location that (i) Can be locked and is properly identified with signs, with access limited to authorized persons, (ii) Can contain spills and avoid uncontrolled release of antibiotics into the surrounding environment, (iii) Provides for storage of containers on pallets or other platforms to facilitate the visual detection of leaks, and (iv) Avoid stockpiles of waste antibiotics by adopting a “first-in, first-out” principle so that they do not exceed their expiration date. Any expired antibiotics should be disposed of in compliance with national regulations 	
9.	Animal welfare ⁵	<p>Apply good management practices as much as possible which are shown in the Good practice note on Improving Animal Welfare in Livestock Operations. The following recommendations should be taken into account:</p> <ul style="list-style-type: none"> • increasing the space allowance for each animal (e.g., individual to group housing, decreasing group stocking density) • providing environmental enrichment (e.g., straw for pigs to manipulate, 	<p>IFC Good Practice Note on Improving Animal Welfare in Livestock Operations Law on Breeding 2018</p>

⁵ Animal welfare means how an animal is coping with the conditions in which it lives. An animal is in a good state of welfare if it is healthy, comfortable, well nourished, safe, able to express innate behaviour, and if it is not suffering from unpleasant states such as pain, fear, and distress. Good animal welfare requires disease prevention and veterinary treatment, appropriate shelter, management and nutrition, humane handling and humane slaughter or killing. Animal welfare refers to the state of the animal; the treatment that an animal receives is covered by other terms such as animal care, animal husbandry, and humane treatment. Per ESS6, the Borrower involved in large-scale commercial farm, including breeding, rearing, housing transport, and slaughter of animals for meat or other animal products (such as milk, eggs, wool) will employ GIIP in animal husbandry techniques, with due consideration for religious and cultural principles.

		<p>nest boxes for hens) to stimulate positive emotional states adding bulk to high energy diets to help satisfy appetite</p> <ul style="list-style-type: none"> • minimizing the pain from invasive husbandry procedures (e.g., avoiding such procedures; using low-pain methods or analgesics) • re-aligning production-orientated genetic selection to include welfare traits (e.g., less aggressive or fearful animals) • increasing the monitoring of individual animals by well-informed stockpersons using direct observation to aid in the early detection and alleviation of health and welfare problems 	
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Table 4.2: Environmental Codes of Practice for Vegetables, Crops and Fruits Livelihoods

No.	Environmental and Social Issues	Suggested Mitigation Measures	Applicable Regulations and Guidelines
1.	Soil conservation and management	<p>Practice reduced and zero tillage (often known as “low till” or “no till”), as well as direct seeding and planting, to minimize damage to soil structure, conserve soil organic matter, and reduce soil erosion. Consider contour and strip planting, terracing, intercropping with trees, and grass barriers in sloping areas</p> <p>Minimize soil compaction, damage, or disturbance by using appropriate land preparation machinery at the right time of year</p> <p>Consider a crop rotation program to maintain the soil coverage during the year</p> <p>Manage soil organic matter by returning crop residues or adding compost and manures whenever available and economically viable</p> <p>Plan soil preparation when weather conditions pose the lowest risk of causing environmental damage</p> <p>Consider erosion management practices (e.g., contour and strip planting, terracing, discontinuous trenching, intercropping with trees, and grass barriers) in</p>	<p>Law on Environmental Protection 2014</p> <p>WBG EHS Guidelines</p>

		<p>sloping areas</p> <p>Draw up mitigation plans for planting or harvest operations that must take place during unsuitable periods</p> <p>Plan and control the flow of water from access roads to avoid erosion from the roads' diverted water. Use flow control weirs and diversion canals to reduce erosion in areas with field drainage</p> <p>Restrict the width of roads to the minimum that will provide the means for efficient and safe transport</p> <p>Cultivate crops that are suited or adapted to the local climate and soil conditions and adopt good agronomic practices to optimize crop productivity</p> <p>Coordinate with district agricultural extension center to collect meteorological data on precipitation, evapotranspiration, temperature, and sunlight, then use this information to inform and guide agronomic management techniques</p> <p>Coordinate with district agricultural extension center to:</p> <ul style="list-style-type: none"> - Use soil maps and soil survey results to determine crop suitability and appropriate soil management practices - Develop and implement a soil monitoring and management plan that includes soil and terrain mapping and erosion risk identification - Conduct regular surveys to monitor soil structure and chemistry in order to identify areas where remedial action is required <p>Recycle and/or incorporate organic materials (e.g., crop residues, compost, and manures) to replenish soil organic matter and improve soil water-holding capacity whenever available and economically viable</p> <p>Minimize the use of pesticides by implementing a pest and disease early-warning system, by using biological pest and disease control methods, and by</p>	
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		<p>implementing control measures before outbreaks require large-scale control</p> <p>Follow good practice irrigation guidance to avoid negative impacts on soil productivity</p>	
2.	Nutrition management	<p>Consider the use of green manures, cover crops, or mulching techniques to maintain soil cover, reduce the loss of nutrients, replenish soil organic matter, and capture and/or conserve moisture</p> <p>Plan a crop rotation program to incorporate nitrogen-fixing legume crop plants and cover crops in the cropping cycle</p> <p>Time the application of crop nutrients to maximize uptake and minimize nutrient runoff or volatilization</p> <p>Ensure that all personnel are trained in and use appropriate management procedures for the storage, handling, and application of all types of fertilizers, including organic wastes</p> <p>Personal Protective Equipment (PPE) should be used</p>	<p>Law on Environmental Protection 2014</p> <p>WBG EHS Guidelines</p>
3.	Crop residue and solid waste management	<p>Recycle residues and other organic materials by leaving the materials on site or through composting (and spreading)</p> <p>Consider the potential for harboring and spreading pests and diseases before implementing this practice</p> <p>Consider using crop residues for other beneficial purposes—such as animal feed, bedding, or thatching—when leaving residues in the field is neither practical nor appropriate</p> <p>In cases where crop residues are in excess of those needed for nutrient management, consider using them as a thermal energy source for agriculture processing or for the generation of heat and/or power.</p> <p>Avoid using harmful residual chemicals at end of crop life when preparing for</p>	<p>Law on Environmental Protection 2014</p> <p>WBG EHS Guidelines</p>

		<p>removal</p> <p>Non-crop wastes or hazardous wastes from the production systems (e.g., pesticide containers, waste pesticides, and packaging) often have the potential to contribute to adverse health, safety, or environmental impacts. Considerations for the prevention and control of potential impacts from these wastes include:</p> <ul style="list-style-type: none"> + Ensure all packaging for pesticides and herbicides is collected from the field after use and properly stored until final disposal + Do not burn packaging, plastics, or other solid waste. Dispose of this waste in designated waste disposal facilities or by recycling. Manage solid waste in accordance with the General EHS Guidelines + Consider large container and/or bulk systems for fuels, oils, fertilizers, and chemicals to reduce the volume of waste containers + Examine alternative product formulations and packaging (e.g., biodegradable material) + Manage expired and unwanted pesticides as hazardous wastes in accordance with the GoV's regulations. 	
4.	Pesticide use and management	<p>Ensure that any pesticides used are manufactured, formulated, packaged, labeled, handled, stored, disposed of, and applied according to the GoV's regulations on pesticide use</p> <p>Do not purchase, store, use, or trade pesticides that fall under the World Health Organization's (WHO) Recommended Classification of Pesticides by Hazard Classes 1a (extremely hazardous) and 1b (highly hazardous), or Annexes A and B of the Stockholm Convention</p> <p>Do not use pesticides listed in WHO Hazard Class II (moderately hazardous), unless the project has appropriate controls established with respect to the manufacture, procurement, or distribution and/or use of these chemicals. These chemicals</p>	<p>Law on Environmental Protection 2014</p> <p>Law on Plant Protection and Quarantine 2013</p> <p>WBG EHS Guidelines</p>

		<p>should not be accessible to personnel without proper training, equipment, and facilities in which to handle, store, apply, and dispose of these products properly</p> <p>Storage</p> <p>Store all pesticides in a lockable, bunded container or store that has sufficient space in which to capture any spills without contaminating the environment. Stores should be set away from water sources, residential and built-up areas, as well as livestock and food storage areas</p> <p>Procure spill kits and institute suitable control measures in case of accidental spillage</p> <p>Store all pesticides in their original, labeled containers, and ensure that storage instructions are followed</p> <p>Keep a register of all pesticides procured, recording when they were received, the amount used, the amount remaining in store, and their location</p> <p>Keep SDS at appropriate locations in storage facilities</p> <p>Warehouses must have appropriate ventilation, secondary containment, and emergency showers and kits</p> <p>Handling</p> <p>Operators must read, understand, and follow product label directions for safe mixing, application, and disposal; use trained personnel for critical operations (e.g., mixing, transfers, filling tanks, and application)</p> <p>Insist that correct PPE (e.g., gloves, overalls, eye protection) for each exposure route listed in the SDS be worn at all times when handling and applying pesticides</p> <p>Mandate that any mixing and filling of pesticide tanks occur in a designated filling area</p> <p>+ This should be set away from watercourses and drains</p>	
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		<ul style="list-style-type: none"> + If on concrete, water should be collected in a separate sump and disposed of as a hazardous waste + Ensure that spills are cleaned up immediately using appropriate spill kits; spills should not be washed away into watercourses or drains <p>Application</p> <p>Give preference to the application method with the lowest EHS risk and ensure non target organisms are not affected</p> <p>Select pesticide application technologies and practices designed to minimize off-site movement or runoff (e.g., low-drift nozzles, using the largest droplet size and lowest pressure that are suitable for the product)</p> <p>Establish buffer zones around watercourses, residential and built-up neighborhoods, as well as livestock and food storage areas</p> <p>Ensure that all equipment is in good condition and properly calibrated to apply the correct dosage. Insist that applications occur under suitable weather conditions; avoid wet weather and windy conditions</p> <p>Disposal</p> <p>Any unused dilute pesticide that cannot be applied to the crop—along with rinse water, and out-of-date or no-longer approved pesticides—should be disposed of as a hazardous waste, as per the GoV’s regulations</p> <p>Empty pesticide containers, foil seals, and lids should be triple rinsed, and washings used in the pesticide tank should be sprayed back onto the field or disposed of as hazardous waste in a manner consistent with the GoV’s regulations and according to the manufacturer’s directions</p> <p>Containers should be stored safely and securely under cover prior to their safe disposal; they should not be used for other purposes</p>	
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5.	Fertilizer	<p>Store fertilizers in their original packaging and in a dedicated location that can be locked and properly identified with signs, access to which is limited to authorized persons</p> <p>Ensure that SDS and inventories are available at fertilizer storage facilities and available to first responders when necessary</p> <p>Only purchase and store minimal fertilizer requirements, and use older fertilizers first</p> <p>Keep fertilizer stores separate from pesticides and machinery (e.g., fuels, ignition, or heat sources)</p> <p>Know and understand each crop's fertilizer requirements and only apply what is required, when it is required, to minimize losses to the environment</p> <p>Implement a suitable training program for personnel that are transporting, handling, loading, storing, and applying fertilizers</p>	<p>Law on Environmental Protection 2014</p> <p>WBG EHS Guidelines</p>
6.	Biodiversity and Ecosystems	<p>Appropriate site selection, including expansion planning, is the single most important impact-avoidance measure available to annual crop production. Early screening can improve macro-level project site selection so as to avoid selecting areas with high biodiversity values, such as critical or natural habitat, areas with high conservation values (HCV), those modified habitats that contain significant biodiversity value (such as previously abandoned farmland that has subsequently developed into secondary forest), or provisioning or regulating ecosystem services. Such screening can help with the scoping of priorities for further assessment, if complete avoidance is not possible, thus reducing unnecessary biodiversity and/or ecosystem impacts and costs in the future. Screening should be conducted to identify species and sites of importance within the broader region or landscape</p> <p>Screening should consider any existing spatial data and landscape mapping as part of the literature review and desktop analysis</p>	<p>Law on Environmental Protection 2014</p> <p>Law on Biodiversity 2008</p> <p>Law on Forestry 2017</p> <p>WBG EHS Guidelines</p>

		Conversion of existing critical, natural, or HCV habitats into agriculture should be avoided wherever possible and planting on modified habitats or degraded lands should be promoted. This should be informed by an assessment of existing modified habitats or degraded lands suitable for crop production or restoration, to reduce risks and costs associated with biodiversity impacts or further reduction of ecosystem services	
7.	Greenhouse Gas (GHG) Emission	<p>Apply 1 must do and 5 reduction, including must use validated seed, reduction in seed, nitrogen fertilizer, water, pesticides, workload, and post-harvest loss</p> <p>Apply composting method</p> <p>Limit soil preparation</p> <p>Use early ripening varieties (short-term)</p> <p>Change production structure where appropriate</p> <p>Where available, use abated nitrogen fertilizers, which have lower GHG emissions associated with their manufacture, or use nitrification or urease inhibitors, which reduce soil emissions</p> <p>Where feasible, consider using renewable energy (e.g., solar, wind, biofuel) for crop drying or to power irrigation pumps</p> <p>Drain water from wetland rice soils during the growing season to reduce methane emissions</p>	<p>Law on Environmental Protection 2014</p> <p>WBG EHS Guidelines</p>
8.	Air quality	<p>Avoid open burning for land preparation, weed control, and post-harvest treatments. Where burning is unavoidable, potential impacts should be identified and weather conditions monitored to schedule burning in an effort to minimize impacts</p> <p>Prohibit burning of pesticide-treated agricultural wastes and by-products (e.g., pesticide containers) to avoid unintended emissions of persistent organic</p>	<p>Law on Environmental Protection 2014</p> <p>WBG EHS Guidelines</p>

		<p>pollutants (POPs)</p> <p>Adopt IPM strategies to avoid and reduce use of pesticides and associated drift</p> <p>Note certain types of nitrogen fertilizer have higher ammonia emissions associated with their use than others. Consider incorporating fertilizer at planting to minimize ammonia emissions</p> <p>Establish cover crops where possible; retain residues, and reduce tillage intensity to avoid dust and soil degradation due to wind erosion. Where water supplies are ample, water application to cropped areas and access roads may reduce the risk of airborne dust</p>	
9.	Biological hazards	<p>Wear appropriate protective clothing, such as a long-sleeved shirt, long pants, hat, gloves, and boots</p> <p>Inspect and shake out any clothing, shoes, or equipment (including PPE) before use</p> <p>Remove or reduce tall grasses, debris, and rubble from around the outdoor work areas. Control water accumulation</p> <p>Use insect repellent</p> <p>On-site first-aid equipment (including, for example, antivenom serum) and trained personnel should be available, as well as procedures for emergency evacuation</p>	<p>Law on Environmental Protection 2014</p> <p>Law on Labour 2019</p> <p>Law on Labor Safety and Hygiene 2015</p> <p>Law on People Health Protection 1989</p> <p>WBG EHS Guidelines</p>
10.	Chemical hazards	<p>Adopt means of personal protection, such as boots, water-repellent clothes, gloves, and respiratory masks with proper chemical protection</p> <p>Train workers on hazardous product management and storage. Include training on how to read labels and the SDS and to understand the risks associated with all hazardous products, including pesticides, fertilizers, and crop-processing products</p> <p>Monitor and proactively manage all stages of pesticide and chemical purchase, storage, mixing, usage, and disposal. Maintain accurate records and analyze these</p>	<p>Law on Environmental Protection 2014</p> <p>Law on Labour 2019</p> <p>Law on Labor Safety and Hygiene 2015</p> <p>Law on People Health Protection 1989</p>

		<p>records for any evidence of undue exposure or misuse of hazardous products</p> <p>Ensure that hygiene practices are followed in accordance with the GoV to avoid exposure of personnel or family members to pesticide or chemical residues. PPEs should never be taken home and should be cleaned in a segregated facility</p>	WBG EHS Guidelines
11.	Occupational health and safety	<p>General Requirements for Elderly Workers</p> <p>Worker’s health should be regularly checked at least twice a year to make sure that they are in a good health condition for working</p> <p>Do not employ elderly employees to do heavy, hazardous and dangerous jobs that adversely affect the health of elderly workers, except for special cases prescribed by the Government</p> <p>Shorten daily working hours</p> <p>Apply part-time work regime</p> <p>Get interested health care at workplace</p> <p>Exposure to Physical Hazards</p> <p>Prevention of falls into openings for water supply systems, underground manure storage tanks, and other confined spaces through installation of covers, fences, and other fall prevention methods</p> <p>Training on correct animal handling techniques and provision of appropriate personal protective equipment (PPE), such as gloves and aprons, to prevent scratches</p> <p>Confined Spaces</p> <p>Entry to all confined spaces should be restricted and should be subject to permitted supervision by properly trained persons</p> <p>Exposure to Biological Agents</p>	<p>Law on Environmental Protection 2014</p> <p>Law on Labour 2019</p> <p>Law on Labor Safety and Hygiene 2015</p> <p>Law on People Health Protection 1989</p> <p>WBG EHS Guidelines</p>

		<p>Inform workers of potential risks of exposure to biological agents and provide training in recognizing and mitigating those risks</p> <p>Provide personal protective equipment to minimize all forms of exposure to materials potentially containing pathogens</p> <p>Ensure that those that have developed allergic reactions to biological agents are not working with these substances</p>	
12.	Community health and safety	<p>Inform local communities about project activities that may involve human health risk in a timely manner through consultation</p> <p>Raise community's awareness of environmental and human health protection through communication program designed for the project</p> <p>Monitor and record all potentially harmful products and activities and manage them to minimize the risk to communities. Regularly audit and update operating procedures and ensure that personnel are suitably trained</p> <p>Do not apply pesticides, chemicals, or manure if meteorological conditions are likely to result in adverse impacts in surrounding communities</p> <p>Use biological or lower-risk-profile products, if available</p> <p>Respect pre-harvest intervals and post-harvest withholding periods for products that have been treated with pesticides to avoid unacceptable levels of residues</p> <p>Do not store or transport pesticides and fertilizers with food (human or livestock foodstuffs) or beverages (including drinking water)</p> <p>Ensure that animals and unauthorized people are not present in the areas where pesticides or other potentially harmful products are handled, stored, or applied</p> <p>Store manure and crop protection products as far away from dwellings as possible, and use measures, such as covering the manure, to reduce odors and atmospheric emissions</p>	<p>Law on Environmental Protection 2014</p> <p>Law on Labour 2019</p> <p>Law on Labor Safety and Hygiene 2015</p> <p>Law on People Health Protection 1989</p> <p>WBG EHS Guidelines</p>

Table 4.3: Environmental Codes of Practice for Aquaculture Livelihood

No.	Environmental and Social Issues	Suggested Mitigation Measures	Applicable Regulations and Guidelines
1.	Contamination of Aquatic Systems	<p>Soil Erosion and Sedimentation</p> <p>Construct pond and canal levees with a 2:1 or 3:1 slope (based on soil type) as this adds stability to the pond banks, reduces erosion, and deters weeds. Avoid pond construction in areas that have a slope of more than 2 percent, as this will require energy-intensive construction and maintenance</p> <p>Stabilize the embankments to prevent erosion</p> <p>Reduce excavation and disturbance of acid sulfate soils during construction</p> <p>Carry out construction work during the ‘dry’ season to reduce sediment runoff that may pollute adjacent waters</p> <p>Install temporary silt fences during construction to slow down and catch any suspended sediments. Silt fences can be made of woven plastic or fabric, or hay bales</p> <p>Suspended solids</p> <p>Avoid discharging waters from ponds while they are being harvested with nets, as this will add to the suspended solids in the effluent drainage</p> <p>If feasible, use partial draining techniques to empty ponds that have been harvested. The last 10–15 percent of pond water contains the highest quantities of dissolved nutrients, suspended solids, and organic matter. After harvest, hold the remaining water in the pond for a number of days before discharge, or transfer to a separate treatment facility</p> <p>Fertilizers</p> <p>Plan the rate and mode of application of fertilizers to maximize utilization and</p>	<p>Law on Environmental Protection 2014</p> <p>Law on Fisheries 2017</p> <p>WBG EHS Guidelines</p>

		<p>prevent over-application, taking into account predicted consumption rates</p> <p>Increase the efficiency of application and dispersion through such practices as dilution of liquid fertilizers or solution of granulated fertilizers prior to application. Other options include the use of powdered fertilizers or the placement of powdered fertilizer bags in shallow water to allow solution and dispersion</p> <p>Consider the use of time -released fertilizer in which resin coated granules release nutrients into the pond water, with the rate of release corresponding to water temperature and movement</p> <p>Avoid the use of fertilizers containing ammonia or ammonium in water with pH of 8 or above to avoid the formation of toxic unionized ammonia (NH₃)</p> <p>Depending on the system (e.g., freshwater aquaculture), grow organic fertilizer (e.g. natural grass) in the pond basin after harvest</p> <p>Initiate pond fertilization only in static ponds with no pond water overflow that can impact downstream waters and watersheds</p> <p>Conduct pond fertilization to avoid or minimize consequences of potential runoff due to floods or heavy rain and avoid application to overflowing ponds</p> <p>Chemicals</p> <p>Design the pond depth to reduce the need for chemical control of aquatic weeds and reduce thermal stratification</p> <p>Do not use antifoulants to treat cages and pens. The chemically active substances used in antifouling agents are very poisonous and highly stable in an aquatic environment. Clean nets manually or in a net washing machine</p> <p>The following management measures can be taken in pond-based systems to prevent pond effluent from entering surrounding water bodies</p> <p>+ In some fish systems, avoid automatic drainage of ponds at the end of the</p>	
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		<p>production cycle as the same pond water may be used to cultivate several crop rotations of certain species (e.g. catfish)</p> <ul style="list-style-type: none"> + Reuse water from harvested ponds by pumping it into adjacent ponds to help complement their primary productivity, provided that the level of BOD is controlled; This process is called “bloom seeding,” and requires careful timing of harvests + Consider the hydrology of the region in the design of the pond system and ensure that the pond embankments are high enough to contain the pond water and prevent loss of effluent during periods of increased rainfall and potential flooding <p>Antibiotics Use</p> <p>Antibiotics used must be legally permitted</p> <p>Use of antibiotics in Aquaculture should be limited</p> <p>Antibiotics should be chosen suitable for used purpose</p> <p>Antibiotics must be used and stored in accordance with the manufacturer’s instructions</p> <p>When working with antibiotics, the user must wear PPE (mask, gloves, etc.)</p> <p>Avoid stockpiles of waste antibiotics by adopting a “first-in, first-out” principle so that they do not exceed their expiration date. Any expired antibiotics should be disposed of in compliance with national regulations</p>	
2.	Occupational health and safety	<p>General requirements for Elderly Workers</p> <p>Worker’s health should be regularly checked at least twice a year to make sure that they are in a good health condition for working</p> <p>Do not employ elderly employees to do heavy, hazardous and dangerous jobs that adversely affect the health of elderly workers, except for special cases prescribed</p>	<p>Law on Environmental Protection 2014</p> <p>Law on Labour 2019</p> <p>Law on Labor Safety and Hygiene 2015</p>

		<p>by the Government</p> <p>Shorten daily working hours</p> <p>Apply part-time work regime</p> <p>Get interested health care at workplace</p> <p>Physical hazards</p> <p><i>Heavy Lifts</i></p> <p>Use mechanical and / or automated equipment to facilitate lifts heavier than 25 kg</p> <p>Design workstations that can be adapted to individual workers, especially if fish are processed post-harvest</p> <p>Construct ponds that are rectangular in shape to facilitate harvesting. If ponds are of sufficient size, and the embankments are at least 2.5 meters wide, vehicles can be used on the embankments to drag harvest seines</p> <p><i>Electric shock</i></p> <p>Waterproof all electrical installations</p> <p>Ensure that fuses are used and that there is an appropriate connection to the ground</p> <p>Ensure that all cables are intact, waterproof, and without connection</p> <p>Provide training in the correct handling of electric equipment (e.g., pumps and) to avoid the risk of short circuits</p> <p>Employ lock out / tag out procedures</p> <p><i>Drowning</i></p> <p>Provide lifejackets and harnesses with safety clips (karabiners) that lock on to lines</p>	<p>Law on People Health Protection 1989</p> <p>WBG EHS Guidelines</p>
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		<p>or fixed points</p> <p>Ensure that personnel are experienced swimmers</p> <p>Require that personnel wear lifejackets at all times on exposed sites</p> <p>Exposure to Chemicals</p> <p>Replacement of the hazardous substance with a less hazardous substitute</p> <p>Implementation of engineering and administrative control measures to avoid or minimize the release of hazardous substances into the work environment</p> <p>Keeping the number of employees exposed, or likely to become exposed, to a minimum</p> <p>Communicating chemical hazards to workers through labeling and marking according to national and internationally recognized requirements and standards, including the International Chemical Safety Cards (ICSC), Materials Safety Data Sheets (MSDS), or equivalent. Any means of written communication should be in an easily understood language and be readily available to exposed workers and first-aid personnel</p> <p>Training workers in the use of the available information (such as MSDSs), safe work practices, and appropriate use of PPE</p> <p>Water-born Diseases</p> <p>Prevention of larval and adult propagation through sanitary improvements and elimination of breeding habitats close to human settlements</p> <p>Elimination of unusable impounded water</p> <p>Increase in water velocity in natural and artificial channels</p> <p>Promoting use of repellents, clothing, netting, and other barriers to prevent insect bites</p>	
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		Following safety guidelines for the storage, transport, and distribution of pesticides to minimize the potential for misuse, spills, and accidental human exposure	
3.	Threats to Biodiversity	<p><i>Conversion of Agricultural Land – Salinization</i></p> <p>Ensure that the embankments around brackish water pond systems are high enough to form a physical division between agriculture and aquaculture</p> <p>Ensure that the saline / brackish water discharges are appropriately treated and disposed of (e.g. through use of discharge canals) for the receiving waters</p> <p>Ensure that appropriate discussions are held at the community level to avoid conflicts of interest when agricultural land is transferred to aquaculture production</p> <p><i>Introduction of Alien, Selectively Bred, or Genetically Engineered Species</i></p> <p>Preventing the escape of species from pond-based aquaculture systems. Examples of common escape prevention measures include</p> <ul style="list-style-type: none"> + Installation and maintenance of screens with a mesh that is small enough to prevent the entry and potential escape of aquatic species in the drainage channels connecting production ponds to sedimentation ponds as well as those connecting sedimentation ponds to the receiving water + Installation of fish-proof strainer dams + Installation and maintenance of gravel filtration on pond discharge structures When necessary, consider chemical treatment of water released from hatcheries(e.g. with chlorine at acceptable concentrations for the receiving waters) to destroy escaping larvae or juveniles + Consider the hydrology of the region in the design of the pond system and ensure that the pond embankments are high enough to contain the pond 	<p>Law on Environmental Protection 2014</p> <p>Law on Biodiversity 2008</p> <p>Law on Fisheries 2017</p> <p>WBG EHS Guidelines</p>

		<p>water and prevent escape of the species during periods of heavy rainfall and potential flooding</p> <ul style="list-style-type: none"> + Establish a contingency plan if there is an escape of the species being cultivated into the wild <p>Preventing the escape of species from open water aquaculture systems. Examples of common escape prevention measures include</p> <ul style="list-style-type: none"> + Regularly inspect the cage and pen netting for holes(e.g. before crowding of the harvest and at intervals during the operation) + Design and construct cage and pen units, including choice of nets, to deal with the worst weather and environmental conditions likely to occur on the site + Provide for containment during periods of storm surges and excessively high tides + For cage culture in open waters, use submersible cages that can be submerged during storms below damaging wave action + Provide adequate marking of the fish farm system to warn navigators of the potential obstruction and reduce the risk of collision + Establish a contingency plan for harvest of escapees of the species being cultivated into the wild 	
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Table 4.4: Environmental Codes of Practice for rehabilitation of small assets (e.g., improving or building of animal husbandry pen, shed, cage or expanding or digging deeper fishponds)

No.	Environmental and Social Issues	Suggested Mitigation Measures	Applicable Regulations and Guidelines
1.	Waste management	<p>ISHCs should bear efforts to reduce debris, and solid wastes, and to separately collect, reuse these wastes such as leveling on site.</p> <p>Solid waste (unusable cement bags, contaminated soil, and other unusable wastes) is separated at the site for disposing to the local dumping site. The scraps of wood, steel, and used cement bags are separated for reusing or recycling if possible, otherwise disposal to the local dumping site. The remaining wastes, including clean soil, debris from demolition activities, are used for leveling on sites, otherwise collected by an authorized unit for reusing based on its purposes.</p> <p>Precaution measures such as tarpaulin cover shall be used to cover spoils when transporting the spoils to disposal sites to avoid dropping on roads.</p> <p>Burning of waste (either domestic or construction waste) should be strictly prohibited on site.</p> <p>On-site and Off-site transportation of waste should be conducted so as to prevent or minimize spills, releases, and exposures to employees and the public.</p> <p>Waste is stored in a manner that prevents the commingling or contact between incompatible wastes, and allows for inspection between containers to monitor leaks or spills. Examples include (i) sufficient space between incompatibles or physical separation such as walls or containment curbs, (ii) store in closed containers away from direct sunlight, wind and rain, and (iii) provide adequate ventilation where volatile wastes are stored.</p>	<p>Law on Environmental Protection 2014</p> <p>WBG EHS Guidelines</p>
2.	Occupational health and safety	<p>General requirements for Elderly Workers</p> <p>Worker's health should be regularly checked at least twice a year to make sure</p>	<p>Law on Environmental Protection 2014</p>

		<p>that they are in a good health condition for working</p> <p>Do not employ elderly employees to do heavy, hazardous and dangerous jobs that adversely affect the health of elderly workers, except for special cases prescribed by the Government</p> <p>Shorten daily working hours</p> <p>Apply part-time work regime</p> <p>Get interested health care at workplace</p> <p>Over-exertion</p> <ul style="list-style-type: none"> + Training of workers in lifting and materials handling techniques in construction and decommissioning, including the placement of weight limits above which mechanical assists or two-person lifts are necessary + Planning work site layout to minimize the need for manual transfer of heavy loads + Selecting tools and designing work stations that reduce force requirements and holding times, and which promote improved postures, including, where applicable, user adjustable work stations + Implementing administrative controls into work processes, such as job rotations and rest or stretch breaks <p>Slips and Falls</p> <ul style="list-style-type: none"> + Implementing good house-keeping practices, such as the sorting and placing loose construction materials or demolition debris in established areas away from foot paths + Cleaning up excessive waste debris and liquid spills regularly + Locating electrical cords and ropes in common areas and marked 	<p>Law on Labour 2019</p> <p>Law on Labor Safety and Hygiene 2015</p> <p>Law on People Health Protection 1989</p> <p>WBG EHS Guidelines</p>
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		<p>corridors</p> <ul style="list-style-type: none"> + Use of slip retardant footwear <p>Dust</p> <ul style="list-style-type: none"> - Dust suppression techniques should be implemented, such as applying water or non-toxic chemicals to minimize dust from vehicle movements - PPE, such as dusk masks, should be used where dust levels are excessive <p>Working Environment Temperature</p> <ul style="list-style-type: none"> - Monitoring weather forecasts for outdoor work to provide advance warning of extreme weather and scheduling work accordingly. - Adjustment of work and rest periods depending on the temperature and workloads. - Providing temporary shelters to protect against the elements during working activities or for use as rest areas. - Use of protective clothing. - Providing easy access to adequate hydration such as drinking water or electrolyte drinks, and avoiding consumption of alcoholic beverages <p>Personal Protective Equipment (PPE)</p> <ul style="list-style-type: none"> - Active use of PPE if alternative technologies, work plans or procedures cannot eliminate, or sufficiently reduce, a hazard or exposure. - Identification and provision of appropriate PPE that offers adequate protection to the worker, co-workers, and occasional visitors, without incurring unnecessary inconvenience to the individual. - Proper maintenance of PPE, including cleaning when dirty and replacement when damaged or worn out. Proper use of PPE should be part 	
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		<p>of the recurrent training programs for employees.</p> <ul style="list-style-type: none"> - Selection of PPE should be based on the hazard and risk ranking described earlier in this section, and selected according to criteria on performance and testing established by recognized organizations 	
3.	Community health and safety	<p>A. General Site Hazards</p> <ul style="list-style-type: none"> - Restricting access to the site, with a focus on high risk structures or areas depending on site-specific situations, including fencing, signage, and communication of risks to the local community. - Removing hazardous conditions on the sites that cannot be controlled effectively with site access restrictions, such as covering openings to small confined spaces, ensuring means of escape for larger openings such as trenches or excavations. <p>B. Disease Prevention</p> <p><i>Communicable Diseases</i></p> <ul style="list-style-type: none"> - Providing surveillance and active screening and treatment of workers. - Preventing illness among workers in local communities by: <ul style="list-style-type: none"> + Undertaking health awareness and education initiatives + Training health workers in disease treatment. + Conducting immunization programs for workers in local communities to improve health and guard against infection. + Providing health services. + Providing treatment through standard case management in on-site or community health care facilities. + Promoting collaboration with local authorities to enhance access of 	<p>Law on Environmental Protection 2014</p> <p>Law on Labour 2019</p> <p>Law on Labor Safety and Hygiene 2015</p> <p>Law on People Health Protection 1989</p> <p>WBG EHS Guidelines</p>

		<p>workers families and the community to public health services and promote immunization.</p> <p><i>Vector-Born Diseases</i></p> <ul style="list-style-type: none"> - Prevention of larval and adult propagation through sanitary improvements and elimination of breeding habitats close to human settlements. - Elimination of unusable impounded water. - Increase in water velocity in natural and artificial channels. - Promoting use of repellents, clothing, netting, and other barriers to prevent insect bites. <p>C. Traffic Safety</p> <ul style="list-style-type: none"> - Inform communities about the plan for project activities - Avoid use of vehicle trucks, where unavoidable assign a man to regulate traffic - Raise awareness of traffic safety for drivers and communities through communication program designed for the project 	
4.	Chance finds	<p>If excavation activities discover cultural heritages⁶ the workers shall:</p> <ul style="list-style-type: none"> - Stop the excavation activities in the area of the chance find; - Delineate and protect the discovered site; - Notify the local authorities responsible for information and culture in a timely 	<p>Law on Heritage 2001 and 2009</p> <p>WBG EHS Guidelines</p>

⁶ ESS8 defines the term “Cultural Heritage” encompasses tangible and intangible heritage, which may be recognized and valued at local, regional, national or global level, as follows:

- Tangible heritage, which includes movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Tangible cultural heritage may be located in urban or rural settings, and may be above or below land or under the water.
- Intangible cultural heritage, which include practices, representations, expression, knowledge, skills, - as well as the instruments, objects, artifacts, and cultural space associated therewith – that communities and groups recognize as part of their cultural heritage, as transmitted from generation to generation and constantly recreated by them in response to their environment, their interaction with nature and their history.

		<p>manner.</p> <p>Excavation activities can only resume after permission is granted from the responsible local authorities concerning the safeguard of the heritage.</p>	
5.	Labour influx	<p>Gender-based violence (GBV)</p> <p>Mandatory and regular training for workers on required lawful conduct in host community and legal consequences for failure to comply with laws;</p> <p>Commitment/policy to cooperate with law enforcement agencies investigating perpetrators of gender-based violence;</p> <p>Creation of partnership with local NGOs to report workers' misconduct and complaints/reports on gender-based violence or harassment through the Grievance Redress Mechanism (GRM);</p> <p>Provision of opportunities for workers to regularly return to their families;</p> <p>Provision of opportunities for workers to take advantage of entertainment opportunities away from rural host communities</p> <p>Child labor and school drop out</p> <p>Ensuring that children and minors are not employed directly or indirectly on the project;</p> <p>A child over the minimum age (the age of 14 unless national law specifies a higher age) and under the age of 18 will not be employed or engaged in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health of physical, mental, spiritual, mortal or social development;</p> <p>A child over the minimum and under the age of 18 may be employed or engaged in connection with the project only under the following specific conditions:</p> <ul style="list-style-type: none"> • The work does not fall within paragraph above; 	<p>Law on Labour 2019</p> <p>Law on Gender Equality 2006</p> <p>WBG EHS Guidelines</p>

		<ul style="list-style-type: none">• An appropriate risk assessment is conducted prior to the work commencing; and• The project owner conducts regular monitoring of health, working conditions, hours of work, and the other requirement of ESS2 (Labor and Working Conditions) <p>Forced labor</p> <p>Ensuring that forced labor, which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty will not be used in connection with the project.</p>	
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Coronavirus disease (COVID-19) prevention measures

There is worldwide spread of Coronaviruses (COVID-19) infecting human health, including in Vietnam. Project personnel and workers may be exposed to and infected by COVID-19 which can cause mild disease similar to a common cold, while others cause more severe disease. The virus has more powerful adverse impacts on older people and people with chronic diseases.

To prevent COVID-19 exposure and infection to the project personnel, workers, the old people, and transmission to the local community the following basic measures should be followed:

Strictly adhere to the central and local regulations and guidance on prevention of Covid-19

- The central and local regulations and guidance should be collected and share with the project team and local partners, and the ISHCs, as appropriate
- Project activities (training, workshop, field visits, ISHC monthly meetings and activities...) can be conducted only if they are allowed to do so by the local authority. In this case, the project should apply the safety measures as recommended by local authority.
- When needed, the project activities should be suspended until they can be conducted safely, as advised by the local authority.

Adhere to Standard Precautions

- Train all staff, club management boards (CMBs) and volunteers to undertake standard precautions - assume everyone is potentially infected and behave accordingly.

Manage Visitor Access and Movement

- Establish procedures for managing, monitoring, and training visitors
- All visitors must follow respiratory hygiene precautions while in the project site, as per national or local government regulations and guidelines, otherwise they should be removed
- During the visit, make sure all visitors adhere to respiratory hygiene, cough etiquette, and hand hygiene. Provide oral instructions on registration and ongoing reminders with the use of simple signs with images in local languages.
- Restrict visitors from visiting project sites under risk situation. In case the visit can not be suspended, at these times, PPE should be used by visitors.
- All visitors should be scheduled and controlled, and once in the project site, instructed to limit their movement.
- Visitors should be asked to watch out for symptoms and report signs of acute illness for at least 14 days.

Minimize Chance of Exposure of workers

- Any worker showing symptoms of respiratory illness (fever + cold or cough) and has potentially been exposed to COVID-19 should be immediately removed from the site and tested for the virus at the nearest local hospital
- Close co-workers and those sharing accommodations with such a worker should also be removed from the site and tested

- Project management must identify the closest hospital that has testing facilities in place, refer workers, and pay for the test if it is not free
- Persons under investigation for COVID-19 should not return to work at the project site until cleared by test results. During this time, they should continue to be paid daily wages
- If a worker is found to have COVID-19, wages should continue to be paid during the worker's convalescence (whether at home or in a hospital)
- If project workers live at home, any worker with a family member who has a confirmed or suspected case of COVID-19 should be quarantined from the project site for 14 days, and continued to be paid daily wages, even if they have no symptoms.

Training of Staff and Precautions

- Train all staff in the signs and symptoms of COVID-19, how it is spread, how to protect themselves and the need to be tested if they have symptoms. Allow Q&A and dispel any myths.
- Train all staff on how to wash hand correctly, on correct use and disposal of personal protective equipment (PPE), including gloves, facemasks, ..., and check that they understand. Supply face masks and other relevant PPE to all project workers at the entrance to the project site. Any persons with signs of respiratory illness that is not accompanied by fever should be mandated to wear a face mask
- Provide handwash facilities, hand soap, alcohol-based hand sanitizer and mandate their use on entry and exit of the project training venue and during breaks, via the use of simple signs with images in local languages
- Train all workers in respiratory hygiene, cough etiquette and hand hygiene using demonstrations and participatory methods
- Train cleaning staff, if any, on most effective process for cleaning the facility: use a high-alcohol based cleaner to wipe down all surfaces; wash instruments with soap and water and then wipe down with high-alcohol based cleaner; dispose of rubbish by burning etc.
- Use existing grievance procedures to encourage reporting of co-workers if they show outward symptoms, such as ongoing and severe coughing with fever, and do not voluntarily submit to testing

Managing Access and Spread

- Should a case of COVID-19 be confirmed in a project worker on the project site, visitors should be restricted from the site and worker groups should be isolated from each other as much as possible;
- Extensive cleaning procedures with high-alcohol content cleaners should be undertaken in the area of the site where the worker was present, prior to any further work being undertaken in that area.

Mitigation measures for impacts on Ethnic Minority Groups

Although names of specific beneficiary communities may not be determined by appraisal, it is known that some of the identified project provinces have a high proportion of ethnic minority populations, such as Hoa Binh, Thanh Hoa, Quang Binh, Khanh Hoa, and Ninh Thuan. These groups include Muong, Thai, Tay, Dao, Mong, Bru Van Kieu and Chut. Among them, Muong, Thai and Tay generally have a higher level of economic development and a better command of the Vietnamese language than the remaining groups. As the proposed ISHC model is designed to focus on vulnerable older persons, it is likely that the project activities will take place in some poor communes with high rates of ethnic minority older persons, although the names of the project communes remain unknown at this stage. The SA identifies the existing barriers against the ethnic minority older persons to participate in and benefit from the project's activities to improve their quality of life and well-being. These barriers may be related to languages, cultural practices, institutional arrangements, and religious or spiritual beliefs. Different needs and preferences of older men and women from ethnic minority groups in the project communes will be considered in the design of the project's activities and organization of consultations. An engagement process with older persons from the ethnic minority groups in the project communes will be undertaken, including stakeholder analysis and engagement planning, disclosure of information, and meaningful consultation, in a culturally appropriate and gender and inter-generationally inclusive manner.

On a basis of the findings from the SA and the engagement process, an EMPF has been prepared prior to appraisal. This EMPF provides guidance on how an Ethnic Minority Development Plan should be prepared during implementation to set out the measures or actions proposed with a clear timeframe. The EMPF helps, on the basis of consultation with affected EM in the project areas, ensure (a) affected EM peoples receive culturally appropriate social and economic benefits; (b) when there are potential adverse effects on EM, the impacts are identified, avoided, minimized or mitigated. EMDP should be developed on the basis of consultation with EMs in the project areas. Consultation is important to preparation of an EMDP since it provides EMs groups (both potentially affected and not affected by projects) with opportunities to participate in planning and implementation of projects. More importantly, it helps identify potential adverse impacts, if any, as a result of project, on EMs groups, thereby enabling devising of appropriate measures as to how adverse impacts could be avoided, minimized, and mitigated. Consultation also aims to ensure EMs people, especially older people, have opportunities to articulate, on the basis of their understanding of project/ project objectives, their needs for support from the project in relation to the project goal/project activities. The whole exercise of developing an EMDP is grounded on the SA. More details can be obtained from the full EMPF of the project.

V. PROCEDURES FOR REVIEW, CLEARANCE AND IMPLEMENTATION OF PROJECT'S E&S INSTRUMENTS

5.1 Objective and Approach

Since the details of propose livelihood activities will be identified during Project implementation, the ESMF has been prepared and it will be applied to all livelihoods activities. Main objective of the ESMF process is to ensure that the livelihood activities to be financed by the Project will not create any significant adverse risks and impacts on human

health and the environment and the residual and/or unavoidable impacts will be adequately mitigated in line with the WB's E&S policies.

During project implementation, the identified livelihood activities will be screened for their E&S issues, risk classification, applicable ESSs, and the necessary ESA and other E&S instruments will be prepared following the requirements in the ESMF, proportionate to the nature and scale and the potential risks and impacts of the proposed activities, and consistent with the requirements of the Bank Environmental and Social Framework (ESF). These instruments may include, but not limited to, SEP, LMP, and ECOP including occupational health and safety, community health and safety, and labor influx issues related to Gender-based Violence (GBV), child and forced labor, sexual exploitation and abuse (SEA). In addition, relevant Ethnic Minority Development Plans will also be prepared in line with the requirements of the EMPF. The ESA process will follow requirements of the relevant ESSs in identifying, evaluating and managing the environmental and social risks and impacts including direct, indirect, cumulative, and residual impacts.

5.2 Key steps

The ESMF process comprises 4 steps and they are schematically shown in the following figure. This section briefly describes key steps.

- Step 1: Screening for eligibility and E&S issues including risks and impacts classification, application of ESSs, and identification of and needs for preparation and implementation of E&S documents/instruments. Given the nature of the project, the available ECOPs in the ESMF to manage environmental and social risks and impacts relating to livelihood activities will be used with update if needed. There will be no ESA instruments to be prepared during implementation as per the requirements of ESS1, there will be also no subprojects either, only individual activities at the household level.
- Step 2: E&S Documents Preparation - The project is required to prepare EMDPs during project implementation as per the requirements of ESS7 and in line with the EMPF. The project has prepared LMP and SEP during project preparation in accordance with the requirements of ESS2 and ESS10 respectively. SEP, LMP and ECOPs will be updated during project implementation if needed.
- Step 3: E&S documents clearance and information disclosure - The E&S documents prepared during project such as ESMF, EMPF, ECOPs, LMP and SEP will be submitted to the Bank for review and clearance and disclosure prior to appraisal. EMDPs prepared during project implementation will be submitted to the Bank for review and clearance, and disclosure.
- Step 4: Implementation, monitoring, and reporting - Environmental and social compliance requirements will be included in the technical design, partnership agreement, and POM. ECOPs and EMDPs implementation will be closely monitored by HelpAge. HelpAge will also be responsible for report on environmental and social performance to the Bank periodically.

The following flow-chart illustrates the environmental and social performance in accordance with the requirements of ESSs during project implementation on a basis of step by step.

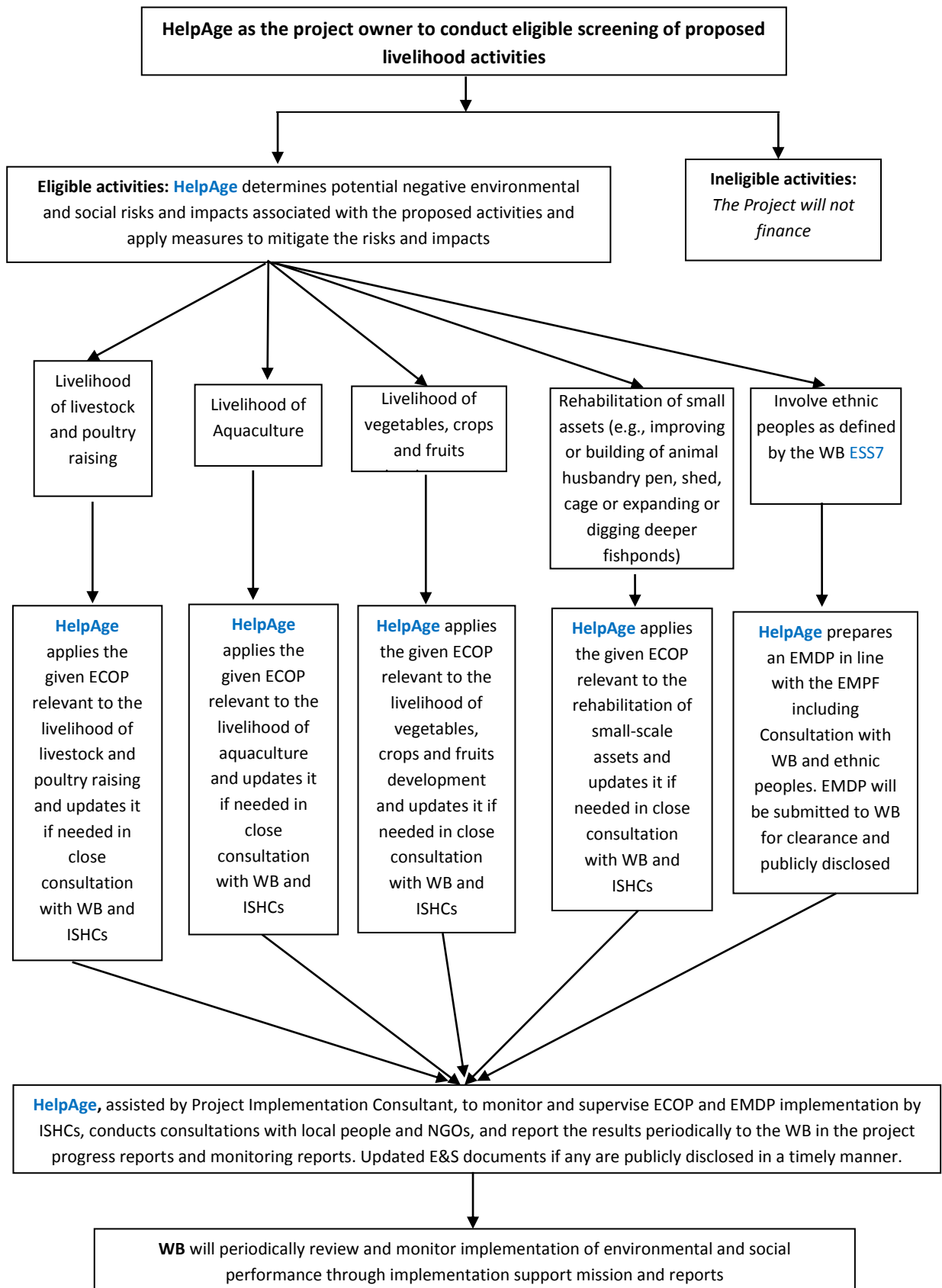


Figure 5.1. Schematic Flowchart for Environmental and Social Performance

The following table summarizes the application of annexes for the ESMF process.

Table 5.1: Applications of ESMF Annexes

Annexes	Content	Application
1	Labor Management Procedures (LMP)	All project workers ⁷
2	Eligible Screening Checklist including the exclusion list	All livelihood activities
3	GRM Template	All livelihood activities
4	E&S risk classification	All livelihood activities

5.3 E&S Risk and Impact Assessment

This step (Step 1) aims to confirm the eligibility of livelihood activities to be financed by the Project as well as determine potential environmental and social risks and impacts of the livelihood activities including the need for preparation of E&S documents as required by ESS1, ESS2, ESS3, ESS4, ESS5, ESS6, ESS7, ESS8, and ESS10. HelpAge is responsible for conducting screening and confirming with the Bank on the eligible activities. Consultation with WB E&S specialists for a complex livelihood activities will be made as needed.

5.4 Development of E&S Documents

This step (Step 2) aims to prepare E&S documents in line with the issues identified in Step 1. SEP and LMP have been prepared and provided in Annexes. Separate guideline for development of EMPD is provided in the EMPF. HelpAge will be responsible for preparation of EMPDs in line with the EMPF during project implementation. Consultation with the WB E&S specialists during development of EMPDs are needed.

Given the small scale and simplicity of livelihood activities supported by the project project, preparation of an ESIA or ESMP is not expected. Instead, ECOPs have been prepared for different types of livelihood activities with taking into account labor and working conditions (ESS2), resource efficiency and pollution prevention and management (ESS3), community health and safety (ESS4), biodiversity conservation and sustainable management of living natural resources (ESS6), cultural heritage (ESS8), and stakeholder engagement and information disclosure (ESS10). In case, ECOPs need to be updated during project implementation, HelpAge should consult with the Bank task team in a timely manner.

5.5 Public consultation

HelpAge is responsible for conducting the public consultation with key stakeholders such as AE, CMB, ISHCs, local NGOs and locally-affected people about technical, environmental and social aspects associated with implementation of proposed livelihood activities during

⁷ Per ESS2, the term “project worker” refers to “direct workers”, “contracted workers”, “primary supply workers”, and “community workers”.

project implementation, and takes their views into account technical design and preparation of E&S documents for proposed livelihood activities.

5.6 Review, Approval, and Disclosure of E&S Documents

WB review and clearance: EMDPs prepared during project implementation will be submitted to the WB for prior review and clearance. The WB will only do prior review of the first set of ECOPs which were prepared for proposed livelihood activities by HelpAge during project preparation, and do post review of others if any during project implementation. Regarding EMDPs, the WB will conduct prior review and clearance. ECOPs and EMDPs will be publicly disclosed on HelpAge's website and commune offices accessible to locally-affected people and local NGOs and authorities.

The GoV's approval: The project is not expected to prepare EIA or EPP as per the GoV's environmental regulations given the nature and scale of proposed activities to be financed by the project. Thus, there will be no the GoV's review and approval during project implementation.

5.7 Monitoring and reporting on implementation of E&S documents

HelpAge will monitor and report the environmental and social performance, such as compliance with ECOP and EMDP, of the project in accordance with the legal agreement (including the ESCP). HelpAge will ensure that adequate institutional arrangements, systems, resources and personnel are in place to carry out monitoring.

Monitoring will include recording information to track performance and establishing relevant operational controls to verify and compare compliance and progress. Monitoring will be adjusted according to performance experience, as well as actions requested by relevant regulatory authorities and feedback from stakeholders such as community members. HelpAge will document monitoring results.

Based on the results of the monitoring, HelpAge will identify any necessary corrective and preventive actions, and will incorporate these in an amended ESCP. HelpAge will implement the agreed corrective and preventive actions in accordance with the amended ESCP, and monitor and report on these actions.

The Bank will monitor the environmental and social performance of the project in accordance with the requirements of the legal agreement, including ESCP, and will review any revision of the ESCP including changes resulting from changes in the design of the project or project circumstance.

The Bank will provide implementation support regarding the environmental and social performance of the project, which include reviewing the HelpAge's monitoring reports on compliance of the project with the requirements of the legal agreement, including ESCP.

VI. IMPLEMENTATION ARRANGEMENTS

6.1 Responsible for ESMF implementation

Legally, HelpAge as the project owner will be completely responsible for ESMF implementation. HelpAge will also engage a project implementation consultant (PIC) to support it in project implementation. ISHCs member borrowers, managed by Club Management Boards (CMB) will be mainly responsible for environmental and social performance associated with the livelihood activities. Club Management Board (CMB) will

monitor and supervise ISHCs' performance including environmental and social performance under direction of Association of the Elderly (EA) and HelpAge. Table below points out the responsibility of key stakeholders.

Table 6.1: Institutional responsibilities for Environmental and Social Performance

Key stakeholders	Responsibilities
HelpAge	<ul style="list-style-type: none"> - Be responsible for monitoring and reporting on environmental and social performance of the project in accordance with the legal agreement (including the ESCP). - Engage PIC to support HelpAge and AE in the project implementation including environmental and social performance. - Periodically report to the Bank on the status of the project's environmental and social performance as set out in the ESCP.
PIC	<ul style="list-style-type: none"> - Assist HelpAge and AE to (i) screen eligible livelihood activities, (ii) develop E&S instruments in line with the ESSs, (iii) incorporate ECOP into partnership agreement, (iv) review monitoring reports, as part of ISHC monthly reports, submitted by the Club Management Board (CMB); (v) conduct regular site visits and help the ISHCs with solutions to handle environmental and social issues of the livelihood activities; (vi) prepare periodic monitoring reports, as part of project progress reports, to submit to the World Bank, and (vii) provide the requisite training on environmental and social performance to ISHCs.
ISHCs member borrowers	<ul style="list-style-type: none"> - Be responsible for ECOP compliance relating to livelihood activities. - Report to CMB on environmental and social performance during implementation of livelihood activities. - Coordinate with CMB and PIC to resolve complaint from local communities if any
Club Management Board (CMB)	<ul style="list-style-type: none"> - Be responsible for monitoring and supervision of environmental and social performance of ISHCs borrower members and reporting to local AEs and HelpAge on environmental and social performance status. - Prepare periodic monitoring reports to submit to HelpAge. - Coordinate with AE, PIC and ISHCs borrower members to resolve environmental and social issues related to implementation of livelihood activities in a timely manner.
Local authorities and communities	<ul style="list-style-type: none"> - Has right to participate and contribute their views to the design to ensure that the design is suitable for the local context. - Routinely monitor and supervise the implementation of livelihood activities to ensure that it follows the approved design and agreed environmental and social recommendations.

Key stakeholders	Responsibilities
	- Has right to send complaints and request resolving the complaints through the established GRM to ensure that the is implemented in accordance with the Bank safeguards policies and the GoV's regulations.

6.2 Reporting arrangement

HelpAge will provide regular reports as set out in the ESCP (normally biannual reports) to the Bank of the results the monitoring. Such reports will provide an accurate and objective record of the project implementation, including compliance with the ESCP and the requirements of the ESSs. Such reports will include information on stakeholder engagement conducted during project implementation in accordance with ESS10. PIC will be designated to develop the reports for HelpAge to review.

HelpAge will notify the Bank promptly of any incident or accident relating to the project which has, or likely to have, a significant adverse effect on the environment, the affected communities, the public and workers. The notification will provide sufficient detail regarding such incident or accident, including any fatalities or serious injuries. HelpAge will take immediate measures to address the incident or accident and to prevent any recurrence, in accordance with national law and the ESSs.

Table 6.2: Reporting Procedures

Report Prepared by	Submitted to	Frequency of Reporting
CMBs	AE	Monthly
AE	HelpAge	Once every three months
Community Monitoring Board	AE/ Club Management Board /HelpAge	When the community has complaint about the environmental and social performance of the project
HelpAge	WB	Once every six months in accordance with the Legal Agreement including the ESCP

6.3 Incorporation of ESMF into Project Operational Manual

The ESMF process and requirements will be incorporated into the Project Operation Manual (POM) and HelpAge will provide training to ensure that ISHCs understand them as well as will supervise and monitor the ESMF implementation periodically. The E&S section in the POM will also make reference to the ESMF annexes as needed.

VII. CAPACITY BUILDING AND DEVELOPMENT

7.1 Institutional Capacity Assessment

HelpAge have not yet implemented the Bank-financed projects, so HelpAge is not aware of and familiar with the Bank E&S policy requirements, i.e. the ESF and ESSs. HelpAge will engage a project implementation consultant (PIC) to assist in project implementation,

including environmental and social performance. Capacity development and training for HelpAge, PIC, CMB, and ISHCs is needed with support from the Bank E&S specialists.

7.2 Environmental and Social Capacity Building

HelpAge will be responsible for strengthening E&S capacity for ISHCs and other stakeholders throughout project implementation. E&S training shall be organized as early as the project implementation. HelpAge will prepare the content of training which cover all the ESSs of the project so that helps ISHCs and other stakeholders effectively perform environmental and social requirements in accordance with the ESMF and ESSs. Participation of the Bank E&S specialists in the training workshops to provide the support is needed.

Priority for training should include, but not limited to, the following:

- (i) The scope of application and objectives of the Bank E&S policies, e.g., the ESSs, applicable to the Project;
- (ii) E&S Instruments preparation and implementation (e.g., ESMF, EMPF, EMDP, ECOP);
- (iii) Specific training on EMDP planning and implementation including the application of GRM that could be effective in responding to local complaints;
- (iv) WBG EHS Guidelines; and
- (v) Environmental and social performance monitoring and reporting requirements

Table 7.1: Content of E&S Training

No	Key content	Target Groups for Training
1	The scope of application and objectives of the Bank E&S policies, i.e. the ESSs, applicable to the Project	HelpAge, PIC, AE and CMB
2	E&S Instruments preparation and implementation (e.g., ESMF, EMPF, EMDP, ECOP)	HelpAge, PIC, AE and CMB
3	Specific training on EMDP, SEP and LMP planning and implementation including the application of GRM	HelpAge, PIC, AE and CMB
4	WBG EHS Guidelines	HelpAge, PIC, AE and CMB
5	Environmental and social performance monitoring and reporting requirements	HelpAge, PIC, AE and CMB

VIII. ESMF IMPLEMENTATION BUDGET

The ESMF implementation budget comprises:

- Cost for preparation of EMDPs;
- Cost for E&S capacity building
- Cost for implementation of agreed mitigation measures within ECOP/EMDP

- Cost for supervision, monitoring and reporting of environmental and social performance

HelpAge will be responsible for the breakdown of the costs for every activities of E&S performance during project implementation.

Table 8.1: Cost estimates for E&S performance

Item	Cost estimates (in US\$)
<ul style="list-style-type: none"> • Preparation of EMDPs 	10,000 (included in Component 3)
<ul style="list-style-type: none"> • E&S capacity building 	5,000 (included in Component 1)
<ul style="list-style-type: none"> • Implementation of agreed mitigation measures • Monitoring and supervision of environmental and social performance 	Included in Component 2 Included in project management cost under Component 3

IX. GRIEVANCE REDRESS MECHANISM (GRM)

There are two major GRMs applying to the project including GRM for environmental and social performance and GRM for workers in accordance with ESS10 and ESS2. Aside from those, project-affected parties may use GRS of the WB. The following sections discuss the details of these GRMs.

9.1 Grievance Redress Mechanism (GRM) for E&S Performance

In line with ESS10, HelpAge will respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, HelpAge will propose and implement a GRM to receive and facilitate resolution of such concerns and grievances in accordance with the existing legal provisions of grievance under relevant national laws and regulations. The GRM may include the following (a) Different ways in which users can submit their grievances, which may include submission in person, by phone, text messages, mail, email or via a web site; (b) A log where grievance are registered in writing and maintained as a database; (c) Publicly advertised procedure, setting out the length of time users can expected to wait for acknowledgement, response and resolution of their grievances; and (d) Transparency about the grievance procedures, governing structure and decision makers; and (e) An appeals process (including the natural judiciary) to which unsatisfied grievance may be referred when resolution of grievance has not been achieved. HelpAge may provide mediation as an option where users are not satisfied with the proposed resolution. The GRM will be in place and included in POM before project implementation start.

9.2 Grievance Redress Mechanism for Workers

This GRM will be provided separately from the GRM required under ESS10, for all direct workers and contracted workers⁸ to raise workplace concerns. Such workers will be informed of the GRM at the time of recruitment and the measures put in place to protect them against any reprisal for its use. Measures will be put in place to make the grievance

⁸ Direct workers are defined as people employed or engaged directly by the Borrower (including project proponent and the project implementing agencies) to work specifically in relations to the project. Contracted workers are defined as people employed or engaged through third parties to perform work related to core functions of the project, regardless of location.

mechanism easily accessible to all such project workers. The GRM will be designed to address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned in a language they understand without retribution, and will operate in an independent and objective manner. The GRM will be implemented in accordance with the existing legal provisions of grievance under relevant national laws and regulations⁹.

If community workers are involved in the project, Labor Management Procedures will also specify the way in which community workers can raise grievance relating to the project.

Rights and duties of workers and employers will be managed according to GoV's related laws and regulations. Procedure below outlines the process for GRM for project workers which should be applied to the project by including the followings into all contracts.

- Right and duty of all project workers are protected by the national laws and regulations.
- When violation occurs due to the contract owner/employer, the workers/employees may lodge their complains and/or grievance to HelpAge through the following ways: submission in person, by phone, text messages, mail, email or via a website. The complainants should provide adequate information on the cases as much as possible including identifying specific regulations that are likely to be violated;
- HelpAge will register the complain/grievance (in a log) and respond to the complainant in writing within 7 days after receiving the complaint. HelpAge will take actions within 15 days after receiving the complaint/grievance and maintain all information in a GRM database. If needed a settlement committee should be established to facilitate a fair/transparent discussion and settlement. The resolution should be achieved within 30 days after receiving the complaint/grievance.
- If the two parties could not agree or the grievance could not be solved, they have the right to file the grievance/complaint to the GoV's agencies responsible for addressing the issues and follow the GoV's settlement process.
- HelpAge will inform the WB of the compliant/grievance through the E&S monitoring report. However, for serious cases, the issues will be informed to the WB within 48 hours after receiving the compliant/grievance.

9.3 WB Grievance Redress Service (GRS)

WB's GRS: Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanism or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaints to the WB's independent Inspection Panel which determines whether harms occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at anytime after concerns have been brought directly to the WB's attention, and Bank Management has been given an opportunity to respond. For information on how to

⁹ Law on Complaint 2011, Law on Labor 2019 and Decree 24/2018/ND-CP promulgated by the GoV.

submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit www.worldbank.org/grs. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org

X. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

10.1 Stakeholder engagement process

HelpAge and the World Bank's task team recognize the importance of engagement with relevant stakeholders, beneficiary communities and project affected parties throughout the project cycle. During the development of the Idea Proposal for JSDF, HelpAge has already conducted consultations with potential beneficiaries to identify the needs not yet met by the current ISHC model. The World Bank's task team has also joined HelpAge on fieldtrips to learn more about the needs of beneficiaries. These consultations have revealed the need for greater collaboration between formal health and social protection services, on the one hand, and community-based organizations for the elderly, on the other hand. In addition, it was found that the current ISHC model has not yet fully met health and care needs of older persons with chronic or terminal diseases, or who need rehabilitation services to regain physical or cognitive capacity after illness. Consultations also confirm the need for support to livelihoods of older persons and the benefit provided to older persons and their family caregivers by the livelihoods/income generation activities of the ISHC.

HelpAge has prepared and implemented an inclusive Stakeholder Engagement Plan (SEP) proportional to the nature and scale of the project and associated risks and impacts. The objectives of stakeholder engagement are:

- To establish a systematic approach to stakeholder engagement that will help HelpAge identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- To assess the level of the stakeholder interest and support for the project and to enable stakeholders' view to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risk and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow HelpAge to respond to and manage such grievances.

The SEP involves all project affected parties including HelpAge, the World Bank and JICA, the association of the elderly at all levels, commune health stations, and particularly targeted ISHCs and communities. The SEP also involves other interested parties including local authorities, community leaders (village heads and others), local women's unions, local farmer's unions, local Red Cross, local Father Land Front, and local media.

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

Where properly designed and implemented, SEP supports the development of strong, constructive and responsive relationships that are important for successful management of the project’s environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process and the assessment, management and monitoring of the project’s environmental and social risks and impacts.

During preparation of the ESMF, consultations with key stakeholders have been conducted. Key stakeholders include Association of the Elderly of six project provinces. For meaningful consultations, HelpAge has provided relevant material in a timely manner such as project paper and draft ESMF to the consulted groups to seek their views prior to consultation. Comments and recommendations received during the consultations were taken into account project design and finalization of the draft ESMF. Table 9.1 summarizes results of the public consultations on the ESMF.

Table 10.1: Summary of ESMF consultation results

Stakeholders/ Participants	Date	Discussed points	Stakeholder’s comments
6 Provincial Associations of the Elderly	10-17 April 2020	(i) Project objectives (ii) project content including proposed livelihood activities (iii) Potential positive impacts (iv) Potential adverse environmental and social risks and impacts associated with implementation of proposed livelihood activities (v) Mitigation plan	6 Provincial Associations of the Elderly agreed with these 5 discussed points and will collaborate closely with HelpAge to implement measures in the mitigation plan

10.2 Information Disclosure

Incompliance with the WB policy on access to information, the draft ESMF, and EMPF in Vietnamese language was locally disclosed on HelpAge’s website on 18 April,2020. The

English version were disclosed at the Bank's external website on The final ESMF will be disclosed at the same places as the draft ESMF after the Bank approves it.

All updated ECOPs if any and EMDPs prepared during project implementation will be locally disclosed on the HelpAge's website and at public places such as commune offices accessible to ISHCs, CMB, locally-affected people and local NGOs and authorities in Vietnamese language prior to appraisal of proposed activities.

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4. The Environmental and Social Management Framework for Transforming the Mekong Delta GCF Program for Vietnam Project, 2019.
5. The Environmental and Social Management Framework for Vietnam Emergency Natural Disaster Reconstruction Project, 2017.
6. The Environmental and Social Management Framework for Vietnam Health Professionals Education and Training for Health System Reforms Project, 2013.
7. The Environmental and Social Management Framework Toolkit for World Bank-financed projects in Vietnam, 2015.
8. WBG Environmental, Health and Safety Guidelines.
9. WHO, 1990. Public Health Impact of Pesticides Used in Agriculture.
10. WHO, 2012. Animal Waste, Water Quality and Human Health.

ANNEXES

Annex 1. Labor Management Procedures

Project title: Reducing Income- and Health-Related Vulnerability of Older Persons in Vietnam

Project ID (World Bank): P171030

Implementing Agency: HelpAge International

Practice Area (Lead): Health, Nutrition & Population

Contributing Practice Areas: Social Protection & Jobs

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2. ABOUT THE PROJECT

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1. INTRODUCTION AND CONTEXT

1.1. Country Context

Vietnam has achieved tremendous poverty reduction over the last couple of decades through distributing the gains of strong economic growth equitably. By 2016, the incidence of poverty had fallen to 9.8 percent (national General Statistics Office [GSO]-World Bank poverty line), down from nearly 60 percent in 1993.

Balancing economic prosperity with environmental sustainability, promoting equity and social inclusion, and strengthening state capacity and accountability—all within a constantly evolving global and domestic context—will be challenging.

1.2. Sectoral and Institutional Context

Vietnam has one of the most rapidly aging populations in the world. By 2049, nearly one quarter of the population will be age 60 and older. In 2019, the ratio of working-age people to older persons is about 9 to 1, but by 2049, this ratio will fall to only 4 to 1. Currently there are about 11.7 million persons aged 60 and older, but by 2049, this number will reach nearly 25 million, of whom nearly 4 million will be age 80 and older. Among the population aged 60 and older, a majority are women, with the share of females increasing with age.

In 2014, about 56 percent of people aged 60 to 69 years were female, increasing to 66 percent by the age group 80 and older. A majority of older persons are living with their children (63 percent in 2011), but many are in less advantageous living situations, e.g. living with other older persons or alone. About 39.1 percent of older persons are still working, a majority in government jobs (56.8 percent), followed by self-employed agricultural occupations (22.6 percent). A large share of people reported not working due to health reasons (39.4 (age 60-69) rising to 54.7 percent (age 80+)). The main sources of financial support reported by older persons is children (31.9 percent), working (29.4 percent), pension (16.1 percent) and social allowance (9.4 percent). Relatively large shares of people age 60 and older report that financial resources are insufficient for daily needs (26.2 percent) or sometimes insufficient for daily needs (36.2 percent). Some 17.2 percent of older persons report living in poor households, with only about 30 percent reporting social allowance payments, 3.7 percent reporting pension. The economic situation of older persons in rural areas tends to be worse than in urban areas. Rural older people are also more dependent on continuing working as a way to support themselves compared to urban older people.

Health is an important concern of older persons in Vietnam as in any society. In 2015, life expectancy at age 60 was 25 for women and 20 for men in Vietnam. However, seven of those years for women and five for men are lived in poor health. When asked about their health, 10.1 percent of older persons report very weak health and another 55.3 percent report weak health. Among people aged 60 and older, 40 percent of men and 46 percent of women report having some disability. While vision problems are the most prevalent, mobility, hearing and memory/cognition problems are also common. Some 37.6 percent of older persons reported difficulties with activities of daily living (ADLs). In 2011, 30.8 percent reported difficulty in getting up from lying position, 15.1 percent struggled with toilet hygiene, 14.8 percent had trouble self-feeding. Health problems among older persons tend to be related to chronic diseases, with the burden of disease from cardio-vascular disease and cancer accounting for nearly half of all DALYs among people aged 60 and older.

2. ABOUT THE PROJECT

2.1. Proposed Development Objective(s)

In order to reduce the income- and health-related vulnerabilities of older persons, the project development objective is to increase the participation of older persons in income-generating activities and their use of community-based health and social care services in the selected communities in six provinces

2.2. Project Description

The Intergenerational Self-help Clubs (ISHC) development model closely follow the Community Driven Development (CDD) approach which is a development initiative that provides control of the development process, resources and decision-making authority directly to community groups. The underlying assumption of ISHC approaches are that communities are the best judges of how their lives and livelihoods can be improved and, if provided with opportunities, information and adequate resources, they can organize themselves to provide for their immediate and future needs.

The core activity of the project is the establishment of community-led sustainable ISHCs to promote economically productive, healthy and active ageing, while enhancing the contributions of older persons to their own families/communities, and also reducing the burden of care of older people on these families/communities. The ISHCs supported by this project will implement four types of activities:

Livelihoods program for needy ISHC members. At the core of the ISHCs is an income-generation program that provides capital for ISHC members to start small age-appropriate and environmentally-friendly income-generating activities. Operated as a revolving fund, this program allows members to access capital to start livelihoods activities (e.g. small-scale agriculture, animal husbandry, handicrafts, or small business) to provide much needed income in old age.

Activities focused on the health of older persons. Clubs will give presentations and demonstrations on health-related topics, organize physical exercise, promote access to health insurance and, with support from local Association of the Elderly. The ISHC management boards will also help to arrange for the provision of low-cost home-based medical care for people who are not able to easily leave home (e.g. help with rehabilitation exercises, monitoring of blood pressure and/or blood glucose, help with taking of medication etc)

Activities focused on community-based care. Each club will have at least 10 volunteer caregivers (mostly older persons) trained in the knowledge and skills to provide home care for those in need. This includes support for activities of daily living (ADLs), instrumental activities of daily living (IADLs), and companionship.

Support for older persons to receive their entitlements. In collaboration with VAE and/or the Women's Union (WU), the clubs will inform older persons of their entitlements (such as old age pension, benefits for people with disabilities, veterans' benefits) and help them to complete the administrative procedures needed to access them.

2.3. Overview of labor use in the Project

The project will be implemented by the HelpAge International (HelpAge).

The third party service providers that will be used by HelpAge's in this project, include Vietnam Association of the Elderly (VAE) and provincial Associations of the Elderly, tentatively in Hoa Binh, Thanh Hoa, Quang Binh, Khanh Hoa, Ninh Thuan provinces and Da Nang city.

For the purpose of these Labor Management Procedures', HelpAge, The Vietnam Association of the Elderly, and provincial Associations of the Elderly are considered as employers where relevant.

ESS 2 categorizes the workers into: direct workers, contracted workers, community workers and primary supply workers. As per the design and nature of this project, three categories of workers are involved, which are: direct workers, contracted workers and community workers.

Direct workers. Those employed or engaged directly by HelpAge to work specifically in relation to the project. These workers include HelpAge staff and consultants who are hired on contract basis for the implementation of wide range activities of the project. Examples of these direct workers are as: National Project Manager, National ISHC consultants, National Finance and Admin Manager, National Finance and Admin/Procurement Consultant...

Direct workers include both full time and part time contracts. Total number of direct workers dedicated to this project is estimated at around 10.

The direct workers (called National Project Team - NPT) will be in charge of the day to day management and implementation of the project. There are three project sub-teams of NPT, each including of one National ISHC consultant and one national junior ISHC consultant, to be in charge of 2 target provinces out of total 6 provinces. The NPT will be responsible for developing and implementing the project annual workplan, budget and M&E, knowledge management, safeguards, and reporting. Specifically, the PT will conduct, in partnership with and logistic support of local AE, the project activities including project orientation, training and review & networking and on-going trainings, regular technical support visits to the ISHCs and local AEs, annual meetings with project Advisory Committee, project model sharing and replication to non project communities, and involve in the M&E. The PT will conduct monthly visit to the project sites to assess overall progress against the project's plan and targets, as well gather best practice and lessons learned.

Contracted Workers. Those worked at the third parties (Associations of the Elderly (AEs) – national level and provincial level) to perform and support works related to the project activities at the localities. The AEs can propose TOR and qualified candidates then HelpAge will do selection and contracting process. Examples of these contracted workers are as: National VAE ISHC advisor, Provincial AE ISHC consultant, Provincial AE ISHC junior consultants.

Contracted workers include both full time and part time contracts. Total number of contracted workers dedicated to this project is estimated at around 13. The roles of contracted workers at provincial level, with the technical support from national project team (HelpAge), include: responsible for organizing (logistic arrangement of) all the project activities in their province, guiding local AEs to recruit ISHC Management Board members and ISHCs members, communication and link/collaborate with key stakeholders at provincial, district, commune and community levels to provide better support to ISHCs and older people. They will also provide direct and regular monitoring and technical support to the local AE and ISHCs, as well as participating in the project annual evaluation. They will also play a key role in the project advocacy work within their target province.

At the national level, the VAE ISHC advisor will support the project in the sharing of the project model widely within the project areas as well as nationally. She/he will help bring the challenges that the older people and ISHCs in the project communities face with to the national agenda and advocate for change. She/he also provides guidelines to the provincial AE and CMBs (Club Management Board) in term of older people right and entitlement, advising provincial AEs in addressing issues relating to ISHCs replication such as financing, influencing other sectors to support ISHCs, ect...

Community workers. Those voluntarily engaged in the ISHCs' activities at the commune/village level. These are the volunteers of ISHC and the ISHC's board members as well. There will be 5 volunteers and 5 board members per each ISHC. The board members and volunteers may be re-selected by the ISHCs every 2-years or every 3-years based on the ISHC's regulation

With the target of 180 fully funded ISHCs, the total number of community workers involved in this project is estimated at around 1,800 in 3 years of the project.

The community workers will provide all the community level services/activities relating to income, health and care, among others, for their members and community members, most of them are older people. They will also involve in project participatory M&E. They will receive the regular technical supports from local AE and HelpAge

3. DIRECT WORKERS

3.1. General principle and the rights of labors

The project guarantees the rights and legitimate interests of employees and encourages agreements providing employees with conditions more favorable than those provided by the labor law.

An Employee of the project is persons who is full 18 years or older, has the ability to work, works under a labor contract, is paid with wage and is managed and controlled by the employer.

The project will not hire child labor.

An employee has the following rights:

- a/ To work, freely choose a job or occupation, to participate in vocational training and to improve occupational skills and suffer no discrimination;
- b/ To receive a wage commensurate with his/her occupational knowledge and skills on the basis of an agreement reached with the employer; to receive labor protection and work in assured conditions of labor safety and labor hygiene; to take leave according to the prescribed regime, paid annual leaves and enjoy collective welfare benefits;
- c/ To form and join and participate in activities of trade unions, occupational associations and other organizations in accordance with law; to request and participate in dialogues with the employer, implement democracy regulations and be consulted at the workplace to protect his/her rights and legitimate interests; and to participate in management activities according to the employer's regulations;

d/ To unilaterally terminate the labor contract in accordance with law;

e/ To go on strike.

3.2. Labor contract

A labor contract must be directly entered into between an employee and an employer before the employee is admitted.

A Job Description shall be provided. An employer shall provide an employee with information about the job, workplace, working conditions, working hours, rest time, occupational safety and hygiene, wage, forms of wage payment, social insurance, health insurance, regulations on business confidentiality, technological confidentiality, and other issues directly related to the entry into the labor contract as requested by the employee.

The employee shall provide the employer with information about his/her full name, age, gender, residence address, education level, occupational skills and qualification, health conditions and other issues directly related to the entry into a labor contract as requested by the employer.

During the performance of a labor contract, any party that requests to modify or supplement the contents of the labor contract shall notify at least 3 working days in advance to the other party of the contents to be modified or supplemented.

In case the two parties can reach an agreement, the modification or supplementation of the labor contract must be carried out by signing an annex to the labor contract or signing a new labor contract.

In case the two parties cannot reach an agreement on the modification or supplementation of the labor contract, they shall continue performing the labor contract already entered into.

All workers are employed under contract for a specific period, the duration and date of commencement of the employment contract, including the probationary period, notice period will be stated. The contract may be renewed by mutual agreement prior to an expiry date.

The right of employees to unilaterally terminate labor contracts. An employee working under a definite-term labor contract, a seasonal labor contract or performing a certain job of under 12 months may unilaterally terminate the labor contract prior to its expiry in the following cases:

a/ He/she is not assigned to the job or workplace or is not given the working conditions as agreed in the labor contract;

b/ He/she is not paid in full or on time as agreed in the labor contract;

c/ He/she is maltreated, sexually harassed or is subject to forced labor;

d/ He/she is unable to continue performing the labor contract due to personal or family difficulties;

e/ He/she is elected to perform a full-time duty in a people-elected office or is appointed to hold a position in the state apparatus;

f/ A female employee who is pregnant and must take leave as prescribed by a competent health establishment;

g/ If he/she is sick or has an accident and remains unable to work after having received treatment for 90 consecutive days, in case he/she works under a definite-term labor contract, or for a quarter of the contract's term, in case he/she works under a labor contract for a seasonal job or a specific job of under 12 months.

The right of employers to unilaterally terminate labor contracts. An employer may unilaterally terminate a labor contract in the following cases:

a/ The employee often fails to perform his/her job stated in the labor contract;

b/ The employee is sick or has an accident and remains unable to work after having received treatment for 12 consecutive months, in case he/she works under an indefinite-term labor contract, or for 6 consecutive months, in case he/she works under a definite-term labor contract, or more than half the term of the labor contract, in case he/she works under a labor contract for a seasonal job or a specific job of under 12 months.

When the employee's health has recovered, he/she must be considered for continued entry into the labor contract;

c/ If, as a result of natural disaster, fire or another *force majeure* event as prescribed by law, the employer, though having applied every remedial measure, has to scale down production and cut jobs;

d/ The employee is absent from the workplace after the time limit specified in Article 33 of the Labor Code¹⁰.

3.3. Wages

Wage is a monetary amount which is paid by an employer to an employee to do a job as agreed by the two parties.

Wage includes a wage amount which is based on the work or title, wage allowance(s) and other additional payments. An employee's wage must not be lower than the minimum wage set by the Government. A wage must be paid to an employee based on labor productivity and quality of the work performed.

An employer shall pay equal wages without gender-based discrimination to employees doing a job of equal value.

An employer may select the form of wage payment based on working time, products or piecework. The selected form of wage payment must be maintained for a certain period of time. Any change in the form of payment must be informed by the employer to the employee at least 10 days in advance.

¹⁰ **Article 33. Reinstatement of employees upon expiry of the period of suspension of labor contracts**

Within 15 days after the expiry of the period of suspension of a labor contract in a case specified in Article 32 of this Code, the employee shall show up at the workplace and the employer shall reinstate the employee unless otherwise agreed upon by the two parties.

Wages are credited to staffs' bank accounts on the 25th of each month, payable in VND. If 25th is a weekend or holiday, the salaries can be transferred in the prior day. In some special cases, staff will be informed if the salary transfer is later than 25th.

Employees enjoying hourly, daily or weekly wages must be paid after the working hour, day or week or paid in a lump sum as agreed by the two parties.

Employees enjoying monthly wages must be paid once a month.

Employees enjoying wages based on products or piecework must be paid as agreed by the two parties; if the work is to be performed in a number of months, each month, the employee must be given an advance wage according to the volume of work completed in the month.

Timesheet is required to support for wage payment.

Employees, those are subject to compulsory state insurance scheme, shall contribute the employees' compulsory part to social insurance, health insurance and unemployment insurance and other compulsory contributions (if any) in compliance with the laws. The deductions in wage payments are applied accordingly.

Salary/wage reviews. Salaries shall be adjusted:

- on the basis when renewal of employment contract for each staff
- or, on an annual review with effect from 01 April.

3.4. Insurances and benefits

Participation in social insurance and health insurance

Employers and employees shall participate in compulsory social insurance, compulsory health insurance and unemployment insurance and are entitled to the benefits in accordance with the social insurance and health insurance laws.

Employers and employees are encouraged to participate in other different forms of social insurance for employees.

When an employee is absent from work and covered by social insurance, the employer is not required to pay a wage to the employee.

For a worker (e.g. a consultant) who is not subject of compulsory social insurance, compulsory health insurance and unemployment insurance, the employer shall calculate and pay to the labor a wage which includes the level of contribution to compulsory social insurance, compulsory health insurance and unemployment insurance in accordance with regulations.

Other benefits

Beside the benefits required by Vietnam Labor Code, the Social Insurance Laws, and the Health Insurance Law, HelpAge attempts to provide benefits for the wellbeing of staff which are consistent with market practices. Other benefits may be below:

Health and Accident Insurance (Group insurance)

The Health and Accident Insurance will be on annual basis and will be dependent on HelpAge's ability to pay and will vary each year and will have to be approved by the Country Director.

Annual Physical/Health Check Up

HelpAge will provide an annual standard medical examination for all current staff, the check-up items/contents may vary according to age. Details of the check up will be announced by the Finance and Admin Manager.

The annual medical examination will be dependent on HelpAge's ability to pay and will vary each year and will have to be approved by the Country Director.

Tet (Lunar New Year) bonus

The Tet bonus will be dependent on HelpAge's ability to pay and will vary each year and will have to be approved by the Country Director upon yearly basis.

The project-end bonus may be applied depending on the regulation of each project. In this case, the Country Director has the right to combine the two kinds of bonus and decide the bonus rate for each staff.

Terminal grants

HelpAge will contribute to your Provident Fund (Employer contribution 10% if employee agrees to contribute 5% of his/her base salary). It is understood that the Provident Fund is not part of the monthly salary. The Provident Fund will be deposited in a long-term bank account or stock and bonds, in agreement with the employer and employees. Once the employee contract is terminated, the employee is entitled to withdraw their provident fund. Other withdrawal cases will be decided by the Country Director.

3.5. Working hour, annual leave, public holidays, personal leave, unpaid leave and other leave

Normal working time

Normal working time must not exceed 8 hours per day or 40 hours per week.

Annual leave

An employee who has been working for an employer for full 12 months is entitled a fully paid annual leave as stated in his/her labor contract as follows:

Twelve working days for an employee working in normal conditions;

The annual leave of an employee will be increased 1 day for every 5 years' working for an employer.

Public and New Year holidays

An employee is entitled to fully paid days off on the following public and New Year holidays:

a/ Calendar New Year Holiday: 1 day (the first day of January of the calendar year);

b/ Lunar New Year Holidays: 5 days;

- c/ Victory Day: 1 day (the thirtieth day of April of each calendar year);
 - d/ International Labor Day: 1 day (the first day of May of each calendar year);
 - e/ National Day: 1 day (the second day of September of each calendar year);
 - f/ Commemorative Celebration of Vietnam's Forefather - Kings Hung: 1 day (the tenth of March of the lunar year).
 - g/ Besides, 3 Holidays are applied for HelpAge's employees: 24th, 25th, 31st December
- Total: 13 holidays per year.

Personal leave, unpaid leave

1. An employee may take fully paid leave for personal reasons in the following cases:

- a/ Marriage: 3 days;
- b/ Marriage of his/her child: 1 day;
- c/ Death of a blood parent or a parent of his/her spouse, his/her spouse or child: 3 days.

2. An employee may take 1 day off without pay and shall inform the employer when a paternal or maternal grandparent or blood sibling dies; his/her father or mother gets married; or a blood sibling gets married.

3. An employee may discuss and agree with the employer on unpaid leave in addition to the leaves specified in Items 1 and 2 above.

Maternity leave

1. A female employee is entitled to 6 months of prenatal and postnatal leave.

In case a female employee gives birth to twin or more babies, counting from the second child upward, for each child the mother is entitled to 1 more month off.

Prenatal leave must not exceed 2 months.

2. During the maternity leave, a female employee is entitled to maternity policies provided by the law on social insurance.

3. After the maternity leave period stipulated in Item 1 of this Maternity Leave, if a female employee wishes, she may take additional leave without pay as agreed upon with the employer.

4. Before the expiration of her maternity leave stipulated in Item 1 of this Maternity Leave, a female employee may return to work if she so wishes and the employer so agrees provided that she has a certificate from a competent health establishment that early resumption of work will not adversely affect her health and she has taken at least 4 months of maternity leave.

In this case, the female employee continues to receive the maternity allowance as provided by the law on social insurance, in addition to the wage paid by the employer for her working days.

Business leave/Compensation leave

Occasionally, due to the work/travel requirement, staff will have to spend time after normal working hours (from 10 hours and above) or during weekends, the day-off-compensation can be applied with full salaries. The compensation leave is on the basis of one free day for a day worked.

Paternity leave

National male staff are entitled 10 working days for paternity leave

Medical leave

Subject to the HelpAge's staff policy, HelpAge will normally grant paid sick leave up to 20 working days per annum. However in special cases, HelpAge, by the Country Director, may give sympathetic consideration and at his/her discretion may grant paid sick leave in excess of the employee's entitlement.

Sterilization Leave

Staff can take leave to undergo sterilization procedures for a period of time determined by first-class physicians and receive pay. The leave request must be submitted seven days in advance and must be approved by the Country Director to take effect.

Other Leave

Any leave which is not mentioned by Vietnam laws will be decided by the Country Director.

4. CONTRACTED WORKERS

4.1. General principle and the rights of labors

The project guarantees the rights and legitimate interests of employees and encourages agreements providing employees with conditions more favorable than those provided by the labor law.

Employee of the project is persons who is full 18 years or older, has the ability to work, works under a labor contract, is paid with wage and is managed and controlled by the employer.

The project will not hire child labors.

An employee has the following rights:

- a/ To work, freely choose a job or occupation, to participate in vocational training and to improve occupational skills and suffer no discrimination;
- b/ To receive a wage commensurate with his/her occupational knowledge and skills on the basis of an agreement reached with the employer; to receive labor protection and work in assured conditions of labor safety and labor hygiene; to take leaves according to the prescribed regime, paid annual leaves and enjoy collective welfare benefits;
- c/ To form and join and participate in activities of trade unions, occupational associations and other organizations in accordance with law; to request and participate in dialogues with the employer, implement democracy regulations and be consulted at

the workplace to protect his/her rights and legitimate interests; and to participate in management activities according to the employer's regulations;

d/ To unilaterally terminate the labor contract in accordance with law;

e/ To go on strike.

4.2. Labor contract

A labor contract must be directly entered into between an employee and an employer before the employee is admitted.

A Job Description shall be provided. An employer shall provide an employee with information about the job, workplace, working conditions, working hours, rest time, occupational safety and hygiene, wage, forms of wage payment, social insurance, health insurance, regulations on business confidentiality, technological confidentiality, and other issues directly related to the entry into the labor contract as requested by the employee.

The employee shall provide the employer with information about his/her full name, age, gender, residence address, education level, occupational skills and qualification, health conditions and other issues directly related to the entry into a labor contract as requested by the employer.

During the performance of a labor contract, any party that requests to modify or supplement the contents of the labor contract shall notify at least 3 working days in advance to the other party of the contents to be modified or supplemented.

In case the two parties can reach an agreement, the modification or supplementation of the labor contract must be carried out by signing an annex to the labor contract or signing a new labor contract.

In case the two parties cannot reach an agreement on the modification or supplementation of the labor contract, they shall continue performing the labor contract already entered into.

All labors are employed under contract for a specific period, the duration and date of commencement of the employment contract, including the probationary period, notice period will be stated. The contract may be renewed by mutual agreement prior to an expiry date.

The right of employees to unilaterally terminate labor contracts. An employee working under a definite-term labor contract, a seasonal labor contract or performing a certain job of under 12 months may unilaterally terminate the labor contract prior to its expiry in the following cases:

a/ He/she is not assigned to the job or workplace or is not given the working conditions as agreed in the labor contract;

b/ He/she is not paid in full or on time as agreed in the labor contract;

c/ He/she is maltreated, sexually harassed or is subject to forced labor;

d/ He/she is unable to continue performing the labor contract due to personal or family difficulties;

e/ He/she is elected to perform a full-time duty in a people-elected office or is appointed to hold a position in the state apparatus;

f/ A female employee who is pregnant and must take leave as prescribed by a competent health establishment;

g/ If he/she is sick or has an accident and remains unable to work after having received treatment for 90 consecutive days, in case he/she works under a definite-term labor contract, or for a quarter of the contract's term, in case he/she works under a labor contract for a seasonal job or a specific job of under 12 months.

The right of employers to unilaterally terminate labor contracts. An employer may unilaterally terminate a labor contract in the following cases:

a/ The employee often fails to perform his/her job stated in the labor contract;

b/ The employee is sick or has an accident and remains unable to work after having received treatment for 12 consecutive months, in case he/she works under an indefinite-term labor contract, or for 6 consecutive months, in case he/she works under a definite-term labor contract, or more than half the term of the labor contract, in case he/she works under a labor contract for a seasonal job or a specific job of under 12 months.

When the employee's health has recovered, he/she must be considered for continued entry into the labor contract;

c/ If, as a result of natural disaster, fire or another *force majeure* event as prescribed by law, the employer, though having applied every remedial measure, has to scale down production and cut jobs;

d/ The employee is absent from the workplace after the time limit specified in Article 33 of the Labor Code.

4.3. Wages

Wage is a monetary amount which is paid by an employer to an employee to do a job as agreed by the two parties.

Wage includes a wage amount which is based on the work or title, wage allowance(s) and other additional payments. An employee's wage must not be lower than the minimum wage set by the Government. A wage must be paid to an employee based on labor productivity and quality of the work performed.

An employer shall pay equal wages without gender-based discrimination to employees doing a job of equal value.

An employer may select the form of wage payment based on working time, products or piecework. The selected form of wage payment must be maintained for a certain period of time. Any change in the form of payment must be informed by the employer to the employee at least 10 days in advance.

Wages are credited to staffs' bank accounts on the 25th of each month, payable in VND. If 25th is weekend or holiday, the salaries can be transferred in the prior day. In some special cases, staff will be informed if the salary transfer is later than 25th.

Employees enjoying hourly, daily or weekly wages must be paid after the working hour, day or week or paid in a lump sum as agreed by the two parties.

Employees enjoying monthly wages must be paid once a month.

Employees enjoying wages based on products or piecework must be paid as agreed by the two parties; if the work is to be performed in a number of months, each month, the employee must be given an advance wage according to the volume of work completed in the month.

Timesheet is required to support for wage payment.

Employees, those are subject to compulsory state insurance scheme, shall contribute the employees' compulsory part to social insurance, health insurance and unemployment insurance and other compulsory contributions (if any) in compliance with the laws. The deductions in wage payments are applied accordingly.

4.4. Insurances and benefits

Participation in social insurance and health insurance

Employers and employees shall participate in compulsory social insurance, compulsory health insurance and unemployment insurance and are entitled to the benefits in accordance with the social insurance and health insurance laws.

Employers and employees are encouraged to participate in other different forms of social insurance for employees.

When an employee is absent from work and covered by social insurance, the employer is not required to pay a wage to the employee.

For a labor (e.g. a retired person) who is not subject of compulsory social insurance, compulsory health insurance and unemployment insurance of the Project, the employer shall calculate and pay to the labor a wage which includes the level of contribution to compulsory social insurance, compulsory health insurance and unemployment insurance in accordance with regulations.

4.5. Working hour, annual leave, public holidays, personal leave, unpaid leave and other leave

Normal working time

Normal working time must not exceed 8 hours per day or 40 hours per week.

Annual leave

An employee who has been working for an employer for full 12 months is entitled a fully paid annual leave as stated in his/her labor contract as follows:

Twelve working days for an employee working in normal conditions;

The annual leave of an employee will be increased 1 day for every 5 years' working for an employer.

Public and New Year holidays

An employee is entitled to fully paid days off on the following public and New Year holidays:

- a/ Calendar New Year Holiday: 1 day (the first day of January of the calendar year);
- b/ Lunar New Year Holidays: 5 days;
- c/ Victory Day: 1 day (the thirtieth day of April of each calendar year);
- d/ International Labor Day: 1 day (the first day of May of each calendar year);
- e/ National Day: 1 day (the second day of September of each calendar year);
- f/ Commemorative Celebration of Vietnam's Forefather - Kings Hung: 1 day (the tenth of March of the lunar year).

Personal leave, unpaid leave

1. An employee may take fully paid leave for personal reasons in the following cases:

- a/ Marriage: 3 days;
- b/ Marriage of his/her child: 1 day;
- c/ Death of a blood parent or a parent of his/her spouse, his/her spouse or child: 3 days.

2. An employee may take 1 day off without pay and shall inform the employer when a paternal or maternal grandparent or blood sibling dies; his/her father or mother gets married; or a blood sibling gets married.

3. An employee may discuss and agree with the employer on unpaid leave in addition to the leaves specified in Items 1 and 2 above.

Maternity leave

1. A female employee is entitled to 6 months of prenatal and postnatal leave.

In case a female employee gives birth to twin or more babies, counting from the second child upward, for each child the mother is entitled to 1 more month off.

Prenatal leave must not exceed 2 months.

2. During the maternity leave, a female employee is entitled to maternity policies provided by the law on social insurance.

3. After the maternity leave period stipulated in Item 1 of this Maternity Leave, if a female employee wishes, she may take additional leave without pay as agreed upon with the employer.

4. Before the expiration of her maternity leave stipulated in Item 1 of this Maternity Leave, a female employee may return to work if she so wishes and the employer so agrees provided that she has a certificate from a competent health establishment that

early resumption of work will not adversely affect her health and she has taken at least 4 months of maternity leave.

In this case, the female employee continues to receive the maternity allowance as provided by the law on social insurance, in addition to the wage paid by the employer for her working days.

Business leave/Compensation leave

Occasionally, due to the work/travel requirement, staff will have to spend time after normal working hours (from 10 hours and above) or during weekends, the day-off-compensation can be applied with full salary. The compensation leave is on the basis of one free day for a day worked.

Medical leave

National staff are entitled to a sick leave as long as necessary. However, subject to the provision of the Labor law, HelpAge will grant paid sick leave up to 20 working days per annum. HelpAge, by the Country Director, may give sympathetic consideration and at his/her discretion may grant paid sick leave in excess of the employee's entitlement.

Sterilization Leave

Staff can take leave to undergo sterilization procedures for a period of time determined by first-class physicians and receive pay. The leave request must be submitted seven days in advance and must be approved by the Country Director to take effect.

4.6. Employment of elderly employees

1. When necessary, an employer may reach agreement with an elderly employee who has sufficient health conditions on the extension of the labor contract or the conclusion of a new labor contract in accordance with the provisions of Chapter III of the Labor Code.
2. If, after retirement, an elderly employee is employed under a new labor contract, he/she still enjoys the rights and interests agreed upon in the labor contract, in addition to the rights and benefits under the retirement regime.
3. An employer may not employ elderly employees in heavy or dangerous jobs or jobs exposed to toxic substances that adversely affect their health, except in special cases as stipulated by the Government on the Decree No. 39/2016/NĐ-CP dated 15th May 2016.
4. An employer is responsible for taking care of the health of elderly employees at the workplace.

5. COMMUNITY WORKERS

Since all project intervention (design, implementation and monitoring) at community level will be led by the ISHCs, which will involve ISHC's members and its community volunteers, the Project will include the community workers. The community workers, which are all community non-paid volunteers, would include the ISHCs' management board, members, life-long communicators, homecare and economic volunteers, neighborhood group leaders, exercise and sport groups, social and cultural groups, self-help groups which will take lead in

all ISHC community actions. Due to the nature of the investment activities it is not expected the Project would involve in a contracted employment. Due to the voluntary nature of work, the community workers will not be subject to terms of and conditions of employment, regular payment or written notice of termination.

HelpAge maintains its policy of Equal opportunities and dignity at work applies to all those who work for HelpAge including the volunteer/community workers. The community workers will be protected from from discrimination, harassment, exploitation and intimidation (if any). See further in section 8.

Led by the ISHCs, the members and its community volunteers will involve in a number of different activities to which the working conditions and occupational health and safety will apply to the following ISHC's intervention:

Community lead activities	Led by	Beneficiary	Frequency	Working condition and occupation health and safety
1) Social and cultural	Social and cultural group	Community & ISHC members	Monthly	<ul style="list-style-type: none"> • Are social and culturally sensitive • Environmentally friendly • Location: at village level • Safe and accessible venue • Time: daytime (decided by the members) • Inclusive of gender, ageing, EM and disability • Free of charge
2) Exercise and sport	Exercise & sport teams	Community & ISHC members	Daily, weekly or monthly	<ul style="list-style-type: none"> • Are social and culturally sensitive • Environmentally friendly • Location: at village level • Safe and accessible venue • Time: daytime (decided by the members) • Inclusive of gender, ageing, EM and disability • Free of charge
3) Health component <ul style="list-style-type: none"> • 3.1 Health awareness and health promotion • 3.2 Health screening • 3.3 Health check-up • 3.4 Health insurance 	Health led (CMB) and local health experts (CHS - volunteers)	3.1 ISHC and community members 3.2-3.4 ISHC members and care clients	Monthly	<ul style="list-style-type: none"> • Are social and culturally sensitive • Environmentally friendly • Are voluntary (information provided on the benefit of healthy and active ageing) • Location: at village level • Safe and accessible venue • Time: daytime (decided by the members) • Inclusive of gender, ageing, EM and disability • Free of charge
4) Care component <ul style="list-style-type: none"> • 4.1 Social care 	Care lead (CMB) and local health experts (CHS -	3.1 and 3.2 are provided by community care	At least 2 times per week per	<ul style="list-style-type: none"> • Are social and culturally sensitive • Environmentally friendly • Are voluntary

<ul style="list-style-type: none"> • 4.2 Personal care • 4.3 Living support care • 4.4 Health and medical care 	volunteers)	<p>volunteers</p> <p>4.3 by ISHC and local communities</p> <p>4.4 CHS staff and local retired medical volunteers</p>	clients	<ul style="list-style-type: none"> • Care training and care kits provided to homecare volunteers (how to protect oneself, when providing care – like washing hands and wearing gloves) • Location: at village level • Safe and accessible venue • Time: daytime (decided by the members) • Inclusive of gender, ageing, EM and disability • Free of charge
<p>5) Livelihood</p> <ul style="list-style-type: none"> • 5.1 Awareness • 5.2 Revolving fund • 5.3 Home-visit • 5.4 Economic volunteer 	Livelihood led (CMB) and local livelihood experts (community members and local livelihood extension officials)	<p>4.1 ISHC and community members</p> <p>4.2-4.4 ISHC members and care clients</p>	Monthly and Quarterly	<ul style="list-style-type: none"> • Are social and culturally sensitive • Environmentally friendly • Are voluntary (information provided on the benefit of pro-poor, age and environmentally friendly livelihood schemes. • Location: at village level • Safe and accessible venue • Time: daytime (decided by the members) • Inclusive of gender, ageing, EM and disability • Free of charge
<p>6) Live-long learning (ISHC monthly meeting)</p>	CMB and local livelihood, health and right experts (community members and local experts)	ISHC members	Monthly	<ul style="list-style-type: none"> • Are social and culturally sensitive • Environmentally friendly • Are voluntary (information provided on the benefit of life-long learning). • Location: at village level • Safe and accessible venue • Time: daytime (decided by the members) • Inclusive of gender, ageing, EM and disability • Free of charge
<p>7) Self-help</p> <ul style="list-style-type: none"> • 7.1 Individual cases • 7.2 Community development support 	CMB and group leaders	Those most in need in target communities	Monthly	<ul style="list-style-type: none"> • Are social and culturally sensitive • Environmentally friendly • Within the capacity of the ISHC and its members. • Are voluntary (information provided on the benefit of pro-poor, age and environmentally friendly livelihood schemes. • Location: at village level • Safe and accessible venue • Time: daytime (decided by the members) • Inclusive of gender, ageing, EM and disability • Free of charge

8) Right and entitlement <ul style="list-style-type: none"> • 8.1 Awareness • 8.2 Monitoring • 8.3 legal service 	Right and entitlement led (CMB) and local right and entitlement experts (community members and local AE and authorities)	8.1 -8.3 community and ISHC members ISHC	Monthly	<ul style="list-style-type: none"> • Are social and culturally sensitive • Environmentally friendly • appropriate and environmentally friendly • Are voluntary (information provided on the benefit of pro-poor, age and environmentally friendly livelihood schemes. • Location: at village level • Safe and accessible venue • Time: daytime (decided by the members) • Inclusive of gender, ageing, EM and disability • Free of charge
9) Resource mobilization <ul style="list-style-type: none"> • 9.1 Golden Heart sponsorship • 9.2 Membership fee • 9.3 Revolving fund interest • 9.4 Small social enterprise 	Resource mobilization led (CMB)	Those most needy in the target communities	Monthly	<ul style="list-style-type: none"> • Are social and culturally sensitive • Environmentally friendly • Are voluntary (information provided on needy cases in the target communities. • Location: at village level • Safe and accessible venue • Time: daytime (decided by the members) • Inclusive of gender, ageing, EM and disability • Free of charge
10) Advocacy <ul style="list-style-type: none"> • 10.1 gather inputs from ISHC and communities • 10.2 regular feedback and dialog with local authorities and service providers 	CMB and local service providers and authorities	Entire communities, especially for those most in need	At least 2 times per year	<ul style="list-style-type: none"> • Inclusive of gender, ageing, EM and disability • Are voluntary (consultation with ISHC and community members) • Location: at village and commune levels • Safe and accessible venue • Time: daytime (decided by the members) • Free of charge

6. OCCUPATIONAL HEALTH AND SAFETY

Employers' and employees' (including community workers) obligations for occupational health and safety

1. An employer has the following obligations:

a/ To ensure that the workplace meet the requirements on space, airiness, dust, steam, toxic gas, radiation, electricity of magnetic field, heat, moisture, noise, vibration and other harmful factors as prescribed in relevant technical regulations. These factors must be checked and measured on a regular basis;

b/ To ensure safe and hygienic working conditions for machines, equipment and workshops as required by the promulgated or applied national technical regulations or standards on occupational safety and hygiene at workplace;

c/ To check and evaluate dangerous and harmful factors at the workplace in order to put forward measures to avert and minimize dangers and harms and improve working conditions and healthcare for employees;

d/ To examine and maintain machines, equipment, workshops and warehouses on a periodical basis;

e/ To display signboards of instructions for occupational safety and hygiene for machines, equipment and workplaces at easy-to-read and -see locations at the workplace;

f/ To consult the representative organization of the grassroots-level employees' collective when planning and implementing activities to ensure occupational safety and hygiene.

2. An employee has the following obligations:

a/ To observe regulations, processes and internal rules on occupational safety and hygiene which are relevant to assigned jobs;

b/ To use and maintain equipped personal protection equipment and occupational safety and hygiene tools at the workplace;

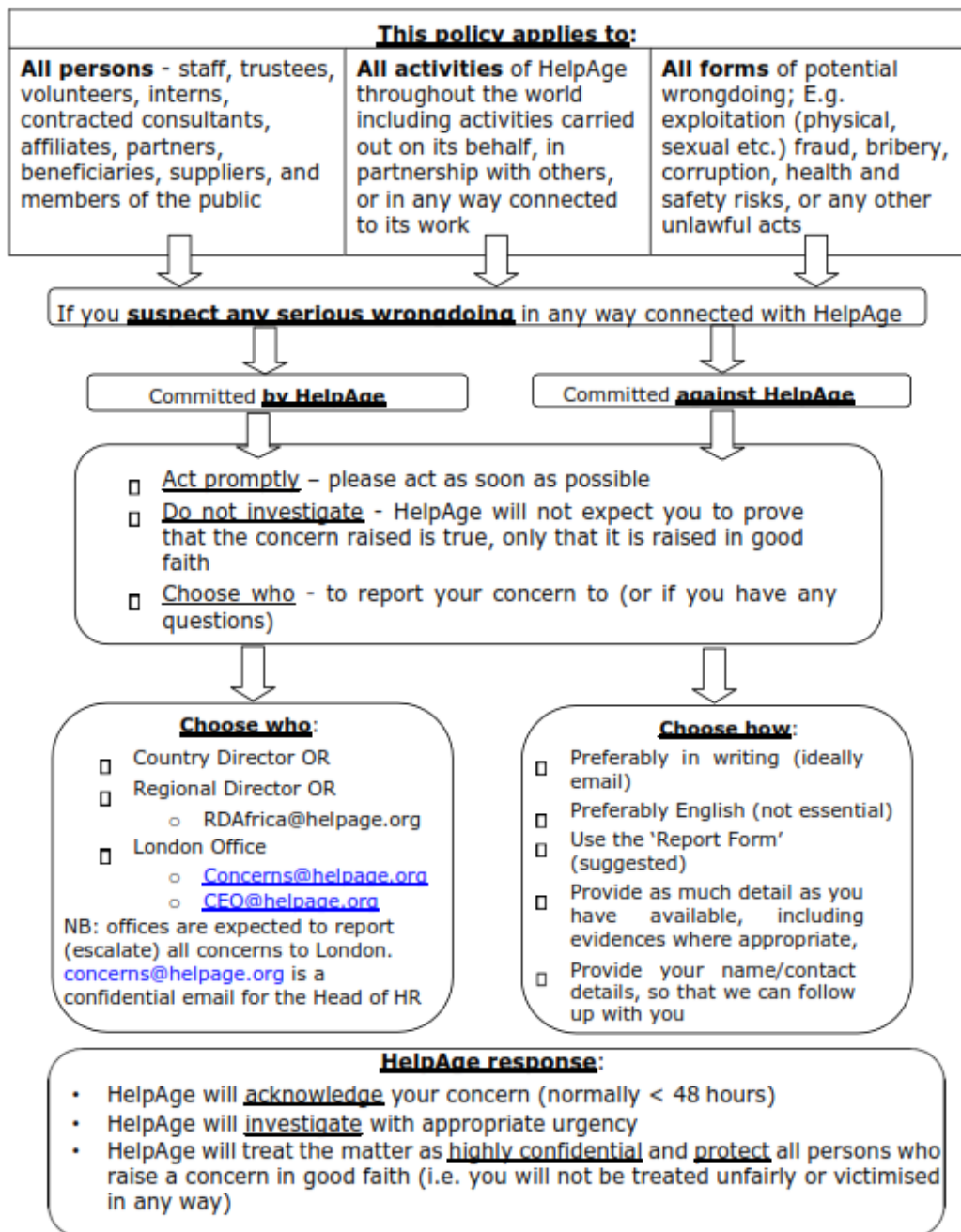
c/ To promptly report to responsible persons when discovering risks of labor accident, occupational disease, toxic or dangerous incidents; to participate in first aid and overcoming the consequences of labor accidents as requested by the employer. The contact numbers of responsible persons of employers are always disseminated to employees at the beginning of the employment. Contact channel can be both in telephone and email.

7. GRIEVANCE MECHANISM

As an internal global policy, HelpAge maintain a grievance mechanism and provide for all direct workers, contracted workers and community workers to raise their workplace concerns.

The grievance mechanism is translated, disseminated and provided to all workers at the beginning of the Project or at the time of recruitment. This will help to protect employees against any violation, reprisal.

Below is the HelpAge grievance mechanism to provide all partners, employees.



8. NON-DISCRIMINATION AND EQUAL OPPORTUNITIES

HelpAge International is committed to equal opportunities for all its employees and potential employees. It seeks to be an inclusive organisation where everyone is treated with respect and dignity and where there is equal opportunity for all.

It is HelpAge's Equal opportunities and dignity at work policy to provide equality of treatment to all, irrespective of:

- Gender, including gender reassignment
- Marriage or civil partnership
- Having or not having dependents
- Religion, belief
- Race (including colour, nationality, ethnic or national origins,)
- Disability
- Sexual orientation
- Age
- Pregnancy or maternity
- Caste

HelpAge policy applies to all those who work for (or apply to work for) HelpAge across its locations globally, for example:

- Job applicants and potential applicants
- Employees
- Contract workers
- Agency workers
- Volunteer workers

All employees, whether part-time, full time or temporary will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. Decisions about pay and benefits, terms and conditions of employment, appraisals, dismissal or redundancy will be made objectively and without unlawful discrimination. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organization.

Managers will ensure that:

- Standards referred to this policy are adhered to within their own area of responsibility
- Bring the details of the policy to the attention of their team members
- Ensure that information on equality of opportunity is included in all induction processes.
- Ensure that their team members are available to attend relevant equality training programmes (if any)

The Human Resources Department is responsible for ensuring that this policy is effectively communicated to all employees and all those involved with the organisation at whatever

level or position and for providing advice and guidance where appropriate. It will in particular provide full text and an induction on equal opportunities to all new employees; translate this policy into Vietnamese and send to all relevant partners. In addition upon any significant update, the policy will be presented to all staff or department/office meetings and re-translated to all relevant partners.

Each member of staff has a responsibility to:

- Co-operate with any measures introduced to ensure equality of opportunity and in preventing discrimination, harassment or bullying
- Report any discriminatory acts
- Treat others fairly without prejudice;
- Promote a work environment where an individual can feel valued and realise his/her potential and encourage others to do so;

Failure to comply with the policy, procedures and practices outlined below will be considered within the framework of HelpAge's disciplinary procedure.

The HelpAge's equal opportunity policy also covers bullying and harassment issues in the workplace and in any work-related setting outside the workplace, for example, during business trips and at work-related social events.

Some harassment is unlawful discrimination and serious harassment may be a criminal offence.

Bullying is offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end.

Examples of bullying would include:

- Abuse of authority by a line manager or their acting in such a way that the employee feels threatened or coerced
- Aggressive or intimidating behaviour towards an individual including shouting or unreasonable anger
- Repeated unfair criticism or destructive and negative criticism along with lack of reasonable support for future improvement
- Criticism in front of others that humiliates and undermines them including by email
- Criticism that focuses on a personal characteristic rather than work performance
- Ostracising someone e.g. refusing to speak to them, blatantly ignoring their views or comments, or deliberately excluding them from work related or social activities
- Deliberately imposing grossly excessive or unachievable workloads or impossible deadlines in order to make life difficult for a particular employee
- Unjustified micromanagement that may undermine confidence or disempower an individual
- Coercion or pressure to perform social favours or participate in religious or political activity
- Making threats or comments about job security without foundation.

Harassment is unwanted conduct related to relevant protected characteristics, which are sex, race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age, that:

- has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or
- is reasonably considered by that person to have the effect of violating his/her dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for him/her, even if this effect was not intended by the person responsible for the conduct.

Examples of harassment would include:

- Physical conduct ranging from unwelcome touching to serious assault;
- Unwelcome sexual advances;
- Demeaning comments about a person's appearance;
- Unwelcome jokes or comments of a sexual or racial nature or about an individual's age;
- Spoken or written words of abuse;
- Insulting or ridiculing the way someone dresses, speaks or behaves;
- Display or circulation of any offensive or pornographic material, graffiti or racist literature; or sexually suggested pictures, objects or written materials;
- Isolation and/or non-cooperation at work and exclusion from social activities

HelpAge is committed to creating a work environment free of harassment and bullying, where everyone is treated with dignity and respect.

HelpAge will treat complaints of bullying and harassment sensitively and maintain confidentiality to the maximum extent possible. Support will be provided for those who have experienced instances of discrimination, bullying and harassment.

Annex 2. Eligible Screening Checklist

Screening Questions	Yes/No	Remarks, (If yes?)
1. Will the /activity likely to damage or otherwise adversely affect/impact on the natural habitats, and/or cultural heritages (Per ESS6 and ESS8 of ESF).		If yes, the sub-project is not eligible for funding.
2. Will the s/activities require procurement of pesticides that falls in WHO classes IA, IB, or II.? (Per ESS4 of ESF)		If yes, then the is not eligible for funding.
3. Will there be any territorial dispute between two or more countries in the and its ancillary aspects and related activities? (Per OP/BP 7.60)		If yes, then the is not eligible for funding.
4. s/activities that require large amount of land acquisition, resettlement, and/or loss of assets without adequate mitigation and compensation measures and without formal consultation with WB (per ESS5 of ESF)		If yes, then the is not eligible for funding
5. s/activities that are classification as <i>high risks</i> according to WB's ESF risk classification without adequate mitigation and compensation measures and without formal consultation with WB (Per ESS1 of ESF)		If yes, then the is not eligible for funding

The Exclusion List below defines the types of s/activities that the project **does not** finance. The project does not finance the following s/activities:

- Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements.
- Production or trade in weapons and munitions.ⁱ
- Production or trade in alcoholic beverages (excluding beer and wine).ⁱ
- Production or trade in tobacco.ⁱ
- Gambling, casinos and equivalent enterprises.ⁱ
- Trade in wildlife or wildlife products regulated under CITES.ⁱⁱ
- Production or trade in radioactive materials.ⁱⁱⁱ
- Production or trade in or use of unbonded asbestos fibers.^{iv}
- Purchase of logging equipment for use in primary tropical moist forest.

- Production or trade in pharmaceuticals subject to international phase outs or bans.
- Production or trade in pesticides/herbicides subject to international phase outs or bans.
- Drift net fishing in the marine environment using nets in excess of 2.5 km. in length.
- Production or activities involving harmful or exploitative forms of forced labor/harmful child labor.^{vi}
- Production, trade, storage, or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals.^{ix}
- Production or activities that impinge on the lands owned, or claimed under adjudication, by Indigenous Peoples, without full documented consent of such peoples
- Commercial logging operations for use in primary tropical moist forest.
- Production or trade in products containing PCBs.^{vii}
- Production or trade in ozone depleting substances subject to international phase out.^{viii}
- Production or activities involving harmful or exploitative forms of forced labor/harmful child labor.^{vi}
- Commercial logging operations for use in primary tropical moist forest.
- Activities involving conversion or degradation of natural habitats
- Activities involving land acquisition and resettlement
- Production or trade in products containing PCBs.^{vii}
- Production or trade in ozone depleting substances subject to international phase out.^{viii}
- Production or trade in wood or other forestry products from unmanaged forests.

Footnotes:

ⁱThis does not apply to project sponsors who are not substantially involved in these activities. "Not substantially involved" means that the activity concerned is ancillary to a project sponsor's primary operations.

ⁱⁱCITES: Convention on International Trade in Endangered Species of Wild Fauna and Flora. A list of CITES listed species is available from the Environment Division.

ⁱⁱⁱThis does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where the project considers the radioactive source to be trivial and/or adequately shielded.

^{iv}This does not apply to the purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%.

^vForced labor means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty.

^{vi}Harmful child labor means the employment of children that is economically exploitive, or is likely to be hazardous to, or to interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

^{vii}PCBs: Polychlorinated biphenyls - a group of highly toxic chemicals. PCBs are likely to be found in oil-filled electrical transformers, capacitors and switchgear dating from 1950-1985.

^{viii}Ozone Depleting Substances (ODS): Chemical compounds which react with and deplete stratospheric ozone, resulting in the widely publicized 'ozone holes'. The Montreal Protocol lists ODSs and their target reduction and phase out dates. A list of the chemical compounds regulated by the Montreal Protocol, which includes aerosols, refrigerants, foam blowing agents, solvents, and fire protection agents, together with details of signatory countries and phase out target dates, is available from the Environment Division.

^{ix}A list of hazardous chemicals is available from the Environment Division. Hazardous chemicals include gasoline, kerosene and other petroleum products.

Annex 3. Template of Grievance Registration Form

This annex applies to all s to be financed by the project. HelpAge will be responsible for implementation of the GRM process (see ESMF main text, Section IX) and complete the GRM registration form and report the results as part of the E&S monitoring report to be submitted to WB. It is expected that a Community Development Committee (CDC) is established to take the lead in responding to the GRM process. Training will be provided to responsible staff.

Grievance Number: _____ LOCATION: District: _____ Village: _____ CDC Name: _____ NAME OF COMPLAINANT: _____ ADDRESS: _____ Telephone #: _____ DATE RECEIVED: _____														
Classification of the grievance (Check boxes) <table style="width: 100%; border: none;"> <tr> <td><input type="checkbox"/> Water Use</td> <td><input type="checkbox"/> Dispute with contractors</td> </tr> <tr> <td><input type="checkbox"/> CDC formation</td> <td><input type="checkbox"/> Inter-community dispute</td> </tr> <tr> <td><input type="checkbox"/> Land acquisition and Compensation</td> <td><input type="checkbox"/> Technical/operational coordination</td> </tr> <tr> <td><input type="checkbox"/> Financial</td> <td><input type="checkbox"/> Process delays</td> </tr> <tr> <td><input type="checkbox"/> Water Quality</td> <td><input type="checkbox"/> Noise</td> </tr> <tr> <td><input type="checkbox"/> Sanitation</td> <td><input type="checkbox"/> Water Use</td> </tr> <tr> <td colspan="2"><input type="checkbox"/> Other (specify) _____</td> </tr> </table>	<input type="checkbox"/> Water Use	<input type="checkbox"/> Dispute with contractors	<input type="checkbox"/> CDC formation	<input type="checkbox"/> Inter-community dispute	<input type="checkbox"/> Land acquisition and Compensation	<input type="checkbox"/> Technical/operational coordination	<input type="checkbox"/> Financial	<input type="checkbox"/> Process delays	<input type="checkbox"/> Water Quality	<input type="checkbox"/> Noise	<input type="checkbox"/> Sanitation	<input type="checkbox"/> Water Use	<input type="checkbox"/> Other (specify) _____	
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<input type="checkbox"/> Water Quality	<input type="checkbox"/> Noise													
<input type="checkbox"/> Sanitation	<input type="checkbox"/> Water Use													
<input type="checkbox"/> Other (specify) _____														
Brief description of the grievance:														
What is the perceived cause?														
Suggested action (by complainant) to address grievance:														

Annex 4. Criteria for E&S Risk Classification

(1) A project is classified as **High Risk** after considering, in an integrated manner, the risks and impacts of the project, taking into account the following, as applicable:

- (a) The project is likely to generate a wide range of significant adverse risks and impacts on human populations or the environment. This could be because of the complex nature of the project, the scale (large to very large) or the sensitivity of the location(s) of the project. This would take into account whether the potential risks and impacts associated with the project have the majority or all of the following characteristics: (i) long term, permanent and/or irreversible (e.g., loss of major natural habitat or conversion of wetland), and impossible to avoid entirely due to the nature of the project; (ii) high in magnitude and/or in spatial extent (the geographical area or size of the population likely to be affected is large to very large); (iii) significant adverse cumulative impacts; (iv) significant adverse transboundary impacts; and (v) a high probability of serious adverse effects to human health and/or the environment (e.g., due to accidents, toxic waste disposal, etc.);
- (b) The area likely to be affected is of high value and sensitivity, for example sensitive and valuable ecosystems and habitats (legally protected and internationally recognized areas of high biodiversity value), lands or rights of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities and other vulnerable minorities, intensive or complex involuntary resettlement or land acquisition, impacts on cultural heritage or densely populated urban areas;
- (c) Some of the significant adverse E&S risks and impacts of the project cannot be mitigated or specific mitigation measures require complex and/or unproven mitigation, compensatory measures or technology, or sophisticated social analysis and implementation;
- (d) There are significant concerns that the adverse social impacts of the project, and the associated mitigation measures, may give rise to significant social conflict or harm or significant risks to human security;
- (e) There is a history of unrest in the area of the project or the sector, and there may be significant concerns regarding the activities of security forces;
- (f) The project is being developed in a legal or regulatory environment where there is significant uncertainty or conflict as to jurisdiction of competing agencies, or where the legislation or regulations do not adequately address the risks and impacts of complex projects, or changes to applicable legislation are being made, or enforcement is weak;
- (g) The past experience of the Borrower and the implementing agencies in developing complex projects is limited, their track record regarding E&S issues would present significant challenges or concerns given the nature of the project's potential risks and impacts;
- (h) There are significant concerns related to the capacity and commitment for, and track record of relevant project parties, in relation to stakeholder engagement; and

- (i) There are a number of factors outside the control of the project that could have a significant impact on the E&S performance and outcomes of the project.

(2) A project is classified as **Substantial Risk** after considering, in an integrated manner, the risks and impacts of the project, taking into account the following, as applicable:

- (a) the project may not be as complex as *High Risk* projects, its E&S scale and impact may be smaller (large to medium) and the location may not be in such a highly sensitive area, and some risks and impacts may be significant. This would take into account whether the potential risks and impacts have the majority or all of the following characteristics: (i) they are mostly temporary, predictable and/or reversible, and the nature of the Project does not preclude the possibility of avoiding or reversing them (although substantial investment and time may be required); (ii) there are concerns that the adverse social impacts of the Project, and the associated mitigation measures, may give rise to a limited degree of social conflict, harm or risks to human security; (iii) they are medium in magnitude and/or in spatial extent (the geographical area and size of the population likely to be affected are medium to large); (iv) the potential for cumulative and/or transboundary impacts may exist, but they are less severe and more readily avoided or mitigated than for *High Risk* Projects; and (v) there is medium to low probability of serious adverse effects to human health and/or the environment (e.g., due to accidents, toxic waste disposal, etc.), and there are known and reliable mechanisms available to prevent or minimize such incidents;
- (b) The effects of the Project on areas of high value or sensitivity are expected to be lower than *High Risk* projects;
- (c) Mitigatory and/or compensatory measures may be designed more readily and be more reliable than those of *High Risk* projects;
- (d) The Project is being developed in a legal or regulatory environment where there is uncertainty or conflict as to jurisdiction of competing agencies, or where the legislation or regulations do not adequately address the risks and impacts of complex Projects, or changes to applicable legislation are being made, or enforcement is weak;
- (e) The past experience of the Borrower and the implementing agencies in developing complex Projects is limited in some respects, and their track record regarding E&S issues suggests some concerns which can be readily addressed through implementation support; and
- (f) There are some concerns over capacity and experience in managing stakeholder engagement but these could be readily addressed through implementation support.

(3) A project is classified as **Moderate Risk** after considering, in an integrated manner, the risks and impacts of the Project, taking into account the following, as applicable:

- (a) The potential adverse risks and impacts on human populations and/or the environment are not likely to be significant. This is because the Project is not complex and/or large, does not involve activities that have a high

potential for harming people or the environment, and is located away from environmentally or socially sensitive areas. As such, the potential risks and impacts and issues are likely to have the following characteristics: (i) predictable and expected to be temporary and/or reversible; (ii) low in magnitude; (iii) site-specific, without likelihood of impacts beyond the actual footprint of the Project; and (iv) low probability of serious adverse effects to human health and/or the environment (e.g., do not involve use or disposal of toxic materials, routine safety precautions are expected to be sufficient to prevent accidents, etc.);

(b) The Project's risks and impacts can be easily mitigated in a predictable manner.

(4) A project is classified as **Low Risk** if its potential adverse risks to and impacts on human populations and/or the environment are likely to be minimal or negligible. These projects, with few or no adverse risks and impacts and issues, do not require further E&S assessment following the initial screening.