Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 04/23/2020 | Report No: ESRSA00502
# BASIC INFORMATION

## A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vietnam</td>
<td>EAST ASIA AND PACIFIC</td>
<td>P171030</td>
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</tbody>
</table>

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

**Practice Area (Lead)**: Health, Nutrition & Population

**Financing Instrument**: Investment Project Financing

**Estimated Appraisal Date**: 6/15/2020

**Estimated Board Date**: 6/15/2020

### Borrower(s)

- HelpAge International
- HelpAge International in Vietnam

### 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.

### Financing (in USD Million)

<table>
<thead>
<tr>
<th>Amount</th>
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<tbody>
<tr>
<td>Total Project Cost</td>
</tr>
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## B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

## C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The core activity of the Project is the establishment of community-led sustainable Inter-Generational Self-Help Clubs (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 ISHC development model closely follows the community driven development (CDD)
approach through which communities are given control over the development process, resources and decision-making authority.

The ISHCs supported by this Project will implement three main types of activities:
(i) Livelihood support: increasing the incomes of older persons through appropriate, age-friendly and pro-poor livelihoods activities that generate income in old age;
(ii) Health promotion and care: strengthening linkages between community-level ISHC’s 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 NCDs), thus keeping older people healthier and economically active longer;
(iii) Social care: 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 activities of daily living (ADLs) and instrumental activities of daily living (IADLs) is declining.

The Project will be implemented by HelpAge International Vietnam, in collaboration with Vietnam Association of the Elderly (at national, provincial, and local levels) and in coordination with government agencies (specifically, the Ministry of Labor, Invalids and Social Affairs, and the Ministry of Health)

D. Environmental and Social Overview

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

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. 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 tract 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. 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. 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. 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. 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. 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.

Most beneficiaries of the project are expected to fall within the age group of 60 to 80, with the proposed ISHC model focused on vulnerable older persons who are in income-based poverty, without proper family support, facing severe illness and disability, or from ethnic minority groups. The project interventions are intergenerational, where the “younger old” persons (aged 60-69 years) are not only beneficiaries of project interventions, but also project contributors by helping the “old” (70-79 years) and “older old” (80+ years), e.g. through providing assistance with ADLs and IADLs. With the largest share of the older population being women, the project will have a disproportionately positive impact on the well-being of women (estimated to be around 55 per cent of project beneficiaries). The project also has substantial spillover benefits to the beneficiaries’ families (and, again, especially women who tend to bear the largest share of the burden of care of older family members) and the general community in which elderly members live, in the form of support for ensuring livelihoods, assistance with the caregiving burden, and increased knowledge and skills with which to better care for older people. Some of the project provinces have a high proportion of ethnic minority populations, such as Hoa Binh, Thanh Hoa, and Ninh Thuan. 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 the elderly population belonging to ethnic minority groups in these provinces, although the names of the project communes remain unknown at this stage.

D. 2. Borrower’s Institutional Capacity

This project, financed exclusively by the Japan Social Development Fund, will be implemented by the HelpAge International in partnership with Association of the Elderly (AE) both at national and local levels, and in close cooperation with the Department of Health and the Department of Labor, Invalids and Social Affairs (DOLISA) and other local authorities. HelpAge International has not prepared nor implemented a World Bank financed project in Vietnam, even though the NGO has sufficient capacity to manage projects funded by other international donors. Six provincial authorities have been involved in the implementation of World Bank financed projects, and have experience managing environmental and social risks under the Bank’s safeguards policies. However, none of the project implementing agencies has experience in preparation and implementation of a World Bank financed project.
under the new Environmental and Social Framework (ESF). They are not familiar with the concept of proportionality and adaptive management of the ESF, and Environmental and Social Standards (ESSs). The communities which will directly implement the project interventions and mitigation measures have variable capacity, and in some cases the implementation capacity are quite weak. Therefore, supportive measures, including training and technical support to the local communities by HelpAge and local partners, will be put in place during implementation. The institutional capacity of HelpAge has been enhanced during project preparation through the Bank’s support to their preparation of various ESF instruments, such as the Social Assessment (SA), the Ethnic Minority Planning Framework (EMPF), the Labor Management Procedures (LMP), the Environment and Social Management Framework (ESMF), the Stakeholder Engagement Plan (SEP) and the Environment and Social Commitment Plan (ESCP). HelpAge’s capacity for ESF implementation will need to be strengthened further during project implementation through the Bank’s continued support, which may require additional resources from both sides.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Environmental Risk Rating

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 will not generate any substantial environmental risks and impacts. The main adverse environmental risks and impacts from the livelihoods program are the health risks and impacts associated with pesticide use in small-scale agriculture activities, animal waste generated by animal husbandry, avian flu, 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 moderate impacts on the environment. However, these risks and impacts would be likely temporary, reversible, low - to moderate in magnitude and site-specific given the nature and scale of the investment, 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.

The implementing agency has not previously received a grant from the World Bank, and thus has no experience with the World Bank’s environmental and social policies, posing the risk of unsatisfactory management of environmental and social risks and impacts during project preparation. Overall, considering both the nature of these implementation risks and the client’s capacity to apply the relevant standards from the Bank’s Environmental and Social Framework (ESF), the project’s environmental risk and social risks are both classified as moderate.
Social Risk Rating

Despite the positive impacts that the project may bring to elderly beneficiaries, there may be social risks arising from the poor implementation of project activities. 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, if it is not possible to mobilize enough of the right volunteers, who can work on a part-time and unpaid basis, to meet the increasing demand for basic personal care from older persons. This may result in weak commitment and poor services provided by volunteers to the project’s beneficiaries, which would in turn lead to poor quality care being delivered, putting the health and safety of beneficiaries at risk. Given the nature of these 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.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

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 receive capital to start livelihood activities (e.g. small-scale agriculture, husbandry, handicrafts, or small businesses) to provide much-needed incomes in the 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 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, short-term, and manageable. It is anticipated that the project activities will not cause long-term, cumulative impacts on environment and human health if good design and construction practices are followed.

Since the scope and sites of project activities have not yet been identified, the implementing agency, HelpAge has prepared the ESMF for the assessment and management of E&S risks and impacts at the framework level. 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 Code of Practices (ECOPs) would suffice to manage the potential risks and impacts of the livelihood activities. The ECOPs describe 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; and animal welfare. The ESMF includes Labor Management Procedures (LMPs) as well. Public consultations have been consulted on the draft ESMF. The feedbacks from the consultation have been incorporated into the project design,
the final draft ESMF. The draft ESMF was disclosed locally on April 17, 2020 in an accessible place, and in a form and language understandable to project-affected parties and other interested parties. The final ESMF will be disclosed locally at the HelpAge project office, project areas, and the World Bank external website.

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 old 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 measures were included in the ESMF: providing adequate hygiene and personal protection equipment to personnel and workers; minimizing chance of exposure to staff, workers, and visitors; adhering to standard precautions procedures issued by the government; providing training on COVID-19 prevention to personnel and workers; and closely monitoring implementation measures by HelpAge and the stakeholders.

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, which informs the project design and provides measures to be considered during implementation, has 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 considerations. Elderly women from poor and ethnic minority communities, and elderly people with disabilities may face the intersectionality of multiple disadvantages which need adequate attention. On the basis of these findings, the SA has proposed 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, prepared and agreed upon, with the Implementing Agency, sets out 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 will be finalized and disclosed before the Bank Board’s Approval.

ESS10 Stakeholder Engagement and Information Disclosure

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 SEP involves all project affected parties including HelpAge, the World Bank and JICA, the association of the elderly at all levels, commune heath 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, were disclosed before project appraisal per requirements of ESS10 and is treated as a live document to be updated regularly along the pace of project implementation.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The project will include direct workers and community workers. The direct workers are HelpAge’s employees, AE’s employees, 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. Due to the nature of the investment activities, it is not expected that the project would involve contracted workers. 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. Consultations with some key stakeholders such as local associations of elderly and ISHCs show that there is no risk of child and involuntary labor to be used under the project. HelpAge’s Labor policy inhibits the use of child and involuntary labor. Vietnam’s Associations of the Elderly (AEs), which is the project’s counterpart, does not employ forced labor. Meanwhile, community workers are volunteer elderly from ISHC and the ISHC’s board members. They are re-selected by ISHCs every two or three years on a basis on the regulation of ISHCs, which commit not using forced labor for their activities. 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.

ESS3 Resource Efficiency and Pollution Prevention and Management

The nature and scale of the proposed project will not cause significant water and energy use. However, the project will support a livelihood program, in which IHSCs’ members can receive capital to start livelihood activities (e.g. small-scale agriculture and husbandry). These activities may increase waste generated from husbandry and pesticide used in agriculture. The risks and impacts related to the release of pollutants, waste generation, the management of pesticides, and impacts on community were assessed, and mitigation measures were proposed and included in the ESMF and ECOPs.

ESS4 Community Health and Safety

The project is anticipated to have positive impacts 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 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 cause any adverse impacts on the community due to labor influx. Therefore, standard measures in the World Bank Group Environment, Health, and Safety Guidelines (EHSG) to ensure the community health and safety of communities during implementation should suffice.

During the preparation of the SA, GBV has been assessed through rating exercises for prioritized needs among different elderly groups disaggregated by gender, including those among the Kinh, various ethnic minority groups. Respondents from consultations with stakeholders agreed that home care volunteers could pose a risk to
beneficiaries if they are neglectful or abusive. In particular, 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 program and expected to receive personal care from community volunteers. However, they also believed that these GBV risks during project implementation are low. In a response, the project has developed adequate mitigation measures, including (i) project monitoring visits; (ii) assignment of two community workers to support elderly beneficiaries during each visit to prevent the risks. Community workers are from the same villages as elderly beneficiaries. Strong social inclusion in rural Vietnam keeps the anticipated GBV risks minimal; (iii) training for community workers will include GBV risks to raise awareness and skills to prevent and knowledge of how and where to report cases; (iv) elderly beneficiaries are provided with phone numbers of relevant contact persons from local associations of elderly and CMBs to report cases for further support; (v) incidents will be reported in CMBs’ monthly meetings for guidance and support.

Before commencement of project activities, HelpAge will incorporate raising awareness of how to prevent and control communicable diseases at work in its training for project staff and community workers. HelpAge will share the Vietnamese Government and WHO’s guidelines and protocol on this issue with Vietnam Association of Elderly to disseminate to contracted workers related to the project.

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 natural and critical habitats or ecosystem services. Nevertheless, the ESMF provides guidance on screening and mitigation measures to ensure that project activities related to agriculture do not alter or cause destruction of any critical or sensitive natural habitats. Given the project investment typology, animal welfare may be an issue. The potential risks and impacts on the welfare of the animals in the project were addressed in the ESMF.

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.

ESS9 Financial Intermediaries

At this stage, the project is not expected to use any financial intermediary.

B.3 Other Relevant Project Risks

No other relevant project risks are envisaged.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

The project will not carry out any investment linked to international waterways as defined in the Policy.

OP 7.60 Projects in Disputed Areas

The project will not be implemented in areas known to involve disputed areas.

III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

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<th>DELIVERABLES against MEASURES AND ACTIONS IDENTIFIED</th>
<th>TIMELINE</th>
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<tr>
<td><strong>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</strong></td>
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<tr>
<td>Establish and maintain an organizational structure with qualified staff at national and provincial levels to support management of E&amp;S risks.</td>
<td>08/2020</td>
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<tr>
<td>E&amp;S risk management will be part of the Term of Reference of the project staff at all levels.</td>
<td>08/2020</td>
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<tr>
<td>Update the draft of Social Assessment report, the Environmental and Social Management Framework (ESMF) and Stakeholder Engagement Plan (SEP) that have already been prepared for the Project, and, thereafter, implement these plans, as required, in a manner acceptable to the Bank.</td>
<td>08/2020</td>
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<td><strong>ESS 10 Stakeholder Engagement and Information Disclosure</strong></td>
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<tr>
<td>ESS 2 Labor and Working Conditions</td>
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<tr>
<td>Update, adopt, and implement the Labor Management Procedures (LMP) that have been developed for the Project.</td>
<td>08/2020</td>
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<tr>
<td>Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMF.</td>
<td>08/2020</td>
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| ESS 3 Resource Efficiency and Pollution Prevention and Management |  
|-------------------------------------------------|-----------------------------------------------------------------------|------------------------------------------------------------------|
| Resource efficiency and pollution prevention and management measures will be covered under the ESMF prepared for this project. | 08/2020 |  |

| ESS 4 Community Health and Safety |  
|----------------------------------|-----------------------------------------------------------------------|------------------------------------------------------------------|
| Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMF. | 08/2020 | Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities as mentioned in the ESMF, which has been prepared for this project. | 08/2020 |

| ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement |  
|-----------------------------------------------------------------|------------------------------------------------------------------|

| ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources |  
|---------------------------------------------------------------------------------|------------------------------------------------------------------|

| ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities |  
|-----------------------------------------------------------------|------------------------------------------------------------------|
| Prepare, adopt, and implement the EMDP that will be prepared for the Project, as mentioned in EMPF, in a manner acceptable to the Bank. | 08/2020 | Prepare, adopt, and implement the arrangements for the grievance mechanism for ethnic minority people, as required under the EMDP to be developed for this project. | 08/2020 |

| ESS 8 Cultural Heritage |  
|------------------------|------------------------------------------------------------------|

| ESS 9 Financial Intermediaries |  
|------------------------------|------------------------------------------------------------------|

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

**Is this project being prepared for use of Borrower Framework?** No
Areas where “Use of Borrower Framework” is being considered:
Although Vietnam has its own E&S Framework, regulations and standards applicable to the community level interventions are fragmented and insufficient. There are gaps between the environmental and social assessment regulation and practice, especially in description of the environment, level of impact analysis and mitigation measures, and public consultation and disclosure of information. In addition, there is no experience of the implementing agencies in implementing and applying ESF and its associated environmental and social standards. Therefore, there are no plans to use the Borrower’s E&S Framework within this project.

IV. CONTACT POINTS

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Borrower/Client/Recipient
Borrower: HelpAge International

Implementing Agency(ies)
Implementing Agency: HelpAge International in Vietnam

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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