

# Simplified Approval Process

## Annex 12: Environmental and social action plan



Environmental and Social  
Action Plan

Climate Adaptation and Resilience  
in Thua Thien Hue Province  
(CARE Hue)

February 2024

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## ACRONYMS

<b>CARe Hue</b>	Climate Adaptation and Resilience in Thua Thien Hue Province
<b>CBEWS</b>	Community-based Early Warning System
<b>CBO</b>	community-based organizations
<b>CC</b>	commanding committees
<b>CEDAW</b>	Convention on the Elimination of All Forms of Discrimination against Women
<b>CEM</b>	Committee for Ethnic Minorities
<b>CERD</b>	International Convention on the Elimination of All Forms of Racial Discrimination
<b>CESCR</b>	International Covenant on Economic, Social and Cultural Rights
<b>CKC</b>	Centre for Knowledge Co-creation and Development Research)
<b>CORENAM</b>	Center on Natural Resources Management
<b>CPC</b>	Commune People's Committee
<b>CRD</b>	Center for Rural Development
<b>CSRD</b>	Centre for Social Research and Development
<b>DARD</b>	Department of Agriculture and Rural Development
<b>DOLISA</b>	Department of Labour, Invalids and Social Affairs
<b>DONRE</b>	Department of Natural Resources and Environment
<b>DPC</b>	District People's Committee
<b>DPI</b>	Department for Planning and Investment
<b>EbA</b>	Ecosystem-based Adaptation
<b>EM</b>	Ethnic minorities
<b>ESAP</b>	Environmental and Social Action Plan
<b>ESS</b>	Environmental and Social Safeguards
<b>FS</b>	Feasibility Study
<b>GAP</b>	Gender and Social Inclusion Action Plan
<b>GCF</b>	Green Climate Fund
<b>GoV</b>	Government of Vietnam

<b>GRM</b>	Grievance Redress Mechanism
<b>ILO</b>	International Labor Organization
<b>LuxDev</b>	Luxembourg Development Cooperation Agency
<b>M&amp;E</b>	Monitoring and Evaluation
<b>MOLISA</b>	Ministry of Labour, Invalids and Social Affairs
<b>NAP</b>	National Adaptation Plan
<b>NDC</b>	Nationally Determined Contribution
<b>PFPDF</b>	Provincial Forest Development and Protection Fund
<b>TAO</b>	Project Management Unit / Technical Assistance Office
<b>PPC</b>	Provincial People's Committee
<b>PPMB</b>	Provincial Project Management Board
<b>PSC</b>	Project Steering Committee
<b>SAP</b>	Simplified Approval Process
<b>TT Hue</b>	Thua Thien Hue Province
<b>UNFCCC</b>	United Nations Framework Convention on Climate Change
<b>(V)WU</b>	(Vietnam) Women's Union
<b>VDB</b>	Village Development Board

## **1. INTRODUCTION AND OBJECTIVE**

This Environmental and Social Action Plan (ESAP) has been developed for the project Climate Adaptation and Resilience in Thua Thien Hue Province (CARE Hue) under the GCF Simplified Approval Process (SAP) scheme. The ESAP has been prepared in accordance with the Accredited Entities' (LuxDev) Environmental and Social Safeguards System, GFC's Revised Environmental and Social Policy, updated Gender Policy and Indigenous Peoples Policy. The objectives of the ESAP are to assess the environmental and social impacts and risks associated with the project along with its proposed activities and to develop adequate mitigation measures. Approved under the SAP scheme, the project will only support activities eligible under the Category C risk category. Therefore, exclusively activities with minimal or no adverse environmental and social risks and impacts are eligible for funding.

Based on the risk assessment, the ESAP formulates mitigation measures fit-for-purpose of the project's activities, describes a plan for meaningful stakeholder engagement, and foresees a grievance redress mechanism to address any complaints that may arise during project implementation. Moreover, the documentation of stakeholder consultation during project formulation is included, combined with a review of the regulatory framework.

### **1.1. Methodology**

The ESAP has been developed based on a desk study combined with stakeholder interviews. A team of an international and a national safeguard expert has been assigned to develop the ESAP, combined with a Gender and Social Inclusion Action Plan (GAP).

A field mission has been conducted from March 13 to 22, 2023. Consulted stakeholders included public agencies at province, district and commune level, the Vietnam Women's Union, CSOs active in Hue province, and potential project partners. For further details see Chapter 5 Summary of consultations.

Based on the Environmental and Social Screening Checklist completed at Concept Note stage, the international safeguards expert has conducted a risk assessment per proposed project activity. The information from the Checklist was validated against outcomes of the field consultations and the literature review. The identified risks build the foundation of the ESAP, which can be found in Chapter 3. Adequate mitigation measures were formulated, along with respective timelines, indicators, responsible persons and financial resources.

Continuous stakeholder engagement throughout project implementation is key to a successful roll out of the ESAP. Therefore, a stakeholder engagement plan has been developed, detailing out all relevant engagement events and activities, aligned with the mitigation measures identified in the ESAP. Moreover, a Grievance Redress Mechanism (GRM) has been designed to address stakeholder complaints that could come up during implementation. Both, the Stakeholder engagement plan and the GRM have been equipped with adequate staff requirements and budgets.

## **2. PROJECT OVERVIEW**

### **2.1. Objective**

Vietnam is one of the countries most exposed to climate change. The province of Thua Thien Hue (TT Hue) is highly exposed to climate-related hazards and vulnerable to the effects of climate change – including storms, floods and droughts, coastal and river erosion, and salinisation of soil and lagoon water – which are already impacting livelihoods and the ecosystems on which they rely. Persistent and increasingly heavy rainfall are already overwhelming the three main river systems in the mountainous western part of the province, causing landslides in hilly areas and floods in low-lying areas.

This project builds on the experience and lessons learned of projects implemented by LuxDev in collaboration with the Government of Vietnam. It aims to increase the climate resilience of local communities and the ecosystems upon which they depend in TT Hue province, directly 306,000 persons (male 151,500, female 154,500) and indirectly benefit 406,000 persons (female 205,030, male 200,970) that will be covered under an improved EWS. It will bring over 115,900 hectares of agricultural and forested land in TT Hue under improved climate-resilient planning. It will do so through the implementation of activities focused on strengthening the enabling environment for climate change adaptation, scaling up investments in ecosystem-based adaptation, and climate-resilient value chains in the agriculture sector. The project aims to continue supporting TT Hue on its path to becoming a model province for climate change adaptation planning, investing, and monitoring in the country.

## **2.2. Project area**

The project area of Thua Thien Hue province (henceforth TT Hue,), in Vietnam's North-Central Region, stretches over 128 km North to South along the central coastline. Much of its 5,033 km<sup>2</sup> is low-lying land, including a large 220 km<sup>2</sup> lagoon, it is in in this low-lying land where most of TT Hue's 1.13 million people live.

The implementation of project activities under outputs 1 and 2 (except for sub-activity 1.1.3 focused on the implementation of Community-based Early Warning Systems) will target the entire province, while activities under outputs 3 and 4 will focus on three districts, namely Phong Dien, Huong Tra, and Quang Dien and in the most vulnerable communes of Huong Thuy district. The 44 prioritized communes in these districts have a total population of close to 335,000 people.

## **2.3. Project design**

This project proposal aims to enhance the climate resilience of local communities and ecosystems in TT Hue Province, Vietnam. It seeks the strategic use of GCF funds to implement targeted measures for strengthening the institutional framework for climate change adaptation and the scaling up of investments in ecosystem-based adaptation and climate-resilient value chains in the agriculture sector. The project seeks to support TT Hue's transition to a climate-resilient development pathway and establish it as a model province for climate change adaptation planning, investing, and monitoring. The project builds on the experiences and lessons learned by LuxDev and the Government of Vietnam and supports the scaling up of best practices while establishing an enabling environment that will serve as a mechanism to continue mobilization and channeling of public and private finance for climate action in the target sectors.

The project will catalyze investments in climate change adaptation, specifically through enhancing the province's Early Warning System as well as mainstreaming climate adaptation into development planning and monitoring, ecosystem-based adaptation and climate resilient agriculture. This will be developed through the following components:

- Component 1 Strengthened institutional framework for enhanced risk-based decision and climate change adaptation planning, investment, and monitoring (comprised of outcomes 1 and 2)
- Component 2. Enhanced resilience of ecosystems and the livelihoods of local men and women (comprised of outcome 3)
- Component 3. Scaling up of climate-resilient practices and financial mechanisms (comprised of outcome 4)

Activities under the three components are complementary. Activities under component 1 will inform the development of activities under component 2 which focus on protecting men and women in TT Hue against climate change hazards, while activities under component 3 focus on supporting the diversification and enhanced resilience of livelihoods through the promotion of climate resilient productive practices. Social inclusion and gender-equality are cross-cutting elements throughout the project, as climate change has a disproportionate impact on the livelihoods of women, girls and vulnerable households and communities.

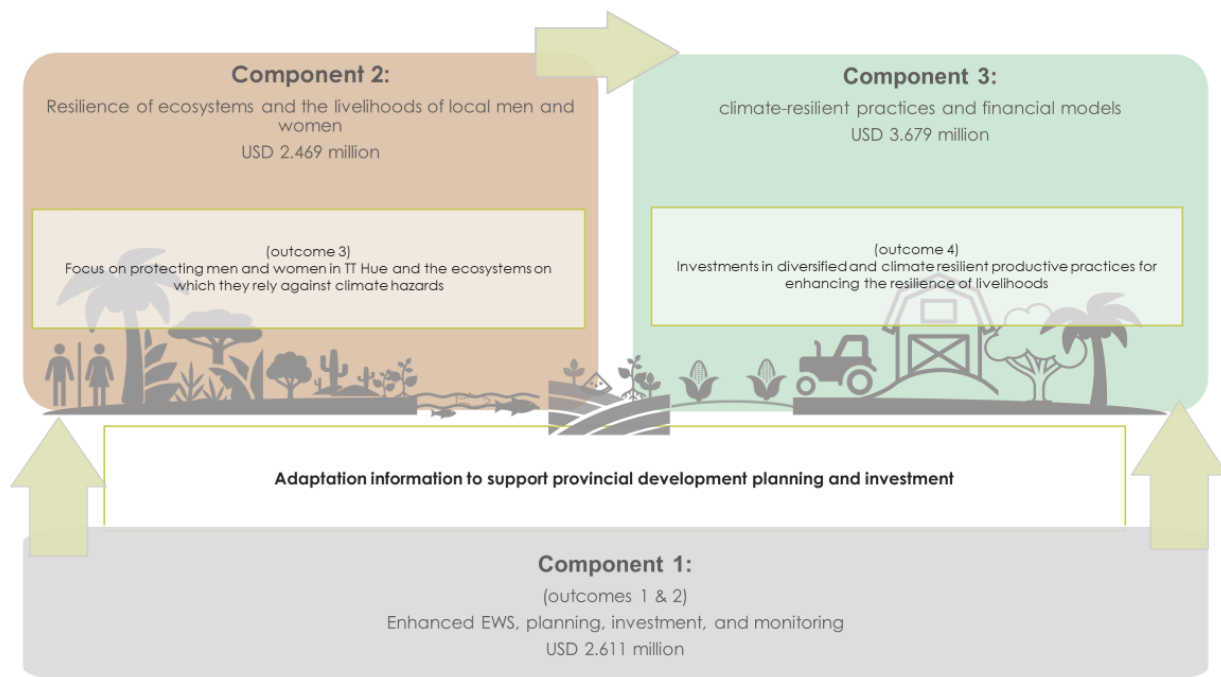


Figure 1. Overview of project components

### 3. ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP)

This chapter provides an overview of the environmental and social risks and mitigation actions per project output. As required by GCF, the ESAP considers the environmental and social risks identified during the screening, the risk significance, and measures to manage and address the identified risks.

Summary of risks	Risk level	Mitigation measures	Responsible party	Schedule	Expected results	Cost/ Budget
<b>Cross-cutting</b>						
<p>Generally, for climate finance projects, there is a risk that environmental and social impacts are not appropriately mitigated.</p> <p>The environmental risks and impacts encompass various aspects, such as community safety (e.g., pesticide usage), threats to the protection, conservation, and restoration of natural habitats and biodiversity, ecosystem services, and the utilization of living natural resources like forests.</p> <p>Social risks and impacts entail the possibility of project effects disproportionately affecting individuals and groups who may be disadvantaged or vulnerable. This includes potential prejudice or discrimination in granting access to development resources and project benefits, particularly concerning those who are disadvantaged or vulnerable.</p>	Low	<p>A specialized team will be running the project, equipped with expertise on climate change adaptation, forestry, agriculture, coastal protection, community development and gender, combined with familiarity of environmental and social risks related to these topics.</p> <p>An environmental and social safeguards expert<sup>1</sup> will be part of the team. The safeguards expert will observe and manage the potential risks arising during operation, including reporting to the TAO, Provincial Project Management Board, and the Green Climate Fund (GCF) on ESAP implementation and performance.</p>	TAO	Year 1-5	<p>All environmental and social issues and impacts that could arise during project implementation are appropriately addressed. The team is aware of potential environmental and social risks and knows how to address them in their respective field of action.</p> <p>A qualified national expert of environmental and social safeguards (“safeguards expert”) with proven experience to perform the tasks was recruited.</p>	Part time, national expert position (12 months á 2,800 USD) <sup>2</sup>
	Low	Sufficient training to project personnel, partner staff, and beneficiaries on how	TAO	Year 1	6 trainings conducted at the beginning of the	4 trainings á 1,200 USD at

<sup>1</sup> The Environmental and Social Safeguards Expert must have proven experience in working with ethnic minorities and on sexual exploitation, abuse and harassment (SEAH). If these qualification criteria cannot be met, alternatively the Gender Expert can compensate this qualification. Yet, the TAO needs to ensure that at least one of the two experts deliver the required expertise in working with ethnic minorities.

<sup>2</sup> To be combined with safeguards expert position (see ESAP budget): either 27 months safeguards and gender expert, or two positions (13,5 months each) for safeguards and gender.

Summary of risks	Risk level	Mitigation measures	Responsible party	Schedule	Expected results	Cost/ Budget
<p>Moreover, there may be negative economic and social consequences arising from involuntary restrictions on land use and the tenure and utilization of natural resources.</p> <p>Additionally, the health, safety, and well-being of workers and the communities affected by the project, along with their cultural heritage, could also be impacted.</p>		to comply with the environmental and social standards will be provided.			project, one training for project staff, one training for partner staff at province level, and 4 trainings for partner staff at district level. measures in their fields of work.	district levels (9,800 USD in total)
	Low	The project will not finance any activities listed by the IFC exclusion list (2007) <sup>3</sup> . Furthermore, it should be noted that the project will refrain from financing any activities that have an adverse effect on land ownership or necessitate the resettlement of individuals, households, or communities. Activities that bear the risk of physical or economic displacement will be excluded from the project. The project will incorporate participatory approaches throughout all its activities to ensure information, consultation, and consent of targeted project stakeholders.	TAO	Year 1-5	The project does not finance or promote activities with moderate or substantial risks for the environment and the local communities.	Participatory approaches included in overall project budget.
	Low	The Grievance Redress Mechanism has been developed and can be found in Chapter 8 of the ESAP. The Stakeholder Engagement Plan, describing all participatory processes across the project and action for stakeholder engagement, can be found in the Chapter 7 of the ESAP.	TAO	Year 1-5	A functioning GRM is in place, allowing for filing proper management of grievances. Stakeholder engagement is ensured across all project activities, including	Costs of GRM establishment and management: 10,000 USD Costs for periodic

<sup>3</sup> IFC Exclusion List. The IFC Exclusion List defines the types of projects that IFC does not finance : [https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/company-resources/ifcexclusionlist#2007](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/company-resources/ifcexclusionlist#2007)

Summary of risks	Risk level	Mitigation measures	Responsible party	Schedule	Expected results	Cost/ Budget
		The outcomes of the stakeholder consultations conducted during the project design phase is documented in Chapter 6 of the ESAP and the Gender and Social Assessment.			capacity building measures, trainings, and community mobilization. Stakeholders will be informed about the GRM and periodic stakeholder update meetings will be organized.	stakeholder meetings once a year at province and district level (5 meetings at province level á 1,000 USD, 20 meetings at district level á 1,000 USD, total costs: 25,000 USD)
	Low	Training of stakeholders responsible for the GRM: Stakeholders involved in the management of the GRM at different levels are trained on how to receive, document, manage, and resolve complaints. In addition, stakeholders are trained on issues such as confidentiality and sensitive complaints, such as SEAH-related concerns. Representatives of the Women's Union will receive targeted training sessions on receiving and managing SEAH-related complaints.	TAO	Year 1	GRM Stakeholders know how to receive, record, manage, and resolve complaints according to the project-level GRM. Selected stakeholders received targeted training on dealing with SEAH-related complaints.	1 training á 2,000 USD (for project staff, province-level partner staff), 4 trainings á 1,500 USD at district levels, 4 trainings for commune-level stakeholders á 1,500 USD (14,000 USD in total)
The project will not negatively impact ethnic minorities (i.e. non Kinh ethnic groups). It is the objective of the project to decrease vulnerabilities and improve	Low	The Gender and Social Inclusion Plan describes actions for the inclusion of vulnerable and poor groups. This includes the small population of ethnic	TAO	Year 1-5	The project activities do not negatively impact vulnerable groups. Vulnerable groups are	See GAP

Summary of risks	Risk level	Mitigation measures	Responsible party	Schedule	Expected results	Cost/ Budget
climate resilience and vulnerable livelihoods. Prior assessments indicated a very low prevalence of ethnic minority groups in the project area. Yet, as these groups are often vulnerable and poor, there is a risk that they do not equally benefit from project activities.		minority households in the project target area.			clearly targeted to benefit from project activities.	
A SEAH assessment, according to the GCF guidelines on SEAH has been conducted (see Annex 5). Risks have been identified, and mitigation measures have been developed in the Gender and Social Inclusion Action Plan.	Low	Risk mitigation measures included in the GAP are as follows: <ul style="list-style-type: none"> <li>• Development of a Code of Conduct prohibiting SEAH by project staff and implementation partners</li> <li>• Training of project and partner staff on gender-related subject matters during project implementations, including awareness raising and coaching concerning the risk of SEAH</li> </ul>	TAO	Year 1	A SEAH Code of Conduct is in place and enforced during project implementation 6 trainings conducted at the beginning of the project, one training for project staff, one training for partner staff at province level, and 4 trainings for partner staff at district level	See GAP

**3.1. Output 1. Improved early warning system (EWS) in place to enable local people and governments at the provincial, district and commune level to better prepare for climate hazards and to respond to climate change impacts**

Summary of risks	Risk level	Mitigation measures	Responsible party	Schedule	Expected results	Cost/ Budget
<b>Activity 1.1: Strengthen the existing early warning system in TT Hue province</b>						
Small-scale infrastructures are included under Component 1, such small-scale infrastructure (i.e. installation of warning posts and watchtowers) that	Low	The project will develop mitigation measures to avoid potential accidents or	TAO	Year 1-5	The contracted construction firm has adequate risk	Costs included in

typically entail OHS risks such as risks of fall and mechanical risks during installation itself and O&M		<p>incidents during installation and O&amp;M. Construction firms to be contracted for those works will be obligated to provide proof of staff training and proof of adequate OHS measures in place.</p> <p>In more detail, the project will require the contracted construction firm to provide their workers with training on proper installation procedures and potential health and safety risks. The provision of proper signages allowing only authorized access will be obligatory. Fencing will be applied if the towers are easily accessible to the community.</p>			mitigation measures in place to address OHS risks.	budget for project sub-activity.
The installation of early warning system infrastructure may negatively impact the biodiversity in case the selected site is in or close to a protected area.	Low	<p>The project will not choose protected areas for the installation of early warning systems.</p> <p>If needed, the project will consult with a biodiversity expert to provide advice on the installation of early warning system infrastructure ensuring that the activity will not adversely affect biodiversity.</p>	TAO	Year 1-5	Early warning systems will be installed without negative impact on biodiversity.	Costs included in budget for project sub-activity.
The project will introduce solar-powered flood warning-posts to the designated project area. Risks associated with solar-powered warning posts include inadequate waste disposal of damaged solar panels as well as end-of life disposal of solar panels.	Low	The project will ensure that adequate waste disposal procedures are in place to mitigate the risks associated with solar-powered warning	TAO	Year 1-5	Damaged or expended solar panels are disposed according to adequate	Costs included in budget for

		posts. This will involve collaborating with local waste management authorities or specialized companies, if needed. Monitoring will be conducted to verify compliance with waste disposal procedures throughout the project lifecycle.			disposal procedures on collaboration with local waste management authorities or specialized companies, if needed.	project sub-activity.
Women and other vulnerable groups are disproportionately affected by climate-related hazards. Their livelihoods usually rely more heavily on climate-sensitive natural resources and constitute most of the workforce in the rural and agriculture sectors. At the same time, women and other vulnerable groups are at risk of being excluded from climate forecasting as they are marginalized.	Low	The GAP has formulated measures to safeguard the inclusion of women and other vulnerable groups in this activity.	TAO	Year 1-5	See GAP	See GAP

**3.2. Output 2. Climate adaptation considerations are mainstreamed into the SEDPs of target districts and 44 communes, and an effective M&E system is in place to monitor adaptation action**

Summary of risks	Risk level	Mitigation measures	Responsible party	Schedule	Expected results	Cost/ Budget
<b>Activity 2.1: Mainstream climate adaptation into the SEDPs of the target districts and 44 communes</b>						
Climate adaptation mainstreaming needs to incorporate the needs of marginalized groups.	Low	The GAP has formulated measures to safeguard the inclusion of women and other vulnerable groups in this activity.	TAO	Year 1-5	See GAP	See GAP
<b>Activity2.2: Improving climate change adaptation impact-based monitoring at the provincial level</b>						
There is a lack of data disaggregated by vulnerability indicators. Therefore, there is a risk that this trend is	Low	The GAP has formulated measures to safeguard	TAO	Year 1-5	See GAP	See GAP

continued within the project activities if no measures are taken.		the inclusion of women and other vulnerable groups in this activity.				
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### 3.3. Output 3. EbA strengthens the resilience of livelihoods and ecosystems to climate change

Summary of risks	Risk level	Mitigation measures	Responsible party	Schedule	Expected results	Cost/ Budget
<b>Activity 3.1: Scale EbA interventions to 450 hectares to enhance the resilience of men and women in TT Hue</b>						
<p>Given LuxDev's level of accreditation to the GCF, the project will only support interventions with low or minimal environmental and social risks (ESS Category C) supporting EbA interventions..</p> <p>However, even ecosystem-based approaches can have moderate risks. The risk of those measures is project- and context-specific and should be judged on a case-by-case basis. The selection of the measure should be based on relevant data.</p>	Low	<p>Generally, the project will focus on small-scale, site-specific interventions within an already-built environment. It will mitigate marginal risks by taking a holistic approach that engages local stakeholders and favors soft EbA interventions.</p> <p>To ensure that interventions under this sub-activity remain as Category C, and to avoid negative environmental and social impacts, the project staff will collect site-specific information.</p> <p>If a measure can be applied without further technical study it is eligible under the project. If the activity requires further technical assessment and safety studies, it will be excluded.</p> <p>For more details on the selection of interventions under this sub-activity, see the Feasibility Study.</p> <p>The project will hire a full-time consultant responsible for activities conducted under Output 3. If needed, additional short-term expertise will be hired.</p>	TAO	Y1-5	A full-time and short-term expert (need driven) has been hired to develop and manage EbA related assessments and tasks.	Full time staff costs for Output 3 included in project budget; lump sum budget for short-term expert advice: 6,000 USD Staff costs

There is a possibility that adaptation actions may not sufficiently diminish the vulnerability of ecosystems and communities to climate impacts or result in maladaptation. Moreover, all communities may not benefit equally.	Low	The planning process of each adaptation measure will evaluate the ecosystem and social vulnerability to provide feedback on adaptation actions at the community level. The evaluation will include, but not be limited to, climate risks to which the selected area is exposed and social vulnerabilities, and the area's sensitivity, and adaptive capacity during the entire lifecycle of the measure..	TAO	Y1-5	The project promotes adaptation options that are best suited for the selected sites and ensure the best possible benefit of all impacted communities.	Costs included in budget for project sub-activity.
Potential risks to biodiversity conservation arising from EbA activities	Low	A biodiversity assessment will be included as part of the site assessment carried out to identify suitable restoration areas. Risks are identified as low as the aim is to bring back native suitable species for restoration which should contribute to restore natural ecosystems. A biodiversity expert will provide input to the assessment ensuring that the project activities ensuring that these will not result in net loss of biodiversity. Relevant authorities will be consulted, and all activities will be aligned with any existing forest protection or management plan.	TAO	Y1-5	Risks to biodiversity identified and addressed	Part of the project budget for site assessments

**3.4. Output 4. Producers, producer associations, and women's organisations have the capacities and access to finance and markets to transition to climate-resilient practices that support food security**

Summary of risks	Risk level	Mitigation measures	Responsible party	Schedule	Expected results	Cost/ Budget
<b>Activity 4.1.1: Implement and scale up climate-resilient agriculture models and practices for key local value chains (supporting 6,000)</b>						
Agricultural activities bear the risk of introducing invasive species.	Low	The project will exclusively work with native or locally already-used species. The use of	TAO	Year 1-5	Scaled up climate-resilient	Included in

		Genetically Modified Organisms (GMOs) will be excluded. Hence there is no risk of introducing new potentially invasive species to the target area.			agriculture, aquaculture, and fisheries models based on native or locally already-used species	project budget
There is a potential risk to biodiversity when agricultural activities unexpectedly expand into forested areas.	Low	The project will not promote agricultural activities that involve forest encroachment. Project beneficiaries will be trained on agricultural practices, this training will include awareness raising and capacity building on potential risks and impacts.	TAO	Year 1-5	All agricultural activities will be conducted on non-forested lands.	Included in project budget
Certain households may currently employ agrochemicals, which can result in harm, intoxication, and detrimental effects on ecosystem health and biodiversity.	Low	Agrochemicals will not be procured by the project. Training on environmental and human health hazards attributed to agrochemicals will be conducted. The use of biochemicals, integrated pest management, and organic fertilizers will be promoted. If agrochemicals become necessary, safety measures for the responsible store, use, and disposal of agrochemicals will be supported.	TAO	Year 1-5	Project beneficiaries integrate IPM in their agricultural practices.	Included in project budget
Women and other vulnerable groups are at risk of being excluded or benefiting less from project activities.	Low	Promoted agricultural models must explicitly target marginalized groups to ensure equal participation and benefit. The GAP has formulated measures to safeguard the inclusion of women and other vulnerable groups in this activity.	TAO	Year 1-5	See GAP	See GAP
There is a risk of lacking labor and occupational health and safety standards at local level in the selected value chains. Further risks could result from inappropriate agro-chemical use,	Low	The farmers, cooperatives and organisations, the project will collaborate with to promote selected agricultural models, will be required to observe the national labour laws and regulations. The World Bank Environmental, Health and Safety (OHS) Guidelines will be applied	TAO	Year 1-5	Supported farmers, cooperatives and agricultural MSMEs adhere to national labour	Included in project budget

although the project will neither procure nor promote agrochemical use.		<p>proportionate to the risk and as adequate to the scope of the project.</p> <p>Furthermore, OHS trainings and awareness raising will be integrated into project activities related to the promotion of climate-resilient agriculture models and practices.</p> <p>The project will promote awareness raising on pesticide safety procedures and alternative measures. Generally, the project will promote agrochemical-free agriculture through the application of good agricultural practices, therefore the use of chemical agricultural input will not be promoted.</p> <p>Last, to address any potential supply chain risks, LuxDev requires that its contract holders and subcontractors (when work exceeds 10% of contract value) sign a declaration of honour stating that they will adhere to labour regulations of the country where they are established or the country of the contracting authority.</p>			standards and are aware of OHS risks and are able to address them at a level adequate to their operations.	
<b>Activity 4.2.1: Development of tailored financial products and services for climate-resilient agriculture</b>						
Women and other vulnerable groups are at risk of being excluded or benefiting less from project activities.	Low	<p>Promoted financial products and services must explicitly target marginalized groups to ensure equal participation and benefit.</p> <p>The GAP has formulated measures to safeguard the inclusion of women and other vulnerable groups in this activity.</p>	TAO	Year 1-5	See GAP	See GAP

## **4. LEGAL AND REGULATORY FRAMEWORK**

### **4.1. International legal framework**

Vietnam ratified various international conventions in the sphere of climate protection. In 1994, the United Nations Framework Convention on Climate Change (UNFCCC) was ratified, followed by the Kyoto Protocol in 2002 and the Paris Agreement in 2016. Viet Nam submitted its Nationally Determined Contribution (NDC) in 2016, and subsequently provided updated versions in 2020 and 2022. The country's updated NDC includes an unconditional commitment to reduce greenhouse gas emissions by 9% by 2030, with a conditional reduction target of 27% by the same year if/when sufficient international assistance is provided. Viet Nam has also pledged to achieve net zero carbon emissions by 2050.

Vietnam is a signatory to the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), the International Convention on the Elimination of All Forms of Racial Discrimination (CERD) and the International Covenant on Economic, Social and Cultural Rights (CESCR). A more detailed assessment of the regulatory framework concerning gender and ethnicity can be found in the Gender and Social Inclusion Action Plan.

Moreover, Vietnam is a member of the International Labour Organization (ILO) and ratified fundamental international agreements on forced labor, occupation health and safety, and child labor. Just recently, the Government of Vietnam published the new Decent Work Country Programme 2022-2026. It is the fourth programme between the ILO and tripartite constituents (government, workers' and employers' organizations) in Vietnam. The aim of the programme is to ensure productive work with fair income, workplace security, social protection for families, personal development and social integration opportunities, and freedom to express concerns and participate in decisions affecting people's lives for all men and women in Vietnam.

### **4.2. National legal framework**

The Government of Vietnam adopted the Socio-Economic Development Strategy 2021-2030 in January 2021 with the primary objective of turning the country into a modern industrialized nation by 2030. The Socio-Economic Development Plan 2021-2025 was formulated to contribute to this objective. Key points of the plan include achieving an average annual economic growth rate of 6.5% - 7%, with the processing and manufacturing industry contributing more than 25% and the digital economy contributing 20% to total GDP. Further, the government aims to reduce the budget deficit by 3.7%. Labor productivity is expected to increase by more than 6.5% annually.

In 2021, the Government of Vietnam approved the national target programme on socio-economic development for the mountainous and ethnic minority (EM) areas (2021-2030). The main goal of this programme is to tap into the potential and benefits of ethnic minority and mountainous regions, drive economic development, ensure social security, and achieve rapid and sustainable poverty reduction. Notably, the programme now includes a dedicated allocation for EM women, marking it the first time such a provision has been made.

The Government of Vietnam approved the Economic Restructuring Plan for 2021-2025, intending to enhance the economy's efficiency in resource utilization, labor productivity, quality, and competitiveness. The plan seeks to drive competitiveness in vital economic sectors, improve growth models and productivity, and increase the economy's autonomy, adaptability, and resilience. Notably, the plan focuses on developing digital and urban economies along with prioritizing the development of small- and medium-sized enterprises.

Recent advancements have been made regarding the Labor Code which became effective by January 2021. The ILO highlighted important changes in the Labor Code of Vietnam. It has expanded coverage to workers without written employment contracts and strengthened protections against gender discrimination and sexual harassment. Moreover, the Code has created provisions for workers and employers to negotiate wages and working conditions, and workers can establish and join their own worker's representative organization.

In 2021, the ministry for Agriculture and Rural Development (MARD) introduced the Sustainable Agriculture and Rural Development Strategy for 2021-2030 (with a vision to 2050). The strategy aims to modernize Vietnam's agricultural sector by promoting commodity production based on various factors, such as local advantages, increasing productivity, quality, efficiency, sustainability, and competitiveness. The goal is to become a top producer in the region and globally while ensuring national food security and contributing to socio-economic stability, disaster prevention, environmental protection, and climate change response. In line with the Strategy, MARD's development objectives for 2021–2025 include the continuation of agricultural restructuring and transformation towards sustainable development, improving quality, added value, and competitiveness. The ministry also prioritizes environmental protection, improving income in rural areas, ensuring food security and national defense, promoting modern and organic agriculture, and connecting with global agricultural value chains sustainably while adapting to climate change.

The National Climate Change Adaptation Plan (NAP) for 2021-2030 was approved by Vietnam's Prime Minister on July 20, 2020, with a vision towards 2050. The plan recognizes climate change as a significant threat to humanity and provides direction for efficient resource allocation, technical management, and coordination among ministries and stakeholders. The Ministry of Natural Resources and Environment (MONRE) monitors and coordinates the plan's implementation with the National Climate Change Committee, other ministries, localities, and private sector actors.

The Law on Environmental Protection (2020) aims to contribute to climate change adaptation efforts through various measures, such as improved infrastructure planning, forecasting, increased monitoring efforts, and a stronger focus on ecosystem-based adaptation measures. The Circular on Environmental Impact Assessment - MONRE, Circular No. 27/2015/TT-BTNMT, dated May 29, 2015, details a number of Articles of the Law on Environmental Protection. It entails a list of projects subject to environmental impact assessment. As the proposed project is low risk, aiming at small-scale interventions, it is not subject to the circular. Similarly, in 2022, MONRE published Decree No. 08/2022/ND-CP detailing a number of articles on the law on environmental protection. The Circular sets forth various application and reporting forms to be used for environmental impact assessment, environmental licensing, and environmental registration. It also sets out details of projects/facilities subject to the Environmental Impact Assessment (appendix II) based on their probability of causing environmental pollution. The proposed project is not expected to cause pollution at a scale that would trigger the circular.

Vietnam's Forestry Development Strategy for the period 2021 – 2030, with a vision to 2050, clearly recognizes forests' role in climate change adaptation – and the need for enhanced forest quality (in both uphill and coastal areas) to fulfill this role. It recognizes forests' roles in watershed protection as storm barriers, preventing land degradation, and providing livelihoods, thereby fostering both ecological and community resilience. A specific solution is the use of high-quality seedlings and nurseries to ensure successful forest restoration efforts.

Strategy for Sustainable Agriculture and Rural Development for the period of 2021-2030, Vision to 2050, aims to promote low-carbon and climate-smart agriculture practices and promotes the production of high-value, diversified products of specific local origin along the respective value chains and in accordance with market demands. It further aims to enhance farmers' capacities as well as their access to finance.

A long list of relevant policies and plans for climate change adaptation can be found in the feasibility study. Generally, the national legal framework sets the basis for the activities planned under the proposed project. The regulations favor foreseen interventions, indicating that the project meets the needs of climate change adaptation. No regulation was found limiting or prohibiting the implementation of proposed interventions.

## **5. RESULTS OF CONSULTATIONS**

### **5.1. Overview of consultation events**

During project formulation, the design team conducted two in-country missions. The first mission occurred from March 13 to 22, 2023, accompanied by the international environmental and social safeguards expert and the national support expert. After the first mission, the national expert continued selected consultations on a demand-driven basis. A second mission took place from June 8 to 14, 2023. This mission focused on technical design questions and did not have an explicit safeguards focus.

The following table provides an overview of interviewed stakeholders.

*Table 1 Overview of consulted stakeholders*

Date	Institution consulted	Level	Total	Male	Female
15.03.	VWU (Vietnam Women's Union)	Province	3	-	3
17.03.	PFPDF (Provincial Forest Development and Protection Fund)	Province	3	2	1
15.03.	Loc Troi Rice Company	Province	1	1	-
20.03.	Hue Viet Agribank-Company	Province	1	-	1
20.03.	DPI (Department for Planning and Investment)	Province	4	3	1
18.03.	DONRE (Department of Natural Resources and Environment)	Province	7	5	2
18.03.	DOLISA (Department of Labour, Invalids and Social Affairs)	Province	3	2	1
15.03.	DARD (Department of Agriculture and Rural Development)	Province	11	10	1
14.03.	CSRD (Centre for Social Research and Development)	Province	3	1	2
17.03.	CRD (Center for Rural Development)	Province	2	1	1
14.03.	CORENAM (Center on Natural Resources Management)	Province	2	1	1
13.03.	CEM (Committee for Ethnic Minorities)	Province	3	2	1
14.03.	My Hai Ag Cooperative (LuxDev433 Model 1)	Commune	7	6	1
17.03.	Agribank	Province	5	3	2
17.03.	Phong Dien DPC, DONRE, DARD, DOLISA, VWU	District	28	20	8
16.03.	Huong Tra DPC, DONRE, DARD, DOLISA, VWU	District	20	15	5
17.03.	Huong Thuy DPC, DONRE, DARD, DOLISA, VWU	District	11	8	3
16.03.	Vinh My (Organic Vegetable LuxDev Model 2)	Commune	7	5	2
16.03.	Phu My 1 Community Cooperative (LuxDev Model 3)	Commune	3	3	-
22.03.	CKC (Center for Knowledge Co-creation and Development Research)	Province	1	-	1
08.06.	Quang Dien(DPC, DONRE, DARD, DOLISA, VWU	District	26	14	12
09.06.	Hue Seed Company	Province	4	3	1
12.06.	WWF Office Hue	National	2	2	0
13.06.	Song Huong Protection Forest Mgmt Board	Province	3	2	1
13.06.	Hoa Nen Essential Oil Company	Province	2	2	0
14.06.	Provincial Consultation Meeting	Province	29	18	11
16.06.	Ministry of Planning and Investment	National	2	1	1
			193	130	63
			100%	67%	33%

During the March mission, the mission team collected information concerning the provincial and district status of gender equality and vulnerable groups. This information, including assessments, statistical data, information on public activities, and plans, fed into the Environmental and Social Action Plan and the Gender and Social Inclusion Action Plan.

During the mission, the project design was presented to relevant stakeholders, who provided positive feedback and showed interest in collaborating. This positive development will foster partnership and support for the project.

The mission team recommended measures to empower women and to ensure equal participation of men and women in project activities. Women's Union (WU) involvement will be essential in achieving this objective. The GAP formulates specific actions to ensure sufficient participation and benefit of women and vulnerable groups.

The number of ethnic groups in the target area was assessed as small. Some of these communities have well-developed livelihoods, and some are vulnerable and poor. Other vulnerable groups discussed during the mission include poor households and people with disabilities. Vulnerable households depend on natural resources for their livelihoods and have low resilience to the impacts of climate change. The project considers the needs of these vulnerable groups and developed strategies to mitigate their vulnerabilities. These are further outlined in the Gender and Social Inclusion Action Plan to enable an intersectional approach to looking into gender, ethnicity, and vulnerabilities.

## 5.2. Relevant issues raised and responses

The following table provides an overview of relevant issues raised during the consultations. The table summarizes key aspects, indicates who raised these issues, and explains how the project proposal addresses these aspects.

Comments related to agriculture activities	Raised by	Response
Support Forestry Cooperatives in sustainable forest management practices and prioritize conserving forest areas.	DPC Huong Tra	<p>The project's Output 2 aligns with the request to support sustainable forest management practices and prioritize the conservation of forest areas.</p> <p>The project will collaborate with the Provincial Forest Protection and Development Fund (PFPDF) to establish 30 ha of sustainable NTFP business models for enhancing forest quality using indigenous tree species in degraded forests. The project will provide guidance and operational modalities for working with local communities and businesses to achieve this objective.</p> <p>By incorporating these improvements, the Hue PFPDF will develop a scalable model that enhances forest ecosystems' long-term resilience and effectiveness in providing essential ecosystem services for both people and the environment.</p>
Ensure that crop varieties are climate resilient and locally preferred to enhance their adoption by the community.	DPC Huong Tra	<p>Activity 3.1 of the project aligns with the request to ensure that crop varieties are climate resilient and locally preferred to enhance their adoption by the community.</p> <p>The activity will support production practices, technologies, and value chain linkages in crops that enhance resilience to climate impacts, maximize food security, and address food safety concerns in TT Hue province.</p> <p>Through research and stakeholder interviews, the project has prioritized three crops - Rice, Lotus, and Thanh Tra Pomelo - based on their significance in TT Hue province and alignment with GCF investment criteria.</p> <p>The project will work towards enhancing the resilience of these crops to climate impacts and strengthening their value chain linkages to contribute to food security while ensuring that they are locally preferred and safe for consumption.</p>
Agriculture models should consider women-owned households; Collaboration with VWU and CEM recommended for better addressing ethnic minority and gender issues	DARD	<p>The project will actively collaborate with the Vietnam Women's Union (VWU) to promote women's groups' involvement in agricultural activities. The Best Management Practice guidelines, training, and technical assistance to farmers will specifically focus on vulnerable groups, including women and ethnic minority households. The project will consider collaborating with the CEM where appropriate to ensure adequate support for these groups.</p>

Comments related to agriculture activities	Raised by	Response
<b>Ethnic minorities and vulnerable groups in the target areas</b>		
54,000 ethnic minority people live in the province, 4,9% of the total population in TT Hue. The number is minimal compared to Kinh people, and they mainly live in specific districts (Nam Dong and A Luoi), not targeted by the project. Yet, CEM emphasized the importance of the socio-economic development of ethnic minority people in the province; living conditions are still behind the majority. CEM noted that ethnic minority people that live close to Kinh areas develop faster and take up development measures more quickly.	CEM	<p>The stakeholder interviews conducted by the project team, including the CEM, Department of Labor, Invalids and Social Affairs (DOLISA), Vietnam Women's Union (VWU), and district agencies, have confirmed that the number of ethnic minority households in the targeted areas is small. However, as highlighted by the stakeholders, these households are often located in vulnerable and poor communes.</p> <p>To address this, the project will take adequate measures to integrate vulnerable and poor groups into project activities and ensure they benefit from project interventions. Concrete steps for their involvement have been formulated in the Gender and Social Inclusion Action Plan. The project team will work closely with local partners and communities to identify the specific needs and priorities of ethnic minority groups and develop targeted interventions that address their unique circumstances.</p>
There are many national target programs, including one that targets socio-economic development of ethnic minority groups in the province. It has broad intervention areas and aligns with other ongoing activities. The project should align with this program and build on what has been done to support Ethnic Minority households.	CEM	<p>As mentioned above, the project team will collaborate closely with local partners and communities to identify the distinctive needs and priorities of ethnic minority groups. They will then develop targeted interventions to address their specific circumstances, considering existing initiatives that the project can build upon.</p> <p>The project will collaborate with CEM to align with the National Target Program on socio-economic development in ethnic minority areas, approved by the Prime Minister in October 2021, with the target to double incomes of ethnic minorities by 2025 vs. 2020 baseline.</p>
Ethnic minorities should not be a focus target group of the project as they are very few. The project's support of ethnic minority people should focus on capacity building to improve the economic situation of families and social inclusion so that ethnic minorities get involved in planning activities.	Provincial DOLISA	The project aims to promote climate adaptation measures and climate-resilient agriculture through a training and capacity development approach. The focus is on building the capacity of local communities, focusing on poor and vulnerable groups, to maintain these measures and practices even after the project ends. Therefore, capacity building is integrated into all project activities to ensure the sustainability and scalability of the project outcomes.
Ethnic minority groups: It is not very relevant for the three selected districts.	Provincial VWU	<p>The number of ethnic minority households in the targeted areas is small. However, as highlighted by the stakeholders, these households are often located in vulnerable and poor communes.</p> <p>To address this, the project will take adequate measures to integrate ethnic minority groups into project activities and ensure they benefit from project interventions. Concrete steps have been formulated in the Gender and Social Inclusion Action Plan.</p>

Comments related to agriculture activities	Raised by	Response
In the district, only two communes have ethnic minority populations, consisting of 295 households and 1,002 people across five villages. Additionally, one village with an ethnic minority population in a different commune has received government support for infrastructure improvements such as road construction and power supply. However, the ethnic minority population still faces significant challenges and constraints due to their low levels of education and limited skills. There is a pressing need for increased efforts in economic development to improve their livelihoods.	DOLISA and VWU in Huong Tra District	See the response above.
DOLISA and the VWU stated that there are no ethnic minority groups in the district. A vulnerable group mentioned was people with disabilities. They founded an association for people with disabilities; the vice head of DOLISA is the vice president. They have a policy to support people with disabilities, funded by government budgets.	DOLISA and VWU in Huong Thuy District	The project will seek active collaboration with the VWU. This recommendation is appreciated, and options for involving people with disabilities will be explored during project implementation.
We recommend dividing groups into smaller groups (e.g., ethnic minorities do not feel comfortable speaking up with government agencies or company representatives). Sometimes few women or men dominate others, so some are reluctant to share their opinions.	CKC	The project will take a sensitive approach during project implementation and explore the option to split groups when activities are implemented on the ground. Training, meetings, and capacity development measures may be grouped as needed. The project will seek the advice of local mass organizations and community-based organizations.
<b>Barriers to Women's Participation</b>		
During consultations, many stakeholders commented on barriers for women to project participation. They further explained how adequately the project can include both genders in its activities.	DOLISA and VWU in Huong Tra District and Huong Thuy District, Provincial DOLISA,	Detailed comments, recommendations, and project responses are summarized in the Gender and Social Inclusion Action Plan.

Comments related to agriculture activities	Raised by	Response
	CSRD, CRD, CKC	
<b>Impacts of climate change</b>		
95% of ethnic minorities rely on agriculture and forestry and suffer from climate change impacts. Local people suffer from storms/typhoons, landslides, and floods. They suffer from limited infrastructure and destructed roads and lose their livelihoods. The area of productive land is reduced, quality of the land is decreased. In sum, climate impacts lead to lower living standards.	CEM	<p>The project aims to enhance the climate resilience of local communities and ecosystems in TT Hue Province by implementing targeted measures to strengthen the enabling environment and increase investments in ecosystem-based adaptation and climate resilient value chains in the agriculture, fisheries, and aquaculture sectors. It will promote investments in climate change adaptation, such as climate-informed planning and monitoring, ecosystem-based adaptation, and disaster risk reduction.</p> <p>The project recognizes that climate change disproportionately affects the livelihoods of women, girls, and vulnerable households and communities. Therefore, social inclusion and gender equality are critical elements of the project, and targeted measures will be included to address their unique vulnerabilities and needs. Specific activities have been formulated in the Gender and Social Inclusion Action Plan and integrated in the three project outputs.</p>
Climate change impacts heavily affect poor people. Their livelihoods are nature-based. Therefore they are heavily influenced by drought or heavy rain. Ethnic groups have a positive way of thinking; they try to adapt. Wealthier households are better equipped (e.g., they have glasshouses for vegetable gardens). They recover more quickly from the impacts of climate change. Poor people have more difficulties recovering from climate change-induced hazards, e.g., floods. Their livelihoods are unstable.	CSRD	See the response above.
The impacts of climate change on vulnerable groups are profound, especially in mountainous areas where extreme weather events have led to a 35% decline in crop productivity and a 45% decrease in livestock numbers. These changes have devastated the income of ethnic	CRD	See the response above.

Comments related to agriculture activities	Raised by	Response
minorities, with 75% of their income being dependent on agriculture. Similarly, in coastal areas, the economic situation of communities has been affected by climate change, with floods leading to a decline in income of 10-15%.		
Several consulted stakeholders commented concerning the vulnerability of women to climate change impacts. More information is summarized in the Gender and Social Inclusion Action Plan.	DOLISA and VWU in Huong Tra District and Huong Thuy District, Provincial VWU	See the response above.
<b>Feedback on project design</b>		
DOLISA confirmed that the project meets their targets and interests. The target group should be specifically vulnerable households.	Provincial DOLISA	Social inclusion and gender equality are critical elements of the project, and targeted measures will be included to address their unique vulnerabilities and needs
CEM recommended that the project prioritizes improving housing conditions, transportation, roads, and livelihoods of local communities. Enhance the adaptive capacity of people and improve the resilience of housing conditions and infrastructure to withstand climate change impacts. These measures can improve infrastructure to make it more climate-resilient.  Further, the project should provide appropriate seed varieties resilient to climate change and drought. Implement short-term rotational crops instead of long-term crops. Consider adjusting seeding and harvesting times to avoid damage from climate-related events like storms.	CEM	Output 2 aims to enhance local communities' livelihoods by introducing ecosystem-based adaptation measures and ensuring climate resilience of existing infrastructure. Following GCF safeguard standards, the activities related to infrastructure development will be limited to low-impact measures, as the project is categorized as a risk category C project.  Output 3 aims to promote sustainable and climate-resilient agriculture through various activities, including introducing climate-resilient and improved seed varieties.

Comments related to agriculture activities	Raised by	Response
DOLISA can provide professional support to the project related to gender equality, people with disabilities, social support, provide resources for developing proposals and planning project activities.	Provincial DOLISA	DOLISA's support is highly valued by the project, which will remain in close communication with them throughout the implementation of activities. Any additional support needed from DOLISA will be requested in a timely manner.
Agri Bank has indicated that they are open to considering other models for funding. They have recommended group lending as an alternative approach, focusing on lending to farmer associations, women's unions, and youth associations. In some cases, the bank may be willing to waive the requirement for a land use certificate if a mutual guarantee is provided within the lending group. Group lending is based on a community-based culture of mutual responsibility and support.	Agri Bank	The project welcomes exploring alternative financing models, such as group lending, to support climate-resilient agriculture. Under Project Activity 3.2.1, the project aims to develop specific measures to finance climate-resilient agriculture. To enhance service availability and reduce transaction costs in rural areas, the project will assist Agribank in designing and offering customized banking products, including group lending. Technical support will be provided to develop financial products tailored to the needs of climate-resilient agriculture models and to pilot the products in crops prioritized by the project. The project will prioritize designing products that suit farmers' needs, such as non-collateral loans through group lending, cash-flow-based lending, climate-smart small infrastructure or housing loans, and long-term loans for forestry or perennial trees. The project will also support investment in climate-smart production technology, post-harvest, and processing technology to increase both the productivity and resilience of farming.
The coastal communes are the most vulnerable to the impacts of climate change. Therefore, there is a need for capacity building in climate change-related knowledge and skills. The project should propose the construction of disaster risk reduction infrastructure that is climate change-proof. Additionally, the project should aim to support mangrove restoration in the lagoon area to enhance the ecosystem's resilience to climate change impacts.	Phong Dien DPC	The measure for ecosystem-based adaptation and climate-proofing of existing infrastructure (Activity 2.1) will include the support of for coastal forest restoration. The infrastructure-related activities will be limited to climate-proofing of already built infrastructure and ecosystem-based approaches.

## 6. STAKEHOLDER ENGAGEMENT PLAN

The following table provides information on key considerations and events during project inception and implementation.

*Table 2. Timeline for stakeholder engagement activities*

Activity	Project Phase	Timeline	Responsibility
<p><b>Establishment of TAO:</b> The role of LuxDev as EE will be carried out by a Technical Assistance Office. The TAO will be comprised of a Chief Technical Coordinator supported by technical and operational staff. The TAO will be in charge for coordinating the implementation of all project activities and related stakeholder engagement. Concerning stakeholder engagement this includes the following:</p> <ul style="list-style-type: none"> <li>▪ coordinating project implementation with project partners;</li> <li>▪ assessing the capacity of implementation partners with whom it will sign Delegation Agreements;</li> <li>▪ setting the relevant Delegation Agreements with project implementation partner agencies at the province, district, and commune level;</li> <li>▪ ensuring that activities carried out under delegation agreements comply with LuxDev's rules and procedures;</li> <li>▪ provide additional technical support to the Provincial Management Board and partner agencies as required;</li> <li>▪ maintaining coordination with other projects being implemented in Vietnam and in TT Hue specifically and with the same technical focus;</li> <li>▪ coordinating with line departments involved in the implementation of the project, as well as DPI as key project partner, and the MPI in its role as NDA in Vietnam.</li> </ul>	Inception	Year 1	PPC
<p><b>Establishment of Project Steering Committee (PSC):</b> The PSC will meet at least once per year, and will be comprised of the following:</p> <ul style="list-style-type: none"> <li>▪ Chairperson of the TT Hue PPC;</li> <li>▪ A representative of MPI;</li> <li>▪ A representative of the AE;</li> <li>▪ Chairpersons of the three-target district DPCs;</li> <li>▪ Representatives of the relevant provincial line departments;</li> <li>▪ The CTC as representative of the LuxDev TAO;</li> <li>▪ Others may be invited as observers if necessary.</li> </ul>	Inception	Year 1	PPC
<p><b>Establishment of Provincial Project Management Board (PPMB)</b> A PPMB will be established by the TT Hue PPC for project implementation. The PPMB is responsible for overall project management. It will be comprised of technical and admin staff from DPI working part-time in support of the project and will be headed by a director level representative of the provincial DPI. Technical staff representing the Division of Planning and Finance of the project target districts will also be part of the PPMB.</p>	Inception	Year 1	PPC
<b>Appointment of specialist responsible for safeguard-related issues</b> within TAO	Inception	Year 1	TAO
<b>Establishment of grievance redress mechanism</b> (appointment of responsible staff)	Inception	Year 1	TAO
<b>Establish collaboration with grassroots implementation partners</b> (Community Organizations, District Agencies, Commune PCs, Village leaders, and Village Development Boards (VDBs))	Inception	Year 1	TAO

Activity	Project Phase	Timeline	Responsibility
<p><b>Ongoing stakeholder engagement events embedded in project activities:</b> The following list provides an overview of selected engagement, training and capacity building activities with project stakeholders. For an exhaustive list see detailed activity sheets of the FS and implementation timeline):</p> <p>Output 1:</p> <ul style="list-style-type: none"> <li>Workshops and trainings for members of district and commune commanding committees (CC) for natural disaster prevention and grassroot shock taskforces (Sub-Activity 1.1.3). The training aims to improve knowledge and skills on communication, preparedness, and emergency response.</li> <li>Involvement of Women's Union in training needs assessment and implementation (see GAP)</li> <li>Training and involvement of mass organizations and community-based organizations (CBOs) in scaling up the Community-based Early Warning System (CBEWS) model in target vulnerable communes (Sub-Activity 1.1.3). They will support capacity-building activities and ensure women's participation in decision-making and planning of district and commune-level EWSs.</li> <li>Trainings to guide designated staff of district agencies and commune authorities on how to collect, store and reporting monitoring data includes capacity development on the collection of gender-disaggregated data.</li> </ul> <p>Output 2:</p> <ul style="list-style-type: none"> <li>Participatory planning and designing of forest restoration interventions</li> <li>Training of male and female stakeholders for coastal forest restoration activities (site assessment, species selection, planting, maintaining, protecting, and monitoring); training courses on silvicultural measures for sand dune forest restoration; and on establishing local nurseries for native coastal wood species.</li> <li>provide capacity building for project stakeholders, local authorities and communities on the development of herbal medicinal plants</li> <li>Develop a value chain approach, working with producers, off-takers and processors along the value chain to ensure equitable access &amp; benefit sharing for local communities</li> </ul> <p>Output 3:</p> <ul style="list-style-type: none"> <li>Hold multi-stakeholder platforms, with farmers, cooperatives local authorities and off-takers to identify suitable areas for expansion of lotus production, and Thanh Tra Pomelo.</li> <li>Under sub-activity 3.1.1.1, the project will strengthen the capacities and provide inputs to farmers, Farmer Groups, Women's Groups, agricultural Cooperatives, and farmer extension to transition to more climate-resilient production practices for Rice and Thanh Tra Pomelo and Lotus.</li> <li>Provide support (training and inputs) to farmers, Cooperatives, Womens Groups and Famers Groups to scale up of existing rice varieties which are more resilient to climate change</li> <li>Capacity building on financial and business literacy for vulnerable groups to improve climate change resilience in disaster-prone communities.</li> </ul>	Implementation	Year 1 - 5	TAO

Activity	Project Phase	Timeline	Responsibility
<ul style="list-style-type: none"> <li>Strengthen Cooperatives in organisational and financial management helping them play a key role in orienting production, applying, and transferring advanced techniques, supporting inputs, and purchasing products from farmers.</li> <li>Training and coaching, first for identified master trainers from women's unions their associated organizations including Provincial Center for Women Development or District/commune WU staff, cooperatives as well as staff from cooperating financial institutions such as Agribank.</li> <li>Share lessons learnt and best practices on both climate risk management and product design with the wider financial ecosystem in TT Hue through knowledge events.</li> </ul>			
<b>Periodic stakeholder update meetings</b> and information dissemination	Implementation	Year 1 - 5	TAO
<b>Management of the GRM</b> (regular reporting, treatment of filed cases)	Implementation	Year 1 - 5	TAO
<b>Regular monitoring and periodic reporting</b> of project implementation (as described in FS) The project monitoring system will include performance targets for data collection disaggregated by social and gender aspects.	Implementation	Year 1 - 5	TAO
<b>Mid-term and final evaluation:</b> The TAO will commission an external mid-term evaluation and a final external evaluation before the end of the project. Evaluations will be carried out by a team of external independent experts according to the six evaluation criteria of the Development Assistance Committee of the Organisation for Economic Cooperation and Development. Project stakeholders will be involved early on in the evaluation process and given the opportunity to contribute to evaluation design, including by identifying issues to be addressed and evaluation questions to be answered.	Implementation	Year 1 - 5	TAO

## 7. IMPLEMENTATION ARRANGEMENTS

LuxDev project implementation at the field level will be carried out by a Technical Assistance Office (TAO) based at and working closely in support of the Provincial Project Management Board at DPI. The TAO will be comprised of a Chief Technical Coordinator supported by technical and operational staff.

The technical and operational team will include a national expert responsible for environmental and social safeguards (=safeguards expert). The safeguards expert will observe and manage the potential risks arising during operation, including reporting to the TAO, Provincial Project Management Board, and the Green Climate Fund (GCF) on ESAP implementation and performance. In order to enable the TAO to manage the project with social and environmental risks and impact in mind, training will be provided to project personnel, partner staff, and beneficiaries on how to comply with the environmental and social standards.

The TAO will collaborate with a broad array of stakeholders to implement the project. Involved local partners include the Departments and People's Committees at the provincial, district, and commune levels, as well as grassroots implementation partners such as community-based organizations or groups and village leaders and village development boards. Relevant partners will be trained on issues related to safeguards, SEAH, and grievance redress.

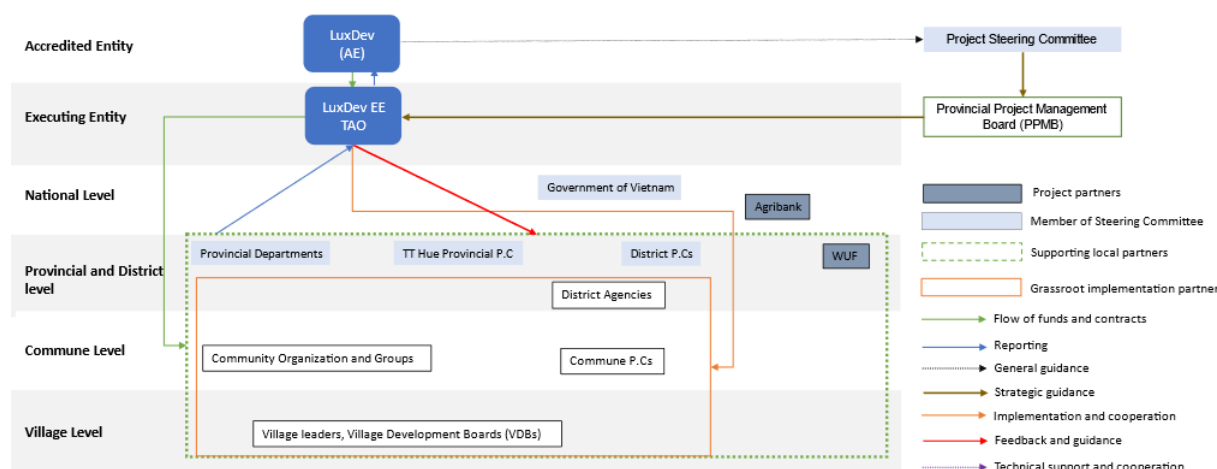


Figure 2. Institutional arrangements

The TAO will hire an M&E specialist. The safeguards expert will be the responsible expert for monitoring ESAP indicators and outcomes. The safeguards expert will be trained on the project's monitoring system and on monitoring ESAP indicators and outcomes. They will collaborate closely with TAO's M&E specialist to ensure that safeguard-related M&E indicators are fed into the overall project monitoring system. Data collected at the field level concerning ESAP indicators will be shared with the safeguards expert on a frequent basis.

The project's regular reporting will cover ESAP reporting. The Mid-term and final evaluation of the project will be conducted by a team of external, independent experts who will also review the implementation of the safeguard instruments.

## 8. GRIEVANCE REDRESS MECHANISM

The five steps<sup>4</sup> that a GRM should cover include:

- Publicize the mechanisms: The project will ensure that the communities affected are fully informed about their options and how the project-level Grievance Redress Mechanism (GRM) works.
- Receive and register: The project will establish appropriate communication channels for receiving grievances and processing them in an accountable manner.
- Review and investigate: The GRM will have the necessary resources to review and investigate filed grievances. The project will provide dedicated staff, budget, and responsibilities to the GRM.
- Develop resolution options, respond to grievances, and close out: The GRM will be flexible and responsive to the different types of grievances that may arise. Depending on the nature of the grievance, various approaches for resolution may be necessary. A clear response will be provided, and the case will only be closed once an agreement has been reached.
- Monitor and evaluate: The project will integrate GRM monitoring into the overall project Monitoring and Evaluation (M&E) system. The effectiveness of the GRM will be measured and reported through statistical analysis.

Intending to ensure a functional Grievance Redress Mechanism (GRM), it is essential to allocate sufficient resources. These resources encompass well-trained staff, effective systems and processes to receive and document complaints, and clearly defined responsibilities and procedures.

### **8.1. LuxDev's institutional-level grievance redress mechanism**

LuxDev upholds a set of core values that guide their actions and operations, including the settlement of grievances. These values are: Respect, Integrity, Solidarity, and Efficiency.

LuxDev provides individuals with two avenues to address grievances. The first option is to utilize the integrity alert mechanism, which enables reporting of any instances, attempts, or suspicions related to fraud, corruption, or abuse. This channel also welcomes reports on acts of harassment, workplace violence, sexual exploitation, or abuse. Additionally, individuals can submit inquiries concerning matters of integrity. The second option involves registering a complaint regarding LuxDev's services. This platform serves as a means to report any harm caused by LuxDev's activities to individuals, communities, or organizations. It offers a dedicated space to raise concerns and seek resolution for any negative impacts experienced. By offering these two avenues, LuxDev aims to ensure that all grievances are addressed appropriately and that individuals have a reliable means to voice their concerns.

Fraud and corruption are contrary to LuxDev's values and adversely impact its activities and operations. LuxDev is strongly committed to preventing and combating fraud, corruption and any other form of prohibited practice. In that regard, it expects all members of staff as well as third party entities involved in the implementation of activities (operational partners and contractors), to maintain the highest level of ethics and integrity. Similarly, LuxDev does not tolerate any form of harassment, workplace violence, sexual exploitation or abuse.

#### **Integrity Alerts**

Integrity Alerts can be issued at the LuxDev homepage at the following address: <https://luxdev.lu/en/contact/integrity/form>. Alerts can be issued by the following actors:

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<sup>4</sup> (IFC, 2009, p. 3)

- LuxDev staff members
- LuxDev suppliers or providers
- LuxDev partners
- Beneficiaries of LuxDev's activities

A grievance can be filed in the following cases of misconduct :

- If a person is confronted with an integrity problem or suspect a fraud act or attempt or if the person has doubts about actions related to LuxDev's activities.
- If a person has a doubt about an act or behaviour or a question about integrity.

### **Handling of alerts, complaints, and questions**

**Confidentiality:** Alerts, complaints, and questions are treated with the utmost confidentiality. However, they cannot be transmitted anonymously. LuxDev must be able to contact the person who issued the alert in order to obtain additional information. LuxDev does not tolerate retaliation against staff members or other parties who in good faith express concerns or provide assistance during investigations.

**Follow-up:** LuxDev will acknowledge receipt of complaints, questions or integrity alerts that are transmitted. All alerts will be kept in a register. Alerts are exclusively accessible to LuxDev's Management Committee and the Chairman of the Audit Committee of LuxDev. If necessary, the Management Committee may liaise with its relevant department heads or resident representatives and may inform the Chairman of the Board of Directors. Whistleblowers will be informed of the decisions taken in response to their alerts and of any actions that may be undertaken.

### **GCF Independent Redress Mechanism**

The GCF Independent Redress Mechanism (IRM) offers a channel for individuals impacted or potentially impacted by GCF projects or programs. Therefore, the GCF IRM can also be accessed by parties impacted or potentially impacted by the CARE Project.

The IRM further processes appeals for the reevaluation of funding proposals rejected by the GCF Board. The IRM's objective is to handle complaints from affected parties, ensuring a fair, effective, and transparent process, ultimately contributing to the improvement of GCF's climate funding performance. Additionally, the IRM considers requests from Developing Countries seeking a review of funding proposals denied by the GCF Board.

Beyond dispute resolution, the IRM is tasked with advising the Board on GCF's operational policies and procedures, drawing insights from resolved cases. Recognizing the potential need for support in establishing grievance mechanisms, especially for GCF Direct Access Entities, the IRM is also authorized to implement capacity development programs.

GCF's IRM can be accessed online: <https://irm.greenclimate.fund/>

## **8.2. Project-level Grievance Redress Mechanism**

### **Legal framework for responsibility and process**

In general, the process and responsibilities of resolving grievances/complaints in Vietnam will be in compliance with the regulations on dealing with grievance and redress at Decree No 75/2012/NĐ-CP dated 3/10/2012 and Complaint Law No.02/2011/QH13, dated 11/11/2011. Following this legal framework, the provincial P.C also issued the regulations on receiving, processing and resolving

complaints under its Decision No. 26/2014/QĐ-UBND dated 23/5/2014 and on internal administrative procedures to resolve complaints under its Decision No. 327/QĐ-UBND dated 8/2/2023 in TT Hue province.

### **Principles**

The development and implementation of the project grievance redress mechanism will base on the following guiding principles: responsiveness and confidentiality, objectivity and independence, simplicity, fairness, timeliness, and participation. In addition, the process for processes for receiving, addressing, and tracking complaints of affected people and communities in project target areas will comply with the Complaint Law, national and provincial regulations and guidelines.

### **Subjects and scope of GRM**

The grievance redress mechanism will apply to project partners, beneficiary local people, group and communities, who are affected and raise complaints about the project management, implementation, and other issue specific related CARE project in TT Hue. Those affected by the project activities may lodge complaints relating to the rights and their responsibilities in the implementation of projects that may be related to compensation policies, land acquisition, occupational safety and the difficulties caused by the implementation process.

### **Forms and procedures of lodging grievances and complaints**

Those affected by the project can lodge their grievances and complaints in writing or verbally to the suitable levels of resolution in their community without paying any cost. In addition, they can call to present their grievance/complaint via a hotline, which is a direct phone line set up by TAO.

Procedures of the project-level grievance redress mechanism will basically comply with the regulations and guidelines of the national and provincial legal framework for mediation and resolution of grievances and complaints, which require to go through three levels of mediation/resolution, start at the commune, the district and the province level. All administrative and legal fees that might be incurred in the resolution of grievance and complaints will be charged by the executing agency. The following procedures for grievance redress are established at three level of mediation/resolution as provided by the law and other related legal documents.

- **At the commune as the first stage.** The affected person can bring his/her complaint in written or verbal forms to any member of the Commune People's Committee CPC, either through the Village Head or directly to the CPC. The designated staff of CPC or the Village Head bear the responsibility to notify the CPC and the grievance/complaint. Then, the CPC will arrange a meeting with the aggrieved or complainant to learn more about the issue. The timeframe for resolution of lodged grievance/complaint is from 30 days to a maximum of 60 days, particularly for complicated case or in remote area. The CPC office is responsible for documenting and filing all complaints that it handles after the grievance/ complaint is resolved. The role of the incumbent staff of the CPC and the Village Head is very important so the project staff (for example the District Facilitator), who is responsible for the project implementation in that commune, will work closely with them on the implementation of grievance/complaint redress mechanism.

In addition, the TAO will establish a grievance mediation/reconciliation unit in each village which includes village leaders and members of Fatherland Front, WU, Veteran Union, Youth Union, Farmers Union, Fishery Associations at the village level. This process will be facilitated by the CPC, This unit will directly receive and review the nature of grievance or complaint from the affected people or group, and resolve it prior to their submission of the case to the CPC for resolution.

- **At the District as the Second Stage.** If the affected person is not satisfied with the CPC decision or in the absence of any response to their grievance/complaint within 30 days or 45

days (in remote area), he/she may bring the case, either in written or verbal forms, to the designated staff of the District People's Committee (DPC). The DPC is required to resolve the grievance/complaint within 30 days or a maximum of 70 days for complicated case or in remote area after the lodging date. The DPC is responsible for documenting and filing of all complaints that it handles and will inform the TAO of any decision made. The TAO is responsible for supporting and collaborating with the DPC to resolve the affected people's grievance/complaint and to ensure that the DCP final decision is notified to the aggrieved/complainant.

- **At the Province as the third Stage.** If the aggrieved/complainant is still not satisfied with the DPC's final decision or in the absence of any response within 30 days or 45 days (in remote area), he/she may bring the case in writing to the PPC for resolution. The PPC has from 30 days to a maximum of 70 days to resolve the complaint to the satisfaction of the affected person, depending on whether the case is complicated or it comes from a remote area. The PPC is responsible for documenting and filing all complaints that have been resolved, and notifying its decision to the aggrieved/complainant.

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### **Gender-responsive and survivor-centred GRM**

The GRM will be designed in a gender-responsive and survivor-centered manner. The GRM will aim to be inclusive and unbiased, valuing and prioritizing the rights, needs, and preferences of survivors. Special consideration is given to the most marginalized and vulnerable groups. The filing of anonymous complaints will be possible. Representatives of the Women's Union will be trained in managing SEAH-related complaints. The training will also educate participants on how to respond to SEAH reports in a safe and effective way. The GRM will allow for confidential reporting of cases at different levels and through representatives of the WU, as well as through a free-of-charge hotline that will be established for the GRM. In addition to the project-level mechanism, complainants can turn to the AEs institutional-level grievance redress mechanism online.

Project stakeholders and affected communities will be informed about the GRM and the options to submit SEAH-related complaints at the earliest opportunity during stakeholder consultations.

## ANNEX 1: REFERENCES

- ADB. "Viet Nam 2021-2025: Agriculture, Natural Resources and Rural Development Sector Assessment, Strategy and Road Map.," January 2022. <https://www.adb.org/sites/default/files/institutional-document/763181/vietnam-2021-2025-agriculture-sector-assessment-strategy-road-map.pdf>.
- ICAT. "Vietnam: Assessing the Impact of Climate Mitigation Initiatives." *ICAT* (blog), August 19, 2022. <https://climateactiontransparency.org/vietnam-assessing-the-impact-of-climate-mitigation-initiatives/>.
- IFC. "Addressing Grievances From Project-Affected Communities," 2009. <https://www.ifc.org/wps/wcm/connect/f9019c05-0651-4ff5-9496-c46b66dbeedb/IFC%2BGrievance%2BMechanisms.pdf?MOD=AJPERES&CACHEID=ROOTWORKSPACE-E-f9019c05-0651-4ff5-9496-c46b66dbeedb-jkD0-.g>.
- International Climate Initiative (IKI). "Vietnam's National Adaptation Plan (NAP) Issued," 2020. <http://ikinews.climatechange.vn/vietnams-national-adaptation-plan-nap-issued/>.
- IWGIA. "The Indigenous World 2022: Vietnam - IWGIA - International Work Group for Indigenous Affairs." Accessed May 10, 2023. <https://www.iwgia.org/en/vietnam/4659-iw-2022-vietnam.html>.
- Network for Agricultural and Rural Development Think-Tanks in Mekong Subregion. "Vietnam – Prime Minister Approved the Strategy for Sustainable Agriculture and Rural Development for the Period of 2021-2030, Vision to 2050." *NARDT.Org.Vn* (blog). Accessed April 27, 2023. [http://nardt.org/vn/tID4227\\_Vietnam--Prime-Minister-approved-the-Strategy-for-Sustainable-Agriculture-and-Rural-Development-for-the-period-of-20212030-Vision-to-2050.html](http://nardt.org/vn/tID4227_Vietnam--Prime-Minister-approved-the-Strategy-for-Sustainable-Agriculture-and-Rural-Development-for-the-period-of-20212030-Vision-to-2050.html).
- The Ministry of Finance E-Portal. "2021 - 2025 Economic Restructuring Plan Focuses on Digital Transformation.," November 24, 2021. [https://mof.gov.vn/webcenter/portal/ttpten/pages\\_r//detail?dDocName=MOFUCM216648](https://mof.gov.vn/webcenter/portal/ttpten/pages_r//detail?dDocName=MOFUCM216648)

## ANNEX 3: ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST

This Annex is a copy of the Environmental and Social Screening Checklist as it has been submitted with the Concept Note on May 9, 2022. The Checklist has been reviewed in the process of developing the ESAP.

### Part A: Risk Factors

Please indicate your answers to the questions below and provide an explanation on the response selected. In cases when the TBD response has been selected please explain briefly why you are not able to determine now and when in the project cycle the question will be addressed.

If the criteria is not applicable to the project you may write N/A in the justification box.

Risk Factors	YES	NO
Will the activities involve associated facilities and require further due diligence of such associated facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>No new associated facilities which would require further due diligence will be involved in the execution of this project. The track record of LuxDev as implementing entity in this region is long and known current and past partners will also collaborate on this new project. For these institutions with who we work a prior "diagnosis" (institutional capacity check) was yet conducted.</i>		
Will the activities involve trans-boundary impacts including those that would require further due diligence and notification to affected states?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>The planned activities are local (see project description) and will not involve larger or trans-boundary impacts. No further due diligence required.</i>		
Will the activities adversely affect working conditions and health and safety of workers or potentially employ vulnerable categories of workers including women and children?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>The planned activities will not adversely affect working conditions and health and safety of workers. Any form of child labor is not tolerated under LuxDev project management. High labor standards apply. For activities on community level (e.g. climate-proofing existing small-scale infrastructure, organic farming incl. agriculture and aquaculture, fish conservation zones, among others) participation is voluntary and a positive discrimination will be applied favoring women and vulnerable poor (e.g. benefiting from demonstration equipment).</i>		
Will the activities potentially generate hazardous waste and pollutants including pesticides and contaminate lands that would require further studies on management, minimization and control and compliance to the country and applicable international environmental quality standards?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>None of the planned activities will generate or treat potentially hazardous waste and/or pollutants including pesticides and/or contaminate lands. On the contrary, the project will, inter alia, focus on helping to develop an organic agriculture market in which chemical/synthetic fertilisers and pesticides are eliminated.</i>		
Will the activities involve the construction, maintenance, and rehabilitation of critical infrastructure (like dams, water impoundments, coastal and river bank infrastructure) that would require further technical assessment and safety studies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>The proposed activities will not involve the construction, maintenance, and rehabilitation of critical infrastructure. Hence no further technical assessment and safety studies will be required. Note that no "infrastructure" or "construction" which would require further assessments are part of this proposal. Activities might include the climate-proofing of existing micro- and small-scale infrastructure. Proposed interventions fully qualify for a category C project. Whenever possible eco-system-based adaptation (EbA) solutions will be the preferred choice. Where EbA interventions are not appropriate to address climate risks, the project will support the climate-proofing of existing micro-scale environmentally friendly infrastructure.</i>		
Will the proposed activities potentially involve resettlement and dispossession, land acquisition, and economic displacement of persons and communities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Criteria not applicable. The proposed activities will not involve any form of resettlement or dispossession, no land acquisition will be required. Land titles exist and are respected/enforced. Activities which require access to land (e.g. organic agriculture) take place on</i>		

land owned by farmers who have land titles and decide to participate in these activities. No economic displacement of persons and communities is expected to take place in relation to the proposed activities. Government or private sector investments in the target area unknown at the time being.

Will the activities be located in or in the vicinity of protected areas and areas of ecological significance including critical habitats, key biodiversity areas and internationally recognized conservation sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project will support the establishment/ definition of fish conservation zones in marine areas (not protected, with no specific status) which are to protect and manage a natural resource in a sustainable manner. The qualification of these zones will be done according to the criteria specified in the relevant law.

Will the activities affect indigenous peoples that would require further due diligence, free, prior and informed consent (FPIC) and documentation of development plans?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Criteria not applicable. A few of the selected target communes have ethnic minority groups (just 187 households in total). As they are typically economically disadvantaged households, they should be positively affected by certain project interventions as socio-economic status is always a criterion taken into consideration.

Will the activities be located in areas that are considered to have archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values or contains features considered as critical cultural heritage?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Criteria not applicable. Beside Hué city, a UNESCO World Heritage Site with the imperial city and the Citadel as Hue's most important historical and cultural sight, there are numerous royal tombs, pagodas and temples inside and around the city, making it one of Vietnam's most important cultural and historical centers. Whereas some of these heritage sites are located within the boundaries of target communes, as per GOV regulations they can never, and will never be negatively affected by any project interventions. On the contrary, planned activities may contribute to better protecting the wider area including such sites of historical, cultural, and religious value.

## Part B: Specific environmental and social risks and impacts

<input type="checkbox"/> Assessment and Management of Environmental and Social Risks and Impacts	YES	NO	TBD
Has the E&S risk category of the project been provided in the concept note?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Has the rationale for the categorization of the project been provided in the relevant sections of the concept note?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Are there any additional environmental, health and safety requirements under the national laws and regulations and relevant international treaties and agreements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The project will always ensure full compliance with the laws and regulations of Vietnam and the GCF regulations which govern the AMA, as well as the funded activity agreement (FAA) .			
Are the identification of risks and impacts based on recent or up-to-date information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
LuxDev has a project team on the ground and is implementing to the satisfaction of the communities and the Government a similar adaptation project (VIE/433) since 2017.			
Labour and Working Conditions	YES	NO	TBD
Will the activities potentially have impacts on the working conditions, particularly the terms of employment, worker's organization, non-discrimination, equal opportunity, child	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

labour, and forced labour of direct, contracted and third-party workers?			
The project will conduct its due diligence in any tendering process and always ensure compliance with the laws and regulations of Vietnam respecting labor and working conditions. No potentially negative impacts are expected since "workers" will most likely come from the target zones and are beneficiaries of the activities.			
Will the activities pose occupational health and safety risks to workers including supply chain workers?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>None. The project will not employ "workers" but work with association and people most likely smallholders on a fully voluntary basis. For any intervention related to the climate-proofing of existing small-scale infrastructure and/or other small adaptive measures related to agriculture or fisheries the EE will only work with (local construction companies respecting the labor and working conditions..</p> <p>Small-scale infrastructures are included under Component 1, such small-scale infrastructure (i.e. installation of warning posts and watchtowers) that typically entail OHS risks such as risks of fall and mechanical risks during installation itself and O&amp;M. The project will develop mitigation measures to avoid potential accidents or incidents during installation and O&amp;M. Construction firms to be contracted for those works will be obligated to provide proof of staff training and proof of adequate OHS measures in place (e.g., staff training on proper installation procedures and potential health and safety risks, provision of proper signages, allowing only authorized access).</p>			
<b>Resource Efficiency and Pollution Prevention</b>	<b>YES</b>	<b>NO</b>	<b>TBD</b>
Will the activities generate (1) emissions to air; (2) discharges to water; (3) activity-related greenhouse gas (GHG) emissions, (4) noise and vibration; and (5) wastes?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Based on the experience of previous adaptation interventions, the project will not have any such negative impacts.</p> <p>The project will introduce a small number of solar-powered flood warning-posts to the designated project area. Minor risks associated with solar-powered warning posts include inadequate waste disposal of damaged solar panels as well as end-of life disposal of solar panels. The project will ensure that adequate waste disposal procedures are in place to mitigate the risks associated with solar-powered warning posts. This will involve collaborating with local waste management authorities or specialized companies, if needed. Monitoring will be conducted to verify compliance with waste disposal procedures throughout the project lifecycle.</p>			
Will the activities utilize significant amount of natural resources including water and energy?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
None of the planned activities will.			
Will there be a need to develop detailed measures to reduce pollution and promote sustainable use of resources?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Since none of the activities will utilize significant amount of natural resources including water and energy, there will be no such need to develop measures to reduce pollution.			
<b>Community Health, Safety, and Security</b>	<b>YES</b>	<b>NO</b>	<b>TBD</b>
Will the activities potentially generate risks and impacts to the health and safety of the affected communities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
None. On the contrary, planned interventions will help reduce those risks.			
Will there be a need for an emergency preparedness and response plan that also outlines how the affected communities will be assisted in times of emergency?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The project will strengthen the capacities for DRR and disaster preparedness (natural disasters).			
Will there be risks posed by the security arrangements and potential conflicts at the project site to the workers and affected community?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

None. No specific security risks or conflicts exist in the target zones. Land and/or natural resources are not contested by conflict parties and hence no risks for workers. "Workers" will most likely come from the target zones and are beneficiaries of the activities.

Small-scale infrastructures are included under Component 1, such small-scale infrastructure (i.e. installation of warning posts and watchtowers) that typically entail OHS risks such as risks of fall and mechanical risks during installation itself and O&M. The project will develop mitigation measures to avoid potential accidents or incidents during installation and O&M. Construction firms to be contracted for those works will be obligated to provide proof of staff training and proof of adequate OHS measures in place (e.g., fencing if the towers are easily accessible to the communities, staff training on proper installation procedures and potential health and safety risks, provision of proper signages, allowing only authorized access).

Land Acquisition and Involuntary Resettlement	YES	NO	TBD
Will the activities likely involve land acquisition and/or physical or economic displacement?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Criteria not applicable. Activities will not require land acquisition and will not lead to any form of physical or economic displacement.

Biodiversity Conservation and Sustainable Management of Living Natural Resources	YES	NO	TBD
Will the activities potentially introduce invasive alien species of flora and fauna affecting the biodiversity of the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

None of the activities will introduce invasive alien species of flora and fauna. Activities related to climate smart agricultural practices will only work with and improve already locally used species. Hence no risk of negatively affecting the biodiversity of the target area.

Will the activities have potential impacts on or be dependent on ecosystem services including production of living natural resources (e.g. agriculture, livestock, fisheries, forestry)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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No negative impacts. As per the objectives of the proposal the activities are expected to have a potential positive impact on ecosystems (e.g. organic agriculture, sustainable natural resources and fisheries). (see final evaluation of earlier project VIE/033)

Indigenous Peoples	YES	NO	TBD
Will the activities potentially have any indirect impacts on indigenous peoples, ethnic minorities, or vulnerable and marginalized groups?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

No direct/indirect negative impacts expected. No indigenous peoples, nor ethnic minorities are present in the target zone. As per the objectives of the proposal the activities are expected to have a potential positive impact on vulnerable and marginalized groups.

Cultural Heritage	Yes	NO	TBD
Will the activities restrict access to the cultural heritage sites and properties?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

No. The activities will not take place in vicinity of cultural heritage sites and properties and will not restrict their accessibility in any form.

Will there be a need to prepare a chance-find procedure in case of the discovery of cultural heritage assets?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Criteria not applicable. The "target area" is a yet "developed" land, no new land will be cleared and hence it is not expected that the activities will lead to the discovery of cultural heritage assets.

Stakeholder engagement and grievance	Yes	NO	TBD
Will the activities include a continuing stakeholder engagement process and a grievance redress mechanism and integrated into the management/implementation plans?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*Stakeholder engagement and participation is an ongoing process and part of the project. An appropriate Grievance Redress and Accountability Mechanism will be elaborated under the full proposal and will be reflected under the implementation plans.*

## ANNEX 4: PROJECT AND IFC EXCLUSION LIST AND PROCESS FOR SITE SELECTION

### *Project exclusion list*

The following is the Project Exclusion List, a list of activities that the project will not support:

- The project will not support activities that result in a negative change to existing legitimate tenure rights
- The project will not involve the involuntary resettlement of households
- The project will not support the clearing of native forests
- The project will not use non-locally adapted species.
- Activities that may increase greenhouse gas emissions substantially
- The project will not support the construction of medium to large infrastructure (e.g. dams above 5m in height, dredging of harbor basins rivers and canals, near-shore breakwaters, installation of sheet pile walls, heavy revetments made from stones or concrete)
- The project will not be implemented in protected areas nor their buffer areas
- The project will not support the direct supply of agro-chemicals

### *IFC Exclusion List (2007)*

The IFC Exclusion List defines the types of projects that IFC **does not** finance.

IFC does not finance the following projects:

- Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements, or subject to international bans, such as pharmaceuticals, pesticides/herbicides, ozone depleting substances, PCB's, wildlife or products regulated under CITES.
- Production or trade in weapons and munitions.<sup>1</sup>
- Production or trade in alcoholic beverages (excluding beer and wine).<sup>1</sup>
- Production or trade in tobacco.<sup>1</sup>
- Gambling, casinos and equivalent enterprises.<sup>1</sup>
- Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where IFC considers the radioactive source to be trivial and/or adequately shielded.
- Production or trade in unbonded asbestos fibers. This does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%.
- Drift net fishing in the marine environment using nets in excess of 2.5 km. in length.

A reasonableness test will be applied when the activities of the project company would have a significant development impact but circumstances of the country require adjustment to the Exclusion List.

**All financial intermediaries (FIs)**, except those engaged in activities specified below\*, must apply the following exclusions, in addition to IFC's Exclusion List:

- Production or activities involving harmful or exploitative forms of forced labor<sup>2</sup>/harmful child labor.<sup>3</sup>
- Commercial logging operations for use in primary tropical moist forest.
- Production or trade in wood or other forestry products other than from sustainably managed forests.

\* When investing in **microfinance** activities, FIs will apply the following items in addition to the IFC Exclusion List:

- Production or activities involving harmful or exploitative forms of forced labor<sup>2</sup>/harmful child labor.<sup>3</sup>
- Production, trade, storage, or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals. Hazardous chemicals include gasoline, kerosene, and other petroleum products.
- Production or activities that impinge on the lands owned, or claimed under adjudication, by Indigenous Peoples, without full documented consent of such peoples.

\* **Trade finance projects**, given the nature of the transactions, FIs will apply the following items in addition to the IFC Exclusion List:

- Production or activities involving harmful or exploitative forms of forced labor<sup>2</sup>/harmful child labor.<sup>3</sup>

## Footnotes

<sup>1</sup> This 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.

<sup>2</sup> Forced labor means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty.

<sup>3</sup> 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.

## Selection of interventions sites under Activity 3.1 Scaling EbA interventions in 450 ha to enhance the resilience of men and women in TT Hue:

Sub-activity 3.1.2 Development of business models for the sustainable management of degraded forest areas (AE and EE: LuxDev)

*Intervention sites will be selected by applying the following criteria:*

- potential sites will be screened against the project's exclusion list and the ESS screening checklist (including SEAH assessment) to ensure that all activities are Category C, the target site should be a forest area where land use rights are clearly defined and where Land Use Plans & Investment Plans indicate no intention of future conversion to other purposes;
- interventions are only to take place in so called protection forests or special use forests (production forests where timber harvesting is the priority are excluded);
- interventions follow exclusively on what is classified as natural forests;
- interventions will focus on degraded forests (where forest quality is classified as medium / poor).

Sub-activity 3.1.1. Enhancing resilience through Coastal Forest Restoration in 400 hectares (AE and EE: LuxDev)

The following process and criteria will be used to determine the intervention sites:

- Potential sites will be screened against the project's exclusion list and the ESS screening checklist (including SEAH assessment) to ensure that all activities are Category C.
- The project will prioritise sites that require immediate attention (i.e. areas are classified as "Protection Forests" and where forest quality has been classified as "poor").

- Following the prioritisation carried in step one, specific sites are chosen in collaboration between the project, local governments (Commune level and DARD-FPD) as well as local communities through participatory workshops. This method not only ensures that the project address areas of concern but also fosters a strong sense of local ownership, making the project more sustainable and aligned with the community's needs. The participatory approach is pivotal to the project's approach focused on emphasizing community involvement and empowerment.

## ANNEX 5: SEAH SCREENING CHECKLIST

Ensuring basic risk mitigation measures are in place ahead of stakeholder engagement	Responsibility	Comments
Does the AE have a SEAH Policy (or SEAH provisions in another policy)?	AE	Yes, LuxDev does have SEAH provisions in place. This includes the following documents and codes: <ul style="list-style-type: none"> <li>• Charter on Harassment and Violence at Work</li> <li>• Prevention Policy of Sexual Exploitation and Abuse</li> <li>• Prevention of Fraud and Prohibited Practices</li> <li>• Whistleblowing Policy and Procedures</li> <li>• Operational guide mainstreaming gender equality</li> </ul>
If the AE has contracted out stakeholder consultations, does that entity have a SEAH Policy (or are they contractually bound to apply the AE's)?	AE/Consultant	No, the contracted consultant does not have a SEAH policy. The consultant does have an employee level sexual harassment policy.
Does the AE have an employee Code of Conduct?	AE	Yes, LuxDev does have a Code of Conduct in place <a href="https://luxdev.lu/files/documents/code_conduct.pdf">https://luxdev.lu/files/documents/code_conduct.pdf</a> Further, LuxDev is a signatory to the "Business and Human Rights" National Pact <a href="https://luxdev.lu/en/news/show/2023-09-20-2">https://luxdev.lu/en/news/show/2023-09-20-2</a>
If the AE has contracted out stakeholder consultations, does that entity have an employee Code of Conduct (or are they contractually bound to apply the AE's)?	AE/Consultant	Yes, the contracted consultant does have a code of conduct.
Have AE employees and consultants conducting stakeholder consultations been trained on preventing SEAH and the Code of Conduct?	AE/Consultant	The consultants have been informed about the employee level sexual harassment policy and the consultant's code of conduct.
Does the AE have a grievance mechanism in place in case of early SEAH complaints from stakeholder engagement?	AE	LuxDev provides individuals with two avenues to address grievances. The first option is to utilize the integrity alert mechanism ( <a href="https://luxdev.lu/en/contact/integrity/form">https://luxdev.lu/en/contact/integrity/form</a> ) which enables reporting of any instances, attempts, or suspicions related to fraud, corruption, or abuse. This channel also welcomes reports on acts of harassment, workplace violence, sexual exploitation, or abuse. The second option involves registering a complaint regarding LuxDev's services ( <a href="https://luxdev.lu/en/contact/complaint">https://luxdev.lu/en/contact/complaint</a> ). This

		platform serves as a means to report any harm caused by LuxDev's activities to individuals, communities, or organizations. It offers a dedicated space to raise concerns and seek resolution for any negative impacts experienced.
Does the AE have a specialist on staff who can undertake the more advanced assessment in Stage 4 as well as deal with early SEAH complaints if they arise; and if not, does the AE require budget and /or assistance with this?	AE	A consultant specialized on safeguards and gender has been hired as part of the team developing the Funding Proposal documents.
Contextual Level (and Baseline Conditions)	Reference	Comments
Does the country have laws prohibiting sexual harassment / stalking generally?	National /State law (Gender Assessment)	The Law on Gender Equality (2006) does not specifically deal with sexual harassment but provides in its Article 10 that gender discrimination in all forms and gender-based violence are strictly prohibited. The Law on Domestic Violence Prevention and Control (2007) does not specifically mention sexual harassment / stalking.
Do labor laws prohibit sexual harassment in the workplace?	National/State law (Gender Assessment)	The Labor Code of 2019 prohibits sexual harassment at work. Further, in 2015 the Government of Vietnam adopted the Viet Nam Code of Conduct on Sexual Harassment in the Workplace. The Code aims to help employers and workers to develop their own policy or regulation for preventing and addressing sexual harassment, and to promote healthy, safe, and productive workplaces.
Does the country have laws prohibiting intimate partner violence (IPV)?	National/State law (Gender Assessment)	The Law on Domestic Violence Prevention and Control (2007) does prohibit intimate partner violence.
What is the prevalence of GBV in the country?	National statistics (Gender Assessment)	A study on domestic violence in Vietnam reveals a slight decline in rates, especially among younger women. However, one in four ever-married/partnered women (26.1%) experienced physical violence. Variations exist across regions and ethnic groups, with higher rates in rural areas.  In the workplace, a 2015 survey by Vietnam's ILO office indicates 17% of mid-career workers faced or knew someone subjected to "sexual favors" for workplace benefits. Workplace sexual harassment, affecting 78% women according to CARE, is prevalent across sectors. Fear of reprisals often silences victims, hindering reporting.  See Gender Assessment for more details and sources.

What is the legal age a person can marry?	National law	The Law on Marriage and Family sets the minimum legal age for marriage at 18 for women and 20 for men.
Despite any laws, what is the prevalence of child marriage in the country?	National statistics	The United Nations identified that 11% of women aged 20-49 were married or in a union before turning 18. Persistent disparities among regions and ethnic groups mean that communities lagging in socio-economic development and gender equality face higher rates of child marriage. A 2015 national survey by the Committee on Ethnic Minority Affairs and the General Statistics Office disclosed that the average child marriage rate among 53 ethnic minority groups was 26.6%. (Source: <a href="https://vietnam.un.org/en/7553-despite-laws-11-women-vietnam-are-married-legal-age">https://vietnam.un.org/en/7553-despite-laws-11-women-vietnam-are-married-legal-age</a> )
What is the income level of the country?	World Bank ranking (H, HM, M, LM, L)	Lower middle-income country (LM)
Where does the country rank on global gender indices?	World Bank Reports / Other	According to the 2022 World Economic Forum Gender Gap Report, Vietnam scores 0.705 on a scale from 0 to 1 in terms of gender gap index, ranking 83 out of 146 countries, improving its position from 87 in 2021.
Is there a national action plan on GBV and/or sexual harassment?	National government	In 2015 the Government of Vietnam adopted the Viet Nam Code of Conduct on Sexual Harassment in the Workplace. The Code aims to help employers and workers to develop their own policy or regulation for preventing and addressing sexual harassment, and to promote healthy, safe, and productive workplaces. Moreover, Vietnam has adopted the National Strategy on Gender Equality for the period 2021-2030 also addressing GBV. The Law on Gender Equality (2006) does prohibit all forms of gender-based violence.
Does the country have specialized services for survivors of GBV (at both the national and local level) including women's shelters, adequate medical facilities and facilities which provide psycho-social support?	Local gov / NGOs	National Strategy on Gender Equality set the target that by 2030 90% of people experiencing domestic and gender-based violence will have access to at least one of the basic support services. A UNICEF report from 2020 highlights the existence of hotlines for reporting cases of violence against children (VAC) and violence against women (VAW). It points out that social workers and police are often the first responders, but there are challenges in them taking VAW reports seriously and sometimes engaging in victim blaming. The scarcity of social work positions limits the support available for VAC and VAW survivors. Additionally, the text notes a shortage of shelters for VAW and VAC survivors, and a lack of awareness among service providers on how to make referrals to these shelters. UN Women has been coordinating the pilot program on essential services packages (ESP)

		<p>for women and girls subject to violence as part of a global joint program. From 2017-2022, 30 training courses was held with nearly 6,500 state management officers, service providers in different fields who were trained in knowledge and skills to support women and children experiencing violence in adherence to the victim-centered principle. (Source: <a href="https://www.unicef.org/eap/media/8646/file/Ending%20Violence%20against%20Women%20and%20Children%20in%20Viet%20Nam.pdf">https://www.unicef.org/eap/media/8646/file/Ending%20Violence%20against%20Women%20and%20Children%20in%20Viet%20Nam.pdf</a>)</p> <p>In 2010-2017, GBV in TT Hue is reported to have decreased by 63%. Whereas data have to be treated cautiously, the overall tendency can be considered reliable and in part can probably be explained by a range of targeted interventions in the last 5 to 10 years. Through various government agencies and mass organizations, TT Hue province is applying 50 models of DV prevention and control, and 139 DV clubs were established at the commune level, with members not only women but also grandparents and children. A 2016 article by DOLISA referred to 113 DV hotlines, 247 counseling facilities, and 579 safe houses. It informed that the number of DV victims that received counseling, medical treatment, or assistance in safe houses is increasing yearly, whereas overall reported DV cases are decreasing (also see Gender Assessment).</p>
Is the country currently experiencing war, internal conflict or humanitarian disaster?	National / Media	<p>Vietnam is currently not in a state of war or internal conflict. However, according to Human Rights Watch, the government of Vietnam is criticized for systematically limiting fundamental civil and political rights. The government, which operates under the one-party rule of the Communist Party of Vietnam (CPV), imposes restrictions on freedom of expression, association, peaceful assembly, movement, and religion. (Source: <a href="https://www.hrw.org/world-report/2022/country-chapters/vietnam">https://www.hrw.org/world-report/2022/country-chapters/vietnam</a>)</p> <p>In terms of humanitarian disasters, the coastal country is heavily impacted by natural disasters such as floods and landslides. According to ReliefWeb, the coastal areas of Vietnam have been affected by several storms, heavy rains and floods. For instance, on 14 October, in Quang Tri, Thua Thien-Hue and Quang Nam Provinces, two people died, 7,820 people have been affected and 3,910 have been internally displaced (3,763 from Da Nang City and 147 from Hue City). In addition, 1,564 houses have been damaged, of which 1,432 are in Da Nang City. Mountainous areas are affected by heavy rains causing landslides. (Source: <a href="https://reliefweb.int/disaster/ff-2023-000136-vnm">https://reliefweb.int/disaster/ff-2023-000136-vnm</a>)</p>
Project Level Risks	Responsibility	Comments

Are women concentrated in lower paid roles and mostly line-managed and supervised by men?	AE	Yes
Are piece-rate systems or other performance- related pay structures used where individuals are in control of how much other workers get paid?	AE	Yes
Will project workers have control over life- changing resources such as the allocation of compensation for displacement or access to basic or highly sought-after resources?	AE	No
Will security personnel be used? Will they be armed?	AE	No
Will there be an influx of male workers into the project area (as opposed to only using local labor)?	AE	No
Are local communities poor and lacking basic resources?	AE	From 2010 to 2020, significant progress in poverty reduction occurred, with the World Bank's LMIC poverty rate dropping from 16.8% to 5%, lifting over 10 million people out of poverty. COVID-19, emerging at the decade's end, halted wage growth and job quality improvements. While 2020 setback progress, it did not reverse it. Concerns include women's recovery in workforce participation, access to skills and jobs in a digitalized economy, gender wage and pension gaps, managing agricultural sector restructuring for women's income opportunities, and low involvement of women in climate change resilience planning. Gender inequalities are especially visible in ethnic minorities, marginalized, disadvantaged, and rural poor populations (also see Gender Assessment).
Will migrant workers be employed by the project, especially those who may not speak the local language? Will they be employed on a temporary or daily basis?	AE	No
Will project workers all have formal contracts?	AE	Yes
Will goods frequently be transported over long distances, especially through poor and/or remote communities?	AE	No
Are worksites or project activities based in remote locations? Will worksites be spread out, with isolated spaces?	AE	No
Will project workers live in the community or in worker housing? If in worker housing, is it mixed sex?	AE	No
Will workers be required to travel long and potentially unsafe	AE	No

distances, and at times of day when transport options may be limited?		
Will the project operate in highly pressurized work environments, with tight seasonal deadlines?	AE	Yes
Is the project located within a male-dominated sector where female workers will be employed?	AE	No
Have communities, especially low income/ vulnerable communities, voluntarily raised concerns in relation to SEAH/GBV during consultations?	AE	During stakeholder consultations, no concerns regarding SEAH/GBV in the context of the project have been raised. It was generally mentioned that domestic violence and GBV are issues in the country and the project target area. Institutions such as the Vietnam Women's Union highlighted their efforts combating domestic violence and GBV.
Have any changes been made to project design or adaptive management undertaken due to concerns of stakeholders and communities? (If yes, work through this checklist again)	AE	No

### Checklist of Potential SEAH Risk Mitigation Measures

Mitigation	Comments
<b>POLICY AND CODE OF CONDUCT</b>	
Does the AE have a SEAH policy which covers the project?	No
Does the project have a Code of Conduct prohibiting SEAH by workers?	The development of a SEAH code of conduct is planned in the Gender Action Plan for Year 1.
Are clauses included in procurement contracts which commit contractors, subcontractors, suppliers, drivers and security personnel (if applicable) to adhere to the AE Code of Conduct (or EE equivalent)?	Any contracts procured under the project will include reference to the project's SEAH Code of Conduct.
<b>SUPERVISION AND TRAINING</b>	
(For larger, longer-term projects) Is there a trained SEAH specialist in the project team?	A gender expert will be recruited by the project in Year 1 to oversee the performance of the Gender Action Plan and support implementation. See Gender Action Plan.
Does the project plan to train all project workers on the Code of Conduct, SEAH and what is prohibited behavior?	Training of project staff and partner staff is foreseen on gender related subject matters. These trainings will include awareness raising and coaching concerning the risk of SEAH (incl. training on code of conduct prohibiting SEAH, and awareness raising on what is considered as prohibited behavior). See Gender Action Plan.
<b>RECRUITMENT AND PERFORMANCE ASSESSMENT</b>	

Are recruitment procedures in place, with interview panels staffed by at least two people?	<p>The Provincial Commanding Committee is responsible for recruiting and contracting external service providers needed for the technical support to their activities.</p> <p>TAO is responsible for recruiting and contracting external service providers needed for the technical support to capacity building activities.</p>
Are candidates' identities checked at interview and are references requested?	Yes
Are all workers required to be hired on formal contracts?	Yes
Are written procedures in place for performance appraisals, promotions, and any performance-related pay increases (if applicable)?	Yes
<b>GRIEVANCE REDRESS MECHANISMS (GRM)</b>	
Does the project have a GRM for community members to raise SEAH- related complaints and concerns and is it confidential and survivor- centred, with multiple reporting channels?	<p>The project-level GRM has multiple reporting channels. Those affected by the project can lodge their grievances and complaints in writing or verbally to the suitable levels of resolution in their community without paying any cost. In addition, they can call to present their grievance/complaint via a hotline, which is a direct phone line set up by TAO.</p> <p>Complaints can be submitted at different levels, including village and commune level. At village level, grievance mediation/reconciliation units will be established, including members from the Fatherland Front, Women's Union, Veteran Union, and Youth Union. Stakeholders will be trained on dealing with SEAH-related complaints.</p> <p>In addition to the project level mechanism, complainants can turn to the AEs institutional-level grievance redress mechanism online.</p>
Does the project have a GRM for project workers to raise SEAH-related complaints and concerns and is it confidential and survivor-centered, with multiple reporting channels?	No, the team directly hired by the project will be small. Staff members can access the AE's institutional-level grievance redress mechanism. Partner staff will work under the regulations put in place by the Government of Vietnam and file complaints under respective grievance mechanisms.
Are the staff who manage the GRMs equipped and trained to respond to SEAH reports in a safe and effective way?	Yes
Are persons, communities and countries affected or potentially affected by the activities consulted and that effective SEAH GRMs to receive complaints and feedback are established and function in a collaborative manner and in a way that is complementary to GCF independent Redress Mechanism, and requiring that any gaps or weaknesses be addressed?	Yes
Are affected communities (or likely to be affected, by the GCF-financed activities) informed about SEAH GRMs at all three levels – at the earliest opportunity of the stakeholder engagement process and in an understandable format and in all relevant languages?	Yes

<b>INVESTIGATION AND RESPONSE</b>	
Are there written procedures for dealing with SEAH complaints or concerns and a dedicated and trained female staff member to deal with these (if no specialist is available)?	Yes, written procedures for the GRM will contain mechanisms on how to deal with SEAH complaints.
Has a service provider mapping been undertaken to identify which services are available for survivors of SEAH?	During consultations, the provincial department for social affairs and the Vietnam Women's Union have been interviewed concerning services for survivors of GBV. Services exist but are not sufficiently available in all areas. Vietnam Women's Union will be involved in project activities.
If there are no public or private service providers in the area, has the project identified and budgeted for outside providers?	N/A
<b>AWARENESS RAISING</b>	
Will/have gender-sensitive and culturally appropriate outreach materials been prepared (such as posters, signage, etc.) on SEAH in all relevant languages?	Stakeholders will be informed about the project-level GRM and SEAH related mechanisms, project staff and partners will be trained concerning SEAH risks. Further engagement would go beyond the risk level of the project.
Has the community been informed about potential SEAH risks for the project and how to prevent them and use the GRM?	See above.
Have any rapid mobile surveys or text surveys been developed to regularly obtain feedback from workers and/or the community?	No, this measure would go beyond the risk level of the project.
<b>PROCUREMENT AND PARTNERSHIP</b>	
Have SEAH prohibitions and mitigation measures been included in procurement documents?	Contracts with external providers will include reference to the project's code of conduct.
Are there clauses in the EE contract requiring them to prohibit SEAH in their workforce?	See above.
<b>PHYSICAL WORKSPACE</b>	
Will separate facilities for men and women be provided at all work sites?	Yes, the project offices will provide separate facilities.
Are SEAH risks included in workplace safety assessments, including worker accommodation and transportation?	No, this measure would go beyond the risk level of the project. The project will not contract workers at a medium or larger scale and will not provide for worker's accommodation or transportation.
Are project workers informed of areas that are off-limits, for example areas around schools (or other places where children are present)?	No, this measure would go beyond the risk level of the project. The project will not contract workers at a medium or larger scale.