PetroVietnam Power Corporation



Dakdrinh Hydropower JSC

Vietnam

Dakdrinh 125 MW Hydropower Plant

Environmental and Social Corrective Action Plan (ESCAP)

August 2021

This document is the Environmental and Social Corrective Action Plan (ESCAP) describing the environmental and social (ES) mitigation, monitoring and organizational measures to be implemented during the operation of the Dakdrinh Hydropower Plant. This document is designed to address outstanding ES issues in a timely and appropriate manner, and in accordance with the AIIB's Environment and Social Policy (ESP) including the Environmental and Social Standards (ESSs) and Environmental and Social Exclusion List (ESEL), as well as applicable Vietnamese laws and regulations.

Dakdrinh Hydropower Joint Stock Company (DHC), PetroVietnam Power Corporation (Sponsor) and their contractors will regularly review and update the ESCAP in consultation with AIIB, as required to reflect any changes in the project implementation, monitoring and organization.



Environmental and Social Corrective Action Plan (ESCAP)

No.	Actions	Reference framework	Deliverables	Implementation Responsibilities
2.	 Environmental and Social (E&S) Policy A project - specific E&S policy will be developed covering the following items: The Project's adherence and commitment to national and international environmental and social standards The Project's social policy which includes an approach and commitment on contributing through investing to community development and overarching labor policy. ESIA and ESMP The Sponsor/DHC will: 	Environmental and Social Policy (ESP) of AIIB AIIB ESS 1 – Environmental and Social Assessment and Management	 Project - specific E&S Policy E&S audit or risk/hazard assessment 	Environmental and Social Department in coordination with other departments Environmental and Social
	 The Sponsor/DHC will: Conduct a E&S risk/hazard assessment. The E&S audit will cover (but not limited to): Community Health, Safety, and Security Land Acquisition and Involuntary Resettlement Biodiversity Conservation and Sustainable Management of Living Natural Resources Indigenous Peoples Cultural Heritage E&S cumulative impact assessment Develop an operational Environmental and Social Management Plan (ESMP) (to include a Chance Find Procedure) 		 E&S cumulative impact assessment Operational ESMP 	Department in coordination with other departments
3.	Emergency Preparedness and Response Plan (EPRP) Community Health and Safety Plan (CHSMP) It is planned that: • A Project -specific EPRP will be developed, which includes the following items: - All possible emergencies (e.g., flood, earthquake, typhoon, fire, extremely	AIIB ESS 1	 Draft EPRP A Project -specific CHSMP CHSMP disclosure to the affected communities Evidence of disclosure and feedback from community if any A dam break analysis should be undertaken 	Environmental and Social Department in coordination with other departments



No.	Actions	Reference framework	Deliverables	Implementation Responsibilities
	 rainfall, landslides and erosion etc.), consequences, required actions, written procedures, and the resources available. Chemical Incident Response Measure (CIRM) and/or a Chemical Incident Response Plan (CIRP) according to the new chemical regulations Detailed lists of emergency response personnel (i.e., cell phone numbers, alternate contact details, and duties and responsibilities) Floor plans Large scale maps showing evacuation routes and service conduits (e.g., gas and water lines). Following up with the flooding map developed by Quang Ngai PC is required to complete the EPRP. Moreover, the EPRP will be disclosed and consulted with potentially affected communities. Emergency drills shall include sensitive receptors/communities Loud audible sirens to be installed 		to determine the hazard category more accurately in accordance with international standards using the classification system of the International Commission on Large Dams (ICOLD) as presented in ICOLD Bulletin No. 82 EPRP (including flooding map considering catastrophic failure of dam weir) EPRP disclosure to the affected communities Evidence of disclosure and feedback from community if any Emergency drills to include sensitive receptors/communities	
4. 5.	Management Systems, Monitoring, and Review Specific E&S monitoring plans will be developed to summarize details of all the E&S monitoring programs conducted. All E&S monitoring will be extended to the Project associated facilities (i.e., Son Ha substation, the 110kV transmission line, and O&M accommodation) to support that appropriate monitoring measures are established and implemented at associated facilities. Organization Capacity and	AIIB ESS 1 AIIB ESS 1	 E&S monitoring plans Assignment of a social/ 	Environmental and Social Department in coordination with other departments



No.	Actions	Reference	Deliverables	Implementation
		framework		Responsibilities
	Competency A social/ community liaison personnel will be officially appointed to implement and manage social related issues of the Project. The employed staff shall have good capability and experience in social management.		community liaison personnel • Assignment of a biodiversity/ecology specialist	and Social Department in coordination with other departments
	A biodiversity/ecology specialist will be officially appointed to implement actions related to biodiversity assessment/shoreline reforestation, environmental flow assessment (may be an expert on retainer basis)			
6.	Training Occupational Health and Safety Training needs for the organization's personnel to be reassessed based on past events (e.g., extreme weather, accidents and potential emergency situations), assess areas for improving performance and identify supplemental training requirements. The training plan will be developed to include definition of training sessions, duration, frequencies, syllabus.	AIIB ESS 1	 Training plan for the organization's personnel (including training sessions, duration, frequencies, syllabus) 	Engineering Department of DHC in coordination with other departments
7.	Stakeholder Analysis, Engagement Planning, Consultation and Disclosure Ongoing Reporting to Affected Communities A Stakeholder Engagement Plan (SEP) provides a framework for stakeholder engagement (i.e., including basic stakeholder identification and current and future engagement plan to such stakeholders) has been developed. This also includes a mechanism for periodic development and disclosure of	AIIB ESS 1	 SEP (completed) ESMR and evidence of disclosure to affected communities Evidence of social engagements and feedback from community 	Social/ community liaison personnel of DHC with support from a CSO/NGO experienced in working with the affected CaDong communes



No.	Actions	Reference framework	Deliverables	Implementation Responsibilities
	the Environmental and Social Monitoring Report (ESMR) to affected communities.			
8.	External Communications and Grievance Redressal Mechanisms (GRM) A community level GRM to be developed and disclosed to surrounding communities, including IPs. Accordingly, it is required to formalize and implement a process of recording, tracking and monitoring all the information as relating to grievances, communications and outreach with stakeholders. Among others, the Sponsor/DHC shall follow up within legal boundaries the issue regarding the payment requested from People's Committee of Son Dung commune as soon as possible (about VND 630 million for compensation assets loss of four HHs damaged in typhoon)	AIIB ESS 1	 Community GRM and its disclosure Evidence of social engagements and feedback from community Evidence / engagement records showing that the grievance issue related to payment requested are communicated and answered properly to the PC of Son Dung commune 	Social/ community liaison personnel of DHC with support from a CSO/NGO experienced in working with the affected CaDong communes
9.	 Labor and Working Conditions A Human Resources Policy/Internal Policy to be updated in line with national regulations (i.e., Labor Codes 2019) and applicable standards. This shall include: workers grievance mechanism and procedure prevention of bullying and harassment at work equality policy drug and alcohol abuse policy child labor and forced labor Moreover, a Health and Safety Manual will be developed and implemented. The workers' GRM will be developed, disclosed to the workers in an appropriate language and implemented. The GRM will be readily accessible and available to all employees. The Sponsor and DHC will receive all grievances as part of the grievance redress process, including resolution and maintain a record the status in a dedicated grievance log. Also, a 	AIIB ESS 1	 Human Resources Policy/Internal Policy Health and Safety Manual Workers' GRM 	Human Resource Department of DHC in coordination with other departments



No.	Actions	Reference framework	Deliverables	Implementation Responsibilities
	dedicated person will be assigned to manage and monitor the grievance receipt and redress process.			
10.	Wastewater discharges Domestic Wastewater: The Sponsor/DHC to provide wastewater flow monitoring to confirm the compliance with national technical regulations on domestic wastewater disposal.	AIIB ESS 1	 Flow monitoring of domestic wastewater discharged from the Project site 	Engineering Department in coordination with other departments
11.	Erosion and sedimentation The Sponsor/DHC to clarify follow-up actions for management of erosion impacts on the reservoir. Moreover, an erosion management plan will be in place for future management (according to a survey report on reservoir sedimentation condition conducted in February 2020).	AIIB ESS 1	 Erosion management plan Completion report on stabilizing and/or repairing erosion at the reservoir Reservoir Shoreline Reforestation Plan for erosion control to address the sedimentation problem in the upper reaches of the reservoir. The plan will include a program for 10-15 m width of reforestation along the embankment/shoreline of the existing reservoir. This band of vegetation/forest around the reservoir will serve as a barrier to erosion and sedimentation of the reservoir. This may also serve as an offset for the natural habitats which were lost during the dam construction. 	
12.	Resettlement and Livelihood Restoration Planning Community Engagement, Physical Displacement, Economic Displacement A Land Acquisition Completion Report (LACR) with a detailed gap analysis (i.e., assessed against applicable standards) of the resettlement process will be prepared. Following the completion of the land acquisition audit completion report, a Land Acquisition Corrective Action Plan (LACAP) highlighting outstanding and/or remedial actions necessary will be prepared as described below: Physical displacement: – Actual number of	AIIB ESS 2 – Involuntary Resettlement, including Land Acquisition	 LACR (completed) Land acquisition Corrective Action Plan (Under review) PVPOWER and DHC's acknowledgement that the issue in RSS in Konplong district has not been resolved yet, waiting final approval from Prime Minister. DHC committed to provide the funding for this matter once there is an approval from Prime Minister. If DHC cannot fulfil this obligation once the approval is issued, then PVPOWER guarantees to make the 	Social/ community liaison personnel and the Environmental and Social Department of DHC with support from a CSO/NGO experienced in working with the affected CaDong communes



No.	Actions	Reference	Deliverables	Implementation
		framework		Responsibilities
	 recipients per option of resettlement support defined Two key concerns of people in Resettlement Sites (RS) in Son Tay district (i.e., RSs are far from farmlands and shortage of water supply for domestic use) will be assessed in the LACR with key measures included in the Corrective Action Plar The Sponsor/DHC will provide evidence showing that the issue in RSs in Ko Plong district had been solved. Economic Displacement: Assessment for economic displacement (including determination of extent and scale) will be a part of a LACR with gap analysis. It is expected that action items an remedial measures will be identified within the Corrective Action Plan. Conduct of Full Land Acquisition Completion Survey. The current resettlement measures are based on a preliminary survey which needs to be expanded to a Full Survey to inform the implementation of the Land Acquisition Completion Survey. The scope of the actions and budget for the ESCAP will needs 	d e ,	payment for this matter. Full land acquisition completion survey	Responsibilities
	to be adjusted to reflect the findings of this survey.			
13.	 Compensation and Benefits for Displaced Persons, Social Support, Supervision, Monitoring The Project Company to collaborate with local authorities to follow-up and complete all pending relevant compensation payments as soon a possible. For example, the following have been identified: Pending payment for 28 Households in Son Dung commune, Son Tay district due to lawsuit Living stabilization and livelihood restoration support payment for another 370 economically displaced HHs in 	e 5 g	PVPOWER and DHC's acknowledgement that the issue in pending payment for people in Son Tay District, Quang Ngai province due to pending final decision from the Court. Once the Court has made decision, DHC committed to provide the funding for the required payment from authority if any. If DHC cannot fulfil this obligation once the Court decision is issued and the authority requested the payment, then PVPOWER	Social/ community liaison personnel of DHC with support from a CSO/NGO experienced in working with the affected CaDong communes



No.	Actions	Reference framework	Deliverables	Implementation Responsibilities
14.	Son Tay district. The pending payment for school and water supply system development in Nuoc Dop RA, Son Long commune, Son Tay district will be resolved. Pending payment for compensation in Kon Plong district also will be resolved. The Sponsor/DHC will clarify the updated status of life support activities (including required budget) as required by the existing financing as well as the plan for implementing these activities in the future. The plan of social support activities will be disclosed to affected communities. Identification of Natural and Modified Habitats/ Environmental Services For the requirement as per AIIB ESS 1, habitats are to be categorized into modified, natural, and critical habitats. Habitats within and surrounding the Project area will be clearly identified and assessed. Regarding forest offset obligation, the Sponsor/DHC will: Provide Payment Order form with confirmation of a local Vietnamese bank to ensure that the required payment from Kon Tum Province was indeed completed. Consult with relevant local authorities of Quang Ngai Province to clarity about their forest offset obligation. Depending on the discussion contents, evidence of exemption or payment	National laws, AIIB ESS 1	 guarantees to complete the payment for this matter. Report on updated status and plan of life support activities (completed – included in LACR) Disclosure of the plan of life support activities to affected communities Categorization for habitats within and surrounding the Project area Assess if critical habitat is present and ecological status Valid evidence of payment for forest offset obligation for Kon Tum Province Evidence of payment of forest offset obligation for Quang Ngai province 	departments
15.	completion shall be provided. Habitats, Flora and Fauna Assessment Biodiversity baseline study is to be conducted for at least two seasons (wet and dry). Baseline data is to include terrestrial and aquatic flora and fauna surveys. A Biodiversity Management Plan will need to be developed for the	AIIB ESS1	 Biodiversity baseline data covering at least two seasons. Includes terrestrial and aquatic surveys. To be undertaken by an interdisciplinary Team of Experts (mammal, avian, herpetofauna, plant 	Environmental and Social Department in coordination with other departments



No.	Actions	Reference	Deliverables	Implementation
		framework		Responsibilities
	mitigation and monitoring of		experts.) Biodiversity	
	biodiversity aspects of the Project.		Management Plan	
16.	Management of ecosystemservicesIt is noted that up until May 2019the minimum environmental flowwas specified as 0.77m³/s and thiswas revised in May 2019 to1.04m³/s to 1.82m³/s.According to international practice,an ecological study was undertakento determine the appropriateminimum environmental release.Unless determined by an ecologicalstudy, it is expected that minimumenvironmental flow is about 10% ofthe average annual flow which inthis case would be about 3.2m³/s.This study will be reviewed by aspecialist to assess whether the	AIIB ESS1	 An ecological study (to determine appropriate minimum required environmental flow) 	Environmental and Social Department in coordination with other departments
	current minimum environmental			
17.	flow is appropriate.		IP screening report	Social/
17.	 Indigenous Peoples An Indigenous Peoples Plan (IPP) will be prepared and implemented. Conduct of Full Indigenous Peoples Survey. The current Preliminary IPP for ethnic 	AIIB ESS 3 – Indigenous Peoples	 In screening report (completed) and Preliminary IP Plan (in draft) requires consultation process Implementation of IPP 	Social/ community liaison personnel of DHC with support from a CSO/NGO experienced in working with the
	minorities is based on a preliminary survey, which needs to be expanded to a			affected CaDong communes
	Full Survey to inform the implementation of the IPP. The scope of the actions and budget for the ESCAP will need to be adjusted to reflect the findings of this survey.		 Full Indigenous Peoples Survey 	
18.	Protection of cultural heritage Tangible cultural structures, including those of the local ethnic minorities affected by the Project, will be included in the E&S audit. Archaeological chance find procedures will be developed for use.	AIIB ESS 3	 Assessment of tangible cultural structures (within the E&S audit) Archaeological chance finds procedures developed 	Environmental and Social Department in coordination with other departments
19.	Disclosure of Environmental and Social Documentation. In addition to disclosure of the updated ESCAP, it is anticipated that the Environmental Impact Assessment Report, Land	AIIB ESF	 ESCAP EIA LACR IPP SEP 	



No.	Actions	Reference framework	Deliverables	Implementation Responsibilities
	Acquisition Completion Report, Indigenous Peoples Plan and Stakeholder Engagement Plan will be disclosed by DHC and AIIB, with summaries in Vietnamese.			

List of Abbreviations

- CSO Civil Society Organization
- DHC Dakdrinh Hydropower Joint Stock Company
- EIA Environmental Impact Assessment
- EPRP Emergency Preparedness and Response Plan
- E&S Environmental and Social
- ESCAP Environmental and Social Corrective Action Plan
- ESEL Environmental and Social Exclusion List of AIIB
- ESMR Environmental and Social Monitoring Report
- ESMP Environmental and Social Management Plan
- ESP Environmental and Social Policy of AIIB
- ESS Environmental and Social Standard of AIIB
- GRM Grievance Redress Mechanism
- ICOLD International Commission on Large Dams
- IPP Indigenous Peoples Plan
- LACAP Land Acquisition Corrective Action Pl
- LACR Land Acquisition Completion Report
- NGO Nongovernmental Organization
- O&M Operation and Maintenance
- PPM Project-affected People's Mechanism of AIIB
- RS Resettlement Site



SEP Stakeholder Engagement Plan