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PROJECT INDUCED IN-MIGRATION MANAGEMENT PLAN

3	31/08/2016	Update to new Project configuration and response to reviewers comments	MFC		
2	27/04/2015	Response LSP's Comments and Final for Issue	ERM	See attachment of reviewer's signature	
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ACRONYMS


ASP	Air Separation Plant
CDAP	Community Development Action Plan
CGMP	Community Grievance Management Plan
CHAP	Community Health Action Plan
CPHCSC	Central Population and Housing Census Steering Committee
CSR	Corporate Social Responsibility
DoC	Department of Construction
DoH	Department of Health
DoIT	Department of Industry and Trade
DoLISA	Department of Labour, Invalids and Social Affair
EPC	Engineering, Procurement and Construction
EZ	Economic Zone
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
HSSE	Health, Safety, Security and Environmental
IFC	International Finance Corporation
KPI	Key Performance Indicator
LRAP	Livelihood Restoration Action Plan
LSP	Long Son Petrochemical Company
NGOs	Non-governmental Organisations
PAP	Project-affected people
PAoI	Project's area of influence
PC	People's Committee
PIIM-MP	Project Induced In-Migration Management Plan
PS	Performance Standard
Q	Quarter
SEP	Stakeholder Engagement Plan
SMP	Security Management Plan
SME	Small and Medium Enterprises
STIs	Sexually transmitted infections
TMP	Traffic Management Plan
WAMP	Workers Accommodation Management Plan
WOHSMP	Worker Occupational Health and Safety Management Plan
WTP	Worker Training Plan

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DISCLAIMER

It is upon the Contractor to solicit, acquire and comply with all information, laws, rules, regulations, and Applicable Standards which is/are necessary and/or required for and applicable to the Contractor's performances of the works hereunder.

The Contractor hereby agrees and acknowledges that the Employer makes no representation or warranty, express or implied, regarding the accuracy or completeness of any or all information, laws, rules, regulations, and Applicable Standards which is/are necessary and/or required for and applicable to the Contractor's performances of the works hereunder. THE EMPLOYER HEREBY EXPRESSLY DISCLAIMS ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ALL RESPECTS, and the Contractor agrees that neither the Employer nor any of its affiliate(s), director(s), officer(s), employee(s), consultant(s), professional advisor(s), and duly authorised representative(s) shall have any liability to the Contractor or any of its affiliate(s), director(s), officer(s), employee(s), consultant(s), professional advisor(s), and duly authorised representative(s) in any way relating to those information, laws, rules, regulations, and Applicable Standards which is/are necessary and/or required for and applicable to the Contractor's performances of the works hereunder or the Contractor's or its affiliate(s)', director(s)', officer(s)', employee(s)', consultant(s)', professional advisor(s)',

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1 INTRODUCTION

1.1 INTRODUCTION

This Project Induced In-Migration Management Plan (PIIM-MP) is for the Long Son Petrochemicals Company Limited (LSP) Petrochemical Complex in South of Vietnam Project (hereafter the “Project”) on Long Son Island, Long Son Commune, Ba Ria Vung Tau Province, Vietnam.

The PIIM-MP has been developed in order to fulfil the conditions required by Vietnamese regulations and commitments made by LSP to its lenders. This document forms part of the overall Environmental and Social Management Plan (ESMP) that was developed as an outcome of the Environmental and Social Impact Assessment (ESIA) produced by the initial consultants in 2014 and updated by Monkey Forest Consulting Consortium¹ (MFC) in 2016, to reflect changes made during Project optimization and to bring the documents into conformance with the IFC Performance Standards in response to comments from the independent advisor to the lenders.

1.2 PROJECT OVERVIEW

The Project is located within Hamlet 2 and Rach Gia Hamlet, Long Son Commune, Ba Ria – Vung Tau Province, Vietnam (see **Figure 1.1** below). It is to be spread over an area of 464 ha on a site presently comprised of swamps, mangrove forest, salt fields, rice fields, hills and residential dwelling and bordered by rural land and villages to the north and east, Ganh Rai Bay to the south and the Rang and Ong Ben Rivers to the east. The Project will be comprised of the following primary components:

- The Petrochemical Plant, consisting of an Olefins Plant, High Density Polyethylene (HDPE) Plant, Linear Low Density Polyethylene (LLDPE) Plant, Polypropylene (PP) Plant, Central Utility (CTU) Plant, Tank Farm, Common infrastructure of Complex, and Pre-work Land Development. There is also a range of supporting facilities and buildings, including complex administration building, canteen, laboratory, emergency centre, and a first aid centre.
- A Seaport, consisting of a construction jetty, breakwater, access channel, turning basin and hydrocarbon jetty .

¹ The MFC Consortium is made up of five parties: MFC (Hong Kong), MFC (Vietnam), both social specialists, and ICEM (Hong Kong, ICEM (Vietnam) and ESSA Technologies, Ltd, HES specialists.


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Figure 1.1 **Location of LSP Project**




The Project is expected to take over 51 months to construct and commission, and will operate for about 50 years. At least 20,700 workers will be employed during the peak phase of construction, of which approximately 5% are expected to be local workers (i.e., from Long Son Commune) and 10% are expected to be from the Ba Ria-Vung Tau Province. At the time of writing (August 2016), the information on the worker's accommodation and design are still unavailable, as the Engineering, Procurement, Construction (EPC) contractors have not yet been selected.

A detailed description of the Project is provided within Chapter 2 of the ESIA.

1.3 **PURPOSE AND SCOPE**

Project induced in-migration caused by an influx of in-migrants during construction was identified and assessed as an unplanned yet predictable impact of the Project within Chapter 17 of the ESIA. It leads to both positive impacts in increased economic activity, income and associated benefits for the local population as well as potential

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negative impacts and risks, including negative community health and safety impacts, potential negative social dynamics and stress on local governance and services. The development of plans to optimize positive impacts, while minimizing the negative impacts was a key management measure to mitigate the adverse impacts of both planned and unplanned population influx during construction.

This PIIM-MP is one of a series of environmental and social management plans that form part of the overall ESMP to manage key environmental and social impacts due to the Project's construction activities as assessed in the Project ESIA. Section 2.3 of this document lists the related management plans that will function in conjunction with the PIIM-MP to manage influx-related impacts. This document addresses potential social and environmental impacts likely to occur due to PIIM during the design and construction phases. It serves to conduct a more detailed assessment of risk and impacts related to PIIM and to provide a strategy for implementation of a range of measures required to understand, characterize and manage PIIM. Through this process, the Project aims to comply with the International Finance Corporation's (IFC) Performance Standards (PS) and guidance set out in its *Projects and People: A Handbook for Addressing Project-Induced In-Migration*.

According to this handbook, several distinct types of in-migrants can be expected in the Project area during the construction phase. These are listed in *Table 1.1*.

Table 1.1 *Expected Typology of the Project Induced In-Migrants during the Construction Phase*

Characterization	Profession/economic motivation
Project employees from outside the project area and their immediate and extended families	Temporary or permanent workers employed by the Project or its contractors who move to the area with or without family to be close to their place of employment
Opportunistic migrants	Unskilled, semi-skilled or skilled people seeking direct or indirect employment or entrepreneurial opportunities. Often very skilled, experienced and mobile workers who travel from project to project with major contractors
Potential providers of goods and services to the local population (including the Project workers)	Traders, entrepreneurs, small and medium enterprise owners, commercial sex workers, etc., from the formal and informal sectors, aiming to capture substantial increases in disposable income through provision of goods and services
Service providers to the project	Entrepreneurs and SMEs from the formal sector; aiming to secure contracts to provide goods and services to the project and its contractors.


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1.4

OBJECTIVES

The key objectives of this PIIM-MP are to:

- Clearly identify and quantify or qualify all impacts risks associated with PIIM;
- Provide a framework for future actions to understand, characterize and manage PIIM and resultant impacts;
- Identify management strategies and actions that aim to:
 - Discourage in-migration into the Project's area of influence (Aol) that would otherwise not occur if the Project did not exist;
 - Stage the in-flow of migrants and plan Project access routes, so as not to encourage the emergence of in-migrant hotspots in other parts of Long Son Commune, the cities of Ba Ria and Vung Tau, and elsewhere within Ba Ria/Vung Tau Province;
 - Manage, to the extent possible, the footprint of in-migrants who settle within the Aol;
 - Plan the delivery of Project benefits (identified within the Community Development Action Plan – CDAP) among existing residents and resettlement-affected households in a way that does not provide incentives for in-migrants;
 - Strengthen Project security to protect the Project against negative PIIM impacts;
 - Facilitate the capacity building and institutional strengthening of government authorities that will be responsible for induced access and in-migration management, and together develop a transition strategy for management from the Project to the relevant Authorities; and
 - Plan Project workforce, EPC contractor and procurement management policies that mitigate PIIM (e.g., by creating effective strategies to increase local content (employment and contracting) at the Project).
- Identify those strategies that will be purely Project led strategies, and those which will require collaboration between local Authorities and LSP.


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2 REFERENCE DOCUMENTS AND APPLICABLE STANDARDS

2.1 LEGISLATIVE REQUIREMENTS

Management of labourers, inclusive of migrant workers and associated issues such as health, security, working permit, temporary residence and worker housing are currently regulated by the following laws and regulations:

- Regulations on Labour Management:
 - Labour Code No. 10/2012/QH13 dated 18 June 2012 (Labour Code 2012);
 - Decree No. 05/2015/ND-CP dated 12 January 2015 Detailing and implementation a number of articles of Labour code;
 - Decree No. 45/2013/ND-CP dated 10 May 2013 Regulating a number of articles of Labour Code on working time, resting time, and occupational health and safety; and
 - Circular No. 07/2016/TT-BLDTBXH dated 16 May 2016 regulation on occupational health and safety for producing and trading facilities
- Regulations pertaining to Foreign Workers in Vietnam
 - Decree No. 11/2016/ND-CP dated 3 February 2016 detailed regulations on implementing a number of articles of the labour code regarding foreign workers in Vietnam;
- Regulations on Public Health
 - Law No. 03/2007/QH12 of 21 November 2007, on prevention and control of infectious diseases;
 - Circular No. 19/2016/TT-BYT guidelines for occupational health and safety management;
 - Circular No. 14/2013/TT-BYT dated 6 May 2013 Guiding health checking;
 - Circular No. 28/2016/TT-BYT on management of occupational diseases;
 - Circular No. 04/2015/TT-BLDTBXH dated 2 February 2015, guidance on compensation, benefits and medical expenses paid to employees as victims of occupational accidents and diseases; and
 - Circular No. 08/2016/TT-BLDTBXH on guidelines for compiling, archiving, summarizing, apprising, announcing and assessing of occupational accidents and technical issues in serious violation of occupational safety and hygiene
- Regulations on Residence Management:
 - Law of Residence No. 81/2006/QH11 and Amended Law of Residence No. 36/2013/QH13 dated 20 June 2013;
 - Decree No. 31/2014/ND-CP dated 18 April 2014 of the Government on detailing and guiding the implementation of a number of articles of the Law on Residence; and
 - Circular No. 35/2014/TT-BCA dated 9 September 2014 on detailing and guiding the implementation of Law of Residence and Decree 31/2014/ND-CP.

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- Other regulations
 - Law No. 23/2008/QH12 of November 13, 2008, on road traffic; and
 - Ordinance No. 10/2003/PL-UBTVQH11 of March 17, 2003, on prostitution prevention and combat; and
 - Decree No. 59/2015/ND-CP dated 18 June 2015 on construction project management




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Table 2.1. Summary of Key Legal Requirements relevant to PIIM Management during Construction Phase


Labour issue	Applicable Vietnamese regulations	Summary of key legal requirement		Authority in charge
General Management of Workers	<ul style="list-style-type: none"> Labour Code 2012 Decree No. 05/2015/ND-CP 	Management of workers	The Project and/ or its contractors shall: <ul style="list-style-type: none"> Provide labour contract, social insurance and health insurance to employees as legally required; and Prepare the labour management book, salary book and present them at the request from competent agencies. 	Department of Labour, Invalids and Social Affairs (DoLISA)
	<ul style="list-style-type: none"> Circular No. 14/2013/TT-BYT Circular No. 28/2016/TT-BYT Decree No. 45/2013/ND-CP Circular No. 19/2016/TT- BYT 	Worker's health	The Project and/ or its contractors shall: <ul style="list-style-type: none"> Ensure pre- work health examination of employees; Provide annual health check-up, occupational diseases and health insurance for employees; Ensure working conditions, working hours and resting hours, occupational health and safety; and Record and manage the health examination results, occupational accident, incidents and diseases. 	DoLISA Department of Health (DoH)
	<ul style="list-style-type: none"> Circular No. 19/2016/TT- BYT Circular No. 08/2016/TT- BLDTBXH Joint Circular No. 01/2011/TTLT-BLDTBXH-BYT 	Reporting	<ul style="list-style-type: none"> The Project and/ or its contractors shall declare the employment within 30 days upon the operation, periodically make and send reports on the change of the labour status to Provincial DoLISA where the Project is located; and The project owner shall submit a mid-year and yearly statistical occupational accident report to the provincial DoLISA. 	DoLISA
Management of Foreign Workers	<ul style="list-style-type: none"> Labour Code 2012 Decree No. 11/2016/ND-CP 	General requirement	<ul style="list-style-type: none"> The Project and/ or its contractors are only entitled to recruit foreign citizen to work as manager, operating director, specialist and technical employee while Vietnamese employee has not meet the production and business demand. 	Provincial PC DoLISA

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Labour issue	Applicable Vietnamese regulations	Summary of key legal requirement		Authority in charge
	<ul style="list-style-type: none"> Labour Code 2012 Decree No. 11/2016/ND-CP 	Demand in using foreign workers of the Project Owner (excepting contractors)	<ul style="list-style-type: none"> Annually, the Project shall determine the demand for foreign workers and report in writing (including: position of work, quantity, professional qualification, experiences, salary rate, working time) to the Provincial DoLISA where its head office is located for acceptance. 	DoLISA
	<ul style="list-style-type: none"> Labour Code 2012 Decree No. 11/2016/ND-CP 	Demand in using foreign workers of the contractors	<ul style="list-style-type: none"> Demand in using foreign workers shall be clearly specified in the invitation to tender including quantity, standards, capacity of foreign workers that are needed for the bidding contract; and Before recruiting foreign workers (1 -2 months in advance), the contractor shall send a written request to the Provincial DoLISA for the employment of Vietnamese workers in the positions expected to recruit foreign ones. If the supply of Vietnamese workers introduced via relevant local agencies cannot satisfy the demand during this 1 -2 month-period, the Provincial PC will accept the recruitment of foreign workers. 	Provincial PC DoLISA
	<ul style="list-style-type: none"> Labor Code 2012 Decree No. 11/2016/ND-CP 	Work permit	<ul style="list-style-type: none"> Foreign workers shall apply for working permit granted by the Vietnamese competent state authorities (DoLISA), except for the cases as prescribed in the Article 172 of the Labour Code 2012. 	DoLISA Provincial Police
	<ul style="list-style-type: none"> Decree No. 11/2016/ND-CP 	Monitoring and Reporting	<ul style="list-style-type: none"> The Project shall monitor and ensure the using of foreign workers of itself and its contractors in compliance with applicable regulations and send quarterly report to the Provincial DoLISA. 	DoLISA Provincial Police
Management of migrant workers' residences	<ul style="list-style-type: none"> Law of Residence No. 81/2006/QH11 and Amended Law of Residence No. 36/2013/QH13; Decree 31/2014/ND-CP Circular 35/ 2014/TT- BCA 	Temporary residence registration for all migrant workers	<ul style="list-style-type: none"> Migrant workers shall be registered for their temporary residence with the local ward/ commune police. Information declared in the registration includes: name, date of birth, gender, hometown, ethnic group, religion, ID number, occupation, working place, place of permanent residence, place of temporary residence and period of temporary residence. 	Ward/ Commune Police

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Labour issue	Applicable Vietnamese regulations	Summary of key legal requirement		Authority in charge
Other issues	<ul style="list-style-type: none"> Law No. 23/2008/QH12 Ordinance No. 10/2003/PL-UBTVQH11 	Alcohol and drug usage	<ul style="list-style-type: none"> Prohibits alcohol use when driving vehicle or riding motorbike; and Prohibits actions linked to prostitution and defines responsibilities for prevention. 	Provincial Police
	<ul style="list-style-type: none"> Decree No. 59/2015/ND-CP 	Temporary construction	<ul style="list-style-type: none"> The temporary construction permit is applicable for temporary structures such as worker camps and this construction must be removed when the permit expired. 	Department of Construction (DoC) City/District PC Ward/Commune PC

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2.2


LENDER STANDARDS AND GUIDELINES

This PIIM-MP is based on guidance provided in the IFC handbook Projects and People: A Handbook for Addressing Project-Induced In-Migration (2009). This document recommends that:


- Projects across sectors, including those in oil, gas and mining, should consider the potential for PIIM, whatever their scale;
- Where PIIM is likely to occur and is recognized as having the potential to cause or contribute to negative impacts in the project area, projects need to conduct a thorough situational analysis and develop appropriate management strategies;
- It is in a project's best interest to consider the project specific causes of in-migration, the adverse impacts that may result within the area of influence and the potential impacts on project operations, and to recognize the Project proponent's role and responsibilities as a cause of, or at least a stakeholder contributing to, PIIM; and
- Project proponents should assume primary responsibility for PIIM within their area of influence for areas within their direct control, and seek the agreement, coordination and collaboration of all stakeholders, including the Authorities, community based organisations and project affected communities, for management of other areas lying outside of or only partially under their control.

In addition, the following IFC Performance Standards (2012) apply to PIIM related issues:

- PS1: Assessment and Management of Environmental and Social Risks and Impacts, which establishes requirements for projects to anticipate, identify and assess unplanned but predictable environmental and social risks and impacts caused by the project, and to establish mitigation measures to avoid, minimize or compensate/offset risks and impacts to workers, affected communities and the environment in an orderly manner through adequately staffed, resourced and organized management plans. The IFC characterizes PIIM as "an unplanned but predictable impact caused by the project" that should be anticipated and mitigated in a project's environmental and social management plan. PS1 further requires projects to use the mitigation hierarchy to avoid, reduce, mitigate and compensate potential impacts in that order. The mitigation hierarchy requires projects to implement actions to avoid and reduce influx impacts, as a preference, thus requiring companies to create local content programs as a priority.

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- PS2: Labour and Working Conditions, which requires projects to identify migrant workers and ensure they are engaged on substantially equivalent terms and conditions to non-migrant workers, protect all workers equally, and not to discriminate against workers, including migrant workers with respect to any aspects of the employment relationship;
- PS4: Community Health, Safety and Security, which establishes requirements for projects to assess and mitigate any negative project impacts on community health, safety and security where the IFC Projects and People: A Handbook for Addressing Project Induced Migration specifically recognizes that PIIM has the potential to generate negative impacts on community health, safety and security. In addition this PS requires projects to:
 - Avoid or minimize transmission of communicable diseases that may be associated with the influx of temporary or permanent project labour;
 - Avoid or minimize non-communicable diseases and health impacts that may be associated with the influx of temporary or permanent project labour (e.g., conflict, road accidents etc.);
 - Assess risks posed by project security arrangements to those within and outside the project site, including those associated with the use of private and public security services;
 - Ensure that those providing private security are not implicated in past abuses, where direct or contracted workers are employed to provide security;
 - Develop security arrangements guided by the principles of proportionality, good international practice and applicable laws in relation to hiring, rules of conduct, training, equipping and monitoring of security works;
 - Provide adequate training for security personnel including training on the use of force, firearms (where applicable) and appropriate conduct towards workers and affected communities; and
 - That security providers act according to the law.
- PS5: Land Acquisition and Involuntary Resettlement, which establishes requirements for projects to assess and mitigate any negative impacts from land acquisition or restrictions on land use. It also requires projects to improve or restore the livelihoods and standards of living of displaced persons, where IFC's *Projects and People: A Handbook for Addressing Project Induced In-Migration* specifically recognizes that PIIM has the potential to exacerbate the negative impacts of involuntary resettlement;
- PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources, which establishes requirements for projects to assess and mitigate

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any negative impacts on biodiversity, recognizing that PIIM has the potential to negatively affect biodiversity; and

- PS8: Cultural Heritage, which establishes requirements for projects to assess and mitigate any negative impacts of PIIM on cultural heritage; recognizing that PIIM has the potential to negatively affect cultural heritage.

2.3


RELATIONSHIP TO OTHER MANAGEMENT PLANS AND POLICIES

This PIIM-MP is based on available information in the Project ESIA, including:

- *Chapter 2: Project Description;*
- *Chapter 7: Socio-Economic Baseline.* This baseline was later updated in January 2015 after two additional household surveys and public consultations were conducted in late 2014;
- *Chapter 17: Socio-Impact Assessment;*
- *Chapter 18: Traffic Impact Assessment;* and
- *Chapter 20: Cumulative Impact Assessment.*

The development of this document is also directly related to a range of other ESMPs including:


- Workers Accommodation Management Plan (WAMP, Ref: LSP-1S01-0004);
- Worker Training Plan (WTP, Ref: LSP-1S01-0003);
- Worker Occupational Health and Safety Management Plan (WOHSMP, Ref: LSP-1S01-0019);
- Stakeholder Engagement Plan (SEP, Ref: LSP-1S03-0006);
- Community Grievance Management Plan (CGMP, Ref: LSP-1S03-0001);
- Security Management Plan (SMP, Ref: LSP-1S01-0006);
- Community Health Action Plan (CHAP, Ref: LSP-1S03-0009);
- Community Development Action Plan (CDAP, Ref: LSP-1S03-0002), including:
 - Local Recruitment and Procurement Plan;
 - Second Priority Livelihood Restoration Programme; and
 - Local Infrastructure Improvement Programme.
- Livelihood Restoration Action Plan (Local Micro, Small and Medium Business Development Programme) (LRAP, Ref: LSP-1S03-0008); and
- Waste Management Plan- Non-Hazardous Waste (WMP, Ref: LSP-1S01-005)
- Waste Management Plan – Hazardous Waste (WMP, Ref: LSP-1S01-005)
- Traffic Management Plan –Terrestrial (TMP, Ref: LSP-1S01-0017).

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2.4 PUBLIC CONSULTATION AND STAKEHOLDER ENGAGEMENT RELEVANT TO PIIM-MP DEVELOPMENT

In 2013, late 2014 and early 2015, the initial consulting team undertook a number of engagement activities with resettlement-affected households and with local authorities including surveys, public consultations and stakeholder engagement activities with local authorities, including Long Son commune authorities. These activities helped to formulate the socio-economic baseline of the Project area and to conduct the initial Project impact assessment. During 2015 and the early part of 2016 engagement continued with local authorities and in July-August 2016 the Project began to implement the permanent presence of a small social engagement team at site, to monitor implementation of the resettlement, coordinate Project disclosure and perform on-going data-collection activities. Data obtained from these engagement and consultation activities provide a picture of the current status of local peoples' livelihoods, education, the quality and adequacy of satisfaction of the local communities with local public infrastructure and services and, the capabilities of the local authorities, as well as the communities concerns in relation to Project impacts. All of these have informed the development of the PIIM-MP.

An engagement meeting with Ba Ria-Vung Tau Department of Industry and Trade (DoIT) was held on 4 September 2014 in order to explore the potential industrial projects of large scale currently in operation or to be developed in close proximity to LSP Project site. The information discussed in this meeting has helped to further inform LSP's understanding of potential cumulative impacts including PIIM impacts.

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3 **RISK AND IMPACT ASSESSMENT**

The following section provides an overview of known information, identified information gaps, risks and impacts related to PIIM.

3.1 **SUMMARY OF KNOWN INFORMATION**

In assessing whether or not a project should be concerned with the risks of PIIM, a first step is to determine the probability and likely scale of influx impacts anticipated. This probability can be predicted on the basis of four factors:

- Extent of mobility of the population;
- An analysis of the probable access pathways;
- The Project characteristics; and
- The capacity of the area to meet project needs.

The following section evaluates these factors based on information provided in the Project description and the socio-economic baseline of the Project ESIA and additional data obtained from secondary sources at the national and provincial levels.

3.1.1 **Population Mobility**


Southeast Region

According to the national Population and Housing Census 1999 and 2009, the Southeast region of Vietnam (where Ba Ria-Vung Tau province is located) is a key economic centre of the country and was a major destination for domestic migration between 1994 and 1999. Subsequently during the period from 2004 to 2009 this area increased further due mainly to the draw of employment (CPHCSC, 2010¹).

As analysed by *Le et al. (2012)*², the high rates of in-migration appear to be closely linked to booming of industrial zones and industrial parks constructed and operated within the region (see *Figure 3.1*). The authors also note that 50.5% of the in-migrants in the Southeast region were aged between 23 and 24 years and that most migrants in Vietnam are from rural areas and have a secondary school education or less. Therefore, they usually work in manual jobs with low salaries, long working hours, no health insurance, and high-pressure work environments. Their limited education levels

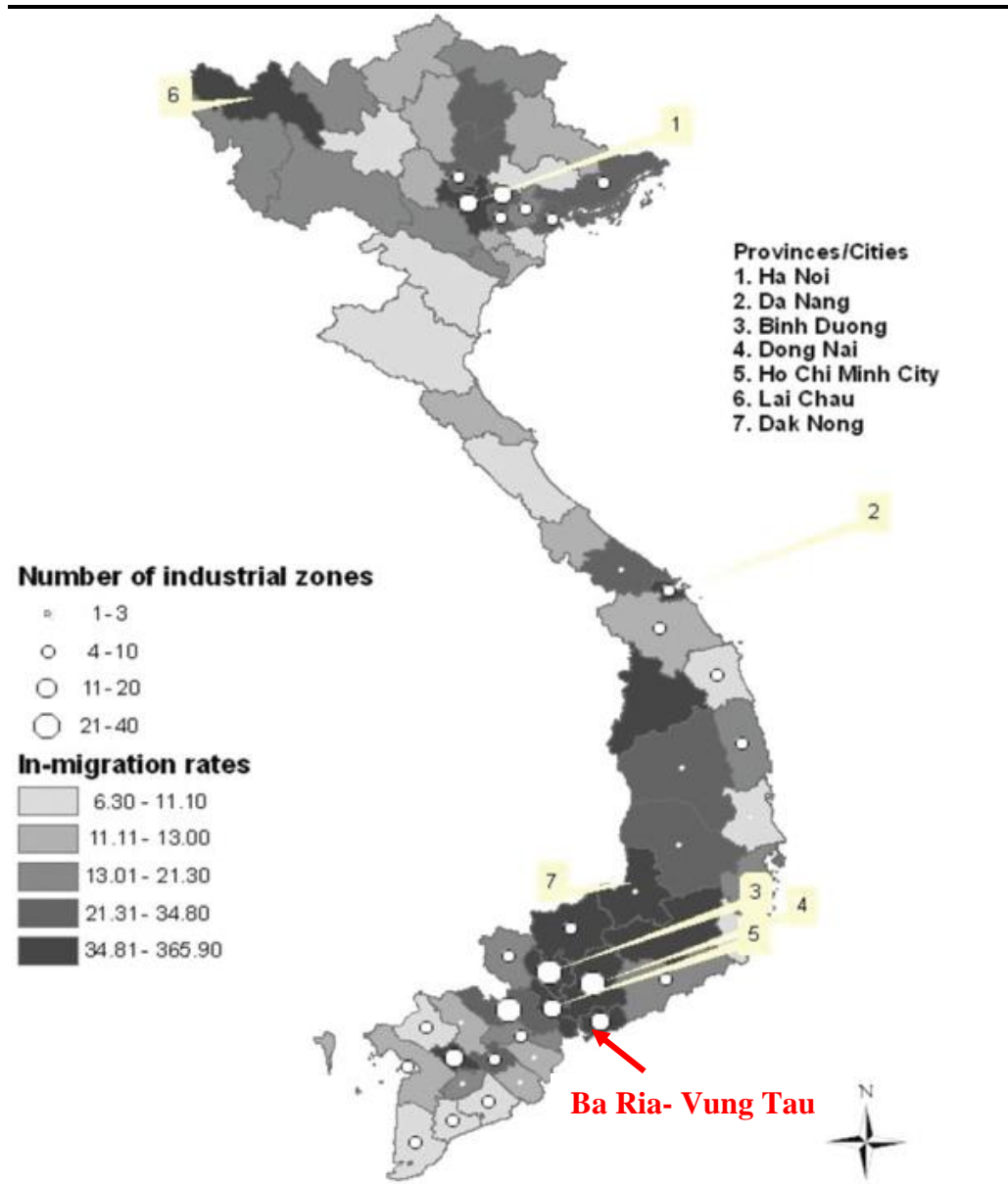
¹ Central Population and Housing Census Steering Committee – CPHCSC (2010). *The 2009 Vietnam Population and Housing Census: Major Findings*. (Accessed at http://unstats.un.org/unsd/demographic/sources/census/2010_phc/Viet%20Nam/Vietnam-Findings.pdf)

² Le Thi Kim Anh, Lan Hoang Vu, Bassirou Bonfoh and Esther Schelling (2012). *An analysis of interprovincial migration in Vietnam from 1989 to 2009*. (<http://www.globalhealthaction.net/index.php/gha/article/view/9334#CIT0016>, retrieved in March 2015). The data in this study came from three sources: the 1989 national census capturing 5% of the population, the 1999 national census capturing 3% of the population, and the 2009 national census capturing 15% of the population.

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may restrict their ability to access to important social and health information and services.

Figure 3.1 *In-migration Rates and Number of Industrial Zones by Province in Vietnam, 2009*



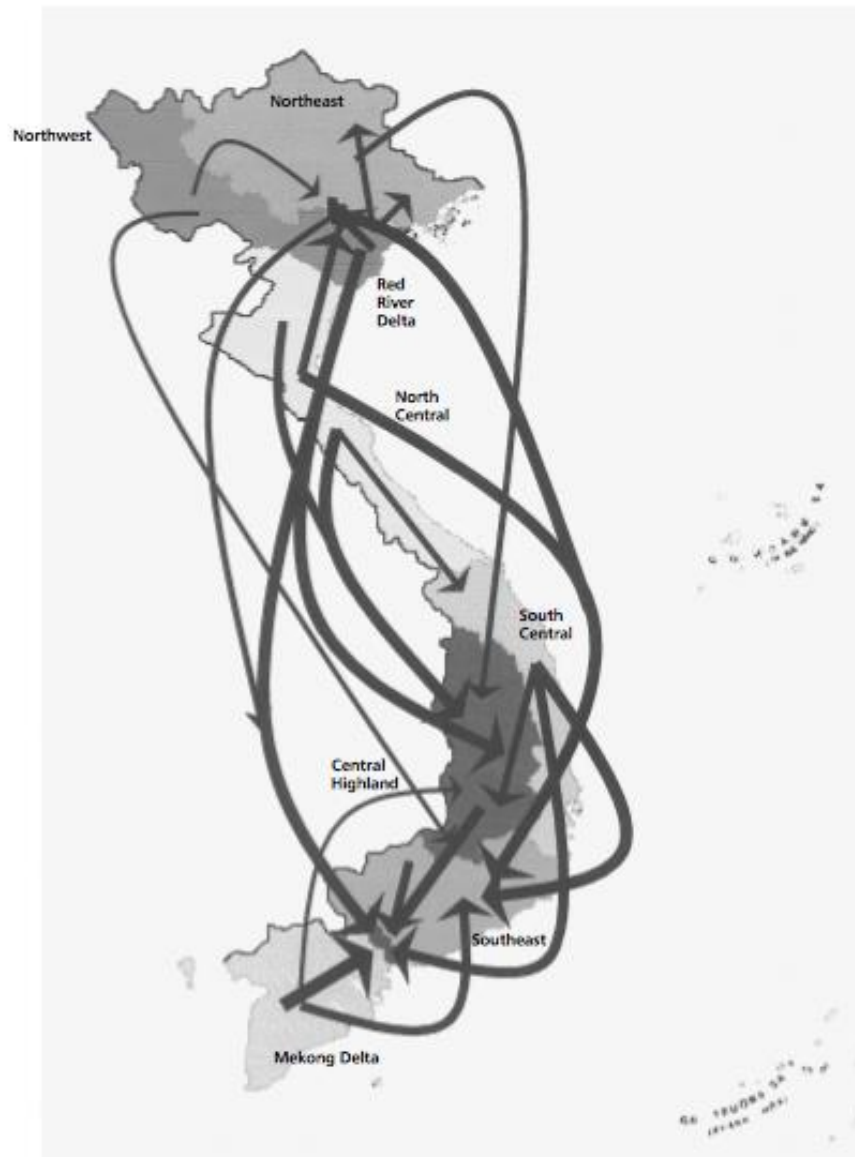
Source: Le et al., 2012

Note: The in-migration rate refers to the number of people arriving from other provinces during an observed period per 1,000 persons aged 5 and above in the destination province.


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According to the Central Population and Housing Census Steering Committee (2010), the general picture of inter-regional migration in 2009 is similar to that found in the 1999 Census (see **Figure 3.2**). In addition to employment as a key driver, the next most important driver of migration is distance, as migrants seem to prefer migrating to neighbouring regions, as this enables them to remain close to their origins and relatives. For example, most migrants from the Mekong River Delta (97% during 2004-2009 period) chose to migrate to the Southeast region.

Figure 3.2 *Key Inter-Regional Migration Flows during 1996-1999 Period*



Source: Dang et al. 2003

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Ba Ria-Vung Tau Province

The in-migration rate to Ba Ria-Vung Tau province in the period 2004-2009 was 62.4 per 1,000 residents¹ (CPHCSC, 2010). The breakdown of in-migrants of the province during this period is presented in *Table 3.1*. The two key in-migration categories of Ba Ria-Vung Tau province were inter-provincial (59.2%) and intra-district (30.4%). In comparison, inter-district migration (10.2%) and migration from abroad (2.4%) were insignificant.

Table 3.1 *Inter-province in-migration rates of Ba Ria-Vung Tau Province in 1994 -1999 and 2004-2009 periods*

Period	Provincial population	Intra-district in-migrants	Inter-district in-migrants	Interprovincial in-migrants	Overseas in-migrants	Total in-migrants
1994-1999 ⁽¹⁾	805,100	-	-	52,428	-	-
2004 -2009 ⁽²⁾	996,628	29,158	9,784	56,773	233	95,949

(Source: (1): Dang et al, 2003²; (2) CPHCSC, 2010)

Note:


- A person is considered a migrant if their current place of residence at the time of the census and the place of residence 5 years prior to the census are not the same administrative unit at the commune level;
- Intra-district in-migrants: migration within the administrative boundaries of a district-level unit;
- Inter-district in-migrants: migration between districts within the province;
- Inter-provincial in-migrants: migration from one province to another.

For inter-provincial in-migration, the overall flow can be subdivided into four (4) key sub-flows of in-migrants to Ba Ria –Vung Tau province during 2004-2009 period: i) from Mekong River Delta (25.75%); ii) from other provinces in the Southeast region (20.75%); iii) from the North Central area (20.16%); and iv) from the Red River Delta (19.34%). Refer to *Figure 3.3* for details. It is noted that 73% of in-migrants originating from the Southeast region are from Ho Chi Minh City and Dong Nai Province, the two closest neighbours of Ba Ria- Vung Tau province.

Among the intra-provincial in-migrants from Ba Ria-Vung Tau province in 2009, less than 16% (~ 9,000 people) were identified as migrating from urban areas. Of those

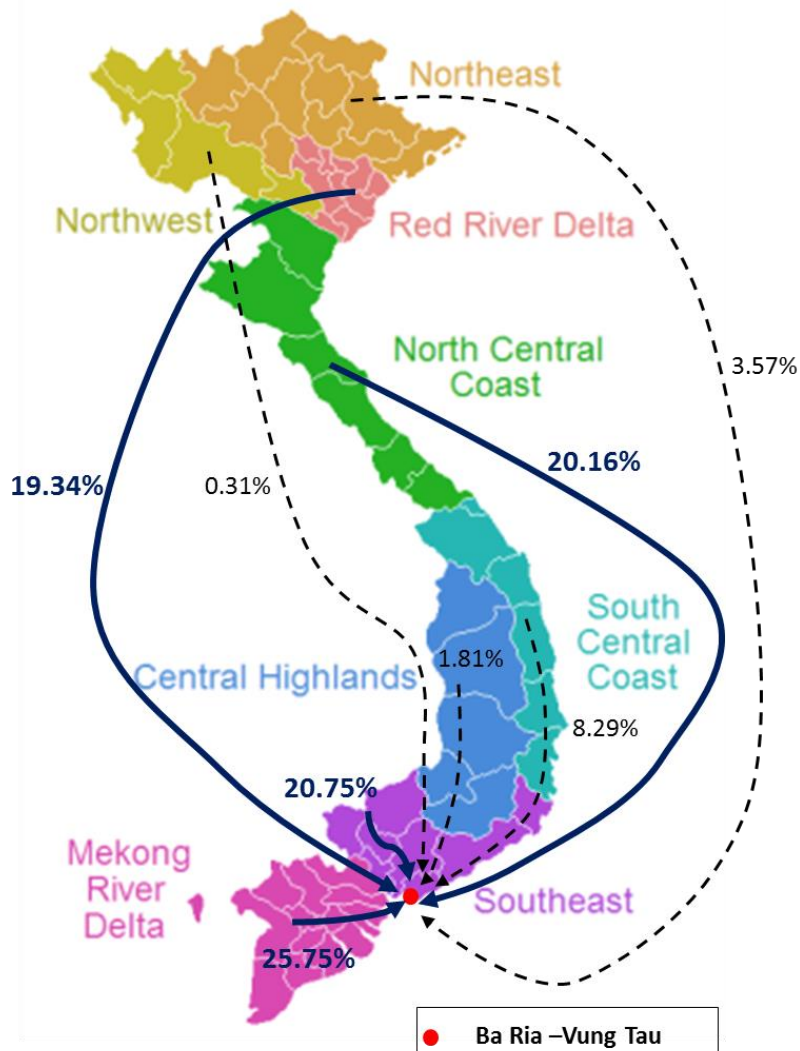
¹ The in-migration rate refers to the number of people arriving from other provinces during an observed period per 1,000 persons aged 5 and above in the destination province

² Dang Nguyen Anh, Cecilia Tacoli and Hoang Xuan Thanh (2003). Migration in Vietnam -A review of information on current trends and patterns, and their policy implications. (Accessed at http://www.eldis.org/vfile/upload/1/document/0903/Dhaka_CP_7.pdf)

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categorized as urban in-migrants, more than 50% were from Ho Chi Minh City and nearly 20% were from Ha Noi respectively. These two cities are recognized as the key sources of skilled labour in the country. The remaining inter-provincial in-migrants from other provinces are, in general, less educated and work in unskilled or semi-skilled jobs as discussed above with reference to *Le, et al.'s* (2012) research.

Figure 3.3 *Inter-provincial in-migration Flows to Ba Ria- Vung Tau province during 2004-2009 Period*



(Source: ERM, 2015 – created from 2009 Vietnam Census data –(CPHCSC, 2010))

The high in-migration rates towards the Southeast region in general and Ba Ria- Vung Tau in particular in 2004-2009 period were mainly due to the high concentration of industrial park growth in this area. Most of the industrial parks developed in Ba Ria-

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Vung Tau province are located in Tan Thanh district, Vung Tau city and Ba Ria city, which are all in close proximity to Long Son Commune. This means that it is likely that, a significant proportion of those who arrived in this area as in-migrants are now living within these administrative areas.

A number of other large-scale industrial projects are scheduled to be built at newly established industrial zones or economic zones (EZ) in the North Central and South Central regions of Vietnam, including at Nghi Son EZ, Ha Tinh EZ, Chu Lai EZ, Dung Quat EZ and Nhon Hoi EZ. Given the migrants' preference for migrating to neighbouring regions and provinces (CPHCSC, 2010), the rate of migration to the southeast region and Ba Ria- Vung Tau province from the Red River Delta and the North Central Coast are expected to decrease.

3.1.2 Access Pathways

Long Son Commune is linked to National Route 51 by the Truong Sa and Hoang Sa Roads. Both of these roads provide rapid two-lane access in each direction. National Road 51 is the main arterial road connecting Ba Ria – Vung Tau with Ho Chi Minh City and Dong Nai Province.

The opening of the Trung Luong - Ho Chi Minh city highway in 2010 and the Ho Chi Minh City – Long Thanh – Dau Day highway in 2014 have further facilitated transportation from the Mekong Delta and other provinces/ cities in the Southeast region to Ba Ria –Vung Tau Province. This suggests that the two existing key in-migration flows to the Ba Ria – Vung Tau Province from Mekong Delta and within the Southeast region to the province (see *Figure 3.3*) are likely to increase in the coming years, due to increased ease of access.


Generally, the Project Site can be easily and conveniently accessed from a number of different pathways.

3.1.3 Project Characteristics

Manpower Demand

Project construction is expected to take over 51 months or 17 quarters. After construction, the plant will operate for about 50 years.

Land development, initially planned for the 1st Quarter of 2015, was delayed until the 2nd Quarter of 2018 and will now be expected to be completed by the 2nd Quarter of 2020. The seaport construction is now expected to start in the 2nd Quarter of 2018, with plant construction expected to commence in Q3 2019, including construction of all plants and supporting units, common infrastructure development.

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The operations phase is expected to commence at separate times for different plant components but all operations will have entered the operation phase by the beginning of the 3rd Quarter of 2022.

During the construction phase, seven (7) EPC Contractors will be selected with responsibilities for different packages of work. The Project tentative schedule and EPC Contractor categories of the construction phase are shown in *Table 3.2* below.

Table 3.2 *Tentative Schedule of the Project Construction Phase*

Activities	Duration (months)	Start time	End time	EPC Contractor
Land Development	24	Q1 2017	Q4 2018	Package L
Seaport Construction				
Construction Jetty	25	Q1 2017	Q1 2019	Package F
Hydrocarbon Jetties	39	Q1 2017	Q1 2020	Package F/A
Petrochemical Plants Construction	36	Q2 2018	Q1 2021	Package A/ B-C-D /G/H
Main Production Plants				
Olefins Plant	36	Q2 2018	Q1 2021	Package A
Polyolefins Plants (HDPE, LLDPE, PP)	33	Q2 2018	Q1 2021	Package B-C-D
Supporting Units				
Central Utility Plant	32	Q2 2018	Q4 2020	Package G
Tank Farm and Interconnecting Pipelines & Pipe Rack	34	Q2 2018	Q1 2021	Package A
Complex Wastewater Treatment Unit	27	Q2 2018	Q2 2020	Package A
Common Infrastructure*	26	Q2 2018	Q2 2020	Package H/I


Note:

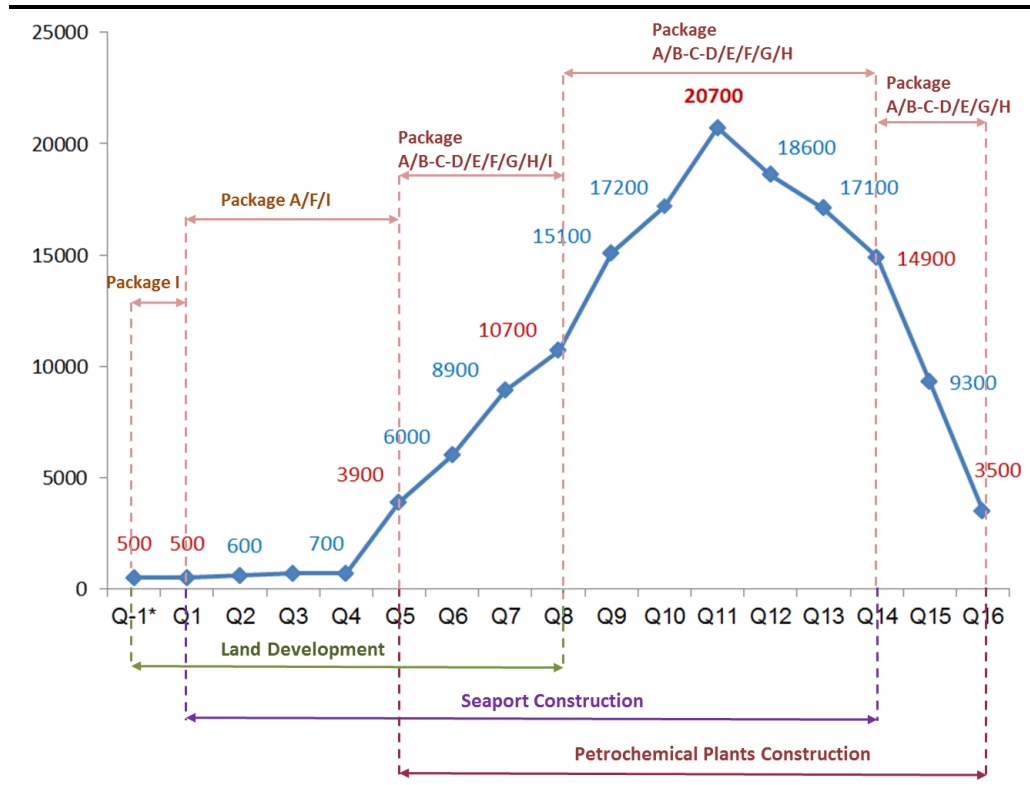
*: Administration building, Laboratory Building, Canteen Building, Emergency Centre and First Aid Centre

With regards to personnel required during construction, approximately 500 workers will be on site daily during the preconstruction activities. The construction workforce would peak at 20,700 people per day in Q11 which is expected at around the 4th Quarter of 2019. The anticipated number of workers, including LSP staff and contractors' workers, required per day during the construction phase is illustrated in **Figure 3.4**.

Figure 3.4 *LSP Project Overall Quarterly Average Manpower Loading per Day during Construction*

(Source: ERM, 2015 – created based on LSP data provided in ESIA – Project Description)

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At the peak time of the construction phase approximately 5% (1,035 people) are expected to be local workers from Long Son Commune and 10% (2,070) are expected to be from Ba Ria-Vung Tau Province. These local worker groups may be able to travel to the site for work each day. The remainder are expected to be either from other provinces within Viet Nam (80%, or 16,650 people) or foreign workers (5% or 1,035 people).

The construction workforce at the peak time would consist of approximately 5,175 skilled professionals (25%), 7,245 semi-skilled workers (35%), and 8,280 unskilled workers (40%).

These Project characteristics are well aligned with the construction work-force characteristics for other large development Projects in industrial or economic zones. Therefore, the patterns of migration observed at these projects are considered to provide a reasonable analogy for the migration patterns likely to occur at the Project.

Worker Accommodation

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The worker camp(s) will be set up outside the Project site and will be the responsibility of the EPCs. These Contractors are to collaborate with LSP to determine the appropriate locations and scopes of the buildings, services, sanitary facilities and utilities required by their workforce. If a worker camp is required, it will include temporary power, water, wastewater and solid waste facilities until the main facilities will be constructed. Accommodation for the workforce during construction will be provided in several ways: by use of worker camps, through rented houses in nearby villages, at purpose-built boarding houses, and at local hotels.

Assumptions

At the time of writing (August 2016), the information on the Project worker accommodation regarding locations, types (i.e., camp site, guest houses and rented houses) and design are unavailable, because the EPCs that will be responsible for developing the worker accommodation strategy have yet to be selected. As such, this PIIM-MP has been developed based on the assumption in the Project ESIA that:


Of 19,700 non-local workers of the Project, there will be 6,000 persons living in camps located within Long Son commune. The 13,700 remainders will reside in either camps or guesthouses outside of the commune.

Based on experience with similar projects in Vietnam, it is expected that:

- The worker accommodation in camps, guest houses, rented houses outside the commune will be located within 10 km radius of the Project (or 20 km by road) which will require up to 45 minutes for travel to site; and
- Worker accommodation units tend to be located 2 km of main roads to facilitate access.

Based on these assumptions, outside Long Son Commune, worker accommodation will be mostly located in the south of Tan Thanh district, the west of Ba Ria city and Vung Tau city (within the red half circle in Figure 3.5). As Vung Tau city has an important tourism industry and tends to be crowded, it is considered unlikely that the authorities will provide permission for establishment of worker camps within the city. Rather, a small number of management personnel and non-local high-level professional skilled staff may be allocated to live in hotels or guesthouses in Vung Tau.

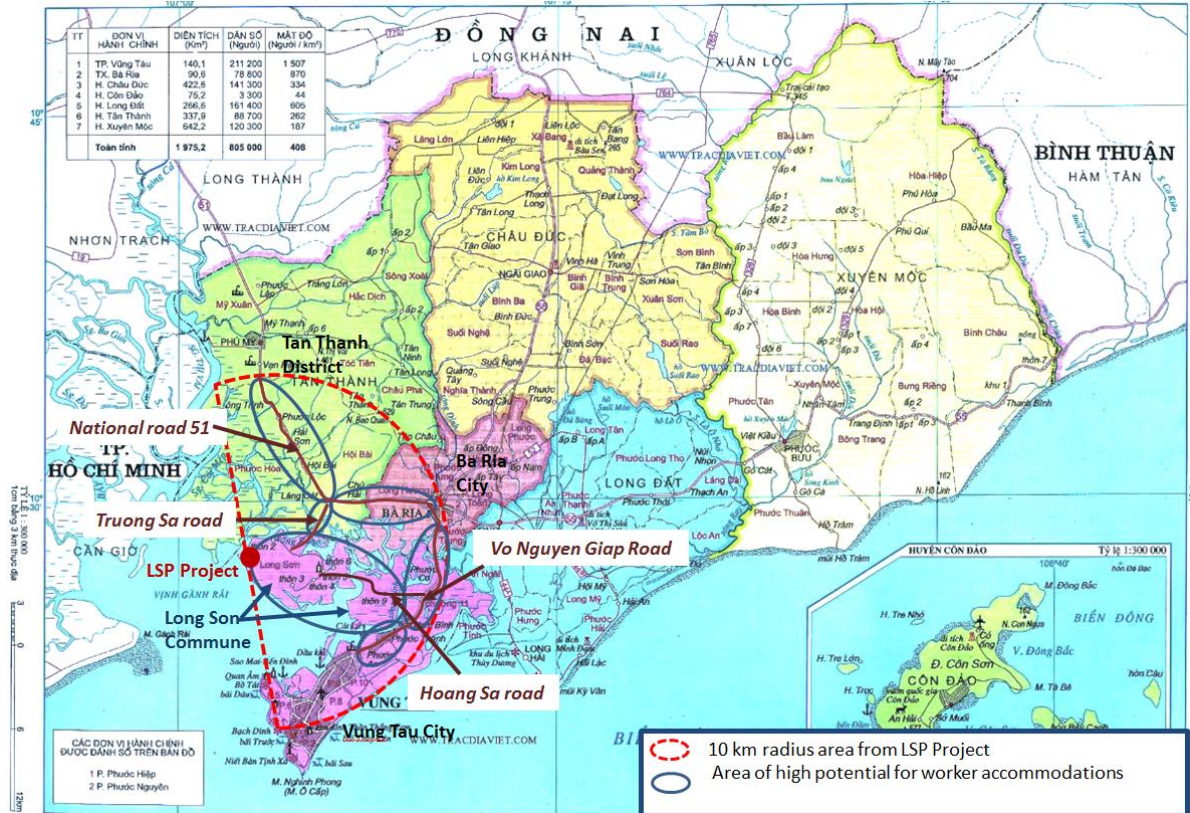
Typically, each of the EPC contractors and their subcontractors are responsible for establishing of their own worker camps, as required and, the requirements for camp

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buildings and camp impact assessment are laid out in the Workers Accommodation Management Plan (WAMP LSP-0103-0004). This plan requires the EPC and subcontractors to locate and evaluate the potential environmental and social impacts of suitable sites for camps, prior to construction and to receive approval from the Project that the camp plans fulfil all of the requirements of the WAMP and the E&S review indicates that the environmental and social impacts are manageable and that appropriate mitigation measures will be implemented. The typical camp building process begins with the leasing of vacant land from either private or state land owners and then involves obtaining a construction permit for the camp from the local authorities in charge of construction management. Usually, the construction permits for worker camps are granted on a temporary basis for the duration of the work contracts, so after the contractors finish their work and leave the locality, these worker camps are usually required to be completely dismantled and the land returned to its owner.

The areas with a high potential for situating Project workers' accommodation units are illustrated within the blue circles in Figure 3.5. These areas include the whole of the Long Son Commune and areas alongside the main roads within the ten-kilometre circle from the Project (i.e., areas neighbouring National road 51 and Vo Nguyen Giap). These areas are considered to be the most likely potential host communities for accommodation units and hence they are likely to include the populations most likely to be impacted by Project Induced In-migration, in terms of the impacts of temporary accommodation and transportation impacts.

Figure 3.5 Predicted high potential locations for Project worker accommodation




3.1.4

Project Area Capacity and Resilience

Local Population

A household survey in 2014 reported the total population of Long Son Commune to be 14,652 persons, of which 52.60% were women and 47.40% were men. The population density of Long Son commune was 159 persons/km², which is much lower than the population density of the more urban areas of Vung Tau City (2,064 persons/km²) and surrounding districts such as Ba Ria city (1,682 persons/km²) and Tan Thanh district (406 persons/km²).

As mentioned previously, during construction approximately 6,000 migrant workers will be living in camps in Long Son Commune, which will increase the commune's population by approximately 40%. Consequently, the demands on the commune infrastructure and services are expected to increase substantially. The remaining 13,700 migrant workers expected, will stay in camps or guesthouses in Ba Ria City,

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Vung Tau City or Tan Thanh District. As this number accounts for only 3.4% the total populations of these cities/ district, the pressure on public services within these areas would be much smaller, although the local impacts may still be significant.


Based on experience from other development projects in the Ba Ria-Vung Tau Province, it is unlikely that significant numbers of staff or construction workers from other countries or provinces will bring their families with them, preferring to work on rotations that enable them to visit their families, without disrupting family routines. In addition to migration for employment, it should be noted that it is expected that a number of in-migrants will seek to establish new goods and services businesses to take advantage of the increased economic activity during the Project construction phase.

Local Labour Resource

According to a survey of resettlement-affected households in 2014, although the commune has a large labour resource with around 68% of its population of working age (approximately 9,965 persons), the general educational level is low and more than half the people in the commune have a maximum education level of primary school completion or below. Secondary school completion levels appear to be around 12% with high school completion at 8.5% and higher education participation at just under 7%.

Corresponding to these low educational levels, only 7.6% of surveyed people occupy skilled professionals positions as government officers, office staffs, teachers or engineers and 6.3% work in semi-skilled roles. Meanwhile, just over 50% (7,564 people) have land-based livelihoods such as aquaculture (16.2%), agriculture (8.5%), salt farming (13.8%) and fishing (15.1%) and around 20% are currently engaged in unskilled jobs (2,794 people). In light of the low education levels of the local community and the 436 households that are being economically displaced during the Project land acquisition, the percentage of Commune residents seeking unskilled employment is expected to increase in the near future. Generally, there are limited professional skilled and semi-skilled labourer pools in Long Son commune whereas the quantity of unskilled labour in the commune is potentially abundant (estimated around 2,000-3,000 persons). This is less than the current Project local recruitment plan for the peak phase of construction, which is estimated at 1,035 local unskilled workers.

An updated skills inventory is underway focusing on the employment and business aspirations and skills of households requiring livelihood restoration, but also including other households in the Long Son Commune interested in accessing employment

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opportunities at the Project. This will be used to develop programs aiming to increase the local hiring and contracting rates throughout Project construction and into operations and may serve to reduce influx.


Availability of Local Infrastructure and Public Services

Long Son Commune

The socio-economic baseline (refer to *Section 7.3.8 of ESIA*) identifies that 96% of households in Long Son Commune are connected to the national power grid and 99% have water supplied to their homes. Solid waste collection services in the commune are weak. The commune has a small clinic, which provides basic medical care in the Commune; however, local people regularly access hospitals in Ba Ria City and Vung Tau City, equipped for tertiary care, which can be accessed within 20 to 45 minutes. There are four schools including kindergarten, primary and secondary in Long Son Commune, with high school, college or universities in Vung Tau or Ba Ria cities serving the commune.

The commune is connected with the two Provincial economic centres, Ba Ria City and Vung Tau City, via the two new roads, including Hoang and Truong Sa. Within the Commune, the main roads connecting hamlets are mainly paved to a width of 11 m and are capable of accommodating the current flow of small trucks, cars and motorbikes. The majority of other hamlet roads are of a poor quality. The household surveys from 2014 show that local people are generally not satisfied with the local roads or the commune clinic service with only 33.7% interviewed households (270 households) rating their quality from slightly good to very good. Both local and community authorities also expressed concerns over the adequacy of the solid waste management system in the commune. The community seemed much more satisfied with the current status of the water supply, power supply and schooling services.

Additionally, local authorities, including the commune PC and the police, have a limited number of officers and have no experience in managing a large industrial project and its migrant workers. Although the authorities clearly recognize these limitations, they also confirm that they consider enhancement of governance capacity to be the sole responsibility of local authorities in a plan that was under preparation by the Provincial PC in late 2014. They do not currently seek intervention or administrative support from the Project to tackle this issue.

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Surrounding Areas (Tan Thanh District, Ba Ria City and Vung Tau City)

These cities/ districts are the most developed areas of Ba Ria-Vung Tau Province with adequate infrastructures and services. There are two large hospitals in Ba Ria and Vung Tau city (Ba Ria General Hospital and Le Loi Hospital) which are only about 20-45 minutes away from Long Son commune and are equipped for tertiary care.

Most authorities in these cities/ districts have experience in managing large construction and industrial projects within their areas of governance. Past projects have included large-scale projects including the Phu My Thermal Power Plant.

Availability of Goods and Services

Goods and services provision in Long Son Commune is adequate, though not abundant. The commune is located near to Ba Ria City, Vung Tau City and Tan Thanh District where, goods and services provision includes markets, grocery shops, cafes and restaurants, all of which are sufficient and diverse. Transportation to the Commune from these cities and districts is convenient, facilitating exchange between them. In late 2014, the initial consultants observed that some small shops, restaurants and coffee shops have started to be established along the main roads of the Commune, following disclosure of information about Project future construction. This development has continued, although at a relatively slow pace, due to Project delays, with on-going development of small businesses, especially close to the access road and resettlement sites in Hamlet 1.

3.2 *STAKEHOLDER IDENTIFICATION AND ENGAGEMENT*

3.2.1 *Stakeholder Identification*

Stakeholders affected by Influx Impacts will include local residents and authorities, as well as government organisations and other groups involved in the management of PIIM. These stakeholders are identified and categorised in Table 3.3 based on their roles in the PIIM-MP.


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Table 3.3 *Stakeholder Identification and Categorisation*


Stakeholders	Description
<i>Stakeholders affected by in-migrants</i>	
Long Son people People of host communities	The presence of in-migrants may lead to the introduction or increased transmission of communicable diseases. Their presence will also place increased pressure on local infrastructure (roads, health service) and food, which may lead to commodity price increases. There may also be increased tension and conflict between workers and local people over customs and access to employment. People of Long Son Commune where the Project is located and communities neighbouring worker camps are most likely to experience these impacts.
Communities living along the roads connecting the Project Site and worker camps	People residing in the communities along the roads from worker camps to the Project Site may experience traffic impacts from the increase in vehicles travelling on the roads. They may also have economic opportunities to engage in commerce with workers.
Local authority of Long Son Commune Local authorities of host communities	The increase in the population in Long Son Commune could put strain on the government of the commune (especially for policing, enforcement etc.). Local authorities including the commune level people's committee and police have limited staff and no experience in dealing with management of a large industrial project and in-migrant population.
<i>Stakeholders involved in Managing the Project Induced In-migration</i>	
Authority of Long Son Commune Authorities of host communities	Governing the immigration-related issues and bureaucratic requirements created by migrant workers residing in their areas.
Authorities of Vung Tau City, Tan Thanh district and Ba Ria city	Support local authorities of host communities and Long Son Commune to manage influx related issues, including planning for increased administrative and service requirements.
Local and national social and health service providers host communities	The Project and/or EPCs may contract service providers (e.g., local clinics, NGOs) to provide support for managing influx related issues such as traffic safety training and health education and disease prevention.

3.2.2 *Stakeholder Engagement*

Following the requirements of PS1, affected stakeholders should be consulted on the potential influx risks and proposed mitigation and management measures of the Project and their concerns included in the resulting management plans. In particular, the following engagement actions are suggested.

Table 3.4 *Engagement Actions*

Proposed Actions	Audience	Timeframe
Disclosure of worker camps' locations	People and authorities of host communities	When worker camps' locations are defined

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Proposed Actions	Audience	Timeframe
Disclosure of potential risks and impacts of project induced in-migration	People and authorities of Long Son Commune People and authorities of the communities living along the road from the Project Site to worker camps. People and authorities of host communities Local and national social and health service providers	When the final Project Induced In-Migration Management Plan and associated management plans are approved and when the E&S reviews for each camp are complete. This should be prior to camp construction and to the overall construction phase.
Disclosure of mitigation and management measures project induced in-migration issues proposed by the Project	People and authorities of host communities. People and authority of Long Son Commune. People and authorities of the communities living along the road from the Project Site to worker camps. Local and national social and health service providers	When the Project Induced In-Migration Management Plan and associated management plans are finalized. Ideally prior to of construction phase.

3.3 RISKS AND IMPACTS

The following section provides a summary of potential PIIM risks and impacts identified in the PIIM Risk Assessment and other Project studies.


3.3.1 Risks

Risk Assessment Criteria

This section considers the risk of migration-induced negative impacts in the Project context. Based on discussions in *Section 3.1* above, the PIIM risk is evaluated based on the probability, scale and likely locations of potential in-migration, anticipated in-migration impact magnitude and the vulnerability of the potential host communities, including:

- Community in Long Son Commune; and
- Communities in surrounding areas (south of Tan Thanh District, west of Ba Ria City and north of Vung Tau City as shown in *Figure 3.5*.

Probability (Unlikely/ Possible/ Likely)

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The probability of in-immigration is determined based on the following ‘pull’ factors:

- The population mobility considered in national and regional scale and historical rates of in-migration in the Province (high, with decreasing participation of people from the North and increasing participation from the South);
- The access pathway to the locality and the Project site (site is easily accessed, especially from HCM city and the Mekong Delta area);
- The Project characteristics in terms of manpower demand (Project will have up to 20,700 workers, 40% unskilled and 25% semi-skilled, fitting the typical regional migrant profile); and
- The presence of socio-economic centres in close proximity to the Project site with sufficient availability of infrastructure and services, thus limiting some local impacts.

Impact Magnitude (Negligible/Low/Medium/High)

This is evaluated based on consideration of relative numbers of in-migrants throughout the Project life cycle, and an informed judgment regarding the assimilative capacity of the area for each impact type. For example, in absolute terms the arrival of 1,000 migrants is a more significant event for a village of 200 people, than for a small town with 10,000-30,000 residents.

Vulnerability (Low/Medium/High)

Key factors for determining the vulnerability of the host communities may include:

- Ability of infrastructure, services and utilities to meet the needs of higher levels of demand associated with a larger population; and
- Various other social factors: politics, the strength and capacity of government, the level of economic development, security risks, health risks, and socio-cultural factors, etc.

The combination of the Impact Magnitude and Vulnerability of host communities is used to determine the PIIM impact consequence or significance, which is presented in *Table 3.5*.


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Table 3.5 PIIM Consequence

		VULNERABILITY		
		Low	Medium	High
MAGNITUDE	Negligible	Negligible	Negligible	Minor
	Low	Negligible	Minor	Moderate
	Medium	Minor	Moderate	Major
	High	Moderate	Major	Major

The PIIM Consequence is then combined with the Probability level to determine the overall PIIM Risk Level following Probability–Consequence matrix in *Table 3.6*.

Table 3.6 Probability –Consequence Matrix

		PROBABILITY		
		Unlikely	Possible	Likely
CONSEQUENCE	Negligible	Negligible	Low	Low
	Minor	Low	Low	Medium
	Moderate	Low	Medium	Medium
	Major	Medium	Medium	High

PIIM Risk Assessment

The following table summarizes the overall risk of Project Induced In-migration risks for the project as a whole, focusing on two distinct areas: the Long Son Commune and the areas likely to be affected by the workers’ camps for the Project (corresponding to the areas highlighted in Figure 3.5). The subsequent text details the types of impacts anticipated, the mitigation measures that will be required and the management plan or ESAP items that further detail these actions.



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Table 3.7 Risk Assessment of the Project Induced In-migration

Factors	Long Son Commune	Surrounding Areas
Probability	Likely	Likely
	<ul style="list-style-type: none"> Long history of high in-migration rates in the Southeast region and Ba Ria –Vung Tau province due to the highest growth of industrial parks compared to other regions; Very convenient access pathways to the Province and Long Son commune. High manpower demand of the Project in comparison to the availability of labour resource in terms of quantity and quality in Long Son commune. The presence of developed socio –economic centres (Vung Tau city, Ba Ria city) with good and adequate infrastructures, goods and services in close proximity to the Project site. 	
General Impact Magnitude	High	Low -Medium
	<ul style="list-style-type: none"> The presence of approximately 6,000 migrant workers will increase the Long Son commune's population by approximately 40%. All 20,700 in-migrant works will be present in the commune at least 8 hours per day, so the commune population will double during daytime. A number of additional in-migrants will also arrive in the commune as goods and service suppliers. 	
Vulnerability	High	Low - Medium
	<ul style="list-style-type: none"> Limited experienced with in-migration as the commune was recently connected by bridges in 2009; Some public infrastructure and services are inadequate or poorly provided including internal roads, medical clinic and solid waste management system; Although the availability of goods and services in Long Son Commune is not abundant, the commune is located near to Ba Ria City, Vung Tau City and Tan Thanh District where commodities and are sufficient and diverse; Local people are recognized as having low education levels and skills that are linked to land-based livelihoods; The commune authorities have limited number of officers and no experience in dealing with management of a large industrial project and its migrant workers; Current relative high rate of HIV/AIDS infection reported; 	
Consequence	Major	Negligible - Moderate
Risk	High	Low – Medium (some local areas may be High)

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Based on the general assessment in *Table 3.7*, the PIIM risk is generally evaluated from **Low-Medium** (for the surrounding areas) to **High** (for Long Son community and potentially for some areas close to camps in the broader Project AoI).

In the following section, the significance of each specific potential impact related to PIIM is determined based on further analysis of relevant aspects of the local and Project contexts as well as experience with other similar projects in Vietnam.

3.3.2 *Potential Impacts*


PIIM may be associated with a range of positive and negative impacts on the host communities within the Project area of influence and on the Project itself (as outlined in Chapter 17 of the ESIA, updated in August 2016). To date, project experience, particularly in the oil, gas and mining sector, demonstrate the primacy of negative impacts. While maximizing positive impacts of in-migration is a valid objective, the primacy of negative impacts leads to the conclusion that avoidance, minimization and management of in-migration should be the primary objective of projects with a **Medium** to **High** risk of in-migration (as identified above in *Section 3.3.1*). Many of the actions taken to prevent harmful impacts (e.g., by increasing local hiring and contracting at a project) have the concurrent effect of enhancing Project benefits for the local population.

Positive impacts can be generated by PIIM, including:

- Generate local business opportunities from within the supply chain;
- Prioritize local employment opportunities;
- Increase demand for food and agriculture/aquaculture products leading improved prices for agriculture/aquaculture products;
- State equity, taken at the provincial government level as well as the at national level increases revenues at the local and regional levels;
- Improved local training and skills development opportunities; and
- Improved access through development of road, electricity and water systems.

In addition, as discussed in earlier studies, particularly the Project ESIA, the key potential adverse impacts associated PIIM include:

- Increased risk of traffic accidents;
- Increased human health impacts including:
 - Vector-borne diseases including dengue;
 - Water-borne diseases, including diarrhoea and cholera;


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- Endemic diseases;
- Epidemic diseases, including novel flus and potentially Zika;
- Sexually transmitted infections (STIs) and HIV/AIDS.
- Increased pressure on local public infrastructures and services;
- Compromising local master planning and townscape due to temporary settlement of in-migrant workers (i.e., establishment of worker camps and rented houses which normally do not follow the local construction master planning);
- Increased price of services - price of commodities and food;
- Increase in crime and social ills, including theft, alcohol and drug abuse, prostitution, gambling etc.; and
- Increased tension, disputes, and conflicts between and among locals and migrants concerning community safety and security, culture preservation, environment, employment opportunities, and other project benefits.

Increased Risk of Transportation-related accidents:

Traffic safety will be a critical issue during Project construction. Much of the traffic related risk will be related to worker transportation insofar as much of the equipment and materials will be transported to site by sea. In the early phases of the construction, material will be trucked in via road. Key drivers of increased traffic accidents will include (i) workers' personal transportation, which will likely involve significant numbers of motorcycles; (ii) generally low awareness and knowledge of traffic rules; (iii) limited numbers of signals and officers to regulating traffic; and (iv) road congestion in Long Son commune.

During the peak construction phase, approximately 13,700 non-local workers will travel to the Main Site and return to workers camps outside Long Son Commune by buses and using their personal vehicles. They may take routes along National Road 51, the Hoang Sa Road or along the Vo Nguyen Giap Road-Truong Sa Road to the Main Site, through inter-hamlet roads. The routes will pass through Hamlet Nos. 8, 5, 7, 6, 1, and 2. These commune roads will also be used by around 6000 non-local workers residing inside the Long Son Commune for daily activities (e.g., visiting entertainment places, etc.) and by local workers accessing the Project Site. In the worst case that no shuttle bus service is provided, approximately 20,000 motorcycles will travel into and through the commune to the worksite, each day, during concentrated periods at the beginning and end of shifts. With that considerable increase in traffic volume to and from Long Son Commune, both traffic accidents and significant congestion are likely to occur.

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In Long Son commune, every year on the birthday of Mr. Tran (Ong Tran) (on the 20th day of the 2nd month of the Lunar calendar) and on Trung Cuu (double nine) day (the 9th day of the ninth month of the Lunar calendar), the National Heritage - Nha Lon Long Son organises festivals that attract more than 10,000 people from the Mekong Delta and neighbouring provinces and cities. As there are only two access roads to Long Son Commune, transportation to and from the Project site, Project traffic will exacerbate traffic congestion and accidents during these festivities.


National Road 51 and Vo Nguyen Giap Road are also key access roads used by tourists to travel to Vung Tau city, which is a very popular tourism destination for residents of the Southeast region. Circulation of a large number of personal vehicles belonging to Project workers will increase the risk of traffic congestion and accidents during peak tourist season, including weekends, national holidays and throughout the summer period between June and August on these roads. The road sections with the highest risk of traffic safety incidents due to travelling of the Project in-migrant workers are illustrated in Figure 3.5 above.

Considering all of these facts related to traffic safety, the impact of traffic safety due to PIIM is considered of **Major** and **Moderate** significance for Long Son commune and surrounding areas, respectively. Particular attention on traffic management should be paid to the all the main internal roads in Long Son commune and Hoang Sa road, Truong Sa road, the National Road 51 and Vo Nguyen Giap road and on developing appropriate management plans to limit the impacts of the Ong Tran and Trung Cuu traffic and Project traffic interactions with peak tourism flows.

Increased human health impacts

During the construction phase, the local community and the workers may be exposed to water-borne diseases due to poor sanitation and vector borne diseases such as dengue fever. In addition, the presence of a significant number of non-local workers in Long Son Commune will potentially lead to increased risk of number of communicable diseases, including:

- Increase in endemic disease rates;
- Increase in epidemic disease risks including for novel flus and diseases such as zika;
- Increase in gastro-intestinal diseases and other food borne diseases such as Hepatitis A due to poor standards of food hygiene in site catering facilities including facilities provided in workers' accommodation; and

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- Increase in sexually transmitted infections (STIs) and HIV/AIDS.


Sexually transmitted infection rate increases are associated with large construction projects due to the influx of large numbers of male workers, living apart from their families. In addition, increased incomes may encourage some local people and migrant workers to increase their participation in alcohol and drug abuse, which are both risk factors for increased STI transmission.

As mentioned previously, Ba Ria-Vung Tau is among the provinces with high HIV/AIDS infection rates in Vietnam. It should be noted that Vung Tau city, Tan Thanh district and Ba Ria city have the highest rates of HIV/AIDS infected people and the largest presence of the high risk groups such as drug abusers, prostitutes and in-migrants¹. As communicated by Long Son Commune Clinic, there are at least 76 HIV/AIDS infected cases in the commune accounting for 0.52% of the total population of the commune which is slightly higher than this rate of Ba Ria–Vung Tau Province (0.49%) but still lower than that of Vung Tau City (0.79%)². As part of Vung Tau City, which is recognized by the government having the highest rate of HIV/AIDS in the province, mitigation of this health issue is considered crucial, particularly when the Project construction is predicted to impose increasing risk of this rate as in the Project ESIA. A detailed health baseline will also be collected prior to commencing Project construction to further elaborate Project Health risks for local communities and identify appropriate mitigation actions and to serve as a baseline against which to compare future health outcomes.

Based on the above facts and the analysis of the general impact magnitude and vulnerabilities of different host communities in *Table 3.7*, the impact of increased risk of human health impacts from PII, particularly HIV/AIDS, is considered of **Major** and **Moderate** significance for Long Son commune and surrounding areas, respectively.

¹ Securing Finance Plan for HIV/AIDS Control and Prevention Activities in Ba Ria –Vung tau Province in the period 2015 -2020 (2014). (Accessed at Website of Vietnam Administration for HIV/AIDS control: <http://vaac.gov.vn/>)

² http://dangcongsan.vn/cpv/Modules/News/NewsDetail.aspx?co_id=30188&cn_id=656322. According to the article, the number of HIV-AIDS infected cases in BRVT province was 5,129 of which 47% was of Vung Tau City. The total population of BRVT province and Vung Tau City in 2014 as in the updated baseline (see Annex A) was 1,041,565 and 309,577 people, respectively.

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Increased Pressure on Local Public Infrastructures and Services

Given the analysis of scale of potential impact and vulnerabilities in different host communities in *Table 3.7*, the pressure of local public infrastructures and services is considered of **Major** and **Minor** significance for Long Son commune and surrounding areas, respectively.


In Long Son commune, special attention should be paid to increased pressure on medical services (due to the low capability of the commune clinic), solid waste management system and commune roads which are currently considered inadequate and of low quality.

Compromising Local Master Planning and Negative Visual Impact due to Temporary Settlement of In-migrant Workers

Migrant workers typically temporality reside either in worker camps constructed by EPC contractors/ subcontractors or in private rented houses or hotels offered by local people. Supplying accommodation for migrant workers is recognised as a good opportunity of income improvement for local people. In order to maximise the income, they may illegally change their non-residential lands (i.e., agriculture land, forest land) or may illegally occupy public land for housing construction or to lease to contractors for worker camps construction. In order to facilitate project construction, local authorities from provincial to commune level may facilitate allow these practices by granting temporary construction permits for worker housing structures, which are required to be completely cleared after the contractors finish their work for the Project.

Experience in Vietnam includes many examples where (illegal) land owners request that contractors or subcontractors do not demolish the accommodation structures in order to permanently change the land use purpose or permanently occupy the public land. Contractors and subcontractors may agree with this request without checking the validity of their worker accommodation construction permit, leading to contraventions of local land use master plans in the locality.

As observed in other projects, the structures of workers' housing or camps are constructed using only temporary materials and often using poor design criteria. As such, retaining these structures illegally typically results in negative visual impacts, which affect the local townscape. This will be particularly true in the surrounding areas

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(i.e., Ba Ria city, Vung Tau city), which are much more developed with better urban planning and construction.

Considering these facts and the analysis of the general impact magnitude and vulnerabilities of different host communities in *Table 3.7*, this impact is considered of **Moderate** significance for both Long Son commune and surrounding areas.

Increased Price of Services, Commodities and Food

Prices of commodities and food are not expected to rise significantly because:

- Long Son Commune is located near to Ba Ria City, Vung Tau City and Tan Thanh District where commodities and services (e.g., markets, grocery shops, cafes and restaurants) are sufficient and diverse and transportation to the Commune from these cities/ district is convenient facilitating food and commodities exchange between the cities and towns; and
- Two thirds of migrant workers will potentially reside in these cities and district after work, so the bulk of goods and services purchases are expected to be in these areas.


Given this the impact is only considered of **Minor** significance for both Long Son Commune and surrounding areas.

Increase in Crime and Negative Social Dynamics

Increased theft, violence, alcohol and drug abuse and problem gambling (i.e., card playing) are common problems associated with the influx of in-migrant workers based on experience with other construction projects in Vietnam and elsewhere. Typically violence is associated with alcohol and drug abuse. According to the socio-economic baseline of the Project ESIA, local people in Long Son are recognised as being regular drinkers. In addition, as analysed in *Section 3.1.1*, the two most prevalent migration inflows to the work for the Project are expected to be from the Mekong River Delta and other provinces in the Southeast region. The heavy drinking culture of people in these regions, particularly those with low education level, is recognized nationally.

Criminality associated with in-migrants often includes:

- Stealing construction materials and equipment from the Project;
- Theft and robbery of money and property from local people; and

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- Forming criminal societies to control development opportunities and operate local businesses, often including the illegal collection of protection fees from local restaurants, hotels and stores.

The most concerning negative social dynamics revolve around drug abuse and transactional sex /and sex work related to the Project. According to the Bar Ria-Vung Tau PC Province report (2014)¹, Ba Ria- Vung Tau is among the provinces with the highest HIV/AIDS infection rates in Vietnam. The groups of people with the highest infection risk in the province in 2013 included drug abusers, sex workers and new in-migrants. As identified in this report, these groups are mainly concentrated in Vung Tau city (including Long Son commune), Tan Thanh district, Ba Ria city and Long Dien district that are in the Aol for PII.


Considering the above facts and the analysis of general impact magnitude and vulnerabilities of different host communities in *Table 3.7*, the impact of increased domestic violence, criminality and social ills is considered of **Major** and **Moderate** significance for Long Son commune and surrounding areas, respectively.

Increased Tension, Disputes, and Conflicts between Locals and Migrants

Experience with other analogous projects suggests that the most frequent cause of conflict between the locals and migrant workers is access to employment. Projects are often required to prioritise local recruitment, particularly for unskilled positions, by local authorities and communities. Employment of a large numbers of foreign workers, especially Chinese workers, for unskilled jobs is a deeply sensitive in Vietnam. In 2014, a significant riot against Chinese workers at a steel and port complex construction site in the central Vietnam was documented. During earlier consultation meetings at the Project, concerns over the in-migration of unskilled labourers were raised and the Project has been requested to prioritise local recruitment as much as possible in order to avoid a similar event by Long Son commune PC.

The cultural differences and inappropriate behaviours and customs of in-migrants may also result in tension and conflicts with the local people. However, because the main sources of in-migrants for this Project are expected from neighbouring provinces in Mekong delta and other southeastern provinces, there are expected to be limited cultural differences present. The conflicts frequently reported in other Projects include

¹ Securing Finance Plan for HIV/AIDS Control and Prevention Activities in Ba Ria –Vung tau Province in the period 2015 -2020 (2014).
(Accessed at Website of Vietnam Administration for HIV/AIDS control: <http://vaac.gov.vn/>)

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issues over uncontrolled litter disposal, noise surrounding the worker accommodations (i.e., camps, rented houses), and fighting due to heavy drinking and gambling.

The Project ESIA notes there may still be a few items of cultural heritage in Long Son Commune that could be damaged by the Project in-migrant workers due to their low awareness, although detailed studies have found no significant cultural heritage so far.

Considering the above facts and the analysis of the general impact magnitude and vulnerabilities of different host communities in *Table 3.7*, the impact of tension, disputes, and conflicts between locals and migrants is considered of **Major** and **Moderate** significance for Long Son commune and surrounding areas, respectively.


3.3.3 Cumulative Impacts

Cumulative impacts during the construction phase of the Project may result when construction activities interact with other existing project activities or when construction impacts are added to existing impacts from other projects.

According to the cumulative impact assessment in the Project ESIA (Chapter 20):

- There are a number of designated Industrial Parks throughout BR-VT Province. These include light and heavy industries, as well as power generation and oil and gas facilities. With the exception of the Long Son Industrial Park, all other Industrial Parks are located a considerable distance away from the Project Site. They are all accessed from different roads and the communities surrounding them are completely separate from those on Long Son. Therefore impacts generally encountered during construction are unlikely to be cumulative, except for additional construction Projects in the Long Son Industrial Park.
- There are a number of large-scale industries throughout the Province, including power plants, fertiliser plants, steel mills, gas production plants and other refineries. The majority of these are located such that construction phase impacts will not be cumulative, and it is also unlikely that any operational impacts will be cumulative.

Long Son Commune will undergo a steady process of industrialisation over the next 10 years, particularly with the development of the LSP Project, an ethane processing plant, refinery and shipyard. Considering the tentative development timeline of these projects as presented in *Table 3.8*, only the Ethane Processing Plant and Wonil

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Shipyards projects may potentially interact with the LSP Project during the construction phase in terms of cumulative PIIM impacts.

However, given the Ethane Processing Plant Project will not be located in Long Son Commune but in the surrounding areas where the overall PIIM risk is evaluated at a **Low to Moderate** level, the PIIM cumulative impacts regarding the six adverse aspects as discussed in *Section 3.3.2* above are considered mainly from interaction with Wonil Shipyard project which will be constructed to the north of the Project site. The workforce demands of those projects are unknown for further assessment.


Table 3.8 *Projects Likely to Interact with LSP Projects in terms of Cumulative PIIM Impact*

Project	Location	Capacity	Tentative Schedule
Ethane Processing Plant (The products will serve as inputs for the LSP Project).	Not yet decided but should be located near to Long Son island	> 100,000 tons ethane/year	The construction phase will be likely to overlap that of LSP Project.
Long Son refinery Complex	Long Son island	- TBD	Construction is delayed until 2020.
Wonil Shipyard	Long Son island	30,000 DWT	Construction: 2-3 years; Operation: 2018.

3.4 INFORMATION GAPS

At the time of writing the following information required for the PIIM risk and impact assessment was not available:

- Expected locations of worker accommodation and identities and numbers of contractors and subcontractors are still unknown. This in turn means that the percentages of workers to be lodged in camps and private rented houses or guesthouses, respectively is still unknown. As such, the assumed area of the PIIM impacts and influence used in this PIIM-MP is still uncertain.
- A detailed livelihood restoration baseline to further identify household livelihood resources using a sustainable livelihoods model, this will assist in identifying particularly vulnerable households, as well as in designing detailed livelihood restoration and community development measures, capable of resolving some of the issues raised in this PIIMP.
- A detailed health baseline is yet to be collected, as such, additional information regarding the specific health risks and impacts that may be exacerbated by the Project (e.g., TB levels, etc.) are still unknown and only broad secondary data

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and experience at analogous projects have been used to create a typology of the types and scales of health impacts and risks anticipated.

- An inventory of local workers and businesses has recently been collected and will be used to develop a detailed Local Hiring and Contracting Plan. At the time of writing, this document is not yet finalized and cannot be used to develop relevant sections of the PIIMP. This document may change some of the fundamental assumptions regarding numbers of migrant workers and their expected accommodation locations.
- The PIIM cumulative impact cannot be evaluated specifically due to lack of information on estimated number of construction workforce demand, availability of local recruitment policy and worker accommodation plans of the other projects identified as of high interaction potential (i.e., Wonil Shipyard, Ethane Processing Plant).


The PIIM assessment, stakeholder list and the PIIM measures within this PIIM-MP will be updated once more detailed location information is in place.

4 PROJECT-INDUCED IN-MIGRATION MANAGEMENT FRAMEWORK

4.1 RECOMMENDED PIIM MANAGEMENT APPROACHES


The approach for PIIM management is through provisions in the EPC contracts, the application of the Worker Code of Conduct and implementation of other relevant Project's ESMPs. The key strategies that are to be adopted by LSP, the EPCs and Subcontractors to reduce the potential risk of large-scale influx-related negative impacts include:

- **Local Recruitment and Workforce Management Plan:** Increasing local hiring is one of the more fundamental measures to minimise influx impacts, by reducing the need for in-migration of so many workers. It achieves this through prioritising hiring of local workers and developing the skills and capacity of local labour resources, particularly those in Long Son commune. This, in turn helps to mitigate all of the subsequent PII as identified in *Section 3.3.2* and *Section 3.3.3* above. Workforce demand should be planned and disclosed to local communities, as soon as possible and prior to commencement of each EPC package and each sub-package of the Project construction. The Project and all of its EPC contractors and subcontractors will be required to comply strictly with all national and local regulations on recruitment and management of migrant workers (i.e., working permit for foreign workers, registration of temporary residences of in-migrant workers

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with local police). In addition, they will be required to conform to the provisions of the Local Recruitment and Workforce Management Plan and other related plans including:

- Provisions in the EPC contracts;
 - Community Development Action Plan (Local Recruitment and Procurement Plan);
 - Livelihood Restoration Action Plan;
 - Security Management Plan; and
 - Workers' Accommodation Management Plan.
- **Worker Accommodation Management Plan (WAMP):** The EPC contractors and their sub-contractors will be required to provide accommodation (i.e., camps) to meet national and IFC standards for migrant workers (if relevant) through provisions in EPC contracts including the requirement to abide by the WAMP. Worker accommodation shall be permitted for construction by local authorities before commencement and accommodation E&S reviews and construction and operation plans shall be approved prior to commencing construction (or for already built properties prior to occupying) the accommodation facilities. Camp rules regarding security, worker code of conduct, food safety, environmental protection and sanitation will also be implemented following the Code of Conduct, the Worker Training Action Plan, the OHS Management Plan, the Security Management Plan and the Community Health and Safety Action Plan and this implementation will include regular reporting by the EPC and/or Subcontractor and regular monitoring and oversight by the Project team.
 - **Continuous Engagement with relevant Local Authorities and Communities:** This will be achieved as a part of the Project Stakeholder Engagement Plan and Communities Grievance Mechanism that will allow the Project and its contractors to respond to and address any issues raised regarding PIIM such as security, environment, etc. in a timely manner. An initial identification of the relevant stakeholder types is included in *Section 3.2* above.
 - **Support to Reduce PIIM Pressure on and Improve Capacity of Local Infrastructures:** This measure will be implemented through the Traffic Management Plan, Waste Management Plans and through specific provisions of the Community Development Action Plan (primarily aspects of the Local Infrastructure Improvement Programme) and the Livelihood Restoration Action Plan. These plans will be developed further through the collection of livelihood baseline data, through analysis of the data collected to create a more detailed and strategic set of action plans and by ground-truthing all new programs.

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- **Worker Training and Awareness Raising:** Inductions and on-going training during the construction phase should be provided for all workers regarding OHS requirements, ESSH requirements, the worker code of conduct, avoidance of domestic violence, criminality, social ills, minimisation of STIs, and awareness raising on traffic safety. Health risk prevention measures should be freely provided (e.g., regular health check, vaccination and condoms). All of these measures are included in the Project Worker Training Plan.
- **Community Training and Awareness Raising:** Training for targeted groups regarding community health and safety issues (e.g., STIs, traffic safety) due to PIIM will be provided through the framework of the Community Health Action Plan and Community Development Action Plan (Local Infrastructure Improvement Programme –Traffic Safety Awareness Programme).
- **Management of PIIM cumulative impacts:** The best way to manage the cumulative impacts associated with migration throughout the Long Son Commune is through a collaborative approach involving LSP, the local authorities and other project owners. This mechanism is described in the Project Stakeholder Engagement Plan.

4.2

PROPOSED MITIGATION MEASURES AND INTERVENTIONS

Mitigation measures and interventions for each negative impact and measures to maximise benefits from the positive impacts on the Project as discussed in *Section 3.3* are detailed in *Table 4.1* below.




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Table 4.1 **Mitigation, Enhancement and Management Measures**


Impact	Significance		Mitigation, Enhancement and Management Measures	Reference	Responsibility	Timeframe
	Long Son Commune	Surrounding Areas				
Negative Impacts						
All negative impacts, including cumulative impacts as listed below.	-	-	<ul style="list-style-type: none"> • Prioritise local recruitment, particularly unskilled and semi-skilled jobs for Long Son community members. EPC contractors and their subcontractors are required to disclose their long term recruitment plan to the Long Son community as soon as possible, so local people can have enough time for skill preparation. • Avoid employing foreign workers for unskilled or simple skilled jobs. 	<ul style="list-style-type: none"> • EPC contracts • Community Development Action Plan (Local Recruitment and Procurement Plan) 	<ul style="list-style-type: none"> • Project Sponsor and EPC Contractors 	Prior to and during construction phase
			<ul style="list-style-type: none"> • Improve capacity of Long Son community in livelihood restoration programs through provision of school completion programs, vocational training programs, apprenticeship programs and local business development programs etc. 	<ul style="list-style-type: none"> • Community Development Action Plan (Second Priority Livelihood Restoration Programme) • Livelihood Restoration Action Plan (Local Micro, Small and Medium Business Development Programme) 	<ul style="list-style-type: none"> • Project Sponsor 	During construction phase
			<ul style="list-style-type: none"> • Ensure compliance with national and local regulations on recruitment and management of in-migrant workers (i.e., working permit for foreign workers, registration of temporary residences of in-migrant workers with local police). 	<ul style="list-style-type: none"> • Security Management Plan • Workers' Accommodation Management Plan 	<ul style="list-style-type: none"> • Project Sponsor and EPC Contractors 	

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Impact	Significance		Mitigation, Enhancement and Management Measures	Reference	Responsibility	Timeframe
	Long Son Commune	Surrounding Areas				
Increased pressure on local public infrastructures and services	Major	Minor	<ul style="list-style-type: none"> Consider contributing to repairs and upgrades for local public infrastructure and service such as roads, solid waste management, and local health service in Long Son commune. 	<ul style="list-style-type: none"> Community Development Action Plan (Local Infrastructure Improvement Programme) Community Health Management Plan 	<ul style="list-style-type: none"> Project Sponsor and EPC Contractors 	During the construction phase
			<ul style="list-style-type: none"> Develop and communicate the provisions favouring local workers to avoid encouraging migrant workers and restrictions for those bringing their family members to the Project and host communities (i.e., workers will be housed but not their families, local employment is preferred). 	<ul style="list-style-type: none"> EPC Contracts Labour contracts Workers' Accommodation Management Plan 	<ul style="list-style-type: none"> Project Sponsor and EPC Contractors 	Prior to construction commencement
			<ul style="list-style-type: none"> Work closely with the provincial/ city/ commune authorities in order to ensure sufficient supply of water, electricity and waste collection service for the Project's activities in Long Son Commune during the construction phase without hindering the current supplies for local community in the commune. 	<ul style="list-style-type: none"> Stakeholder Engagement Plan Community Development Action Plan (Local Infrastructure Improvement Programme) Waste Management Plans (Hazardous Waste and Non-Hazardous Waste) Meeting notes, correspondence letters between the Project and the authorities regarding this issue. 	<ul style="list-style-type: none"> Project Sponsor and EPC Contractors 	During the construction phase

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Impact	Significance		Mitigation, Enhancement and Management Measures	Reference	Responsibility	Timeframe
	Long Son Commune	Surrounding Areas				
Food, commodities and service inflation	Minor	Minor	<ul style="list-style-type: none"> This impact is Minor and temporary during the construction time. The EPC Contractors and subcontractors should offer dining service and canteen within worker camps, especially those located within Long Son Commune. Local suppliers of Food, commodities and service should be prioritised. 	<ul style="list-style-type: none"> Workers' Accommodation Management Plan Community Development Action Plan (Local Recruitment and Procurement Plan) Livelihood Restoration Action Plan (Local Micro, Small and Medium Business Development Program). 	<ul style="list-style-type: none"> Project Sponsor and EPC Contractors 	At the design and construction stages of worker camps
Increase in criminality and social ills (i.e. alcoholism, drug abuse, prostitution, gambling, domestic violence)	Major	Moderate	<ul style="list-style-type: none"> EPC contractors and subcontractors are encouraged to provide accommodation (worker camps) for their migrant workers; Worker camp rules should be established, strictly implemented and frequently monitored; Recreational activities should be provided to workers, especially to non-local workers residing in worker camps. 	<ul style="list-style-type: none"> Workers' Accommodation Management Plan 	<ul style="list-style-type: none"> Project Sponsor and EPC Contractors EPC Contractors EPC Contractors 	At the design and construction stages of worker camps
			<ul style="list-style-type: none"> Provide training on Code of Conduct and Health Awareness to all workers prior to commencement of their work on site, including avoiding/ minimising risks associated with alcoholism, drug abuse, prostitution, gambling. This will be part of induction training and ongoing awareness activities. 	<ul style="list-style-type: none"> Worker Training Plan Community Health and Safety Plan Code of Conduct 	<ul style="list-style-type: none"> Project Sponsor and EPC Contractors 	During the construction phase

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Impact	Significance		Mitigation, Enhancement and Management Measures	Reference	Responsibility	Timeframe
	Long Son Commune	Surrounding Areas				
			<ul style="list-style-type: none"> Local people can submit their grievances on social ills caused by the Project's workers through the Community Grievance Mechanism of the Project. Work closely with and maintain regular contact with district/ commune level authorities (i.e., weekly meeting, phone calls), particularly the local Police on security issues related migrant workers and worker camps. 	<ul style="list-style-type: none"> Community Grievance Management Plan Stakeholder Engagement Plan Security Management Plan 	<ul style="list-style-type: none"> Project Sponsor and EPC Contractors Project Sponsor and EPC Contractors 	
Increased risk of traffic safety	Major	Moderate	<ul style="list-style-type: none"> Provide traffic safety training to workers, especially drivers, of the Project, EPC Contractors and local communities. Require subcontractors and suppliers to provide such training to their drivers. Refresher training should be provided on a periodically basic during the construction phase. Conduct basic traffic awareness programmes within primary and secondary schools within Long Son commune. These will be done a yearly basis throughout the construction phase and focus on delivering children the skills required to be safe when in close proximity to roads, when crossing roads or when travelling in vehicles. Collaborate with local authorities, particularly local police and local Department of Transportation (1) to 	<ul style="list-style-type: none"> Worker Training Plan Community Health Action Plan Traffic Management Plan (Road); Community Development Action Plan (Local Infrastructure Improvement Programme – Section 3.5. Traffic Safety Awareness Programme) Traffic Management Plan (Road); 	<ul style="list-style-type: none"> Project Sponsor and EPC Contractors Project Sponsor Project Sponsor and EPC contractors 	<p>Prior to the time that the workers commence their work on site.</p> <p>During construction phase</p> <p>During construction phase</p>

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Impact	Significance		Mitigation, Enhancement and Management Measures	Reference	Responsibility	Timeframe
	Long Son Commune	Surrounding Areas				
			<ul style="list-style-type: none"> increase traffic inspection at the roads from the Project site to worker camps and (2) providing traffic regulation signals and/ or personnel when there is a need, (3) develop traffic regulation plan during plan during specific peak times such as tourism peak times (i.e., summer, weekends) or festival days of Nha Lon Long Son (4) establish bus routes from Tan Thanh district, Ba Ria City and Vung Vatu City to Long Son that can be used by the Project workers. Encourage EPC Contractors/ subcontractors to provide shuttle buses for workers; 	<ul style="list-style-type: none"> Community Development Action Plan (Local Infrastructure Improvement Programme – Section 3.4 – Public Transport Programme) 		
Increased tension, disputes, and conflicts between locals and migrants concerning community safety and security, culture preservation, environment, employment opportunities, and other project benefits	Major	Moderate	<ul style="list-style-type: none"> Provide training on Code of Conduct (and zero tolerance stance) to all workers prior to commencement of their work on site. This will be part of induction training. 	<ul style="list-style-type: none"> Worker Training Plan Security Management Plan Code of Conduct 	<ul style="list-style-type: none"> Project Sponsor and EPC Contractors 	Prior to the time that the workers commence their work on site.
			<ul style="list-style-type: none"> EPC contractors and subcontractors are encouraged to provide accommodation (worker camps) for their migrant workers; 	<ul style="list-style-type: none"> EPC contracts Workers' Accommodation Management Plan 	<ul style="list-style-type: none"> Project Sponsor and EPC Contractors 	During the construction phase
			<ul style="list-style-type: none"> Worker camp rules should be established, strictly implemented and frequently monitored. 			
			<ul style="list-style-type: none"> Local people can submit their grievances relating to community safety and security to the Project. 	<ul style="list-style-type: none"> Community Grievance Management Plan 	<ul style="list-style-type: none"> Project Sponsor and EPC contractors 	During the construction phase
			<ul style="list-style-type: none"> Work closely and contact regularly with district/ commune level authorities (i.e., weekly meeting, 	<ul style="list-style-type: none"> Stakeholder Engagement Plan 	<ul style="list-style-type: none"> Project Sponsor and EPC contractors 	During the construction phase

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Impact	Significance		Mitigation, Enhancement and Management Measures	Reference	Responsibility	Timeframe
	Long Son Commune	Surrounding Areas				
Proliferation of communicable diseases, particularly sexually transmitted infections (STIs) and HIV/AIDS	Major	Moderate	phone calls), particularly the local Police on security issues related migrant workers and worker camps.	• Security Management Plan		
			<ul style="list-style-type: none"> Set up a health care centre for the Project to provide daily healthcare and emergency treatment for workers during the construction phase. Health checks should be provided to all workers who will be working on site prior to commencing the work and every year during the construction phase. Consider free provision of measures preventing infection of STIs (i.e., provision of free condoms with awareness and use training). 	<ul style="list-style-type: none"> Worker Occupational Health and Safety Management Plan 	• Project Sponsor and EPC Contractors	Prior to and during the construction phase
			<ul style="list-style-type: none"> Training on public health, including STIs, will be conducted to all construction workers prior to the moving to the construction site. 	<ul style="list-style-type: none"> Community Health Action Plan Worker Training Plan 	• Project Sponsor and EPC contractors	Prior to the time that the workers commence their work on site.
			<ul style="list-style-type: none"> Cooperate with local authorities and clinics/ hospitals to propagandise / to provide training on public health and sanitary protection, including HIV/STIs awareness training to local community. Strengthen capacity and improve infrastructure of the local health service of Long Son Commune in partnership with local authorities. 	<ul style="list-style-type: none"> Community Health Action Plan 	• Project Sponsor and EPC contractors	During construction phase
Compromising local master planning and townscape due to temporary settlement of in-migrant workers (i.e., establishment of worker camps and rented houses)	Moderate	Moderate	<ul style="list-style-type: none"> Develop provisions in the contracts with the EPC Contractors to ensure a clearance for all worker accommodation facilities associated with the Project will be implemented by the camps' management. 	<ul style="list-style-type: none"> EPC Contracts Worker Accommodation Management Plan 	• Project Sponsor and EPC contractors	Prior to the construction phase

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Impact	Significance		Mitigation, Enhancement and Management Measures	Reference	Responsibility	Timeframe
	Long Son Commune	Surrounding Areas				
which normally do not follow the local construction master planning)			<ul style="list-style-type: none"> Ensure worker accommodation design and construction to meet national and IFC standards. 	<ul style="list-style-type: none"> Construction permits of worker camps 	<ul style="list-style-type: none"> EPC Contractors 	During construction phase
			<ul style="list-style-type: none"> Ensure construction of all worker accommodation are permitted by local authorities. Documentation of construction permit status of all worker accommodations of EPC contractors and their subcontractors (for temporary or permanent existence of the structures) 			
			<ul style="list-style-type: none"> Ensure all worker accommodations that are temporarily permitted to be cleared before the EPC Contractors and each of their contractors leaving the localities. 	<ul style="list-style-type: none"> Worker Accommodation Management Plan Construction permits of worker camps 	<ul style="list-style-type: none"> Project Sponsor and EPC Contractors 	Before each EPC contractor/ subcontractors complete work and leave the site.
Cumulative Impacts	-	-	<ul style="list-style-type: none"> Cooperate with the local authorities and other project owners to manage the cumulative in-migration impacts. Regular meetings and frequent contact among these parties should be held to raise and address the issues related to cumulative impacts, including PIIM cumulative impacts. 	<ul style="list-style-type: none"> Stakeholder Engagement Plan 	<ul style="list-style-type: none"> Project Sponsor Other potential Project Owners; Relevant local authorities 	During construction phase
Positive Impacts						
The Project will generate business development opportunities from within its supply chain	Positive	Positive	<ul style="list-style-type: none"> Provide business development training to local people, especially the Project Affected Persons. 	<ul style="list-style-type: none"> Livelihood Restoration Action Plan (Vocational Training Programme) 	Project Sponsor	During the construction phase
				<ul style="list-style-type: none"> Livelihood Restoration Action Plan (Micro, Small 		During the construction phase

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Impact	Significance		Mitigation, Enhancement and Management Measures	Reference	Responsibility	Timeframe
	Long Son Commune	Surrounding Areas				
			<ul style="list-style-type: none"> Collaborate with social banks to provide opportunities for local people to have credits for their business development. Maximise using local suppliers. 	<ul style="list-style-type: none"> and Medium Business Development Programme) Community Development Action Plan (Local Recruitment and Procurement Plan) 		Prior to and during the construction phase
The Project will produce employment opportunity though it is expected to be minimal	Positive	Positive	<ul style="list-style-type: none"> Provide opportunities to local people, especially the PAPs to be recruited to the Project. 	<ul style="list-style-type: none"> Livelihood Restoration Action Plan (Vocational Training Programme) Community Development Action Plan (Local Recruitment and Procurement Plan) 	Project Sponsor	Prior to and during the construction phase
Increase demand for food and agriculture/aquaculture products leads to agriculture/aquaculture production improvement in the areas	Positive	Positive	<ul style="list-style-type: none"> Maximise using local suppliers. Give opportunities for local farmers to maintain their land/river based livelihoods if they wish to. 	<ul style="list-style-type: none"> Community Development Action Plan (Local Recruitment and Procurement Plan) Livelihood Restoration Action Plan (Land Based Livelihoods Continuation Programme) 	<ul style="list-style-type: none"> Project Sponsor and EPC Contractors Project Sponsor 	<ul style="list-style-type: none"> Prior to and during the construction phase Prior to and during the construction phase
State equity will be taken at the provincial government level as well as national thereby increasing	Positive	Positive	<ul style="list-style-type: none"> Strengthen revenue management and fiscal accountability of local government so that revenues streams are more effectively used to provide infrastructure and services where they are needed. 	-	<ul style="list-style-type: none"> Project Sponsor 	Prior to the construction phase

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Impact	Significance		Mitigation, Enhancement and Management Measures	Reference	Responsibility	Timeframe
	Long Son Commune	Surrounding Areas				
revenue at the local and regional levels						
Improved local training and skills development opportunities	Positive	Positive	<ul style="list-style-type: none"> Provide education and skills training to local people, especially the PAPs to improve their education and skill levels to be able to look for new and better jobs. 	<ul style="list-style-type: none"> Livelihood Restoration Action Plan (Vocational Training Programme) Community Development Action Plan (School Completion Programme) 	<ul style="list-style-type: none"> Project Sponsor and EPC Contractors Project Sponsor 	During the construction phase
Improved access through development of road systems	Positive	Positive	<ul style="list-style-type: none"> Maintain and improve local road systems during the construction phase. 	Local infrastructure Improvement Plan		Prior to the construction phase


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5

MONITORING, EVALUATION, REPORTING AND REVISION

As discussed in *Section 4.2*, the PIIM impacts will be mitigated, enhanced and managed through various measures which are mostly part of a number of other Project ESMPs that have been developed such as WAMP, WOHSMP, SMP, SEP, CDAP, CHAP, LRP, WMP and TMP (refer to *Section 2.3* and *Table 4.1*). Therefore, specific monitoring requirements of these plans, particularly the Key Performance Indicators (KPI), are also applicable for the monitoring and evaluation of this PIIM-MP implementation. Particular attention should be paid to the following KPIs:

- Level of effort of LSP, EPC contractors and subcontractors in prioritizing local recruitment and local procurement (i.e., early disclosure of recruitment plan, available of local recruitment policy, number of local workers with times, number of local suppliers used);
- Level of effort of LSP in improving capacity of local community in livelihood restoration and job seeking;
- Level of collaborative efforts made by local authorities, communities and other local project owners made by LSP in addressing cumulative PIIM impacts (i.e., meetings, discussions, follow-up actions);
- Number and quality of training and disclosure sessions including public consultation and stakeholder engagement with local communities and authorities regarding PIIM issues;
- Comparative numbers of local and migrant workers employed by LSP, EPC contractors and their subcontractors in unskilled, semi-skilled and skilled positions over time;
- Percentage legal compliance status of migrant workers such as working permit (for foreign worker) and temporarily residence registration with local Police;
- Status of worker accommodation management, including location of camps, approval of E&S reviews and accommodation construction and management plans, availability of construction permit, environmental and security performance, clearance of worker camps, etc.);
- Numbers and resolution status of grievances and concerns from local community and authorities related to PIIM issues including:
 - Number of related grievances and concerns over time; and
 - Whether these grievances and concerns are received, addressed timely and sufficiently.
- Workers health and safety status over time (i.e., record of worker health check as legally required, workers health status, particularly new cases of endemic illness,

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dengue, STIs and other communicable and non-communicable diseases identified as potential issues from the detailed health baseline study)

- Community health and safety status with time (i.e., number of traffic accidents and related fatalities/ injuries due to collision with the Project workers' vehicles, new cases of STIs in the local communities);

Given this PIIM-MP relies on the KPIs of a number of other related Project ESMPs as listed above, these KPIs are subject to different monitoring, evaluation and reporting requirements including frequencies of each ESMP. LSP is required to integrate data of these KPIs to produce internal monitoring reports of PIIM-MP implementation on at least a *quarterly* basis.

Periodic independent (external) evaluation of the PIIM-MP activities should be carried out by the Project to evaluate the success of the PIIM Management Strategy and revise it as required. A third party will be engaged to undertake this at least every six months and will look at the above listed indicators.

6 ROLES AND RESPONSIBILITIES


The overall responsibility for PIIM-MP approval and management in relation to the Project lies with the LSP Board of Directors. The general coordination and monitoring of the PIIM-MP implementation is the responsibility of the EPC Interface Lead because the vast majority of the actions in the PIIM-MP correspond to joint responsibilities between LSP and the EPCs. The EPC Interface Lead will be supported in this role by the Health, Safety, Security and Environmental (HSSE) Manager and team in the HSSE Department, in collaboration with the EPC HR and HSSE representatives.

Table 6.1 Roles and Responsibilities

Departments	Position	Roles and Responsibilities
General Director	CSR Manager	Overall PIIM -MP approval and management In charge of all Community Development and Stakeholder Engagement Actions required under the Plan
	EPC Interface Lead	In charge of coordination of PIIM-MP implementation
	Community Relation Section (CRS) Manager	In charge of monitoring and evaluation of PIIM-MP implementation

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Departments	Position	Roles and Responsibilities
Health, Safety, Security and Environmental (HSSE) Department	Community Relation Officers (SEP Related Activities, CDAP/LRP activities)	Be responsible for implementation and reporting to the CSR Manager all stakeholder engagement activities, CDAP, LRP, CHAP related to addressing PIIM issues.
	CSR Planning Section Officer	Responsibility for actions in the CDAP, LRP, CHAP etc. as assigned.
	HSSE Manager	Oversight of all HSSE Monitoring and oversight activities
	HSSE Monitoring officer	Integration of monitoring data relevant to PIIM implementation from other officers in the HSSE Department as listed below and provide report to CRS Manager.
	Emergency Response Officer and Medical Officer	Implement health and safety measures and support to provide statistic data related to worker health and safety status that may related to PIIM (i.e., traffic accidents, STIs)
	HSSE Training Officer	Organise trainings for workers, including code of conduct, traffic safety, etc. and provide report on training activities
	Security Officer	Implement security measures and support to provide report on security issues related to PIIM.

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BUDGET

Given mitigation measures proposed in this PIIM- MP will be indirectly implemented through a variety of other ESMPs, which have been developed (refer to *Section 2.3* and *Table 4.1*). Specific budgets for implementation of these plans have been arranged. As such, the budget needs for this PIIM–MP is generally related to the effort of internal monitoring, reporting and third party evaluation as well as the plan revision if necessarily. A specific figure for the budget of this PIIM-MP therefore is not available at the time of developing this plan.