



REPORT ON POST – EIA SURVEY TRIPS

**ACTIVITY CODE: INVEN-8
“Improving the monitoring of Environmental Impact Assessment Reports”**

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I. OBJECTIVES OF THE SURVEY

- To review at the DONRE level:
 - Organization in DONREs related to EIA and Post EIA
 - EIA process at provinces
 - Their Opinions upon EIA and Post EIA work and performance in Vietnam and/or in the provincial level.
- To check the data requested in the questionnaire sending to Monroe

II. SURVEY IMPLEMENTATION

- Prepare questionnaire (in English and Vietnamese) and sending to DONREs
- Organize field survey team:
 - MONRE staff
 - Mr. Tran Dong Phong for the Northern provinces
 - Mr. Do Thanh Bai for Central and Southern provinces
- Select the DONREs to be visited (8/63):
 - Lang Son
 - Quang Ninh (including TKV)
 - Hai Phong
 - Da Nang
 - Khanh Hoa
 - Long An
 - Binh Duong and
 - HCMC
- DONRE representative:
 - Directors
 - EIA division staff
 - Pollution Control division staff

III. RESULTS FROM THE SURVEY

1. Some main issues dealing with EIA work in Vietnam

Vietnam has had a long history of EIA work implementation. For more 20 years, EIA work of Vietnam has been improved much regarding quantity and quality.

Main important achievements of EIA work in Vietnam:

- To develop EIAs, in Vietnam, the following technical guidelines so far have been used as technical base: UNEP, WWHO, WB, and ADB, etc.
- MONRE has developed themselves the following technical guidelines for concrete industrial and develop projects (in Vietnamese and it can be accessed from the website of MONRE):
 - *Industrial parks development*
 - *Urban development*
 - *Transportation system*
 - *Beer and soft drink*
 - *Thermo power*
 - *Textile and dying*
 - *Cement*
 - *Stone and clay exploitation*
 - *Hydro power*
 - *Pulp and paper*
 - *Port development*
 - *Basic chemicals*
 - *Landfills for household wastes and wastes from oil and gas industry*
 - *Fuel stores*
 - *Steel*
 - *Open Mining*
 - *Underground mining*
 - *Rear Earth mining and processing*
 - *Boxide projects*
 - *Forestry*
 - *Tourism areas development*
 - *Hazardous waste incinerators*
- Basic procedure for EIAs development in Vietnam is: Screening, Scoping, EIA reports composing and Review and approve (including monitoring programs). But actually due to many reasons, some of these steps have been used not as international technical guidelines.
- MONRE developed a list of 25 types of development projects that should have to submit EIAs to MONRE. The other types have to have other document as “Registration of environmental requirement meeting” to submit to related environmental authorities. These documents (EIAs and Registration of environmental requirement meeting) have

to be reviewed and approved by environmental authorities before being constructed and operated.

- Activities of reviewing and approving EIAs and Registration of environmental requirement meeting documents have been done by EIA committees that consisted of people from environmental authorities related experts (different from central and provincial levels)
- In these documents (EIAs and Registration of environmental requirement meeting), project owners have to be asked for conducting appropriate monitoring programs (for the project types and project sites)
- In the period from 1994 to 2004, about 5800 EIA reports were reviewed in the whole country that consisted of: 4080 EIAs for new projects and about 1730 EIAs for existing and operating projects. Among of these, about 800 EIAs reports have been reviewed at the central level.
- At the same time (from 1994 to 2004), about 26000 documents (EIAs and Registration of environmental requirement meeting) were reviewed at the provincial levels
- From 2011 to 2014, at central level (MONRE), 470 EIAs have been reviewed, and average, about 125-150 EIA reports were reviewed.
- Since 2011, at provincial levels, about 5600 EIAs and 1900 Plans for environmental protection documents have been reviewed and approved (about 33 EIAs document for province in average).
- As statistic, only about 95 EIAs reports were not approved by MONRE' Committees; almost EIAs reports need to be revised and completed for being approved.
- As statistic, since 2005 to now, near 100 projects as results of EIA reviewing, have to change project locations and / or to be rejected due to not meeting environmental protection.
- In the period from 2006 to now, many EIA documents (including SEAs, EIAs and Registration of environmental requirement meeting/Commitment to environmental protection) have been managed, reviewed and approved by related ministries and or provincial/regional industrial and/or economic zones management boards).The documents of "Registration of environmental requirement meeting/ Commitment to environmental protection" since then have been authorized to district people committees to manage at the district levels.

- According to Law of environmental Protection 2005, there are 04 of levels of EIA documents:
 - o *For Strategy and Area/Sector Development Planning: SEAs*
 - o *EIAs for concrete projects*
 - o *Commitment to Environmental protection and Plans for environmental protection*

- The following table give information of human capacity in the 63 provinces (numbers of staff working in the DONREs)

Table 1; Human resources of DONRE

No.	DONREs	Number of staff working for environmental sections in the DONRE	Number of staff working for EIAs, SEAs divisions in the DONRE
1	An Giang	18	5
2	Ba Ria-Vung Tau	28	8
3	Bac Lieu	10	5
4	Bac Giang	12	3
5	Bac Kan	9	6
6	Bac Ninh	20	6
7	Ben Tre	18	6
8	Binh Duong	33	11
9	Binh Dinh	17	5
10	Binh Phuoc	18	4
11	Binh Thuan	18	5
12	Ca Mau	12	6
13	Cao Bang	13	6
14	Can Tho	18	4
15	Da Nang	18	4
16	Dac Lak	12	4
17	Dak Nong	12	4
18	Dong Nai	24	10

No.	DONREs	Number of staff working for environmental sections in the DONRE	Number of staff working for EIAs, SEAs divisions in the DONRE
19	Dong Thap	15	5
20	Dien Bien	15	3
21	Gia Lai	15	6
22	Ha Giang	9	4
23	Ha Nam	16	
24	Ha Noi	36	7
25	Ha Tinh	15	6
26	Hai Duong	18	4
27	Hai Phong	15	5
28	Hau Giang	15	4
29	HCMC	111	12
30	Hung Yen	14	7
31	Hoa Binh	21	5
32	Khanh Hoa	18	5
33	Kien Giang	14	5
34	Kon Tum		7
35	Lai Chau	18	4
36	Lam Dong	12	7
37	Lao Cai	13	4
38	Lạng Sơn	10	3
39	Long An	16	5
40	Nam Dinh	11	3
41	Nghe An	40	9
42	Ninh Binh	28	5
43	Ninh Thuan	13	4
44	Phu Tho	16	5
45	Phu Yen	12	7

No.	DONREs	Number of staff working for environmental sections in the DONRE	Number of staff working for EIAs, SEAs divisions in the DONRE
46	Quang Binh	15	3
47	Quang Nam	12	3
48	Quang Ngai	16	4
49	Quang Ninh	27	6
50	Quang Tri	14	7
51	Son La	12	2
52	Soc Trang	17	4
53	Tay Ninh	13	4
54	Thai Binh	13	4
55	Thai Nguyen	20	5
56	Thanh Hoa	16	3
57	Thua Thien Hue	20	7
58	Tien Giang	13	5
59	Tra Vinh	14	6
60	Tuyen Quang	8	4
61	Vinh Long	16	4
62	Vinh Phuc	25	5
63	Yen Bai	9	4
	TOTAL	1126	323

Table 2: Data of SEAs and EIAs work at the ministerial levels

TT	Ministry	Number of staff working in the environmental sections	Number of SEAs reports		Number of EIAs reports	
			Approved	Reported	Submitted	Approved
1.	MOIT	18	7	-	1	1

2.	MOT	13	0	0	72	65
3.	MARD	12	5	1	24	19
4.	Ministry of Communication	1	0	0	3	2
5.	MOC	10	0	0	1	0
6.	MOH	12	0	0	11	7

The survey at the selected provinces showed that, in general at the provincial level, EIA work is always considered as preventive measures to protect the environment and so this work so far has been quite serious implemented:

- There is always division in charge of EIA work and DONRE and Environment Branch directors manage this work directly
- The number of project to be requested to submit EIA in general is too much compare with human capability of the DONREs
- The professional experts to be invited for joining review and appraise EIA reports are from outside DONRE, mainly from Universities and or institutes
- In some provinces, for example in HCMC, almost industrial and manufacturing projects are reviewed and appraised by the Industrial parks management board; and DONREs reviews and appraises projects in the non-industrial other fields (tourism, urban construction, forestry...). But for many DONREs they do all. In the first group, normally, DONREs do not invite experts because they can themselves cover technical issues such as wastewater or dust control... For the second groups, (Long An, Binh Duong) DONREs request experts from universities and institutes to join. In the second case, in general there is difficult dealing with expert invitation costs.

2. Some main issues dealing with POST-EIA work in Vietnam

2.1. For post EIA work, in general, in the provincial level, this work have been done by DONREs in a such a way of following all the items of Decree, such as:

When receiving the request from the project owners, a review team will be set up, team composition is almost like EIA review team, but smaller

The duty of post EIA team normally is:

- To check EIA reports that so far have been approved
- To List the environmental requirements (environmental treatment facilities) that project have to construct or develop as written in the EIA reports
- To check the existence and real operation of these facilities in the sites
- To commend on these facilities after observation (existence and/or operation)
- If there is no special (too much different with the written things in EIA, facilities not work at the checking moment, treatment of wastes is too low efficient...), these facilities will be certified by DONREs with a name of “Certification of environmental treatment facilities”, and this documents are not reflected anything with environment quality and/or environmental impacts from the projects at the sites. The certificates are issued by DONRE in some days after being checked.
- In case there are many important things that not follow or not like as written in EIA reports, the certification could be delayed and/or refused until some correction done by project owners will be submitted again to DONREs and will be again checked

2.2. The practical results of post EIA work in the visited DONREs

- This work could be allocated at different division of DONREs depending situation of human capacity as well as on the local requirement
- The number of EIA reports to be checked for environmental facilities certification different between DONRE and DONRE, but in general smaller compared with the number of approved EIA reports in the province. This is because two reasons:
 - DONRE not receive request from project owners (may be they do not need these documents)
 - Number of people in charge of this work at almost DONREs is too small, not enough for completing the work requirement.
- The procedure done by DONREs is almost the same between DONRE and DONRE, and in general ratio of project’s environmental facilities being certified and not certified yet (when being checked at the site by post EIA checking team) is the same between DONRE and DONRE, and near 100%
- In general, DONREs and post EIA checking team (at the provincial levels) have not concerned much about environmental impacts of the environmental facilities existences and/or operation. The treatment effectiveness of facilities in general is checked by

compared with standard of recipient environment. The data are submitted by project owners to DONRE, but in some cases DONREs could decide to take other environmental samples to check again, but the number of samples to be taken for being re-checked is limited because financial limitation

- The quality of analytical data related to treatment effectiveness is always problematic and not sufficiently reliable
- DONRE's post EIA checking team is not request project owners to carry out monitoring the local environment quality (air, water or soil). These requirements for environment periodically monitoring work normally done "Pollution Control Division" and it is based requested by EIA (every 3 months, 6 months or yearly...). These two works almost not related each other; it means that the certificate documents seem not closely to environmental quality monitoring issues.
- In fact, a big number of environmental facilities are checked and certified after a long time of being constructed and operated (or existed). The project owners have requested to get certificates not for environmental protection objectives, but for protecting their benefits themselves.
- There is no correlation between agencies who doing environmental quality at the site, project owners and environmental management agencies. It may need to create a new way to connect each other for aiming to the target: quality of the environment is protected in sustainable way

3. Remarks from DONREs on EIA and post EIA work at provincial levels:

3.1. On EIA work:

- Too much work and very heavy work for EIA reports making (time, financial resources, human resources...), but the real effect for environmental protection (prevention) is not fully reached as expected.
- EIA documents are not predictive and theoretical calculation, but in the practice, many things changes and much more complicated when projects being implemented.
- The capacity of EIA consultant agencies are limited, so quality of EIA reports not meeting requirements regarding environment protection; many EIA report have many item and/or information that are not necessary.

- The requirement for environmental and social monitoring work when projects being implemented have been developed not appropriated with the local natural and social condition of the project sites, and then not contributes to the environment preservation at this site.
- Capacity of DONRE for review and appraise EIA reports still limited, the financial resources for inviting experts very limited, it makes EIA report approval process not so qualified.

3.2. Analysis on post EIA data

- POST – EIA work in Vietnam is just carried out in 10 years now.
- The following shows some remarks from POST EIA work survey made by local experts:

As requested by Environmental Law, the project owners have to send application and related documents to request MONRE to verify and to certify the constructed environmental facilities that were requested in the EIA reports (POST EIA VERIFICATION AND CERTIFICATION).

The number of these activities is counted since 2011 are:

- In 2011, only 28 projects
- In 2012: 60 projects
- 2013: 70 projects
- To Sep/2014: 65 projects

Total 233 facilities have been verified, but only 134 facilities have been certified as completion of construction and operation. Beside of that, MONRE has verified 34 hydropower projects up to now for being certified. In fact not any other ministries have carried out this work.

At the provincial level, about 1500 projects have been verified and certified by DONREs. Normally, in principle, only facility that being revived and certified will be allowed to officially operate.

With this verification and certification, many projects have started official operation with high responsibility of project owners in terms of environmental protection performance.

In fact, there are in the practice, there are many development projects that been constructed and even operated but without EIAs, and many projects that are being operated without verification and certification.

According to the EIA department of MONRE, in many cases there have not been closely cooperation between project owners and EIA consultation companies and/or agencies, and as results, the contents of EIAs in that cases are not the same with project activities, and the activities for environmental protection of the project proposed in the EIA reports have not been implemented.

The following tables give picture of POST-EIA work implementation at local level (verification and certification after EIA) basing on data provided by DONREs:

Table 3: Number of EIA, EIA approved, and numbers of facilities requested to be verified and certified and the related rates of the provinces:

No.	DONRE	EIA reports submitted	EIA reports approved	Number of facilities requested to be verified	Number of facilities were verified and certified	% facilities requested to be verified compared with EIA numbers	% facilities were certified compared with requested
1.	An Giang	113	69	40	26	35	65
2.	Ba Ria-Vung Tau	-	-	-	-	NA	NA
3	Bac Lieu	38	37	10	3	26	30
4.	Bac Giang	91	76	59	23	65	39
5.	Bac Kan	40	39	27	19	67	70
6.	Bac Ninh	279	273	73	66	26	90
7.	Ben Tre	88	79	21	19	24	90
8.	Binh Duong	297	266	127	121	43	95
9.	Binh Dinh	85	78	21	18	25	86
10	Binh Phuoc	127	124	26	15	20	58
11	Binh Thuan	125	78	35	12	28	34
12.	Ca Mau	71	66	8	4	11	50
13.	Can Tho	48	48	43	41	89	95
14.	Cao Bang	75	70	16	2	21	12

15.	Da Nang	147	-	82	-	56	NA
16.	Dac Lak	102	89	22	10	21	45
17.	Dak Nong	69	57	2	1	3	50
18.	Dong Nai	-	-	-	-	NA	NA
19.	Dong Thap	94	76	78	55	83	70
20.	Dien Bien	41	30	2	0	5	0
21.	Gia Lai	52	28	13	13	25	100
22.	Ha Giang	41	31	0	0	0	
23.	Ha Nam	124	112	12	10	10	83
24.	Ha Noi	575	524	134	85	23	63
25.	Ha Tinh	191	143	4	2	2	50
26.	Hai Duong	141	128	71	54	50	76
27.	Hai Phong	118	88	22	18	19	82
28.	Hau Giang	46	34	23	16	50	69
29.	Hoa Binh	82	80	8	5	10	62
30.	Hung Yen	118	114	33	26	28	79
31.	Khanh Hoa	129	121	14	11	11	78
32.	Kien Giang	129	98	21	11	16	52
33.	Kon Tum	104	90	11	8	10	73
34.	Lai Chau	-	-	-	-	NA	NA

35.	Lang Son	58	45	7	4	12	57
36.	Lao Cai	106	83	19	17	18	89
37.	Lam Dong	138	113	7	7	5	100
38.	Long An	171	154	143	50	84	35
39.	Nam Dinh	100	100	9	9	9	100
40.	Nghe An	261	236	97	8	37	8
41.	Ninh Binh	60	59	16	12	27	75
42.	Ninh Thuan	52	41	9	5	17	55
43.	Phu Tho	114	92	36	34	31	94
44.	Phu Yen	71	65	18	16	25	89
45.	Quang Binh	136	136	9	7	7	78
46.	Quang Nam	155	130	38	34	24	89
47.	Quang Ngai	69	66	11	11	16	100
48.	Quang Ninh	172	137	40	30	23	75
49.	Quang Tri	112	104	11	6	10	54
50.	Soc Trang	85	59	33	29	39	88
51.	Son La	60	39	3	1	5	33
52.	Tay Ninh	-	-	-	-	NA	NA
53.	Thai Binh	119	89	26	19	22	73
54.	Thai Nguyen	-	-	-	-	NA	NA

55.	Thanh Hoa	295	268	22	22	7	100
56.	Thua Thien Hue	152	138	39	25	26	64
57.	Tien Giang	75	63	42	36	56	86
58	HCMC	290		56	56		
59	Tra Vinh	NA	NA				
60.	Tuyen Quang	71	61	2	2	3	100
61.	Vinh Long	47	33	16	11	34	69
62.	Vinh Phuc	82	71	44	42	54	95
63.	Yen Bai	72	44	26	4	36	15

Table 4: The number of facilities to be verified and certified in different sectors of different provinces

A: Number of EIAs approved

B: Number of facilities verified and certified

DONRE	Industry		Urban development		Transportation		Energy		Mining		Tourism		Irrigation		Agriculture		Forestry		Others	
	A	B	A	B	A	B	A	B	A	B	A	B	A	B	A	B	A	B	A	B
Long An	67	20			5		7		6	3					8	1				
Vinh Long	11	8	1		4				19	2	2				4	1			24	2
Thai Binh	35	3	2		10		8		3						14				25	
Bac Giang	43	19	3		1		4		17	6	1		9		9	1	3		7	
Thua Thien Hue	22	3	4		8		?		60	2	9		24						19	
Bac Kan	9	3	5				1		20	20			2						9	3
Hau Giang	21	12	6								1		2		5	3			9	5
Gia Lai	10	10	7		3		7	1	10		1				7				5	3
Bac Lieu	8	9	8		7		2				2		8		4				4	
Ninh Binh	13	10	9	2	11	0	4	0	38	4	3	2	0	0	4	0	0	0	2	0
Phu Yen	12	4	10	0	10	3	0	0	8	0	1	0	4	0	3	1	1	0	10	4
Vinh Phuc	66	25	11	3	6	0	0	0	10	2	6	0	5	0	7	0	2	0	0	0
Tay Ninh	66	6	12	0	0	0	5	0	1	0	0	0	3	0	10	1	0	0	20	2
Hoa Binh	0	0	13	0	0	0	0	0	46	0	5	0	0	0	2	0	0	0	33	0
Thanh Hoa	42	7	14	5	19	0	13	3	152	0	6	0	56	0	5	0	4	0	41	10
Lai Chau	1	0	15	0	3	0	8	0	15	0	1	0	4	0	1	0	4	0	23	0
Ben Tre	44	9	16	0	6	0	1	0	13	0	2	0	16	0	15	2	0	0	7	1

Yen Bai	3	0	17	0	1	0	8	0	37	5	0	0	0	0	0	0	0	0	0	0
Dong Thap	60	38	18	0	2	0	3	0	6	0	1	0	0	0	0	0	0	0	26	23
Quang Nam	32	20	19	0	7	0	4	2	19	3	12	2	4	0	4	0	6	0	27	3
Thai Nguyen	25	16	20	1	5	0	6	1	50	6	2	0	0	0	4	0	0	0	2	0
Dak Nong	0	0	21	0	2	0	1	2	17	0	3	0	1	0	5	0	0	0	28	2
Hai Phong	53	12	22	2	11	0	0	0	17	2	0	0	1	0	2	0	0	0	1	0
Quang Binh	20	6	23	0	18	1	2	0	43	0	3	0	20	0	4	0	7	0	4	3
Nam Dinh	23	10	24	0	0	0	0	0	4	4	1	0	2	0	1	0	0	0	46	0
Can Tho	30	20	25	0	0	0	2	0	5	0	2	0	6	0	0	0	0	0	11	4
TOTAL	590	222	26	11	110	3	82	9	547	53	58	4	138	0	111	10	20	0	321	58
B/A (%)		38	27	5		3		11		10		7		0		9		0		18

It can be seen from the data of this survey (among 25 provinces) that:

- Number of projects in the field of industry and mining is biggest
- The biggest ratio between number of facilities verified and certified and number of EIAs approved for industry, energy and mining (37%, 11% and 10%)
- Average values of the ratio of provinces with data available is 40%
- The projects that could create more environmental and social impacts (energy, mining, transportation) have still very low rates of verification and certification although these sectors have high rate of EIAs reports approved.

In the national scale, the data can show that:

- The ratio of number of facilities verified and certified and number of EIAs approved in the whole country is about 26%
- The ratio between facilities verified and certified among of requested projects is about 68%, it means that almost facilities that were already installed and need to be verified could be OK for being certified, and could be well operated for environmental protection.

The survey in the selected provinces shown that in process of verification and certification, in general the following actions have been taken in almost provinces:

- To organized a Verification team is consisted of:
 - DONRE leaders and Provincial Environmental Protection Division leaders
 - Representatives from Province/city professional departments
 - Representative for districts (project sites)
 - Some provinces there are involvement from social societies
 - Related and invited environmental experts (normally come from universities and/or institutes of big cities)
- Methods to be applied for verification:
 - Check and compare the quantity, types and quality of the real facilities with ones written in the EIAs
 - Check related documents (work completion files, installation reports and acceptance notes for environmental facilities)

- Check the environmental data and operation data (if necessary and available) of the verified environmental facilities (input and output data)
- Check pipe system (drainages, outlets, recipients)
- Check practical work of waste collection, storage (including hazardous wastes)
- Check the practical application of the monitoring program proposed in EIAs
- In some necessary cases, cross checking by additional sampling and analysing at the sites could be taken (but very rare due to no fund for these activities)
- In cases if the facilities to be verified not meeting the environmental protection objectives (written in EIAs), the following actions could be happened:
 - Stop the verification and certification work
 - In general, the time duration needed to complete the environmental facilities is not been fixed and/or regulated.
 - Re-verification and re-certification could be done again if DONREs receives the request from project owners

From the survey, the DONREs have raised some experiences and important issues related verification and certification process at the local level, such as:

- It is necessary to have technical guidelines on procedures to verify and certify that should be follow
- It is necessary for DONRE staff to be trained in this work
- It is necessary to have 3 months for verification before being certified (at least 1 sampling time per month).
- It is not necessary to sample and/or analyse environmental samples when carrying out verification and certification.
- The members of verification team should be less
- It is very important that the project owners should be requested to understand and implement their responsibility after EIAs were approved
- It is necessary to have concrete regulation on quantity, types and quality of the facility completion files before being verified
- It is necessary to have legal documents to guide how to verify and certify the existing and operating facilities.

- It is necessary to regulate needed capability for consultancy agencies (who develop the environmental facilities completion documents)
- It is necessary to guide DONRE how to verify and certify the projects that have not concrete environmental facilities
- How to verify and certify the environmental facilities of hospital projects

Also it can be seen from the survey that:

- In general, DONREs have no any ideas on “monitoring of Environmental Impact Assessment” because this concept is not existed in the Vietnamese Environment Law as well as not be requested by MONRE. All now be done by DONREs is following requirements addressed in the Law and the EIA Decrees. The concept of “verification and certification” is, in general, understood as “check the existence of hardware of environmental facilities”, may not pay enough strongly attention on the efficiency of the facilities as well as the impacts of all activities from the verified project to the surrounding environment as well as social components. That is why there are some comments that no need to take samples from some DONREs.
- Some said that post EIA checking work actually is not necessary; this work is only burden for industries (administrative requirement and waste a lot of time and money from both industries and local environmental agencies, and not express the nature of environment protection.
- But in general, DONRE agrees that the concept is necessary for the final objectives of Environment Protection, and this concept should be put in the environment law of Vietnam, although its implementation in the practice might be difficult and take long time for awareness raising as well as capacity building work from central level down to provincial level. In that case, MONRE should provide sufficient and feasible technical guidelines for implementing EIA monitoring work at the local level as well as provide resources for DONREs to carry out this work at the provincial level.
- The statistic data in the above tables shows that the real existing capacity of DONRE is too small compared with the need: only about 30-40% of approved EIAs have been verified; and even so, the resources for conducting these verification also very limited

(the need for taking samples for verification is existed, but not being well done because not enough resources, and verification only focused on documents and observation).

- Actually, the number of facilities to be verified is too small compared with the numbers of EIAs reports that have been reviewed and approved, but even so, it will never get equal each other. The thing is that how this work can be done in future with very limited capacity from central level as well as from local level? This could come to an idea that it is necessary to change the approach for doing something after EIAs being approved in order to ensure the environment will be well protected. Two options could be discussed: increase capacity on verification /certification or increase capacity on monitoring environmental quality changing from the operation of EIAs approved projects/ which option would be better in the present context, and/or both options should be implemented, and in this case, how and where MONRE and DONRE can get resources.
- Is it necessary to build up a technical guideline to help related stakeholders for ensuring the environmental protection work of the EIAs approved projects will be done, as well as the environment will be protected ? In case the answer is “yes”, is it necessary to modify some things of the approved legislation documents related to that work? And how we can do it?
- To make sure success of EIA monitoring work, it is necessary to do EIA only for the project that will create significant environmental and social impacts, and then EIA monitoring work should be following up and continuous work just after project being implemented (constructed, operated...). The number of project needed to have EIA in Vietnam now is too many, it is not necessary. MONRE need to check and cut down this number.
- It is necessary to find the way for reducing administrative burdens for industries (too much regulation they have to follow, and many are overlapped, and many are not necessary in the point of view of environmental protection. So it should be done in systematic approach aiming to very general target: environment protection.

IV. RECOMMENDATION (FROM LOCAL CONSULTANTS)

- To organize an official meeting between MUTRAP experts and MONRE staff to discuss and decide approach to improve “post EIA /EIA monitoring” process in Vietnam as well as revised schedule for the project

- To develop technical guideline in two directions:
- Post EIA checking for environmental facilities
- EIA monitoring (environmental quality and social issues)
- To make a road maps of implementation for each direction
- Convert step by step from Post EIA to EIA monitoring in an appropriate way.
- To prolong time and provide more resources for this MUTRAP project
- Conclusion:
- It is necessary to create a world wise acceptable concept on post-monitoring EIA work in Vietnam so that EIA monitoring work in Vietnam could be more efficient regarding environmental preservation.
- The survey and selected provinces showed that EIA work so far have get certain achievement for environmental protection in Vietnam, but the effect still low and have been carried out in formality way. It should be improved firstly by focusing on significant impacts projects with very detail investigation on environmental and social impacts and monitoring activities requirements in different phases of project after EIA was developed.
- Capacity building for EIA as well as EIA monitoring and /or post EIA is needed from all DoNREs, but focusing on impacts identification as well as environmental and social impacts been happening according time and space.
- The data from surveys shows that DONREs have obeyed all the requirement from MoNRE on post EIA checking, but it cost a lot of local resources but low efficiency for environmental protection