PROJECT IDENTIFICATION FORM (PIF) [1]

PROJECT TYPE: Full-sized Project
TYPE OF TRUST FUND:GEF Trust Fund

PART I: PROJECT IDENTIFICATION

Project Title:	Vietnam POPS and Sound Harmful Chemicals Management Project		
Country(ies):	Socialist Republic of Vietnam	GEF Project ID:[2]	5067
GEF Agency(ies):	UNDP (select) (select)	GEF Agency Project ID:	5154
Other Executing Partner(s):	Ministry of Environment and Natural Resources (Vietnam Environmental Protection Authority) Ministry of Industry and Trade (Vietnam Chemicals Agency)	Submission Date:	08/09/2012
GEF Focal Area (s):	Persistent Organic Pollutants	Project Duration (Months)	36 months
Name of parent program (if applicable): ➢ For SFM/REDD+ ☐	Establishment and implementation of the systematic management program to control, phase out and reduce POPs and mercury releases in Vietnam	Agency Fee ($):	242250

A. FOCAL AREA STRATEGY FRAMEWORK[3]:

Focal Area Objectives	Expected FA Outcomes	Expected FA Outputs	Trust Fund	Indicative Grant Amount ($)	Indicative Co-financing ($)
(select) CHEM-1	Outcome 1.4 POPs waste prevented, managed, and disposed of, and POPs contaminated sites managed in an environmentally sound manner.	Output 1.4.2 Countries receiving GEF support for environmentally sound management of obsolete pesticides, including POPs.	GEFTF	500000	2100000
(select) CHEM-1	Outcome 1.5 Country capacity built to effectively phase out and reduce releases of POPs.	Output 1.5.1 Countries receiving GEF support to build capacity for the implementation of the Stockholm Convention.	GEFTF	1320000	5950000
(select) CHEM-3	Outcome 3.1 Country capacity built to effectively manage mercury in priority sectors.	Output 3.1.1 Countries receiving GEF support for mercury management and reduction, on a pilot basis.	GEFTF	300000	750000
(select) CHEM-3	Outcome 3.2 Contribute to the overall objective of the SAICM of achieving the sound management of chemicals throughout their life-cycle in ways that lead to the minimization of significant adverse effects on human health and the environment.	Output 3.2.1 Countries receiving GEF support to implement SAICM relevant activities, including addressing persistent toxic substances and other chemicals of global concern (other than mercury), on a pilot basis.	GEFTF	300000	1550000
(select) (select)			(select)		
(select) (select)			(select)		
(select) (select)			(select)		

[1] It is very important to consult the PIF preparation guidelines when completing this template.
[2] Project ID number will be assigned by GEFSEC.
[3] Refer to the reference attached on the Focal Area Results Framework when filling up the table in item A.

(select) (select)			(select)		
(select) (select)			(select)		
(select) (select)			(select)		
(select) (select)	Others		(select)		
Sub-Total				2420000	10350000
Project Management Cost[4]			(select)	**130000**	550000
Total Project Cost				2550000	10900000

B. PROJECT FRAMEWORK

Project Objective: Continued reduction of environmental and health risks through POPs and harmful chemicals release reduction achieved by provision of an integrated institutional and regulatory framework covering management and reporting of POPs and Mercury within a national sound chemicals management framework and targeted development of POPs contaminated sites management capacity that builds on experience from GEF-4 projects.

The specific objectives:
- To strengthen national capacity on safety management of POPs and harmful chemicals;
- To control and reduce release of POPs to environment from POPs contaminated sites.

Project Component	Grant Type	Expected Outcomes	Expected Outputs	Trust Fund	Indicative Grant Amount ($)	Indicative Cofinancing ($)
1. Policy framework for sound chemicals management, including POPs/PTS.	TA	1.1: Overall policy framework and specific regulatory measures covering environmentally sound management of POPs and PTS through life cycle management developed and implemented	1.1.1 Detailed review and gap analysis with respect to Laws on Chemicals and Environmental Protection with respect to coverage of POPs, PTS and environmentally damaging chemicals management including mercury, conducted. 1.1.2 Decree applicable to the Stockholm Convention amendments on "new" POPs including bans where not yet in place, developed. 1.1.3 Enacted legal instrument in the form of amended Laws or Decrees/regulations defining linkage between these laws and the regulatory instruments in place including inclusion of a Chapter on sound chemicals management in the Law on Environmental Protection.. 1.1.4 Guidelines integrating environmental control of POPs and PTS within the overall chemicals management framework, including coverage of: i) general environmental	GEFTF	550000	1030000

[4] GEF will finance management cost that is solely linked to GEF financing of the project.

			protection for chemical activities, ii) scheduled wastes containing toxic chemicals, iii) environmental emergency and response, environmental risk assessment of waste containing toxic chemicals methodology, iv) health risk assessment for chemical wastes procedures; and v) guidelines for PRTR reporting, developed.			
		1.2: Key institutions have knowledge and skills to formulate and implement neccesary chemicals and environment policies, consistent with sound chemicals management principles and international convention requirements	1.2.1 Active participation of Vietnam in the International Conference on Chemicals Management achieved. 1.2.2 30 professionals from VEA, VINACHEMIA, Department of Water Resources Management, national customs authorities and industrial stakeholers trained in implementation of chemicals classification and labeling in global harmonized system and adaptation of the EU REACH/ROSH approach for application inVietnam 1.2.3 Implement common national procedures for chemicals environmental and health risk assessment and release reduction enforcement including training of 30 professionals from VEA, VINACHEMIA and Ministry of Health 1.2.4 Market based policy initiative developed to promote reduction in POPs releases and POPs disposal through development of national POPs management service provider capability on a commercial basis through private public partnerships.			
2. Monitoring and reporting of POPs and PTS	TA	2.1: National institutions provide comprehensive and coordinated ambient environment and receptor POPs /PTS	2.1.1 Ambient environment and receptor (human, biota, food) POPs and PTS baseline established against which future monitoring can be measured and	GEFTF	500000	4820000

		monitoring that is consolidated into a national database and utilized for high quality reporting to the GoV/National Assembly and the Convention. 2.2: National POPs/PTS laboratory network for support of ambient environment and receptor monitoring certified/accredited.	reported 2.1.2 Inventory of ambient environment and receptor monitoring capability including a gap analysis identifying where strengthening is required 2.1.3 Upgraded monitoring programs in key areas where strengthening is required, developed. 2.2.1 Up to 2 laboratories accredited to international standards to support POPs/PTS monitoring and up to 40 laboratory technicians received upgrading training. 2.2.2. Up to 40 relevant national and provincial government staff trained on POPs/PTS monitoring and reporting following international standards and requirements 2.2.3 Ambient environment and receptor POPs/PTS data base and PRTR reporting system operational and linked to the POPs tracking tool and data submitted to Convention Sectretariat.			
3. Management of POPs contaminated sites	TA	3. 1 Key policies, regulations and technical guidlines for management of POPs contaminated sites are in place.	3.1.1: Supporting regulations and standards for contaminated sites covering requirements for: i) contaminant levels to trigger action, contaminant POPs levels; ii) future land use cleanup level requirements for POPs contamination in soil and water; iii) reporting; and iv) care/custody and liability assignment, developed. 3.1.2. Risk assessment procedures and guidelines for contaminated sites developed. 3.1.3: National consolidated POPs contaminated sites inventory developed and prioritzed 3.1.4.National POPs contaminated sites	GEFTF	1000000	3600000

			management program developed			
		3.2 Key institutions have capacity and knowledge base for environmentally sound management of POPs contaminates sites	3.2.1. Training of 50 technical and regulatory professionals from national level and 10 provinces on contaminated sites management, site/risk assessment and remediation practice taking into account lessons learnt from GEF4 POPs projects 3.2.2 Measures taken for the public awareness raising and participation including involvement in reporting contaminated sites and POPs stockpiles, emergency response, and health and safety protection.			
		3.3 Site assessments, cleanup design, and technology option evaluations of representative priority POPs contaminated sites, have been demonstrated.	3.3.1: Up to 10 characteristic POPs contaminated sites assessed and characterized, clean up design completed, technology options recommended with active involvement of local communities.			
4. National mercury baseline inventory and release reduction strategy	TA	4.1: Mercury baseline source and release inventory developed 4.2: Increased knowledge and awareness of mercury source and release	4.1.1: National Mercury baseline source and release inventory developed 4.1.2: Information outreach workshops (2 nos) conducted to provide information on source and release of inventory.	GEFTF	300000	750000
5. Project monitoring and evaluation	TA		5.1.1 Project monitoring and evaluation report	GEFTF	70000	150000
	TA			(select)		
	(select)			(select)		
	(select)			(select)		
	(select)			(select)		
	(select)			(select)		
			Sub-Total		2520000	10350000
			Project Management Cost[5]	(select)	130000	550000
			Total Project Costs		2550000	10900000

[5] Same as footnote #3.

C. INDICATIVE CO-FINANCING FOR THE PROJECT BY SOURCE AND BY NAME IF AVAILABLE, ($)

Sources of Cofinancing	Name of Cofinancier	Type of Cofinancing	Amount ($)
National Government	MONRE	Grant	3660000
National Government	MONRE	In-kind	2680000
National Government	MOIT	Grant	500000
National Government	MOIT	In-kind	150000
GEF Agency	UNDP	Grant	200000
Others	Czech Government	Grant	610000
Other Multilateral Agency (ies)	SAICM	Grant	250000
Private Sector	Enterprises potentially using or releasing mercury	Unknown at this stage	600000
Private Sector	Enterprises and institutions with contaminated sites	Unknown at this stage	750000
Local Government	Monitoring activities	In-kind	1500000
Total Cofinancing			10900000

D. GEF/LDCF/SCCF RESOURCES REQUESTED BY AGENCY, FOCAL AREA AND COUNTRY[1]

GEF Agency	Type of Trust Fund	Focal Area	Country Name/Global	Grant Amount (a)	Agency Fee (b)[2]	Total c=a+b
UNDP	GEF TF	Persistent Organic Pollutants	Vietnam	2550000	242250	2792250
(select)	(select)	(select)				0
(select)	(select)	(select)				0
(select)	(select)	(select)				0
(select)	(select)	(select)				0
(select)	(select)	(select)				0
(select)	(select)	(select)				0
(select)	(select)	(select)				0
(select)	(select)	(select)				0
(select)	(select)	(select)				0
Total Grant Resources				2550000	242250	2792250

[1] In case of a single focal area, single country, single GEF Agency project, and single trust fund project, no need to provide information for this table

[2] Please indicate fees related to this project.

PART II: PROJECT JUSTIFICATION

A. DESCRIPTION OF THE CONSISTENCY OF THE PROJECT WITH:

A.1.1 the GEF focal area/LDCF/SCCF strategies:

The project is fully consistent with the GEF-5 Chemicals focal area strategy, its Objectives: CHEM-1(Phase out POPs and reduce POPs releases), and CHEM-3 (Pilot sound chemicals management and mercury reduction) as well as its specific Outcomes, Outputs and Indicators set for each objective as summarized in the following:

Relevant GEF-5 Strategy Outcome/Indicator	Project's contribution
Outcome 1.4 POPs waste prevented, managed, and disposed of, and POPs contaminated sites managed in an environmentally sound manner. Indicator 1.4.1 Amount of PCBs and PCB-related wastes disposed of, or decontaminated; measured in tons as recorded in the POPs tracking tool. Indicator 1.4.2 Amount of obsolete pesticides, including POPs, disposed of in an environmentally sound manner; measured in tons.	Component 3 of the project builds on national experience gained in addressing POPs stockpiles and wastes (dioxin, PCBs and POPs pesticides) in three major GEF-4 projects to continue addressing the residual POPs in contaminated sites associated with these particular POPs. This is accomplished by development of a consolidated national policy, regulatory approach and overall management program for POPs contaminated sites. This is recognized as being a long term priority and a primary focus of national efforts related to POPs in the future. The capacity support for this management framework is also provided for up to and including the demonstration of management techniques on priority sites. The result will be environmentally sound management of POPs contaminated sites under coordinated national programs, notably the recently approved National Target Program on Pollution Remedies and Environmental Improvement (2011). Associated with and supporting this are the activities in Component 1 that will build on the significant experience and knowledge base being developed with POPs remediation and disposal technologies (cement kilns, high temperature incineration, in-situ thermal desorption, mechano-chemical treatment, and bioremediation) in the three GEF-4 projects to support development of coordinated national service provider capability with such technologies through private public partnerships. While not directly resulting in quantifiable amounts of targeted POPs eliminated, the capability to do so becomes available for rapid mobilization and replication, something that the country will expeditiously pursue. Sustainability of outcome would be achieved through knowledge sharing among different stakeholders and institutions and regulatory interventions to support remediation and disposal technologies.
Outcome 1.5 Country capacity built to effectively phase out and reduce releases of POPs Indicator 1.5.1 Progress in developing and implementing a legislative and regulatory framework for environmentally sound management of POPs, and for the sound management of chemicals in general, as	The project's overall design is focused on integrating Vietnam's now substantial efforts related to POPs into the emerging Sound Chemicals Management (SCM) framework being developed, as well as filling remaining capacity and knowledge gaps associated with POPs and PTS issues. Component 1 supports the work on legislative and regulatory aspects of this as well as human capacity

recorded in the POPs tracking tool.	gaps applicable to SCM generally. The operational and technical capacity gaps will be further addressed on a targeted basis in Component 2 (strengthening the national capability for ambient environmental and receptor POPs/PTS monitoring and reporting), Component 3 (contaminated sites) and Component 4 (mercury). As mentioned earlier, regulatory interventions to implement SCM framework relating to POPs and institutional level interventions for capacity building to address human capacity gaps would result in sustainability of the outcome.
Outcome 3.1; Country capacity built to effectively manage mercury in priority sectors. Indicator 3.1.1; Countries implement pilot mercury management and reduction activities.	Component 4 of the project is specifically directed to providing the country with an initial baseline inventory of mercury use and release, as well as initiating development of a national mercury release reduction strategy and initiating broad public awareness of this as an emerging issue. These activities will fill a key role in supporting Vietnam's participation in the current INC process leading to a global mercury convention. It also serves to capture and integrate sector specific information on mercury releases that will come from other proposed for GEF-5 projects, particularly in the health care sector. Overall, the project will be guided by and maintain consistency with GEF Council Information document GEF/C.39/Inf.9/Rev.1(Strategy for Mercury Programming in GEF-5). Through inventorisation of sources and releases of mercury and engagement of stakeholders during information outreach programs, the project would contribute to future actions and their sustainability in priority sectors.
Outcome 3.2: Contribute to the overall objective of the SAICM of achieving the sound management of chemicals throughout their life-cycle in ways that lead to the minimization of significant adverse effects on human health and the environment. Indicator 3.2.1: Countries implement SAICM relevant activities that generate global environmental benefits and report to the International Conference on Chemicals Management	Component 1 specifically targets integration of POPs into the sound chemicals management framework that is being developed using a SACIM Quick Start program implemented by the Vietnam Chemicals Agency (VINACHEMIA). The specific SAICM related activities to be supported and into which this project will integrate POPs/PTS considerations are i) developing cross sectoral interagency coordination mechanisms; ii) strengthening planning, priority setting and governance; iii) integrating SCM into national development plans; iv) development of a national SCM action plan; and v) enhancing public awareness. Components 2, 3and 4 all contribute to this process through enhanced knowledge related to POPs/PTS impacts, proactive action in preparation for present and new chemicals conventions, public awareness and contaminated sites issues. In implementing, the project will be guided by and maintain consistency with Appendix 1 of the GEF-5 focal area strategy and GEF Council Information document GEF/C.39/Inf.11 (Strategy on SCM for GEF-5)

A.1.2. For projects funded from LDCF/SCCF: the LDCF/SCCF eligibility criteria and priorities: Not Applicable

A.2. national strategies and plans or reports and assessments under relevant conventions, if applicable, i.e. NAPAS, NAPs, NBSAPs, national communications, TNAs, NIPs, PRSPs, NPFE, etc.:

Vietnam signed the Stockholm Convention on May 23, 2001 and ratified it on July 22, 2002. Vietnam is also a Party to the Basel Convention having acceded to this convention in 1995 and a Party to the Rotterdam Convent which it acceded to in 2007. It is also active in the INC process leading to a global convention on mercury having participated in INC -1 and 2. With the establishment of the Vietnam Chemicals Agency in 2008, the country intends to become an active member of the International Conference on Chemicals Management and is currently undertaking a project under the SAICM Quick Start Program. Additionally, the country is actively pursuing implementation of the Global Harmonized System of Chemicals Classification and Labeling (GHS) and modeling its overall chemicals regulations on the EC chemicals regulation (REACH).

The principal national plan directly relevant to this project is the Stockholm Convention NIP that was adopted and submitted to the Stockholm Convention in November 2007 (Decision No. 184/2006/QD-TTg dated 10 August 2006 on approval of the National Implementation Plan for the Stockholm Convention on POPs). The NIP forms the basis of current programs related to POPs undertaken nationally, including four GEF-4 Projects addressing POPs stockpiles and wastes (POPs pesticides, PCBs, and high concentration dioxin contamination) and U-POPs, as well as participation in a Global project on medical waste management. Currently, the government has adopted an overall strategy of integrating NIP implementation into a national framework for the sound management of chemicals throughout their life-cycle, such that the effectiveness of international and national efforts is optimized. A central part of this strategy is working with the GEF on development of an overall GEF-5 program aimed at addressing outstanding and emerging POPs and PTS issues, as well as ensuring that the NIP is undertaken within the developing SCM framework. More recently, the 2011 National Target Program on Pollution Remedies and Environmental Improvement adopted by the Government of Vietnam provides a direct implementation framework to which the project can be linked, particularly in relation to POPs contaminated sites.

B. PROJECT OVERVIEW:

B.1. Describe the baseline project and the problem that it seeks to address:

Country Context

Vietnam is a rapidly industrializing developing country in South East Asia that has among the highest growth rates in the region. The chemicals sector has been a major contributor to this and Vietnam's experience is representative of a global trend in transferring chemicals production and application from developed to developing countries. The chemicals sector average annual growth rates was15% from between 1990 to 2004 and is currently at 10%. The sector is highly diversified having 11 sub-sectors with approximately 2,000 mainly private sector enterprises making up 12% of national industrial production and employing 10% of the industrial labor force.

At the same time, Vietnam also has a significant history of chemicals use and the legacies that are associated with historical chemicals management and disposal practice. In addition to accumulation of POPs/PTS wastes and contaminated sites and their unintended release resulting from older technological processes and practices, the country has suffered major contamination due to wartime chemical defoliant use which has had health and ecological impacts on a unique scale globally.

These factors have resulted in (a) a very high level of national policy commitment to both addressing the POPs issue under the Stockholm Convention and (b) more recently pursuing SCM policies. The former is evidenced by the countries aggressive implementation of the NIP under the direction of the Ministry of

Natural Resources and Environment (MONRE) acting as the Stockholm Convention focal point and the planned introduction of a chapter on chemicals directly into the overarching Law on Environmental Protection. Complementary to these efforts, is the recent formation of the Vietnam Chemicals Agency (VINACHEMIA) within the Ministry of Industry and Trade (MOIT) with overall responsibility for implementing sound chemicals management policies as well as acting as focal point for a number of international conventions, agreements and initiatives. These include the Rotterdam Convention, Chemicals Weapons Convention, and International Convention on Chemicals Management (SAICM).

Baseline

The current baseline for the GEF-5 Chemicals Focal Area Program and this specific project is effectively defined by the status of NIP implementation in the case of POPs, specifically progress on the three current GEF-4 projects and the above policy decisions respecting integration of POPs initiatives into an emerging SCM framework. This is summarized as follows. Here, information on current status as well as main gaps identified in the existing situation are highlighted.

i) The country has established the basic institutional structure for addressing POPs and SCM generally with focal points being MONRE (VEA) and MOIT (VINACHENIA) respectively, and the basic legal and regulatory framework covering each is in place. However, there is an element of fragmentation inherent in this structure as well as a need to better integrate the interests and mandates of other institutional stakeholders such as Ministries of Health, Defense, Agriculture and Rural Development and Science and Technology.

ii) The major POPs stockpiles and wastes issues representing high priorities in the NIP, namely PCBs, POPs pesticides, high concentration dioxin, are now being addressed in three GEF-4 projects that are estimated to capture and/or eliminate up to 900 t of POPs pesticide waste, 5,000 tons of PCBs, and 1,700g I-TEQ of TCDD utilizing environmentally sound disposal technologies operating in Vietnam and available for future requirements (particularly for contaminated sites). However, effective integration of the results and lessons from these initiatives, particularly in relation to the technology demonstrations is limited which presents a barrier to translating this valuable experience into a commercial service provider capability for POPs and general chemicals management in the future.

iii) Associated with the current work oriented toward capture and elimination of high concentration POPs stockpiles and waste, additional identification and preliminary assessment of significant numbers of POPs contaminated sites has occurred. These include a growing number of POPs pesticide contaminated sites typically in widely distributed in primarily rural areas and smaller communities, PCDD/F contaminated sites associated with rapid industrialization, PCB contaminated site, and additional smaller more remote TCDD contaminated sites. Under the current situation, limited resources are available with the Government in managing clean-up processes for elimination of POPs from such contaminated sites.

iv) Initial work has been undertaken in developing a comprehensive baseline inventory of unintended release of POPs (U-POPs) with associated capacity building related to BAT/BEP applicable to major source sectors.

v) Selected regulations covering PCBs, POPs pesticide management, and dioxin contamination are under development, along with targeted technical capacity strengthening and public awareness associated with each area. However these efforts remain somewhat fragmented, project specific and require integration within an overall chemicals management framework. Also, under the baseline scenario, detailing of implementation processes for enforcement and chemical management regulations ensuring safety in management of chemicals is not yet addressed. There is, thus, a need to bolster the Government efforts in this area.

vi) Initial assessment of POPs and PTS issues in the healthcare sector has been initiated by a global GEF/UNDP project on “Demonstrating and Promoting Best Practices for Reducing Health – Care Waste to Avoid Environmental Release of Dioxin and Mercury” and the country has attracted significant international loan financing to address these issues in that sector.

vii) Basic capability for POPs monitoring and analysis exists but is generally fragmented in terms of data collection, and requires applications of consistent standards and accreditation to effectively contribute to national decision making and contribute to an overall global tracking and data base system. There is a need for strengthening laboratory infrastructure network and expertise of staff handling laboratory infrastructure for more systematic operation of labs and integration of information collected from labs on toxic chemicals. It may be noted that laboratory infrastructure strengthening requires local interventions spread across different parts of Vietnam.

viii) The above is being achieved utilizing GEF-4 support but with a high degree of leveraging from co-financing sources including the national government, a wide range of bilateral donors and international foundations. It is currently estimated that the US$ 17.1 million in GEF-4 POPs program funding will result in US$52.7 million in co-financing.

ix) Overarching legislation and legal measures are in place supporting SCM, namely the Law on Chemicals (2007) and the 2005 Chemicals Safety Decree (No. 68/2005/ND-CP). These nominally provide the legal basis for all aspects of SCM in terms of regulatory controls and applicable standards and practice. The basic practical mechanisms for chemicals registration, use control, bans are in place with development of detail regulations being undertaken progressively. As mentioned in point iii above, resource support including international experience is required for strengthening the implementation and enforcement processes associated with regulations for POPs/PTSs management.

x) Initial development of a SCM regulatory system is drawing on international practice through application of SAICM principles and initiatives respecting adoption of the Global Harmonized System for Classification and Labeling of Chemicals (GHS), and application of EU REACH/ROHS principles. As mentioned in point ix above, enforcement processes strengthening needs additional support.

xi) Mercury used in Vietnam is mainly for mining activities. Other sources of mercury are from measuring and controls equipments (medical, electricity) that contain mercury, in batteries, biocide, paints, laboratories, etc. Except for information from healthcare sector where about 550 kg of mercury is annually released to environment from broken thermometers and sphygmomanometers, there is no other specific data about how much it is used or how much it's released to environment in for form of wastes. No specific regulation for mercury management is available. Mercury wastes are considered as hazardous waste and are often treated together with other hazardous wastes mainly by incineration

xii) Government of Vietnam currently actively participates in INCs on mercury treaty which is expected to be adopted in 2013. Initial steps for inventorisation of mercury sources and emissions is a very critical step that needs to be undertaken at national level.

Barriers

Notwithstanding the progress being made by Vietnam, a number of key barriers remain to maintaining its capability to address ongoing POPs and PTS issues, and to do so within the developing SCM framework. These are summarized below in the context of their being addressed by the current project:

i) Institutional barriers created by fragmentation of POPs and SCM initiatives which limit efforts to effectively coordinate POPs initiatives and to integrate them into an overall SCM framework, as well capitalize on the experience and lessons learned.

ii) Policy and legislative barriers in achieving a comprehensive and well integrated policy and regulatory environment for addressing POPs and PTS such that chemical phase-out /elimination strategies and action plans can be effectively implemented within a common regulatory framework. As mentioned earlier, enforcement strengthening needs expertise based on both national as well as international experiences and knowledge. Capacity building, based on such expertise, at national level is required to achieve this.

iii) Financial barriers associated with assembling sufficient and sustainable level national financing to support required action on current and emerging POPs/PTS issues generally, recognizing the inevitable competition for funds in a developing country, particularly one attempting to balance environmental protection with rapid economic and industrial growth;

iv) Technical capacity barriers in relation to current and emerging POPs/PTS issues particularly "new" POPs, contaminated sites and mercury management, as well as in the physical capability to monitor and report on POPs/PTS in the ambient environment and biological receptors.

v) Information barriers related to fragmented collection and absent monitoring information and inventories on contaminated sites, "new" POPs, and mercury use and release, and as well as chemicals generally.

vi) Awareness barriers created by limited understanding and awareness of both general public and industrial stakeholders related to POPs/PTS and sound chemicals management that constrain the rate of implementing comprehensive programs.

Project Strategy and Design

As illustrated by the above, Vietnam can be described as a country that has aggressively and proactively proceeded with addressing its immediate major POPs issues as well as initiating adoption of SCM. It is now at a point that it needs to move on to addressing other longer term POPs and PTS issues and to do so in a more coordinated fashion that is integrated with the broader SCM framework being developed. This is the basic rationale for overall GEF-5 Chemical Focal Area Programmatic approach of which this project is a key part of. While, the other potential program project components involve addressing some of the other sector specific POPs and to some degree PTS issues, this particular project component targets the capacity strengthening required to ensure effective integration and coordination of POPs/PTS issues within the overall SCM framework. It also initiates focused work on two longer term priority areas to be addressed within a SCM framework, namely contaminated sites management, and mercury capture and release reduction.

GEF support for addressing both the current fragmentation of efforts and work on future priority areas is seen as critical to sustaining current progress and high level of national commitment to POPs and SCM, both in policy and financial terms. GEF funding effectively leverages a significant amount of national co-financing, particularly from government. In its absence, the ability of the lead executing partners, VEA and VINACHEMIA, to obtain the strong policy support from relevant authorities/agencies and co-financing funding reflected in the proposed project would be significantly reduced. Substantial competition exists for national funds generally and particularly those available for environmental activities. While capacity related work on POPs/PTS and SCM would continue at some reduced level of effort, it would do so without any coordination, integration and expansion to future areas of interest that GEF support would stimulate. In addition, international expertise that is of significant importance at this stage for regulations enforcement processes would not be available to the Government of Vietnam. In fact, in the absence of GEF support in this area, the key national executing partner, namely MONRE (VEA), would not be a GEF-5 beneficiary in this focal area which could impact its priority setting in the longer term.

Keeping in view the above baseline situation and the needs to address the said barriers, the project is designed with 5 components whose scope description follows:

i) Component 1- Policy framework for sound chemicals management, including POPs/ PTS: This component is intended to support the integration and coordination of POPs/PTS management and general SCM both in terms of effective and efficient legal and regulatory requirements, ensuring synergy in responsibilities across institutional stakeholders, and efficiently utilizing the technical and human resources being developed. It will include a detailed review and input to the overarching laws on Chemicals and Environmental Protection developed in the baseline project to ensure consistency as well as identify and act upon gaps and duplication. Specific attention will be directed to ensuring that current Stockholm Convention obligations are embedded in this legislation and an effective, well defined linkage exists respecting environmental aspects of POPs/PTS management within the SCM

framework under development, and appropriate detailed regulatory measures and national standards exist for life cycle management of POPs/PTS. Under this component, development of a "Decree" for sound management of POPs would be a priority and this will also include safe use of chemicals. Within this, emphasis is placed on ensuring, through strengthening the baseline project activities, that the key stakeholder institutions and a broad range of stakeholders have the knowledge and skills to undertake and sustain this approach for effective enforcement through training in key areas such GHS for chemicals classification and labeling, bench mark regulatory models, chemicals risk assessment/release reduction and enforcement. Finally, the component will cover a coordinated activity to bring together experience and lessons learned related to POPs disposal technologies being demonstrated on the ground in three of the current GEF-4 projects. These include i) the application of containment techniques, in-situ thermal desorption treatment, and mechano-chemical destruction applied to heavily TCDD contaminated materials; ii) use of cement kilns, and iii) technology options for PCB storage, treatment and destruction. The objective of this will be to facilitate the development of national commercial service provider operational capacity for POPs and chemicals waste management through public private partnerships.

ii) **Component 2 – National POPs monitoring and reporting capacity:** This component is directed to consolidating and strengthening the country's capacity to monitor and report on POPs/PTS in the ambient environment and in key receptors that is taking place through the baseline project of strengthening sampling and analysis capacity in Vietnam. This represents a major national priority with GEF funding being used to leverage a substantial national co-financing commitment in this area. It will develop a national consolidated data base utilizing the significant amount of such data already available but currently widely distributed. It will also identify and address gaps that exist in the current data and as well as the capacity to undertake such monitoring. Recognizing the importance of reporting and contributing to the overall international data base associated with POPs in the environment, assistance for laboratory acceditation which supports monitoring programs will also be targeted for GEF support. The ultimate objective is for Vietnam to be able to measure progress in addressing the POPs issue and report this as part of global intiatives tracking POPs through an integrated process at national level. It must be recognised that the project involves developing capability at sub-national / local level in the country.

The regional contribution to the overall Stockholm Global Monitoring Plan (GMP) is being addressed through a UNEP lead regional project on **"**Implementation of the POPs Monitoring Plan in the Asian Region". The regional project will concentrate on its primary mandate of raising the capacity in the region on providing quality monitoring data on the selected global monitoring matrices include in the Stockholm Convention Monitoring Plan and effectiveness evaluation, i.e. air, human milk and maternal blood. The regional project does not have resources for capacity building required at country level in Vietnam for national laboratory capacity and POPs risk prioritization.

While there are potential for collaboration between the initiatives particularly when it comes to guidelines, protocols and manuals, the level of resources for strengthening national institutions is limited given the geographic spread and intensity of activities proposed in the regional project. In light of this, this project has been designed with the said resources for National POPs monitoring, risk reduction (prioritization) and reporting capacity.

iii) **Component 3 – National POPs contaminated sites program:** Complementing the baseline project consisting of the National Target Programme on Pollution Remedies and Environmental Improvement (2011) with a total financial allocation commitment of US$24 million for about 60 contaminated sites, this component is intended to move the country forward in addressing POPs contaminated sites in recognition that this likely represents a major long term environmental legacy issue. While this is the case in most countries, it is particularly important in Vietnam given the history of POPs contamination resulting from conflicts as well as its use of POPs pesticides, which has resulted in large numbers of widely distributed but cumulatively significant amounts of contamination

which have significant localized impacts on vulnerable rural populations. The component is intended to create a broad policy, legal and regulatory framework to manage this issue into the future. Its specific outputs will include: i) a national contaminated site inventory with capability to maintain it and prioritize site specific containment and remediation; ii) a consolidated set of regulations and standards covering requirements for assessment, action and clean up levels, monitoring and reporting requirements and responsibility for care, custody and financial liability; iii) an national contaminated sites program prepared for implementation; and iv) strengthening national technical capacity among regulatory officials and service providers in undertaking site assessment, containment and remediation. Additionally, it will initiate the task of remediation design and containment activities on characteristic sites. The indicative plan at present, subject to refinement in the PPG stage, is to undertake site and risk assessment on 10 characteristic sites. This is intended to allow preparation of a potential follow on project involving demonstration work on containment and appropriately scaled low cost remediation at least three priority sites.

iv) **Component 4 – National mercury baseline inventory and management strategy:** This component is intended support the country's initial formal efforts related to control of mercury release and the country's informed participation in the current INC process which is anticipated to lead to a global mercury convention as early as 2013. More specifically, it will develop a baseline inventory applicable to sources, use and potential releases of mercury which can serve as a reference for control measures potentially imposed by a convention. It would also serve as the basis for a national mercury release reduction strategy that would prioritize actions and initiatives required for effective control of mercury use and release, as well as informing the national participation in the INC process and decision making in the assumption of resulting international obligations. The component will also include an initial program of awareness initiatives respecting mercury. It should also be noted that this component is complementary to sector specific work being undertaken, particularly that addressing the health sector under a large loan project involving the World Bank and Ministry of Health.

v) **Component 5 – Project monitoring and evaluation:** This component allocates resources for appropriate project monitoring and evaluation inclusive of mid-term revises and completion documentation.

Expected Results

Consistent with the overall project objective and the outcomes above, the principle results expected from the project are:

i) Enacted legal instruments defining linkages between current Laws on Environmental Protection and Chemicals that effectively fill gaps between them and ensure coordinated environmental control of POPs/PTS within the overall SCM framework as well as ensuring entrenchment of current Stockholm Convention obligations in national legislation.
ii) System of detailed regulatory measures, standards and guidelines applicable to POPs/PTS integrated into the SCM framework.
iii) Market based mechanisms for the development of commercial POPs and chemicals management service provider capability involving private public partnerships.
iv) Inter-agency coordination mechanisms involving MONRE, MOIT, Ministry of Health and other stakeholder agencies strengthened in support of integration of POPs/PTS within a national sound chemicals management framework.
v) Consolidated baseline for ambient environmental and receptor (human, biota, food) POPs monitoring data established and maintained as the basis for ongoing national and international reporting.
vi) Sufficient national laboratories internationally accredited, technical staff trained and supporting the national POPs/PTS monitoring program.
vii) National baseline mercury source and release inventory, and national mercury release reduction strategy adopted.
viii) National contaminated site inventory maintained and prioritized with respect to action.

ix) National contaminated sites program prepared and ready for implementation, and
x) High priority sites assessed, and clean up designed.

The project will be implemented by MONRE (VEA) as the principle implementing partner but in partnership with MOIT (VINACHEMIA) consistent with its overarching purpose of integrating POPs/PTS management into the country's evolving SCM framework and initiatives on mercury release reduction.

B. 2. Incremental /Additional cost reasoning: describe the incremental (GEF Trust Fund) or additional (LDCF/SCCF) activities requested for GEF/LDCF/SCCF financing and the associated global environmental benefits (GEF Trust Fund) or associated adaptation benefits (LDCF/SCCF) to be delivered by the project:

The overall incremental reasoning supporting the application of GEF funding to this project is based on it being required to provide the necessary capacity for Vietnam to effectively capitalize its substantive and proactive efforts to date in addressing POPs and to sustain these efforts so that the country can move forward in addressing future POPs/PTS issues and SCM generally. In the absence of the capacity strengthening that this project provides for and which GEF support leverages national support for, such progress would be substantially delayed. The actions supported are all linked to the country's ability to maintain compliance with its current and likely future obligations under the Stockholm and other new pending Conventions as well as international efforts related to SCM. Recognizing the scale of continuing POPs legacies and broader PTS issues that the country must address as well as its status as a country undergoing very rapid industrialization, the capacity to sustain such progress is of long term significance in global environmental terms.

The following notes aspects of this incremental reasoning and associated global environmental benefits for each project component.

i) Component 1 is primarily oriented to institutional, legal and regulatory actions required for effective POPs/PTS environmental control, life cycle management and integration under an overall SCM framework. These are consistent with global priorities in the area and a perquisite to effective and efficient reduction of POPs and PTS release, hence contribute to global reductions in both POPs and other chemicals (such as mercury) released into the environment as well as their impacts on human health. While progress in these areas may occur in the absence of GEF support, this would take substantially longer and would likely remain fragmented. Additionally, inclusion of an activity that is directed at establishing market based commercial service provider capacity in managing POPs and chemicals waste capitalizes on the technology development and demonstration results from GEF-4 project, something that should provide long term global benefits nationally and regionally through availability of cost effective POPs and chemicals waste treatment and destruction capability as well as site remediation capacity.

ii) Component 2 addresses capacity deficits defined in the baseline related to monitoring capability, the need to integrate national monitoring and laboratory capability, and the enhanced ability to contribute sufficiently high quality data and information suitable to support the global monitoring mechanisms being operated for POPs/PTS and in the future for other chemicals. Modest GEF support will leverage substantial national co-financing in this area that might otherwise be directed elsewhere and provide a reliable globally significant source of such data and information. Further, the project would also gain from some of the outputs of regional projects on POPs monitoring which is submitted by UNEP for consideration in the forthcoming work programme. In this respect it should be noted that the proposed UNEP GMP project proposes to increase the capacity of one-two selected national laboratories to deal with Stockholm Convention Global monitoring and effectiveness evaluation needs that are typically measured in matrices (human milk and maternal blood) that does not provide sufficient risk information on many important end-points at national level, including food and feed. Therefore the benefits of this components are additional and will contribute to GEB in increased POPs priority and risk reduction.

iii) Component 3 will provide the basis for what inevitably will be a long term requirement to progressively and incrementally deal with POPs contaminated sites as well as providing capability for addressing chemically contaminated sites generally as they are identified overtime. GEF support underpins the expeditious creation of a national POPs/chemicals contaminated sites program that would otherwise only evolve or a long period of time. This is of direct global environmental significant in that it provides capacity for the elimination of POPs and ultimately other chemicals that have been released but can still be captured. Delay in doing so would degrade the ability to effect such capture.

iv) Component 4 represents the countries first formal initiative related to mercury and is undertaken in direct response to participation in the current INC process leading to an international convention, and the GEF-5 objective in this area. In global environmental terms it starts a potentially significant country along a proactive course to make rapid reductions in mercury releases.

B.3. Describe the socioeconomic benefits to be delivered by the Project at the national and local levels, including consideration of gender dimensions, and how these will support the achievement of global environment benefits (GEF Trust Fund) or adaptation benefits (LDCF/SCCF). As a background information, read Mainstreaming Gender at the GEF.":

The overall socioeconomic benefit of the project is ultimately derived from the increased capability for the country to capture, contain and eliminate POPs/PTS that would otherwise be released into the general environment with the impact that has on biological resources, inclusive of human health. The associated risk reduction at both a local and global level will positively impact the productivity of populations and reduce the financial burden imposed by potentially degraded public health, as well as contributing to general wellness and quality of life. This is particularly true for vulnerable parts of the population and for maternal health. For example, the project would involve close consultations with and capacity building of local communities who are living close to/who can come in contact with contaminated sites including women, in managing their activities without be associated with health risks.

The major direct socio-economic benefits from the project will be obtained from Component's 2, 3 and 4. By improving national monitoring capability for POPs in the ambient environment and in receptors including humans in Component 2, decision making on potential impacts affecting health will be improved and preventative action can be better target to limit exposure at a local level. This will be particularly important in rural areas where such impacts may affect the most vulnerable populations. Likewise, a broad and long term capability and program to address POPs contaminated sites will serve to reduce such exposure directly, particularly in relation to widely distributed dioxin and POPs pesticides contamination known in Vietnam. The increased knowledge and awareness resulting from all three of these components, including mercury will also serve to enhance exposure reduction as those most affected increasingly recognize the risks and are motivated to take local action. Further, local communities and CSOs would be actively involved in preparation of management plans and making important decisions relating to hazardous sites.

B.4 Indicate risks, including climate change risks that might prevent the project objectives from being achieved, and if possible, propose measures that address these risks to be further developed during the project design:

Risk	**Risk rating**	**Risk mitigation strategy**
Institutional risks associated with poor coordination among institutional stakeholders at the national level	Low	For this project the cooperative implementation being undertaken between MONRE (VEA) and VINACHEMIA is evidence of this being addressed at a practical level. This is also consistent with Vietnam's

Risk	Risk rating	Risk mitigation strategy
		adoption of an overall GEF-5 programmatic approach which aims to address the recognized barriers associated with institutional fragmentation and having a coordinated approach to POPs and chemicals issues generally
Lack of access to distributed data and inventory information required to develop national data bases and reporting materials	Low	Following from the above, it is anticipated that the policy level commitment from two Ministries working together will minimize any barriers to obtaining and consolidated monitoring data, and inventory information related to mercury and contaminated sites. The lessons learned from current GEF-4 project implementation will also serve to enhance cooperation and information access between various initiatives
Achieving required levels of co-financings	Moderate	As in any other project at this stage of development, uncertainties exist associated with committed co-financing. However, a strong commitment from two Ministries capable of significant grant and in-kind contributions has been secured and additional support from other stakeholder Ministries such as Ministry of Defense and Ministry of Science and Technology is anticipated. On this basis, the level of co-financing required appears feasible, something that will be developed in detail during the PPG.
Climate hazards affecting long term storage of waste and contaminated materials	Low	The project itself has the effect of mitigating such impacts first by facilitating the remediation and elimination of contaminated soils and associated POPs waste, and by ensuring that containment and long term storage is hydraulically isolated. For example, project design would address POPs storage sites keeping in mind the vulnerability of geographic locations to floods, storms etc. In the cases highlighted above, this addresses situations where climate change impacts involve changes in hydraulic regimes (ground and surface water levels including seasonal variations and increasing frequency of extreme climatic events). Climate change impact considerations will be specifically included in the development of site specific risk assessments. It is also anticipated that this will have an impact on how POPs contaminated site management is undertaken in North versus South Viet Nam.

B.5. Identify key stakeholders involved in the project including the private sector, civil society organizations, local and indigenous communities, and their respective roles, as applicable:

The primary institutional stakeholders are MONRE in its capacity as the lead executing partner, and MOIT through VINACHEMIA. Other national institutional stakeholders include the Ministries of Health, Agriculture and Rural Development (Department of Plant Protection), Defense, and Science and Technology. At a regional and local level, Peoples Committees are significant stakeholders particularly those at the rural community level where POPs legacies associated with contaminated sites are a specific targeted interest for the project in terms of awareness and site specific impact mitigation. Other major stakeholders include various institutions within the scientific and health community whose expertise and experience is critical to the monitoring system being strengthened by the project. Likewise, various enterprises who have used POPs historically as well as those using or unintentionally releasing new POPs and/or mercury are significant stakeholders.

B.6. Outline the coordination with other related initiatives:

The Project's development and implementation will take advantages and lessons learnt from completed and on-going POPs projects including GEF projects implemented by various implementing agencies. These include two UNDP projects ("Building Capacity to eliminate POPs Pesticide stockpiles in Vietnam"; and "Environmental Remediation of Dioxin Contaminated Hotspot in Vietnam"), one WB project (on PCB), and one UNIDO project ("application of the Best Available Techniques (BAT) and Best Environmental Practices (BEP) to reduce release UP-POPs from Vietnam Industry").

A major linkage also exists to the general SCM program and specifically the SAICM Quick Start project "Partnership Initiative for the Integration of Sound Management of Chemicals into Development Planning and Processes", being implemented by VINACHEMIA who will also work with MONRE on Component 1 and assume responsibility for Component 4 under this project. UNDP is also providing national implementing partner support for the SAICM initiative. Component 2 activities on monitoring (under this project) will be synergistic with a proposed regional GEF/UNEP project on POPs monitoring and reporting that Vietnam would participate in. Other initiatives that offer synergies with the project include several bilateral programs being undertaken in association with the Agent Orange project. These include (i) dioxin remediation activities financed by USAID, (ii) dioxin laboratory development financed by the Gates and Ford Foundations, and (iii) a site monitoring and local awareness project funded by the Czech government. The project will also coordinate with several global/regional GEF projects including UNDP's global medical waste project, the South East Asia regional POPs network activities being administered by UNEP.

C. DESCRIBE THE GEF AGENCY'S COMPARATIVE ADVANTAGE TO IMPLEMENT THIS PROJECT:

UNDP has proven track records in undertaking GEF POP projects with regard to Capacity Building and Technical Assistance as confirmed in Annex L of the GEF document "Comparative advantages of the GEF agencies",

At the country level, UNDP plays an important role in rendering assistance to Government of Vietnam (GoV) to fufil its obligations with international environmental conventions/ agreements the country has ratified/acceeded to. Regarding POP focal area, UNDP Vietnam provides technical assistance to the Government to strengthen its capabilities and legislative framework for environmentally sound management of POPs, PTSs and chemicals. Since 2003, UNDP Vietnam has supported the Government in development of the NIP and a series of POPs/chemicals projects that are under implementation. These include GEF projects on "Building Capacity to Eliminate POPs pesticides stockpiles", "Environmental Remediation of Dioxin Contaminated Hotspots in Vietnam", "Demonstrating and Promoting Best Techniques and Practices for Reducing Health-care Waste to Avoid Environmental Releases of Dioxin and Mercury", and a SAICM project on "Partnership Initiative for the Integration of Sound Management of Chemicals into Development Planning and Processes". The implementation of these projects will provide lessons learnt and experience for future management of POPs and chemicals issues in Vietnam and particularly to this proposed project.

Within the UNDP Country Office in Vietnam, the Sustainable Development Cluster (SDC) is the unit responsible for three projects portfolios associated to Environment and Energy sector. The SDC team consists of 10 national staff (seven are full time programme officers who have more than 07 years of experience in project/programme management and three programme associates), four international technical specialists and one international policies advisor. The team has extensive experience in implementation of GEF funded projects, including those in the chemicals focal area.

In addition, UNDP since its establishment in Vietnam has developed a strong partnership and cooperation with various institutions, including ministries, businesses, and local authorities in an efforts to

environmental protection and sustainable development. Such strong and growing partnerships will help delivering the project results successfully.

C.1 Indicate the co-financing amount the GEF agency is bringing to the project:

UNDP does not currently have any legal ability to decide to provide co-financing to GEF funded projects with UNDP's "own" resources (which are referred to as "regular resources"). Decisions on the allocation of UNDP regular resources to particular projects are country-led and are made within the framework of UNDG and UNDP in-country programming processes. UNDP can and does, however, arrange for co-financing from Other Resources (i.e. non-UNDP core) to GEF funded projects. These sources can include multilateral, bilateral and regional donors, the programme countries themselves, NGOs, other UN agencies and the private sector, among others. UNDP normally achieves a ratio of more than $3 in co-financing for every $1 in GEF resources for country projects.

That said, in this case due to timely discussions UNDP is providing US$ 200,000 cash as co-financing contribution towards project component 1 of this project, through "Partnership Initiative for the Integration of Sound Management of Chemicals into Development Planning and Processes" project.

Additionally, the United Nations Development Programme (UNDP) Vietnam has contributed around 30,000 US$ (grant) for the preparation of the GEF5 POP programme and for this project. Identification of further in-house cash contribution towards the initiative will be undertaken during the PPG stage of the project.

C.2 How does the project fit into the GEF agency's program (reflected in documents such as UNDAF, CAS, etc.) and staff capacity in the country to follow up project implementation:

The expected outcomes of the Project as mentioned above will contribute to achieving following UN One Plan's (OP) outcomes and outputs agreed with the Government of Vietnam for period 2012-2016:

One UN Plan 3 (OP3) Outcome 1.4: By 2016, key national and sub-national Agencies, in partnership with the private sector and communities, implement and monitor laws, policies and programmes for more efficient use of natural resources and environmental management, and implement commitments under international conventions.

One UN Plan 3 (OP3) Outputs 1.4.3 - Policies, plans and technical skills are strengthened for the sound management of hazardous chemicals and persistent organic pollutants (POPs), in accordance with international conventions.

To ensure the success of the project implementation, 02 staff from SDC will be assigned to be directly responsible for the overall management and supervision of the project implementation. In addition to the support from SDC, the project implementation also gets support from other UNDP units such as Procurement Unit, Finance Unit, M&E team and HR Unit on respective issues, and is technically assisted by the UNDP-GEF Regional Coordination Unit for Asia-Pacific in Bangkok (UNDP-GEF APRCU) and UNDP Headquarters.

PART III: APPROVAL/ENDORSEMENT BY GEF OPERATIONAL FOCAL POINT(S) AND GEF AGENCY(IES)

A. RECORD OF ENDORSEMENT OF GEF OPERATIONAL FOCAL POINT (S) ON BEHALF OF THE GOVERNMENT(S): (Please attach the Operational Focal Point endorsement letter(s) with this template. For SGP, use this OFP endorsement letter).

NAME	POSITION	MINISTRY	DATE *(MM/dd/yyyy)*
Dr. Nguyen Van Tai	Director General, ISPONRE/MONRE	**MINISTRY OF NATURAL RESOURCES AND ENVIRONMENT**	**08/06/2012**

B. GEF AGENCY(IES) CERTIFICATION

This request has been prepared in accordance with GEF/LDCF/SCCF policies and procedures and meets the GEF/LDCF/SCCF criteria for project identification and preparation.					
Agency Coordinator, Agency name	**Signature**	**DATE** *(MM/dd/yyyy)*	**Project Contact Person**	**Telephone**	**Email Address**
Mr. Yannick Glemarec Executive Coordinator UNDP-GEF		08/09/2012	Suely Carvalho, GEF Principal Technical Advisor for POPs/Ozone UNDP/MPU/Chemicals	212-906-6687	Suely.carvalho@undp.org