

IMPLEMENTATION COMPLETION MEMORANDUM (ICM)

For Wildlife Consumption in Vietnam: Reforming Policies and Practices to Strengthen Biodiversity Conservation (P122701)

A. BASIC TRUST FUND INFORMATION

TF Name: **Wildlife Consumption in Vietnam: Reforming Policies and Practices to Strengthen Biodiversity Conservation**

TF Number: **P122701, TF011394**

Task Team Leader Name/TF Managing Unit: **Thu Thi Le Nguyen**

TF Amount: **US \$1,000,000**

Recipient of TF funds: **Ministry of Natural Resources and Environment (MONRE), The Socialist Republic of Vietnam**

Type of TF: **Free-standing**

Single/Multi Donor: **Single**

Donor(s) Name(s): **Global Environment Facility (GEF)**

TF Program Source Code:

Purpose of TF: **Specific investment loan to strengthen biodiversity conservation through significant reduction of illegal wildlife consumption in Vietnam**

TF Approval/IBTF Clearance Date: **11/15/2011**

TF Activation Date:

TF Closing Date(s): **05/01/2015**

Date of ICM Submission to TFO:

Cost and Financing Table:					
	Project Preparation (a)	Project Implementation (b)	Total (a + b)	Agency Fee	Grand Total
GEF	0	1,000,000	1,000,000	100,000	1,100,000
Co-financing	26,200	1,790,000	1,816,200	0	1,816,200
Total	26,200	2,790,000	2,816,200	100,000	2,916,200

B. TRUST FUND DEVELOPMENT OBJECTIVES AND DESIGN

1. Original (and Revised) Trust Fund Development Objectives

The Trust fund Development Objectives have not changed: The project's development objective is to strengthen biodiversity conservation through significant reduction of illegal wildlife consumption in Vietnam.

2. Original (and Revised) Trust Fund Activities/Components, Outcomes and Outcome Indicators

The Trust fund components, outcomes and outcome indicators have not changed.

Table 1: Components, Outcomes and Outcome Indicators of Project

Component	Outcome	Outcome Indicators
PDO: Strengthen biodiversity conservation through significant reduction of illegal wildlife consumption in Vietnam		Percentage of Hanoi residents that have consumed wild meat in past 12 months (% of sample)
		Percent of Hanoi residents who are current users of bear bile as a traditional medicine (% of sample)
1. Strengthen Policies and Legal Frameworks	A more effective policy and legal framework	Completeness and consistency of legal policy framework
2. Monitoring and Enforcement of Consumption Controls	Improved monitoring systems and enforcement of consumption controls	Percentage of Hanoi restaurants that serve wildlife (% of sample)
3. Building Awareness to change behaviours	Health sector and government and private sectors reduce illegal wildlife consumption	Reduced sales of endangered species in TCM shops
4. Project Management	Effective project management	Sound financial management and procurement
		Effective project reporting
		Training and capacity building of national staff

3. Other Significant Changes in Trust Fund Design

There were no significant changes to the Trust Fund Design

C. OUTCOME

4. Relevance of TF Objectives, Design and Implementation

Illegal wildlife trade is a ‘global bad’, the response to which requires a combination of local and global solutions. Wildlife trade is recognized by the Government of Vietnam (GoV) as one of the key drivers of biodiversity loss in Vietnam according to the Vietnam Socio-economic Development Strategy (SDS) 2011 – 2020, and other national policies namely the National Strategy on Environment Protection to 2020, National Biodiversity Strategy to 2020, Vietnam Vision to 2030, the National Biodiversity Law and Vietnam’s obligations under the Convention on Biological Diversity (CBD). Accordingly, the Vietnam Country Partnership Strategy (CPS) FY12 to FY16 identifies the reduction in illegal trade of biodiversity as a key outcome under pillar 2.1 “Improved Natural Resources Management” of the CPS. The objective of this Project directly addresses this issue by focusing on reducing consumption of wildlife which is itself a driver of the illegal trade, and thus substantively contributes to the national efforts of Vietnam on reducing/ halting the illegal trade of wildlife, and to the global efforts of the Bank on promoting biodiversity conservation¹, and supports the country in meeting its obligations under the Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES) and the CBD.

The project’s components (*Table 1*) are designed to address three main drivers of illegal wildlife consumption in Vietnam: a weak crime prevention legal framework, low enforcement capacity, and high demand for wildlife for traditional Chinese medicine (TCM). Component 1 includes a comprehensive set of activities that are expected to assess weaknesses in the current policy and legal framework for wildlife trade and on the basis of this assessment to strengthen specific areas within the legal framework, and also provide guidelines for implementation of the legal and policy framework. These activities, and other activities under this component focusing on capacity building, are consistent with recommendations from a study of Forest Law and Governance in Vietnam² which include, *inter alia*, improving data sharing, improving inter-agency cooperation and strengthening capacity to understand and implement the law. The Forest Law and Governance study also identified the weak capacity of enforcement agencies to implement the laws. The project in part addresses enforcement capacity through a focus

¹ World Bank, 2012. Towards a Green, Clean and Resilient World for All: A World Bank Group Environment Strategy 2012 – 2022.

² World Bank, 2010. Forest Law and Governance, Socialist Republic of Vietnam. Available online http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2010/05/25/000334955_20100525061347/Rendered/PDF/546440WP01P10110Box349423B01PUBLIC1.pdf

on intelligence-based enforcement. Overall improvement of wildlife consumption management may however be challenged if the manpower and resources for enforcement is not there; this project does not address this issue.³

The paucity of data on wildlife trade and wildlife crimes limits the response to illegal wildlife trade and consumption according to the UN Office on Drugs and Crime (UNODC)⁴. The establishment of a national monitoring system for illegal wildlife and trade under Component 2 will therefore support the strengthening of the wildlife crime prevention network. The system will allow for improving and systematizing data and information collection related to wildlife trade and crime, and the use of the data and information to develop effective strategies for addressing illegal consumption of wildlife. Activities targeting key stakeholder groups for building awareness on wildlife trade and consumption using a menu of approaches specific for each group under Component 3, are strategic for reducing both the demand and supply of wildlife.

5. Achievement of TF Development Objective

A summary of the ratings of the outcomes and outputs of the project upon completion is provided in Table 2, with justification for these ratings provided in the text below.

Table 2: Summary Ratings of Outcome and Outputs

Component	Outcome/ Output	ICM Rating
PDO: Strengthen biodiversity conservation through significant reduction of illegal wildlife consumption in Vietnam	Percentage of Hanoi residents that have consumed wild meat in past 12 months (% of sample)	Satisfactory
	Percent of Hanoi residents who are current users of bear bile as a traditional medicine (% of sample)	Satisfactory
1. Strengthen Policies and Legal Frameworks	Completeness and consistency of legal and policy framework	Satisfactory
	New National Strategy on biodiversity to 2020	Satisfactory
	Action Plan on Wildlife Trade Control (2010-2020)	Satisfactory
	Improved regulations on illegal wildlife trade and consumption	Satisfactory
Component 2:	Improved monitoring systems and enforcement of	Satisfactory

³ A 2008 TRAFFIC study on the drivers of wildlife trade notes that enforcement and broader governance were the critical factors determining the effectiveness of legislation and regulations (both those restricting the use of wildlife resources themselves, as well as those governing rights and access to land and resources), rather than the presence of laws and regulations per se.

⁴ UNODC 2013. Transnational Organized Crime in East Asia and the Pacific A Threat Assessment. Available Online http://www.unodc.org/documents/data-and-analysis/Studies/TOCTA_EAP_web.pdf

Component	Outcome/ Output	ICM Rating
Monitoring and Enforcement of Consumption Controls	consumption controls	
	Strengthened capacity of municipal enforcement teams and judicial authorities in demonstration areas	Satisfactory
	Number of enforcement campaigns implemented with support from Vietnam-WEN	Satisfactory
3. Building Awareness to Change Behaviours	Health sector and government and private sectors reduce illegal wildlife consumption.	Highly Satisfactory
	New public health guidance and policies reflect disease transmission risks and legality/ conservation issue	Satisfactory
	Internal party guidance on illegal wildlife consumption for party members. Satisfactory	Satisfactory

PDO Indicators

By the mid-term review of the project, targets set for these indicators had already been exceeded 25% (target of 23%) and 49% (target of 23%) for the indicators respectively.

Component 1: Strengthen Policies and Legal Frameworks

Outcome Indicator: Completeness and consistency of legal and policy framework.

Satisfactory

There are several notable efforts to strengthen policies and legal frameworks for wildlife conservation. The process of strengthening the policies and legal frameworks began with the undertaking of a review of the legal and policy framework for combatting wildlife trade in Vietnam. The findings and recommendations of the review were shared in a multistakeholder workshop, to which participants responded positively to the recommendations. These have so far been incorporated into a new National Strategy on Biodiversity for Vietnam, and a MONRE-issued Circular for establishing and managing biodiversity conservation facility, and used to improve legislation - Decrees 157 (issuance of the Decree 40 by the Government dated April 27, 2015 on amending Decree 157 on settlements on administrative violations of forest management, forest protection and development, and forest products management clearly excludes species under Decree 160 out of its mandate); Decree 179 on administrative punishment for environment protection released in Nov 2013 includes articles dealing with wildlife violations; and the Circular 160/2014/TTLT-BTC-BTNMT on guiding the use of state budget for implementing NBSAP, which regulates that can use budget on rescue and release of species prioritized for protection.

Output 1: New National Strategy on biodiversity to 2020. **Satisfactory**

The New National Strategy on Biodiversity to 2020 is developed as the country's National Biodiversity Strategy and Action Plan (NBSAP), and is the principle instrument for implementing Vietnam's commitments under the CBD. The NBSAP was endorsed by

the Prime Minister in 2011 and approved in 2013. Although the NBSAP was completed prior to the finalization of the review of the legal and policy framework for wildlife trade, preliminary findings and recommendations of the review are included in the NBSAP. The project consultant was hired to provide technical inputs on the component of “Species Conservation” in the NBSAP, and thereby ensured that the findings of the review were well integrated into the Action Plan. As the NBSAP is the principle instrument for implementing biodiversity at the national level, the inclusion of wildlife conservation and management is a clear signaling of the mainstreaming of this issue within Vietnam.

Output 2: Action Plan on Wildlife Trade Control (2010-2020). **Satisfactory**

Due to the lack of implementation of the previous Action Plan on Wildlife Trade Control (2005-2010), a decision was taken to change focus from the development of an Action Plan to a Presidential Directive for improving wildlife management. In 2014 Directive 03⁵ was issued by the Prime Minister of Vietnam on strengthening the direction and implementation measures to control and protect endangered wildlife. This Directive could be counted as an achievement of the project, as findings and recommendations of the review were used as technical inputs to the Directive by MONRE. For example, to determine the responsibilities of different line Ministries in wildlife management. This Directive is an instrument that promotes coordinated efforts of the GoV in managing illegal wildlife trade.

Output 3: Improved regulations on illegal wildlife trade and consumption. **Satisfactory**

Decree 160⁶ was developed by MONRE and issued in 2013 to support the protection of endangered species. The Decree provides detailed guidance on criteria for determining endangered species, and how these should be managed in Vietnam. The guidance provided through Decree 160 serves to strengthen the regulatory framework for wildlife trade and management. For example, the Decree has given increased level of protection to several species affected by illegal wildlife trade, including both the Sunda and Chinese Pangolin (*Manis javanica* and *Manis pentadactyla*), and tightened restrictions on exploitation of species.

A Circular guiding the establishment and management of biodiversity conservation facilities to support efforts to combat wildlife trade has been drafted by MONRE. The Circular was developed based on the recommendations and findings of the legal review. The Circular is expected to be issued by the 4th quarter of 2015.

⁵ Directive 03: Directive on strengthening the direction and implementation of measures for controlling and protecting endangered, rare and precious wild animals: Accessed at http://www.cites.org/sites/default/files/VietNam_Directive_Wildlife_Crime.pdf

⁶ Decree 160: Decree on Criteria to Determine Species and the Regime to Manage Species under the List of Endangered, Precious and Rare Species prioritized for Protection. Accessed at <http://vietlawonline.com/vbpl/55725/plant-varieties/the-list-of-endangered-precious-and-rare-species-prioritized-protection.vlo>.

The review elucidated conflicts in wildlife trade legislation, for example Decree 157 (administration punishment for wildlife crime) shows conflict with Article 190 in the Penal Code 2009. In light of this, the GoV issued Decree 40 in April 2015, to address some of the conflicts with respect to Decree 157.

There is no official structure in place within the government for reviewing the impact of the improved regulations. However there are several opportunities. These include: revision of the NBSAP; the revision of the decrees/ regulations at both central and provincial level; the development of new regulations and it was suggested by the project management unit (PMU) that a new project being developed on wildlife trade management could also be an opportunity for assessing impact of improvements through evaluation of the decrees/regulations implementation.

A follow-on project to this should consider how to track the improvements made to the legal framework. For example, each Aichi Biodiversity Target of the CBD has a set of indicators which can be systematically tracked and used as proxies for the impact of the improved legislation and regulations on wildlife management. The completeness of the legal and policy framework is likely to be better assessed and informed by a set of comprehensive indicators from which the impact on wildlife trade could be assessed.

Component 2: Monitoring and Enforcement of Consumption Controls

Outcome Indicator: Improved monitoring systems and enforcement of consumption controls. **Satisfactory**

Surveys undertaken pre and post the wildlife enforcement campaigns suggest that these campaigns had an impact in reducing the sale and marketing of wildlife and protected species. The surveys captured a 40 – 60% decrease between pre and post enforcement campaign in the number of retailers engaging in wildlife sale and trade violations. Even in the absence of a more detailed study to rule out other possible contributing factors, these results are an indication of the success of improved monitoring efforts.

A web-based wildlife database and reporting system has been developed under the project which involved various enforcement agencies in Hanoi and the national Environmental Police. The database is designed to support inter-agency information sharing and intelligence-led enforcement campaigns as well as monitoring the wildlife crime situation in Hanoi area. Data is being entered to the system by enforcement agencies and the system has been integrated into VEA⁷ website (link: wlc.vea.gov.vn) during the pilot phase. The system is closed to participating agencies with provided access accounts considering its confidential nature of enforcement efforts.

Output 1: Strengthened capacity of municipal enforcement teams and judicial authorities in demonstration areas. **Satisfactory**

⁷ Vietnam Environment Administration under MONRE

A total of over 700 enforcement and management officials throughout Hanoi and nationwide have been trained to improve awareness communication skills for the communities and provided with communication toolkits⁸. More than 200 enforcement officials across the country have provided inputs for the law explanatory manual during the training workshops to get inputs on the final draft manual. The toolkit has been distributed to all government agencies, and communist party offices, and correspondence was developed by the CCPE⁹ (Correspondence 7584-CV/BTGTW) to support ongoing communication campaigns on wildlife protection. An explanatory manual for wildlife law enforcement developed in 2015, an ID Guide for species under Decree 160 and the introduction to Decree 160 were distributed to all law enforcement agencies targeting law enforcement at the provincial level. These various communication and enforcement tools add to the capacity of the enforcement teams for wildlife management. The manual will also be introduced to the People's Police Academy in a new counter wildlife trade course in 4th quarter 2015.

Wildlife Conservation Society (WCS) provided on-the-job training for staff of Hanoi Environmental Police on relevant issues of enforcement including targeting retailers who may be non-compliant with wildlife legislation, and in designing long-term strategic approaches to enforcement that will feed into the proposed law enforcement program. Capacity was also strengthened after systematic assessment via surveys and undercover operations which provided information on the retailers engaged in wildlife sale and trade which to support the efforts of law enforcers.

Training of judicial authorities is being provided by other NGOs, for example, TRAFFIC – the Wildlife Trade and Monitoring Network, Freeland Foundation and on this basis it was determined that the focus should be only on the municipal enforcement teams in order not to duplicate efforts. However, the Hanoi Supreme People's Court and Hanoi Supreme People's Procuracy were active participants in other project activities such as meetings and workshops on law enforcement issues, joining to develop the wildlife violation database system and were also targeted when developing the law enforcement manual.

Output 2: Number of enforcement campaigns implemented with support from Vietnam-WEN. **Satisfactory**

Two major enforcement campaigns were undertaken as part of the project involving law enforcement authorities and targeting 20 prioritized retailers, who were suspected of being non-compliant with wildlife legislation, out of approximately 2,340 retailers surveyed. These campaigns were guided by an operational manual which provided a strategic approach to enforcement that focused on gathering and using data and information for planning and decision-making. The manual is itself a useful tool for planning similar campaigns, as it brings structure and efficiency to the process of implementing wildlife campaigns. For example, helping to identify who should be

⁸ A DVD resource containing video clips, brochures and reports of the project.

⁹ Central Committee for Propaganda and Education of the Communist Party of Vietnam.

involved in the campaign, and the type of information that should be collected. MONRE is working with the Hanoi People’s Committee (HPC) to have the enforcement campaign done as a regular activity For example, as part of the HPC annual illegal trade campaign in Hanoi around the Tet holidays. Such efforts of mainstreaming the campaigns are important for the sustainability of the process introduced through the project.

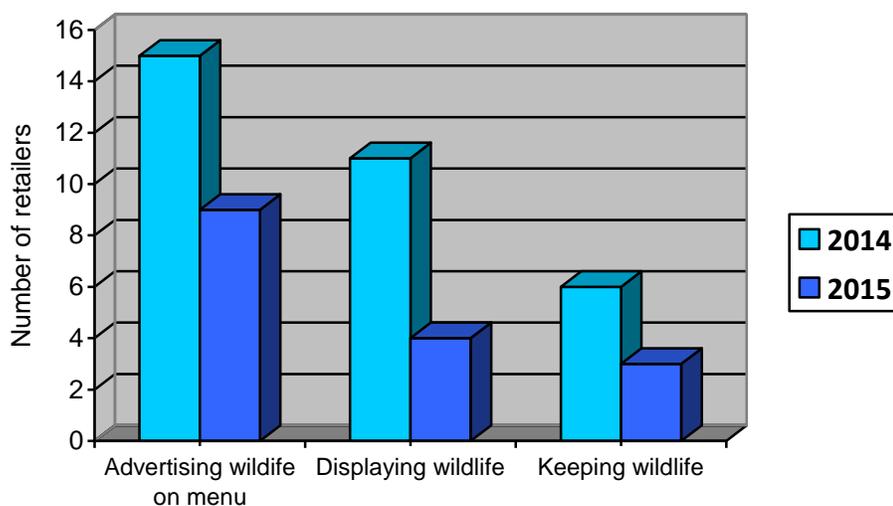
WCS also provided training to enforcement officials in the use of geospatial tools to assist in wildlife trade management. These tools were used for the recording and mapping of locations of violations. Geospatial tools are likely to improve wildlife trade management as these can help to condense a large set of information important for management, and can also assist in the real-time sharing and transfer of information – altogether making wildlife trade management more efficient.

Component 3: Building Awareness to Change Behaviours

Outcome Indicator: Health sector and government and private sectors reduce illegal wildlife consumption. **Satisfactory**

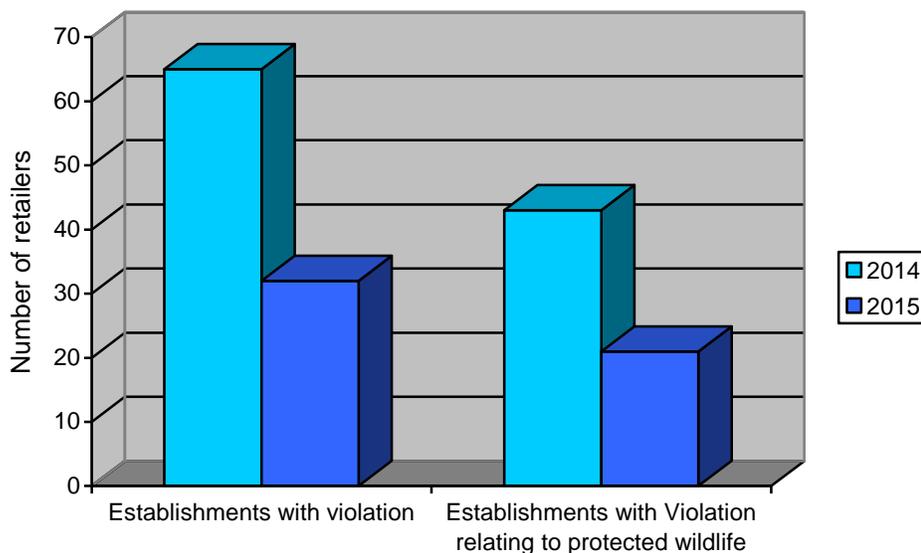
The active participation of the Ministry of Health (MOH) and the CCPE in awareness raising efforts of the illegality of the wildlife trade is a success of the project. Managing the illegal wildlife trade issue requires multistakeholder engagement and participation, such as was demonstrated by the involvement of MOH and CCPE.

The project encountered difficulty in collecting baseline data on sales volume of selected species of wildlife, due to the unwillingness of retailers to disclose such information. The project however noted a reduction in the number of targeted retailers engaged in the sale of wildlife between 2014 and 2015 which may be indicative of the impact of the project on changing attitudes with respect to illegal wildlife trade; see *Figures 1 and 2*.



Source: WCS, 2015. Post Campaign Survey Report

Figure 1: Types of violation reported from 17 priority target retailers (of a sample of 20) surveyed in 2014 and 2015



Source: WCS, 2015. Post Campaign Survey Report

Figure 2: Comparison on the number of retailers with violations within 4 districts across 2014 and 2015

Output 1: New public health guidance and policies reflect disease transmission risks and legality/ conservation issue. **Satisfactory**

MOH guidance correspondence was issued in March 2015 to provincial/municipal departments of health, medicine businesses, clinics, research centers and practitioners, on strengthening protection of endangered and precious wildlife and wild plants. The guidance focused on the illegality of the wildlife trade, and raising awareness on the need for wildlife conservation. Guidance also emphasized the need to find alternatives to wildlife species for use in traditional wildlife medicine and the need for regular inspection on medicine businesses. Little scientific information exists to validate or invalidate the benefits of wildlife in TCM to health. This lack of information may be a stumbling block to changing attitudes with respect to wildlife use. TCM shops are also encouraged to be part of awareness raising efforts by communicating to patients the adverse or non-impact of using wildlife species in TCM to their health.

Output 2: Internal party guidance on illegal wildlife consumption for party members. **Satisfactory**

Guidance was provided through Guideline #98 issued in December, 26th 2013 by CCPE on not consuming wildlife. The Guideline instructs all Party levels to develop communication plans both in Tet 2014 occasion and long-term and conduct propaganda

for not consuming, trading and using wildlife and wild plants illegally. A year later, a workshop to review the implementation of Guideline 98 was also co-hosted by MONRE and CCPE in December 2014. Some good initial results were seen from Bac Ninh and Hanoi Committees for Propaganda and Education, the Party Central Business Committee, and CCPE's Center for Scientific Research, Operations and Documentation.

Following the workshop, CCPE issued Correspondence 7584-CV/BTGTW to urge all parties to continue efforts to implement Guideline 98 together with the wildlife communication toolkit DVD produced under the project.

In addition, the project also supported the finalization and publication of the handbook on wildlife protection and consumer's responsibilities to support propaganda and education activities of all local and provincial communist party organizations.

6. Efficiency

The project established a multi-partner approach involving the GoV, non-government stakeholders working in Vietnam and the World Bank. This approach emphasized ownership and partnership-development through seeking active involvement of a wide range of government stakeholders including representation from MONRE, MARD, MOH and MPS to perform various roles including technical leadership and guidance to the project through representation on the project's steering committee (PSC). The involvement of the WCS, the British Council and the Freeland Foundation in the project was strategic for providing guidance and cash and in-kind co-financing for the project. The co-financing provided to the project was significant as it amounted to approximately 180% of the grant provided by the GEF, indicating the commitment by the GoV and the non-government stakeholders to the illegal wildlife trade reduction efforts.

Given the size of the grant, and the specific activities to be implemented, the three-year period was sufficient for implementing the activities under the project. The outcomes however, would benefit from a longer period of examination. It is notable that even over a relatively short period of a year, that the project was able to detect a change in the behaviour of retailers in relation to the sale and trade of wildlife and protected species. The design of the project was smart in that it did not propose unreasonable results. For example on the issue of changing attitudes towards and practices around illegal wildlife trade, the project focused on building/ raising awareness, which is the first step in the knowledge-attitudes-practice (KAP) theory of change. The selection of five key target groups and designing interventions targeting those groups was also efficient for using limited resources to reach a substantive group of persons, and to have large-scale impact. The project also showed use of existing government systems during implementation, for example the engagement of the CCPE and Central Youth Union to support the communications campaign.

Project activities were also designed with an element of sustainability and scale up. For example the focus on capacity building and training support the sustainability of wildlife efforts. Awareness raising was done at multiple levels using products and approaches

customized for the different stakeholder groups, for example the Central Party, NGOs, and communities.

The design of the intelligence-led approach to monitoring the illegal wildlife trade (enforcement campaigns), development of a database to record and track wildlife crime in Hanoi, and the production of an enforcement campaign manual are very important for providing a systematic approach to wildlife trade monitoring that can better utilize the already scarce resources available for enforcement. The returns from these tools are yet to be officially determined, however positive returns are anticipated. For example, the database will allow for the recording of information, *inter alia*, that can help the GoV to better approximate the volume of wildlife that is illegally traded, and understand the economic value of the wildlife trade. These values can then be used to adjust the country's national accounts to reflect the impact of wildlife trade on the economy. The revision of the legal framework to better support wildlife trade management is also strategic for ensuring that the entire system from judicial to enforcement would be more efficient.

7. Development Impacts, including those that are Unintended/Unrelated to TF Objectives

Improving Vietnam's National Policy Framework for Wildlife Management

There were several contributions of the project toward improving the Vietnam policy framework for wildlife management. In this respect, the project started with a review of the legal framework that supports biodiversity and wildlife management, and achieved a key outcome of increasing the understanding among key line ministries and agencies of the gaps in the legal framework, and the priority areas of the framework for strengthening in order to achieve wildlife management objectives. Based on the review, policies were introduced or amended with the outcome of strengthening the legal framework for wildlife management. These include: Guideline 98-HD/BTGTW on enhancing communication to reduce illegal wildlife trade and consumption; Ministry of Health Correspondence 79 on a joint action plan for protecting biodiversity, especially endangered wild plants and animals; Decree 160 on strengthening the regulatory framework for wildlife trade and management; CCPE Correspondence 7584-CV/BTGTW on supporting ongoing communication campaigns on wildlife protection; a MONRE circular on the establishment of a biodiversity and conservation facility to support efforts to combat wildlife trade; and Decree 40 issued to address some of the conflicts with respect to Decree 157 and MONRE correspondences for three consecutive years instructing relevant agencies nationwide to enhance enforcement and communications for reducing illegal trade and consumption..

Institutional Strengthening and Coordination

The project established and piloted a multi-stakeholder approach, which has proven to be an effective way to mobilize interagency cooperation and support for the wildlife trade

issue. The outcomes of this have been greater awareness among ministries of the illegal wildlife trade issue, and the integration of wildlife trade issues into the operations of these ministries. For example, the Ministry of Health, Ministry of Public Security, and the CCPE have begun to take a more active role to drive the conservation agenda within their relevant sectors. Additionally increased coordination among these ministries is a positive development impact.

Establishment of Wildlife Partnership Forum

The establishment of the Wildlife Partnership Forum (WPF) under the project has had a significant positive outcome on the coordination of the activities of the GoV, NGOs and donor agencies around the wildlife trade issue that may not have been achieved otherwise or slow to occur. The Forum is a platform for networking, building interagency cooperation, knowledge exchange, information sharing and building partnerships to implement initiatives. Membership of the forum includes various stakeholders in wildlife conservation including government ministries and sectors (MOH, MPS, MARD, MONRE, MoJ), international and local NGOs (WSP, PanNature, ENV, WWF, FFI, TRAFFIC), research institutions (IEBR, CRES), Rescue centers, international institutions (WB, ADB, USAID), embassies, individual experts. . The forum has coordinated regular forum meeting on 2 month basis for update activities, sharing information and finding chances to collaborate. For example, under the WPF coordination, various organizations have joined in an exhibition for wildlife protection on Biodiversity Day 2013 ceremony. The weekly biodiversity/wildlife bulletin has been distributed regularly to the forum member through the partnership mailing list network to update relevant information and project activities.

Outside of the WPF, the project also collaborated with NGOs and supported their activities by sharing survey data from the enforcement campaign, developing new communication resources that are freely available for all to use, and collaborating to host the gala event for authorities in Ho Chi Minh City.

Progress toward National and Regional Biodiversity Objectives and Mainstreaming

The project's design was guided by Vietnam's obligations under the CBD, CITES, and ASEAN-WEN. Accordingly, the outcomes of the project support these conventions/programmes.

The project has initiated contributions towards achieving the NBSAP objectives, particularly the second target: "To improve the quality and populations of endangered, rare and precious species, ensuring that no new case of species extinction is reported, and significantly improve the status of endangered, rare and threatened species". Some examples of contributions include some notable advances at the policy level, especially the issuance of Decree 160; raising the profile of the illegal wildlife trade and consumption issue across various ministries and organizations; and developing baseline studies to identify drivers of demand and feasible pressure points for intervention. The

project has also developed useful tools, alliances and experience, all of which can be used by other government agencies, enforcement authorities, and NGOs to scale up and enhance communication and enforcement efforts in Hanoi and other biodiversity and wildlife crime hotspots. Relevant Aichi targets under the CBD that the project contributes to are Targets 1, 4, and 12.

The project will positively impact the Vietnam-WEN program, through the development of several new products that will complement and support their efforts, including the database for tracking wildlife crime, the law enforcement manual, species ID guide, and training workshops with enforcement authorities on implementing Decree 160.

Knowledge Exchange with South Africa

The exchange visit with South Africa provided an opportunity for both countries to better understand some of the demand and supply issues of wildlife trade, the key challenges that each face in combatting illegal wildlife trade, and the various responses of their respective governments and civil society. Such bilateral knowledge exchanges are important for reducing illegal global trade.

8. Overall TF Outcome

The overall TF outcome is rated as **Satisfactory**, based on above motioned aspects: relevance, achievement, and efficiency and development impacts.

D. RISK TO DEVELOPMENT OUTCOME

9. Follow-On Results and/or Investment Activities

Activity/Investment:

____ Recipient/Other Investment; X Grant Project/Program; ____ Bank Project;
____ IFC Financial Project/Activity

A project has not been officially initiated however discussions have commenced and advanced between MONRE and the Bank on a follow up project to scale up results from WLC in the broader context of wildlife trade, demand reduction, and enforcement with funding from the GEF6 cycle. BCA has developed a concept note for a potential GEF6-funded project on protecting wildlife against illegal trade, and has asked if the World Bank might agree to serve as the implementing agency. Vietnam's STAR allocation for the Biodiversity focal area is \$12 million for GEF6.

10. Replicability

The approach taken for strengthening the legal framework for combatting illegal wildlife trade is one that could be replicated in other sectors, as well as in other countries. The review and gap analysis of the legal framework was very instructive in identifying and prioritizing gaps in the framework, and also identifying potential areas of policy overlap. Comprehensive review processes such as this one improves efficiency by providing more direction to the legal revision process, reducing ad hoc and uncoordinated activities, and can help the government better understand where investments are likely to be most strategic.

The law enforcement operation plan has high potential for replicability in other regions experiencing wildlife trade. The methodology included in the plan for conducting wildlife campaigns is sufficiently broad to be applied in different countries and be impactful. One of the learnings emerging from the implementation of the enforcement activities is on the need for good stakeholder analysis to, not only identify the groups that should be involved, but importantly to determine what should be their respective roles and levels of involvement. The PMU reflected that the uptake of the recommendations on law enforcement may have been better received if they came from an enforcement authority rather than the WCS, as WCS are INGO and staff are not trained officially and experienced in law enforcement as well as investigation, and may not have been perceived as credible for determining and delivering recommendations for law enforcement. A more successful arrangement may have been greater involvement of the MPS-Environmental Police in the delivery and implementation of law enforcement activities.

The project has been significant in stimulating and mobilizing interest among different government agencies as a result of the composition of the Project Steering Committee involving several Ministries, and communication and sharing of information with stakeholders using a broad set of communication tools (internet, print, and mass media) and on a regular basis.

11. Overall Risk to Development Outcome

This project engenders several design elements which contribute to the low risk of the sustainability of the development outcome. The overall risk to development outcome is rated as **low**.

The involvement of the GoV in the project through several ministries has helped to build ownership of the illegal wildlife trade beyond MONRE within the government. Throughout the life of the project, each of these ministries have incorporated the wildlife trade issue into their respective programmes of work. The ownership of the wildlife trade issue by these ministries increases the likelihood that there will be resource-support for activities in the future relating to combatting illegal wildlife trade. However, continued and consistent interventions by BCA and other government agencies are needed, providing updates on wildlife trade and related publicity in order to help them keep pace

with their responsibilities to help implement the Prime Minister's Decree on Combating Wildlife Trafficking. Joint branding of communication materials with the same government agencies will also help to ensure their ownership of public awareness materials and activities, which are continuing as a result of the WLC Project, including for example the "Operation Game Change" between the US Government, Government of Vietnam, and NGOs.

The establishment of the Wildlife Partnership Forum as a coordinating mechanism for activities on combatting illegal wildlife trade, and coordinated by the BCA can ensure continued coordination in the management of wildlife trade. Specifically, in the use of resources and in the implementation of activities.

The strengthening of the legal framework for wildlife management and the inclusion of wildlife management in the NBSAP reflects the GoV's interest in sustained efforts to combat wildlife trade. Adequate focus should be placed on planning and channeling of resources for the implementation of the NBSAP to ensure its sustainability. It should not be taken for granted that because the plan has been designed that it would be implemented.

The engagement of the Hanoi's People Committee (HPC) to have the wildlife trade enforcement campaigns added to the annual campaigns of the HPC. The HPC already undertakes enforcement campaigns for illegal trading around major holiday periods, e.g. pre-Tet holidays, so it may be strategic to develop a partnership between the HPC and the Environmental Police (EP) for implementing the wildlife trade campaigns. Sustainability of enforcement campaigns will depend largely on providing more ownership to Environmental Police, together with a spotlight on them to encourage progress and expect results. The Environmental Police Department will undergo newly institutionalized training later in 2015 in counter wildlife trafficking at the People's Police Academy, using training materials developed in part with support from this Project. Since most wildlife crimes in Vietnam are cross-border in nature, EP should work with Vietnam-WEN, which also includes FPD, Customs and other agencies, and shares information with WENs from surrounding countries.

Efforts to raise awareness among public groups through the Ministry of Health, Central Youth Union, and TCM have shown some impact during the project. However, whether this translates to changes in practices with regards to wildlife consumption is uncertain. Strong market demand for wildlife consumption in health, state and especially private sector looks set to continue, with surveys indicating that there is a large pool of aspirational and intending wildlife consumers awaiting sufficient disposable income to purchase "luxury" wildlife products. Rising levels of awareness have not yet translated to change in behavior. Sustained engagement is required to move from knowledge (awareness) to change in attitudes to change in practices. The ability to sustain engagement in this way has not been demonstrated in the project, and may be a strong indicator of the need for a follow up intervention/ project that would continue to build on this engagement.

In general, continued technical and financial support is crucial to continue building the momentum achieved under this project. Without further support, some of the project's results may not be able to sustain change for very long beyond completion of the project.

E. PERFORMANCE

The Bank's performance was rated satisfactory. A task team from the Bank, comprising a Task Manager, and specialists for Financial Management and Procurement, has been maintained through the project implementation. One supervision mission, two procurement post reviews and one mid-term review were conducted in October 2013, March 2013, March 2014 and September 2014 respectively, and more regular management, liaison and progress reporting were provided to follow the project's progress closely and to seek solutions for operational issues encountered during implementation. The Bank's activities were focused on supervision as this was a Recipient-executed project. Support from the Bank to the Project was found to be adequate. Training was provided in financial management (FM) and procurement, and the PMU notes the satisfactory responsiveness of the Bank on FM, procurement and implementation issues.

The Recipient's performance was rated satisfactory. The project has set up a relatively robust institutional structure comprising a Project Steering Committee (including MONRE, MARD, MOH, CCPE, Hanoi PC and MPS representation) and a project management unit (PMU) hosted by the BCA. The PMU comprised a project director, two project deputy directors, a project manager, and a chief accountant and project staff. The project experienced a slow start due to unfamiliarity of the PMU with the Bank's systems. However, after the first year of the project, implementation and disbursements increased rapidly. The day-to-day management provided by the project manager was noted to be very important for ensuring compliance with the Bank's systems and building capacity for FM and enforcement. A Workplan, FM manual, accounting software, and procurement guide were introduced and used by the PMU to support project implementation. Reporting to the Bank, was found to be improved after introduction of an activities matrix including progress and expenditure against the activities. All tasks carried out by the recipient were largely in compliance with the Bank's rules and procedures.

F. LESSONS LEARNED/ RECOMMENDATIONS

Combatting illegal wildlife trade requires political commitment and ownership of the management of the issue by the government. Mobilizing a range of partners in various relevant sectors to drive change within their areas, under the overall coordination of a specialized government agency, has proved to be an effective working structure for the wildlife consumption issue. BCA was able to use its government credentials and mandate to introduce illegal wildlife trade issues to other government ministries and

include in their work plans; as well as utilize the extensive government networks to amplify messages (especially the Central Youth Union and the Communist Party's Central Committee for Propaganda and Education). The Wildlife Trade Forum established by the BCA brings together government partners, and also private sector and civil society to plan, coordinate and coalesce efforts on illegal wildlife trade.

The multi-stakeholder/partnership approach is crucial for issues that are cross-sectoral in nature such as illegal wildlife trade. The only way to significantly and genuinely reduce wildlife demand is to promote the issue across all sectors of society and involve and coordinate the participation of as many relevant sectors as possible. Although it takes a considerable amount of time, effort and resources to develop and maintain partnerships, this aspect has been a major strength of the project, and this approach should be continued and expanded in any future projects of this type. A follow-up project to this one could consider the use of supply chain analysis to inform the strategic points of intervention for reducing the trade, the stakeholders that should be targeted, and for understanding how to design interventions that address motivations and attitudes as a crucial aspect of the 'knowledge attitudes practice' theory of change.

Sustainability of actions to combat wildlife trade requires long term, coordinated efforts likely best achieved through strong linkages with other established programs. The wildlife trade issue is a significant challenge which requires serious, long-term commitment of official support and resources. Efforts must be sustained and expanded to continue with the progress made by this project. Without further support, some of the project's results may not be able to sustain change for very long beyond completion of the project. Given that there are several ongoing efforts in Vietnam and the Region to combat the wildlife trade, the Bank and the GEF should consider how it can use its convening power to better support the activities of the ASEAN-WEN, and focus funding through a programmatic approach rather than a single project.

Multipronged approach at different levels (government, civil society and community) is needed to combat wildlife trade. Simultaneous targeting of actors at multiple levels is necessary, and using a variety of approaches and customized products for the different groups is strategic.

Combatting wildlife trade requires simultaneous action on improving legislation and enforcement, awareness raising, and behavioral change. The three components of the project support each other and are essential to improve together as a whole in working towards demand reduction.

Recommendations provided below for Project Management are applicable to the Bank, and the PMU. These recommendations are also likely to be instructive for other Donor agencies and implementing agencies:

- For implementing agencies unfamiliar with the Bank's systems, training and capacity building in Bank procedures including FM and procurement and reporting should be intensified during the first year of the project. Capacity building of the PMU is particularly needed in the area of accounting and

- reconciling expenditure. Project progress and disbursements are likely to be slower during the first year of the project, and it should not be assumed that disbursement rates should linearly match the time elapsed since project implementation (e.g. 30% disbursement achieved upon completion of the first year of a three year project).
- Systems introduced for projects, if deemed to be performing well, should be maintained for other projects. For e.g. the Bravo accounting system used for the project. Staff turnover may necessitate re-training in the use of these systems.
 - Early preparation of annual work plan, for example in 4th quarter of the previous year. This will ensure that the plan could be approved before the commencement of the new fiscal year. The procurement plan should be developed on the basis of the completion of the annual work plan to ensure consistency. The disbursement plan should follow the completion of the procurement plan so that disbursements are better coordinated with the procurement schedule. Workplan → Procurement Plan → Disbursement Plan

Recommendations are provided below for follow up projects/ interventions on wildlife trade in Vietnam:

- A process of assessing the impacts of changes in the legal framework should be put in place. Establishment of a set of indicators that can measure the impact of wildlife trade. The completeness of the legal and policy framework is likely to be better assessed and informed by a set of comprehensive indicators from which the impact on wildlife trade could be assessed. These can draw on the indicators already developed for the CBD Aichi Targets.
- Specific training for municipal enforcement agencies in anti-corruption as it relates to wildlife trade enforcement should be a feature of the strengthening of enforcement activities. Discrete activities in anti-corruption are beneficial given that corruption supports illegal wildlife trade (World Bank, 2010; UNODC, 2013).
- Strengthening of interagency cooperation. Intelligence-led approaches still require adequate human resources to implement effectively, because of the need for increased cooperation between law enforcement agencies, which takes time and effort to achieve. Interagency cooperation already occurs to some extent; for example, the Hanoi Environmental Police cooperated with the Hanoi Forest Protection Department for the enforcement campaign conducted under the project, but it urgently needs to be strengthened.
- Indicators need to be carefully designed to be realistic. Collecting economic data on illegal or informal activities is often a challenge, and at the risk of not being able to collect this information this should not be included in the project's results framework.
- More time is needed for the development of partnerships. A limitation of the project was the inability to fully develop and activate some important partnerships, such as with the private sector, and other stakeholders such as Ministry of Education and Training, and Ministry of Culture, Sport and Tourism.

G. ICM PROCESSING AND COMMENTS

1. Preparation

TTL at Approval: Thu Thi Le Nguyen

TTL at Closing: Thu Thi Le Nguyen

Comment of TTL at Closing:

Prepared by (if other than TTL): Maurice Andres Rawlins

Date Submitted to Approving Manager:

2. Approval

Manager: Iain Shuker

Date Approved by Manager:

Manager's Comment:

3. TFO Evaluation of ICM Quality

TFO Reviewer:

TFO Rating on the Quality of ICM (*Satisfactory or Unsatisfactory*):

Comment and Justification for Rating Given by TFO:

Annex 1: Mission Schedule

Date	Activity/ Event
Friday 26 th June, 2015	Meeting with Project Management Unit of WLC Project
Thursday 02 nd July, 2015	Meeting with World Bank Financial Management and Procurement support staff to the project
Friday 03 rd July, 2015	Meeting with Project Task Team of World Bank
Monday 06 th July, 2015	Meeting with Project Steering Committee of WLC project
Tuesday 07 th July, 2015	Conference call with World Conservation Society (WCS) Vietnam