

To: *The Drafting Committee and the Editing Team of the Master Framework on Socio-economic Development in Ethnic Minority, Mountainous Regions and Regions with Extremely Difficult Socio-Economic Condition, in the phase 2021-2025, with vision to 2030.*

Ref: *Comments on the draft Master Framework (draft No. 3)*¹

The Ethnic Minorities Working Group (EMWG), established in 2002 with the support of Vietnam's NGO Resource Center, aims to serve as a forum for interested national and international non-governmental organisations, development partners, State agencies and individuals to share and learn good practices in development projects in ethnic minority regions. In addition to information and experience sharing, EMWG prioritizes consultation and dialogues during the policy making process of the Government to contribute to improving policies related to ethnic minority communities in Vietnam. EMWG is chaired by a voluntary core team who contributes human, time and budget resources. At present, CARE International in Vietnam and the Institute for Studies of Society, Economics and Environment are co-chairing the working group for the term 2018-2020.

In promoting the responsibilities, voices and experiences of EMWG members, we would like to send the Drafting Committee and the Editing Team some general comments on the Draft "*Master Framework on Socio-economic Development in Ethnic Minority, Mountainous Regions and Regions with Extremely Difficult Socio-Economic Condition, in the phase 2021-2025, with vision to 2030*" (hereafter referred to as the Master Framework).

This comment paper was prepared based on the findings from literature review of study reports on poverty reduction and ethnic minority region development policies, discussion and comments of EMWG members, and the results of consultation with some independent experts who have, for years, studied poverty reduction policies in general and policies on poverty reduction and development in ethnic minority regions in particular such as Mr. Hoang Xuan Thanh, Mr. Pham Thai Hung, Mr. Nguyen Van Anh, Mrs. Luong Thi Truong, etc.

The following comment paper presents 16 key points, including the Master Framework draft's strengths and rooms for improvement. We would highly appreciate if the Drafting Committee and the Editing Team study and consider these comments during the adjustment and finalization of the Master Framework. EMWG members will include detailed comments directly on the Master Framework document, which will be delivered to the Editing Team after the Workshop.

We are looking forward to receiving feedback from the Drafting Committee and the Editing Team.

Best regards and thank you.

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¹ This document was handed out to participants at the consultation workshop organized by CEMA on 28 June 2019 in Hanoi. Hereafter, the event is referred to as "the Workshop".

OVERALL COMMENTS ON THE MASTER FRAMEWORK DRAFT

I. Strengths of the Master Framework draft

1. The Master Framework has provided a huge amount of accurate and scientific information about the current status, achievements, and difficulties of ethnic minority (EM) communities in regards to poverty reduction and sustainable development in all aspects, i.e. infrastructure, living conditions, education – training, health care, culture – information, etc.. It also states both objective and subjective causes of the difficulties and challenges in the past phase.
2. The Master Framework follows closely the sustainable development goals (SDGs) that Vietnam is committed to, which are the themes that development organizations at large and EMWG specifically are much interested in. When being implemented effectively, this Master Framework will contribute greatly to the poverty reduction and sustainable development for EM communities in Vietnam.
3. Being a Master Framework whose ambition, among others, is to combine and integrate policies in different aspects and different programs, if well designed, it will help address one of the biggest bottlenecks in poverty reduction in the past phase, i.e. the overlap in policies, the inconsistency in the procedure for planning, organization of implementation, monitoring and evaluation and payment and acquittal. As mentioned clearly in the current Master Framework draft: *“There are many focal points in developing, managing and monitoring policies; resources are largely scattered, the responsibilities of different levels and sectors have not been clearly identified, which require reform in policies on socio-economic development and investment for EM regions, mountainous regions and regions with extremely difficult socio-economic condition.”*
4. The Master Framework draft has also listed out important viewpoints. E.g. investment in sustainable development accompanied by poverty reduction and hunger alleviation, gradually narrowing down the gap in living standards in these regions and more developed regions; maintaining and promoting good cultural identity of ethnic groups; investment in socio-economic development accompanied by eco-environmental protection, especially the upstream river/spring systems, flora and fauna ecosystem, forest protection and development, and biodiversity.
5. The Master Framework draft recommends many innovative solutions, e.g. *to synthesize, evaluate strengths and limits, shortcomings of the criteria on dividing ethnic minority regions, mountainous regions and regions with extremely difficult socio-economic condition by development levels, and approach to the new way of division;* and proposals for many typical policies and mechanisms, e.g. *typical mechanisms and policies on recruitment, training, infrastructure, livelihood, increased income, afforestation, forest protection, business start-up, product consumption, etc. in ethnic minority regions, mountainous regions and regions with extremely difficult socio-economic condition.*
6. A Master Framework on socio-economic development in ethnic minority communities, once approved and passed, will contribute to the recognition of the status and values of EM communities in the course of the country’s development in general and of the sustainable development of EM communities in particular.

II. General things to be improved in the Master Framework

1. **The Master Framework has provided a relatively clear picture of the current situation and difficulties that EMs are facing, but not the core reasons for such current situations and difficulties.** For example: *the policy system is not synchronized* (no reasons were provided), *there is a lack of breakthrough innovation in the policy implementation mechanism (why?)*; *the collaboration among different sectors and levels are not tight nor effective (why?)*; *some issued policies have not taken into consideration the generation of motivation for people to actively escape poverty (why?)*; etc. In our opinion, the major reasons for such policy shortcomings are that the policy making is “top-down and granting” rather than based on the actual needs and priorities of EM communities, and the decentralization to grassroots levels, especially communal and village levels in policy making and implementation, has yet to be effective. .

Further to this, we will provide direct comments on the Master Framework document and submit to the Editing Team.

2. **The assessment on current status has not highlighted potentials and strengths of extremely disadvantaged regions where EM people are the major residents.** Three important elements need stronger emphasis to serve as a base for the Master Framework’s solutions:

- Advantages in community organizations: Extremely disadvantaged villages where EM people reside have great advantages in terms of community linkage and self-management via community institutions, which enable them to manage and use natural resources following local tradition/customs and knowledge; maintain health, cultural and spiritual practices; cooperate and support each other while earning a living and building resilience; and execute community-based social security.
- Potentials for local livelihood development: These are closely linked to community based tourism, cultural tourism/festivals; specialties (plants, animals); cattle raising; products/goods suitable to local soil and climate condition; forest economy; clean energy development; etc.
- Potentials for minerals, hydropower, border economy: These potentials, different from local economic potentials mentioned above, need a thorough review to avoid/minimize negative impacts on local people’s life and livelihood. The resettlement, environmental protection and recovery, risk reduction of investment projects (minerals, hydropower, etc.) of enterprises, and risk reduction of cross-border trade and labor need further emphasizing in the Master Framework.

The assessment on the current situation should also further emphasize the diversity, special characteristics and obvious division/differentiation of each area in EM regions, mountainous regions and regions with extremely difficult situation. In reality, each community and each village with different ethnic groups, in different regions or even in one region like in a district or a commune, have its own characteristics, with its particular advantages and difficulties. The context is changing very fast; EM communities have more and more contact beyond themselves, creating opportunities and challenges at the same time. Therefore, two outstanding approaches must be taken into consideration in the Master Framework: suitable support that promotes internal capacity of each village; and support to strengthen linkages between the village and external spaces, relevant agencies, organizations and enterprises. The Master Framework should

review, analyze, and assess advantages of each region in order to develop specific and typical solutions for each region.

Further to this, we will provide direct comments on the Master Framework document and submit to the Editing Team.

3. Lack of production land and forest land is one among fundamental reasons for poverty and hunger in EM communities while 87-98% EM households rely on agriculture.² In 2012, 117,458 EM households did not have enough production land, and 23,285 had no production land. According to Nhan Dan newspaper, issued on 30 January 2019, 54,000 EM households did not have sufficient production land while more than 58,000 households did not own enough residential land.³ Such information should be added to the Current Situation part of the Master Framework.

Further to this, we will provide direct comments on the Master Framework document and submit to the Editing Team.

4. In different parts of the draft Master Framework, there mentioned general things on the current situation and impacts of climate change. For example: “Increasing negative impacts of climate change, natural disasters and floods/storms’ serious impacts on EM regions e.g. land slide, saline intrusion in Cuu Long (Mekong) delta region; flash flood in North Western provinces; droughts in Central Highland, Central Coastal areas, etc. have even worsen the difficult lives of EMs”, “Climate change, with abnormal weather happenings have led to storms, flood, land slide, drought, saline intrusion impacting negatively on ethnic minority regions, mountainous regions and regions with extremely difficult socio-economic condition. The life of part of EM people who were relocated for the purpose of construction of hydropower, irrigation, transportation works or national key works have not been settled down and they are facing lots of difficulties.” Yet, there are no specific information about the impacts of climate change and risks to EM regions and groups or to their socio-economic condition.

Further to this, we propose that the Editing Team consider and supplement more information.

5. The scope (i.e. subjects and aspects in some parts) seems to be not exactly relevant to the Master Framework. For example: the Project shall *cover communes in extremely difficult conditions in seaside areas and islands* (less or no relevant to EMs); *continue reviewing the planning, removing small-scaled hydropower works, conducting overall inventory, evaluating, replanning the exploitation and processing of minerals in EM and mountainous regions* (this may be less relevant to the functions and tasks of CEMA, or it may be difficult for CEMA to collaborate with other Ministries and sectors).

Further to this, we propose that CEMA consider, analyze and make adjustment if needed.

6. Some objectives of this Master Framework seem to be over-ambitious. Examples: Economic growth rate of provinces in EM and mountainous regions is 8-10% /year (higher than the national average rate), *by 2025 EM average income will double*. The objectives and targets of the Master Framework are not totally in line with the 2030 SDGs that Vietnam is committed to. Therefore, there is a need to review such objectives. In addition, the bases for the feasibility of such objectives and targets should also be provided in the Master Framework.

² Irish Aid, UNDP, UBDT, Ethnic minority poverty 2007-2012, Hanoi, 2014.

³ http://www.nhandan.com.vn/nation_news/item/38783202-dinh-huong-chinh-sach-phat-trien-vung-dan-toc-thieu-so-mien-nui.html

Further to this, we propose that the Drafting Committee and Editing Team consider, analyze and supplement information if needed.

7. Many targets are more about “input” than output/outcomes. For example, in some aspects, the current situation is made clear, yet the targets/objectives are not consistent to cope with the situation. For example “*the rate of EM officers, cadre, staff in State agencies at all levels tends to decrease,*” “*there remains around 21% EM people aged 15 and higher who cannot read and write fluently Vietnamese/Kinh language*”, “*The number of EM people who cannot speak their own EM languages is increasing*”, “*According to the statistical data in the period 2016-2020, only 6,94% EM government staff at all levels are holding positions at district level and higher levels. In the 12th Central Committee of the Communist Party of Vietnam, the number of official and alternate central Members being EMs accounts for 10% only.*” We propose using/supplementing these targets in the section about objectives/results of the Master Framework and that these targets be increased by at least 20% in 2025. The Master Framework should propose a mechanism for maintaining and developing EM languages, e.g. encouraging/forcing the use of EM languages in primary education, or promoting communication on values and beauty of EM languages. The target on primary school teachers being EMs and being capable of EM language skills should be put into the Master Framework.

Further to this, we will provide direct comments on the Master Framework document and submit to the Editing Team.

8. To be considered as a continued initiative of poverty reduction programs (phase 2010-2020), especially of the previous phase of Program 135, this Master Framework **should emphasize the continuation of crosscutting principles initiatives and good results of previous poverty reduction programs**, including some important principles and mechanisms. (These were recognized in decisions approving Program 135 phase 2011-2015 and Decision No. 1772 ratifying the National Target Program on Sustainable Poverty Reduction, phase 2016-2020, as well as relevant circulars, decisions of CEMA and reports and proposals of development organizations). Specifically they include:

- Alignment with socio-economic development planning, agricultural production development strategies and real needs of local people, and the suitability with local conditions, characteristics, production needs of poor, near poor households and EM women.
- Openness and democracy from grassroots level, ensuring gender equality, promoting sufficient and effective public ownership and engagement, especially ownership and engagement of EM women. The ensurance of people’s participation and receipt of information, decision making in all stages, e.g. planning, selection of beneficiary households, organization of implementation, monitoring and evaluation. People need effective support to be truly proactive in participating in the selection and decision making on poverty reduction and sustainable development activities based on their own needs and expectations.
- The continuation and enhancement of decentralization and empowerment for grassroots levels. The continuity in promoting decentralization for communal People’s Committee (PC) to be investment owners; promoting empowerment for village level; empowering communities to self-control and self-reliance, and capacity building and monitoring and evaluation. Intervention policies and activities should be executed using an open mechanism, with a lump-sum financial support mechanism to promote ultimate initiatives of localities, EM communities and women. Grassroots administration (i.e. at village level), under the

overall management of the Government, should be renovated with a village-centered approach to promote internal strengths and to ensure the active role of the communities and people in each village in poverty reduction and life improvement given EM cultural identity. EMs, especially EM women, should be ensured to be “development partners” rather than passive “beneficiaries”.

- The promotion of cultural values, traditional knowledge, community constitutions that have positive meaning in poverty reduction and sustainable development. Interventions should be suitable to special characteristics and strengths of each region; suitable to the needs, indigenous cultural tradition of each region, of EM groups, to ensure gender equality, market, natural risk reduction and climate change adaptation. Prioritize investment and support for most difficult communes and villages first; prioritize supporting poor households and groups in most difficult situation and EM women.
- Strengthening communication and other interventions to help the whole society have a more positive view of EM communities’ values and roles in poverty reduction and sustainable development. Promoting the inequality narrowing process in economy, culture and society and job opportunities among different regions and ethnic groups and between men and women nationwide.
- Step-by-step socializing the work of poverty reduction and sustainable development for EM communities by collaborating, integrating with other interested social organizations, enterprises, organizations, and individuals. Promoting a close “partnership” with development partners in Vietnam, both in technical and financial aspects; promoting the strengths of Vietnamese social organizations, vocational organizations, research and training organizations that have programs, projects and activities in the ethnic minority, mountainous regions and regions with extremely difficult socio-economic condition.

Among these above principles, many EMWG members and independent experts think that **strengthening the participation, genuine gender equality, strengthening voices and better recognition of values and capacity of EM communities should be the core strategy of the Master Framework, because only when EMs make decisions and such decisions are respected, can the policies and Master Framework intervention be suitable to the potential, strengths and practices of each individual region, community, and EM group.**

Further to this, we will provide direct comments on the Master Framework document and submit to the Editing Team.

9. Although the Law on Gender Equality and Law on Domestic Violence Prevention and Control in Vietnam require the integration of gender /gender based violence prevention and control into Government programs and policies; and although current reports of the Government, national and international organizations consider gender equality and gender based violence prevention and control and women empowerment extremely vital to poverty reduction and sustainable development among EM communities, **the solutions for addressing gender inequality are poor in the Master Framework.** In the analysis of current situation, there are no gender disaggregated information and data, and targets related to gender equality and gender based violence. It is important to have overall evaluation and identification of outstanding issues affecting the realization of women’s and children’s rights including those on gender based violence in different ethnic groups. There is a considerably big change in National Target Program on Sustainable Poverty Reduction (and Program 135) phase 2016-2020 compared to previous phases, i.e. women have officially been considered as a beneficiary group in the list of

beneficiaries of the Program (as per Decision No. 1772). We propose that EM women should be one important beneficiary group of this Master Framework. The Master Framework should also consider the implementation of the Sustainable Development Goals, in which Goal No. 5 of “Achieve Gender Equality” should be the cross-cutting objective of this Master Framework. The Master Framework should emphasize on awareness raising of gender equality for all relevant stakeholders, ensuring that this Master Framework’s implementation shall contribute to the gender equality promotion nationwide.

Gender disaggregated targets should be added to the targets No. (2), (4) and (6) in part 4.2. *Specific objectives to 2025*, for example:

(2) The rate of trained laborers is over 50%, and the rate of laborers at working age having jobs with stable income is over 80%.

shall be changed into:

(2) The rate of trained laborers is over 50%, and that rate of female laborers is at least 40%; and the rate of laborers at working age having jobs with stable income is over 80%, and that rate of female EM laborers is at least 70%.

Further to this, we will provide direct comments on the Master Framework document and submit to the Editing Team. Especially with the gender disaggregated targets, we propose that the Drafting Committee and Editing Team consider, analyze and supplement further information.

10. As a master and comprehensive framework related to various policy aspects, **this Master Framework still proposes to continue the policies issued till now**, which have totaled up to nearly 100 policy documents with contents being not so innovative. These policies mostly focus on subsidies. That is not yet to mention 11 Decrees/policies more to be proposed. Too many policies with various mechanisms require “policy integration”, intersectional/inter-ministerial collaboration during the organization of implementation. Yet, experience and lessons learnt in the past phase show that it is very difficult to “integrate policies” and difficult for different ministries, sectors and branches to collaborate effectively.

This Master Framework has introduced quite many solutions and special mechanisms. Yet the new and breakthrough points of the Master Framework’s initiatives and policies have not been highlighted and specified. E.g. besides proposing that policies should be integrated, the draft only recommends to “basically keep the policy contents unchanged”.

We propose that this Master Framework have a typical/particular mechanism on the procedure for allocation of typical budget (as currently most of budget is allocated to communal level much later than needed), for planning, organization of implementation, payment and acquittal. There should also be suitable and unified contents and templates/forms for all policies of the Master Framework which are in line with conditions, context, and staff and local people’s capacity in EM regions. All new and current policies should be integrated into the 11 new Decrees (or even less) being proposed with an overall typical mechanism.

Further to this, we will provide direct comments on the Master Framework document and submit to the Editing Team after the Workshop.

11. As a Master Framework, **the draft contents are over-stretched and there is a lack of prioritized/core intervention groups**. One of the reasons for the lack of highlights and key priorities is that this current draft Master Framework has neither analyzed thoroughly the needs

and priority of EM communities, nor considered other programs/projects' priorities. For example: the New Rural Development Program has a rather strong focus on basic construction, then should the basic construction part in this Master Framework be removed, or if not, which aspect of basic construction shall be focused? (e.g. irrigation?). We propose that the Master Framework include a thorough analysis to avoid overlaps with other programs, or that it analyze and clarify the relationship between this framework itself and the two National Target Programs on Sustainable Poverty Reduction in coming phases. At the same time, the needs and actual priorities of EM communities should be considered while designing strategies/aspects of prioritized/core activities of the Master Framework. Based on research and orientation of both the Government and development organizations, EMWG would like to propose some prioritized actions as follows:

- Allocate sufficient land and forest land for EM households. Decision No. 755/QĐ-TTg of the Prime Minister stipulates that “*must ensure production land for households, ... pay special attention to people of ethnic minority groups with small population, poor households and women in remote areas in order to step-by-step help people working in forestry live on forestry work.*” To achieve that target, each EM household needs around 15-20 hectares of forest and forest land (Oxfam study). Ensuring forest land/production land will ultimately help increase income and sustainable livelihood for villagers. (Please note that currently in most cases, it is land, not forest that is handed over to local people).
- Develop human resources for EM communities to ensure sustainable development for EM communities in long term.
- Strengthen and ensure the voice and participation of EMs and EM women in the decision making process at all levels.

Further to this, we will provide direct comments on the Master Framework document and submit to the Editing Team after the Workshop.

12. At present, there are various difficulties for EMs in accessing medical services and quality healthcare, especially reproductive healthcare for EM women. This has been prolonged for years with little change. On one hand, it is due to extremely difficult transportation condition from remote villages to communal/district health facilities especially in rainy season. On the other hand, there lacks a village health system in extremely difficult regions, especially female village health workers while according to some EM cultural tradition and customs, a male birth assistant is not acceptable during delivery. In many regions, there are trained and active village midwives. Yet they are not eligible to allowance as per the Circular No. 07/2013/TT-BYT. There is a serious lack of female doctors and doctors who can speak EM languages at district level to counsel/exam EM patients, especially EM women. We propose to set a criterion that over 90% of villages in communes in extremely difficult situation have village health workers/midwives receiving salary/allowance as per the above mentioned Circular. We also propose to focus on capacity building for these village health workers/midwives. Recruiting female/EM doctors/doctor assistants and those who can speak EM languages for district health system should become a priority.

Further to this, we will provide direct comments on the Master Framework document and submit to the Editing Team after the Workshop.

13. Given limited resources, there is a high chance that the division of villages, communes, districts and provinces in extremely difficult conditions as per current draft leads to increase in the list of areas in extremely difficult condition, resulting in thinly spread investment and difficulties in closing the gaps between different regions and residential groups (SDG on “reducing inequality”). Therefore, there should be a further classification step to identify the “poorest”, “most difficult” villages and communes among those in extremely difficult condition to direct sufficient resources for effective poverty reduction and sustainable development in such “poorest” and “most difficult” villages and communes. There is a need to review, assess and analyse the advantages of each region to have specific and typical policy solutions for each region.

There should be specific solutions for providing labor market information, job linkage and creation inside and outside the province, providing supporting services for migrant workers because migration to urban areas and to other countries for jobs, increased income, and poverty reduction in EM areas is a natural and increasing trend in EM areas.

Further to this, we will provide direct comments on the Master Framework document and submit to the Editing Team after the Workshop.

14. There is a lack of an important content on the mechanism and criteria for budget allocation to execute the objective of reducing disparities and gaps between different regions, EM groups and residential groups. The mechanism and criteria for budget allocation should be clearly defined at all three levels: 1) Central level to provincial level, basically based on the number of areas in extremely difficult condition, with adjustments by targets on EM, poverty, etc.; 2) Provincial level to communal and village levels, with a strong priority for the poorest communes and villages (having many most difficult EM groups). Provinces should develop “the project on poverty reduction and socio-economic development in the poorest communes and villages”, based on which the province will prioritize resources after evaluating current situation and identifying specific investment needs; and 3) Allocation and use of budget in each village and commune. This level should apply thoroughly the mechanism for empowerment and promoting community’s internal strengths/forces, in combination with participatory planning, integration of climate change adaptation and gender equality, community monitoring.

Further to this, we will provide direct comments on the Master Framework document and submit to the Editing Team after the Workshop.

15. There should be a more effective mechanism to monitor the policies’ implementation. At present many policies are being implemented with low effectiveness. This is also a key reason for the long-lasting poverty in EM areas in particular and of the poor in general.

Further to this, we propose that the Drafting Committee and Editing Team consider, analyze and supplement further information.

16. The Master Framework should be linked to the implementation of the “Industrial Revolution 4.0” nationwide. The Master Framework should better clarify digital solutions. It can consider to start developing, gathering and integrating metadata. It may include monitoring and evaluation done by the public via digitized/web-based/mobile-based solutions, etc. Digitized solutions should be forcibly implemented in some service aspects targeting at ethnic minority, mountainous regions and regions with extremely difficult socio-economic condition to promote

access to services, overcome difficulties and limits in topography, distance, transportation, population distribution, risks in cash transactions, etc. For example, the digital/e-credit, digitized wage payment (via accounts/electronic wallet for people working far from home), e-payment, payment of social security policies using digital platform, etc. There should be policies on capacity building, human resources development and other policies for EM regions to ensure 1) minimizing negative impacts of the revolution 4.0 on EM people in the short-term, 2) that, in the long-term, EM people have sufficient capacity to integrate, engage in and benefit from the revolution 4.0 nationwide.

Further to this, we propose that the Drafting Committee and Editing Team consider, analyze and supplement information.
