

7. 修正海外展開計画(最終事業計画)

本調査を通じて得られた情報・アイデアを用いて、第4章で述べた仮説を修正し、本調査における成果としてのビジネスプランを以下の通りとした。

(1) 処理施設設置場所

a) 共用回収拠点

共用回収拠点数は、仮説で想定した15か所(事業開始時)から、83か所(ベトナム国48市省)に増やす。中心都市(ハノイ、ダナン、ホーチミン)に中央(二次)回収拠点を設置し、48市省には基本(一次)回収拠点を最低一か所設置する。立ち上げから2年程度で残りの16省への基本(一次)回収拠点設置を計画に盛り込む。

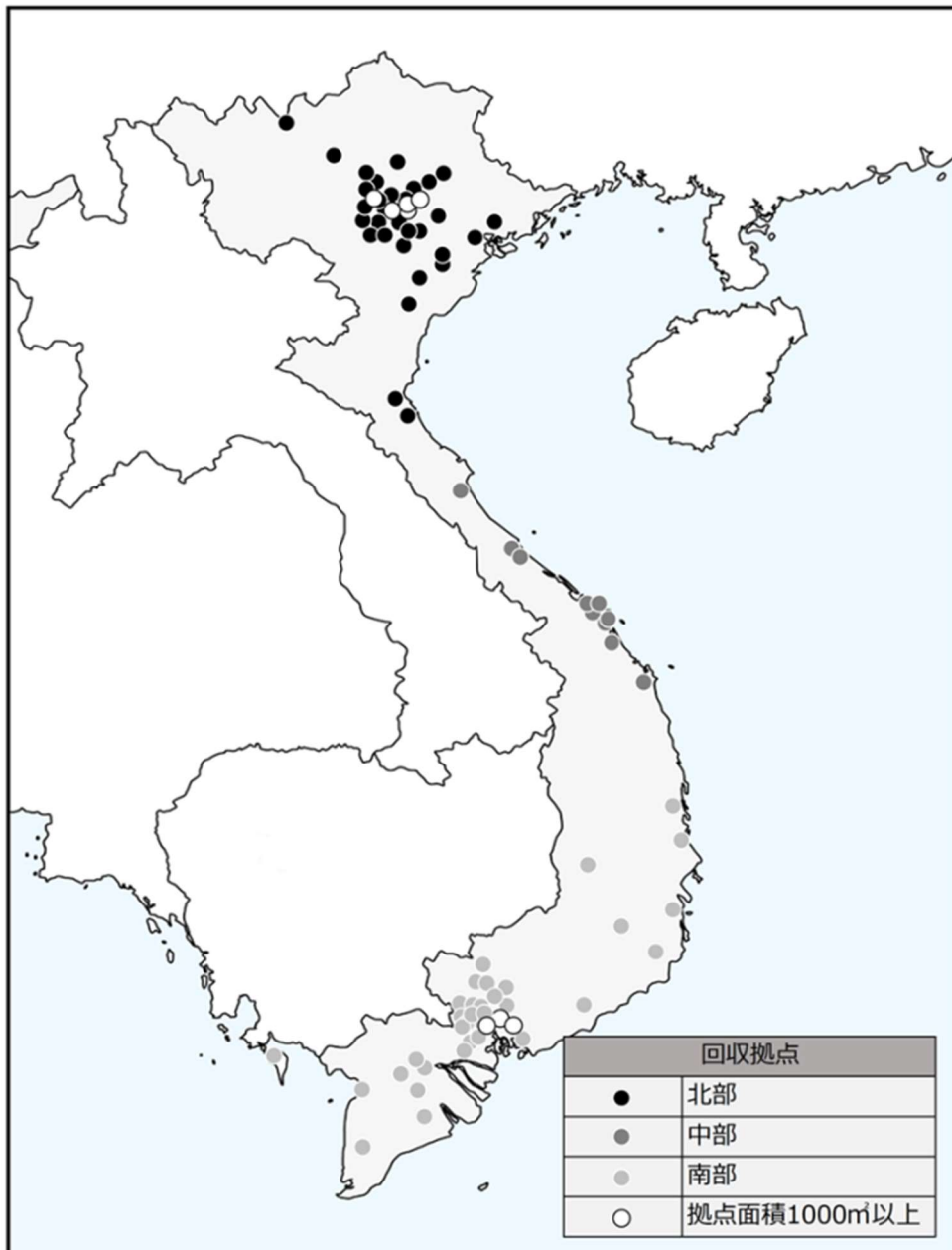


図 7-1: PoR 全国分布図

b) リサイクル/処理協力拠点(既存企業との連携)

仮説では、事業開始当初は北部を中心とした回収拠点設置展開を考えたため、リサイクルアライアンスを組むリサイクル・処理企業も北部を中心に選定することを考えた。しかし回収拠点の設置が一気に全国規模になったことで、当初のアライアンスメンバーもベトナム全土を万遍なく網羅できるよう、北部3社程度、中部2社程度、南部3社程度を確保する計画とする。最終的に仮説通り、全国で15社程度と協力関係を構築する。

(2) 廃棄物の収集対象エリア

廃棄物の収集対象エリアは、即ち共用回収拠点設置場所とし、48市省とする。最終的にはベトナム国63市省全域が収集対象エリアとすることを想定している。

(3) 処理対象廃棄物種類

(4) 利用技術

- “C3 (Common Collection Center) クラブ会員制度”の構築
- Decision16の対象使用済製品を回収するための要件を満たす“共用回収拠点”の全国設置
- 各地の共用回収拠点テリトリー内に点在する各会員が各々設置している末端回収拠点（販売店、修理工場等）に対する協力会社の帰り便や宅配便ネットワークを活用した“共同収集網”の整備（Decision16対象であれば業種を問わず、需要に応じて整備する予定）
- Decision16対象使用済製品を処理・処分・リサイクルする機能を有する既存廃棄物管理業者等との協力体制構築・提携による“リサイクル/処分協力拠点”の全国網整備
- 各共用回収拠点、各リサイクル/処分協力拠点間の有害廃棄物収集運搬許可を保有した協力会社とのアライアンスによる“基幹輸送網”の整備（将来的には自社での許可取得も視野に入れる。）
- “C3ソリューション管理システム”の構築による事業の情報管理と対象事業者の義務遂行の見える化を行う。（回収廃棄物の倉庫管理システム、収集運搬車両や共同回収車両の配車システム、報告代行等諸活動の個別管理システムと対象事業者基幹システム（EPR）の連携）

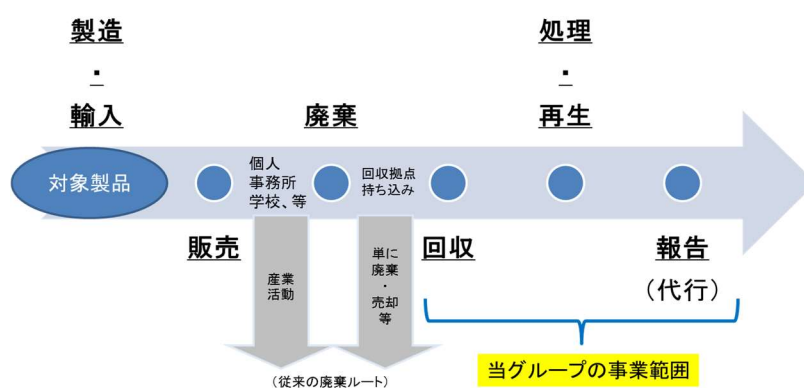


図 4-2: 仮説ビジネスプランの業務範囲案

(5) 導入規模

a) 共用回収拠点(拠点運営、協力会社含めた既存倉庫インフラを活用):

最終目標は全国 63 か所市省への共用回収拠点の整備である。事業開始時点では全国 48 市省・83 か所への設置を想定している。荷役作業の効率化や保管場所を有効活用するために、使用済製品を格納するための専用容器等の開発・導入する。また、使用済製品の盗難防止のためのセキュリティ設備設置(防犯カメラ等)も検討する。

b) リサイクル/処分協力拠点(事業提携、処理委託):

全国にある既存廃棄物管理業者のうち Decision16 対象物使用済製品のリサイクル・処理・処分能力を有する企業と提携し、回収した廃棄品に対する適切な処置を行う。最終目標は全国 15 事業所程度と提携するが、事業開始時点は 5 か所程度を想定する。場合によっては自社で必要な処理・リサイクル技術に対する投資を行う。

c) 車両:

中央(二次)共用回収拠点からの一括輸送は、有害廃棄物収集運搬許可を保有する会社への委託を予定している。将来的には自社で許可を取得し、中央(二次)回収拠点に運搬車両を各1台保有して運用することを検討する。

d) 管理システム:

以下の情報システムを導入することで、全体運用の事務工数の低減と見える化を行う。

i) C3 ソリューション管理システム:

全国 PoR、リサイクル・処理拠点の許認可や設備状況の管理、在庫(回収状況)・処理状況等のトレース管理、報告代行等を管理するシステムを導入し、管理の確実性確保と運用の効率化を行う(フェーズ 1)。

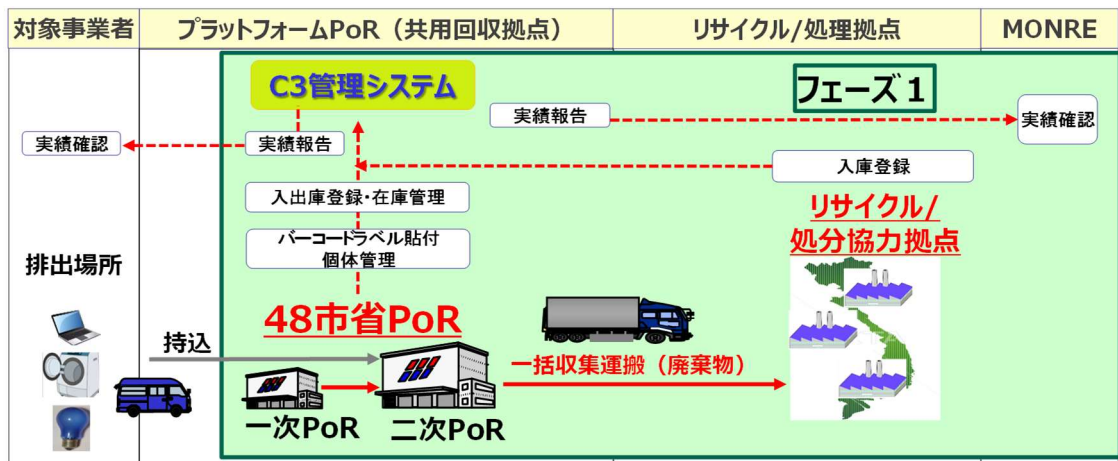


図 7-3: C3 ソリューション管理システム

ii) 倉庫管理システム(WMS):

共用回収拠点内の使用済製品の在庫状況を管理するシステムである。使用済製品に IC チップを取り付け、入出荷やロケーション管理を行うことで、使用済製品の倉庫内での作業状況の見える化と、処理状況のトレース管理が可能となる。(フェーズ1)

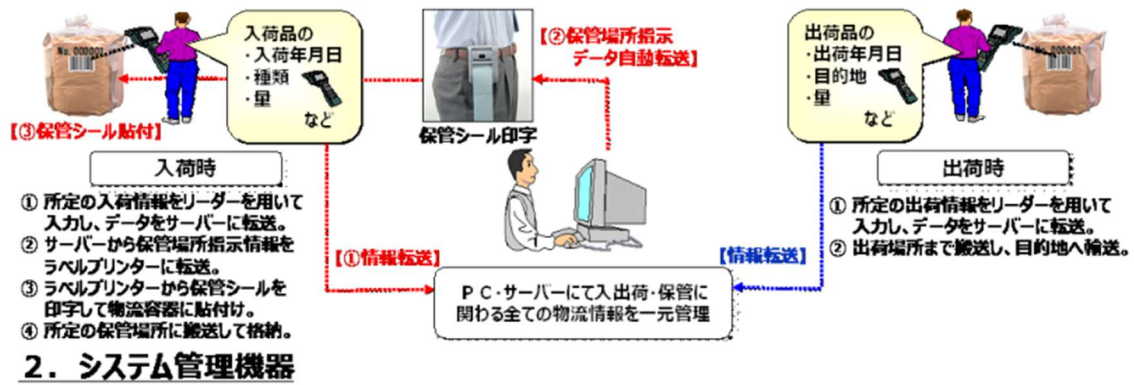


図 7-4:倉庫管理システム

iii) 輸配送管理システム(TMS):

使用済製品の集荷や出荷等を行う車両の効率的な配車(物量に応じた適正台数算出や集荷ルート計画立案等)やGPSを活用した製品の動態(トレース)管理からドライバーの労務管理まで輸配送の効率化・見える化を実現する。(フェーズ2)

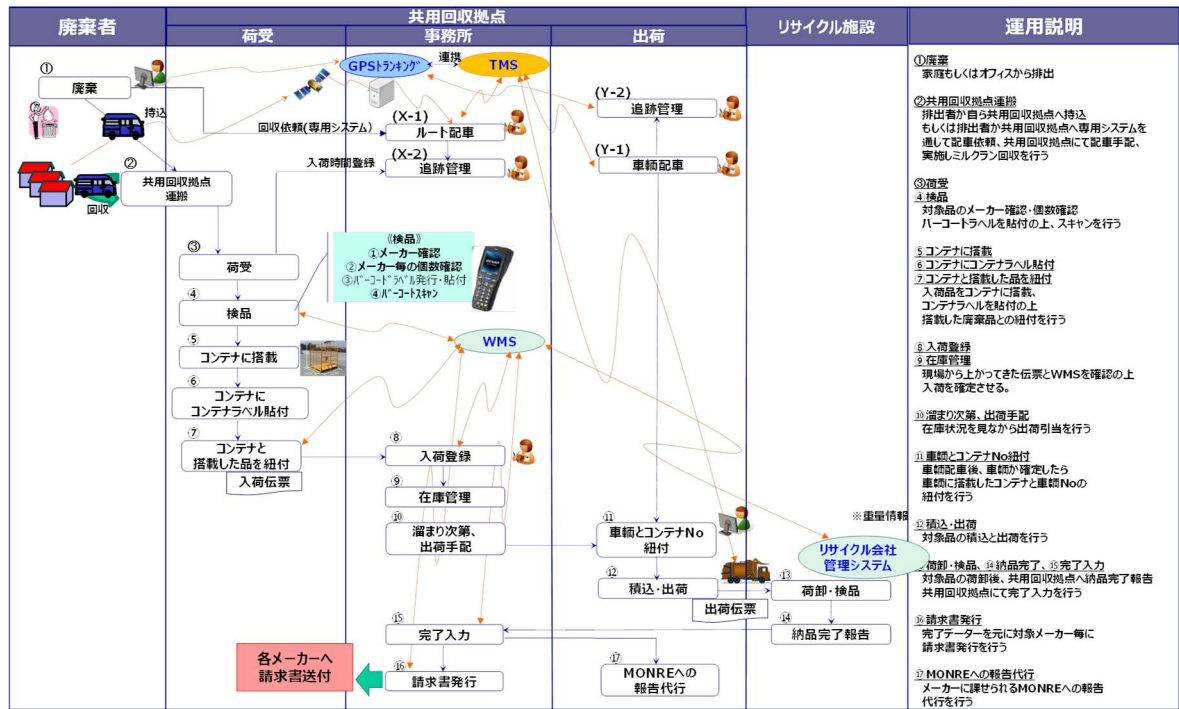


図 7-5:輸配送管理システム

iv) MONRE とのシステム連携による Decision16 実施状況の見える化:

対象事業者、C3 ソリューション管理システム、MONRE のシステムを連携し Decision16 の実施状況の見える化を行い、対象製品回収率の向上を推進する。(フェーズ3)

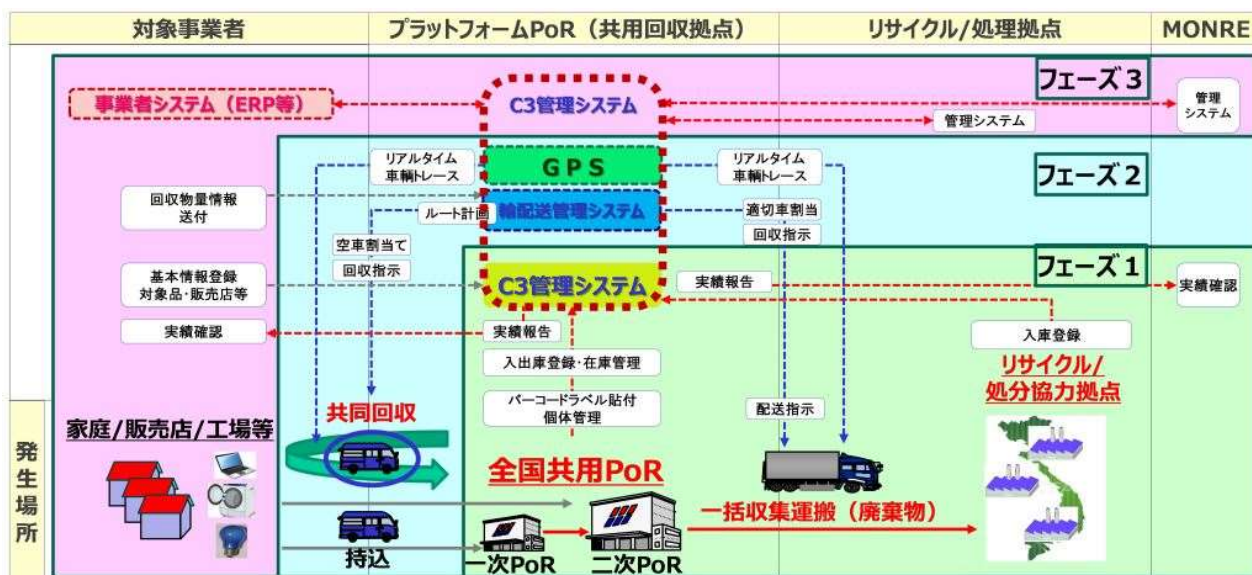


図 7-6: 管理システム概念図(修正)

(6) 料金体系

本事業は、低コストサービスの継続的提供を目的に、事業収益体系を工夫し、電気料金体系で言うところの“基本料金”と“従量料金”の大きく2つに分割する。

a) 基本料金: 基本サービス(≒不動産賃貸モデル)

● 共用回収拠点や共同収集網を各地に整備・提供し(≒不動産業の賃貸物件に相当)、会員企業から年会費(≒家賃相当)を徴収する。この会費の支払いをもって、会員は全国の共用回収拠点を自らの回収拠点であることを当局に報告が可能となる。

● 会費に含まれるサービスは、このほか基幹輸送網・ICT システムの整備や顧客及び当局に対する基本報告業務を含む。

● 年会費は、会員数が60社、共用回収拠点を48市省に各1か所整備した場合、ベース金額を2,000,000円/社・年と設定する。

● C3ソリューションは複数事業者の共同利用プラットフォームの仕組みである為、会員数の増減、共用回収拠点や共同収集網の拡充により年会費が変動する仕組みとする。

b) 従量料金: 付加サービス(=事象発生毎請求業務)

● 使用済製品が回収されてきた場合、付加的にかかる運搬・処理・処分・リサイクル(有価物として売却した場合は請求額を減額)を月次ベースで請求する。

● 徴収する料金は使用済製品や対応方法に応じて変わる。

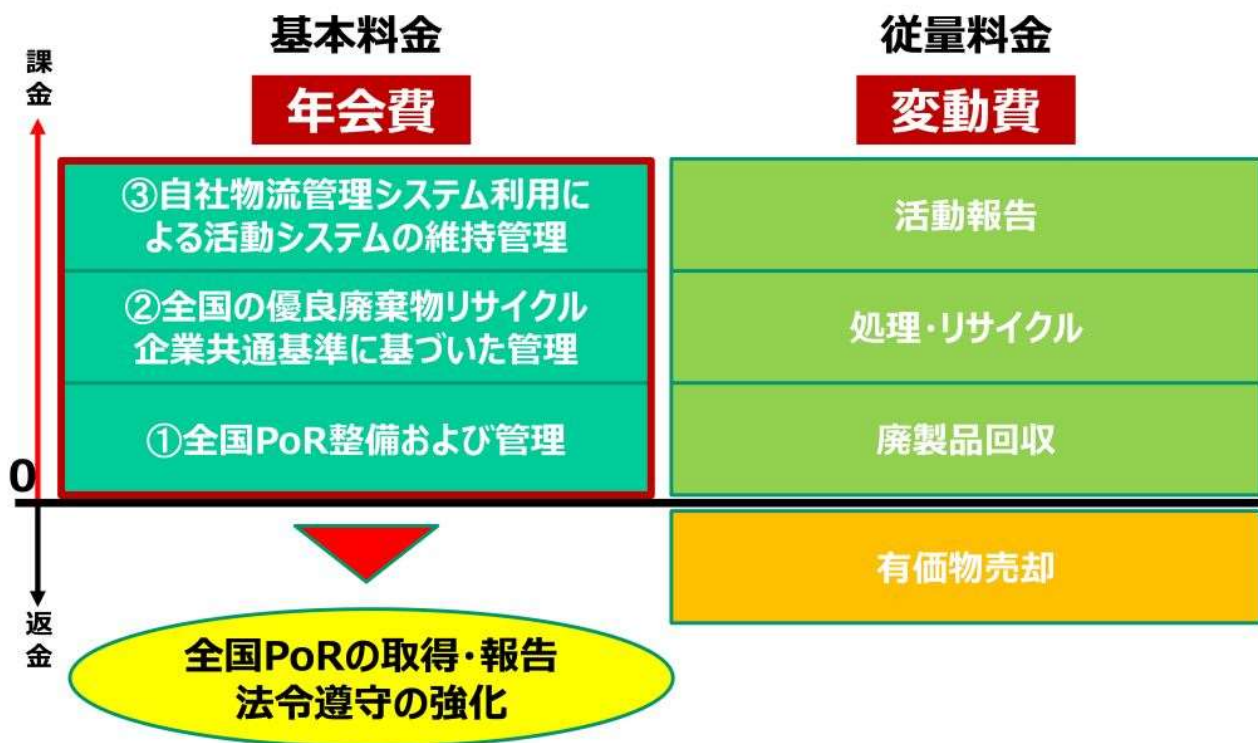


図 7-7:料金体系案(修正)

(7) 運営体制

a) C3 ソリューション運営会社:

株式会社日立物流、株式会社日立物流現地法人(日立物流ベトナム)、日本環境コンサルタント現地法人(VINA-CUES Co., LTD)、他によるJVを設立する(株式会社)。

(主な業務内容: 共用回収拠点運営、ICTシステム管理、事務代行サービス、収集運搬代行、リサイクル・処理代行、有価物等輸出業務 等)

b) リサイクル/処分協力拠点:

協力提携並びに業務委託契約ベースで行う(当該企業による C3 ソリューション運営会社へのマイナー出資を可能とする)。

c) 3) 拠点共有:

協力提携並びに業務委託契約ベースで行う(日立物流ベトナム)の動脈物流提携先企業の物流拠点や協力企業の全国の物流拠点を活用する。拠点が存在しないエリアは、環境公社施設等に共用回収拠点を併設させてもらう、または本事業で整備する共用回収拠点を他の物流会社等の物流拠点を使わせてもらうことを通じて、拠点整備負荷の低減とコストダウンを図る。

d) その他:

- 有価物販売先: 既存有価物買い取り事業者(国内外)と一般商取引ベースで行う。

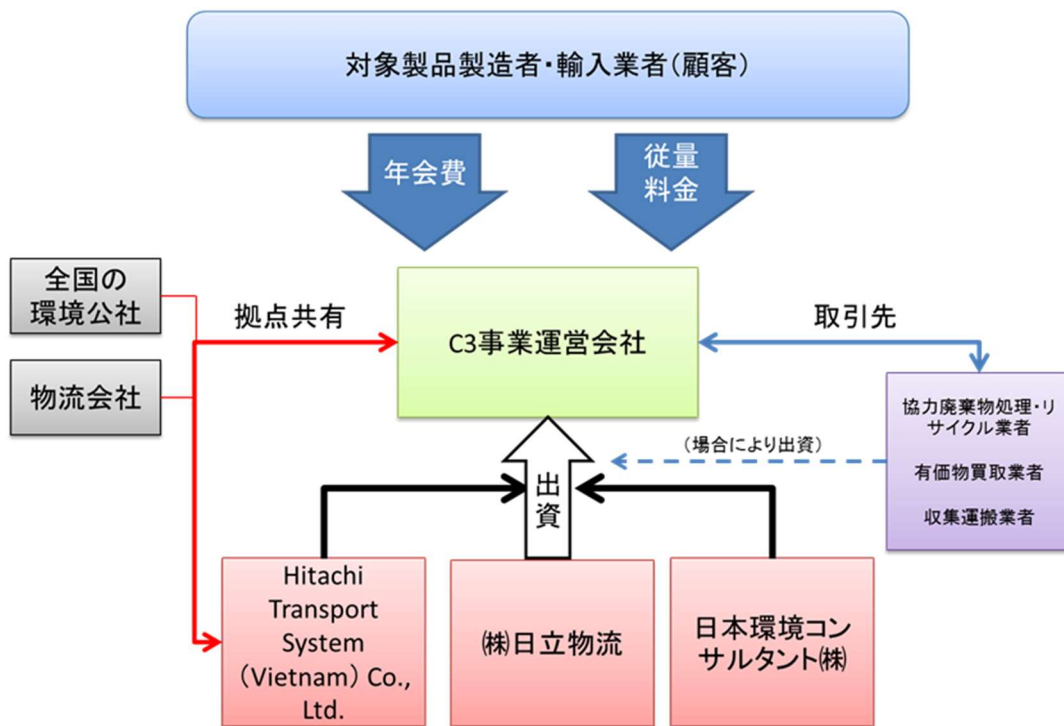


図 7-8: 事業実行体制案

(8) 事業展開スケジュール案

【2018年】

- ベトナム法人(C3ソリューション運営会社)設立準備
- 運搬会社、リサイクル/処分会社(事業開始時5か所程度)とのアライアンス締結
- リサイクル/処分会社認証制度構築
- 必要な許認可申請/取得
- 回収拠点 EPP/EIA 申請・登録
- 対象事業者への法令啓蒙と営業展開
- 実運用体制構築(引き続き)とテスト運用(ICTシステム実証事業)
- 共用回収拠点が無い地域における整備交渉、拠点整備
- 各回収拠点からの運搬体制構築

【2019年】

- 本運用開始

8. その他関連活動報告

8.1 広報活動

(1) C3 ソリューション・PR 動画作成

i) PR 動画製作の背景

法令の周知・啓蒙・ニーズ調査を広く実施するためにセミナー開催と平行で PR 動画の配信を検討することとした。動画製作を検討した理由として、ビジュアルと音声を通じて、情報を伝えられ、国境をも越え、多くの対象事業者に法令と C3 ソリューションを周知することができるためである。(アメリカ合衆国の調査結果で、BtoB の中小企業の 76% が動画プロモーションを実施したことがあるという点も参考とした。)また、物理的、且つ時間的な制約を受けずに何度でも視聴することができるため、新規事業である本事業のマーケティングやブランディングとしても効果的であると考え、製作することとした。更には、法令の内容の周知や確認にも活用できると考えているため、法令を施行したベトナム国に対しても、国民や対象事業者の法令遵守の強化や廃棄物がおよぼす環境問題や健康問題への解決に向けても効果があると考えている。

ii) PR 動画製作のコンテンツ

以下の三部構成とした。

第一章	本提案の背景
第二章	Decision16: 首相決定の狙いとベトナムの社会事情のギャップから生じるジレンマ
第三章	C3 ソリューションのご提案

各章の詳細は以下である。

第一章	本提案の背景
目的	ベトナムの経済発展に伴う廃棄物増加がもたらす環境への影響という観点から、国際的な潮流でのベトナム版の拡大製造業者責任法 (Decision16) の制定に至るプロセスを解説することで、法令の背景や内容、更にはコンプライアンスの考え方を広く浸透させることを目的としている。
詳細	ベトナム国の環境問題 ベトナム国の環境法制定の背景 Decision16 の施行の背景 Decision16 の内容 (対象事業者、適用範囲、対象事業者の義務等)

第二章	Decision16: 首相決定の狙いとベトナムの社会事情のギャップから生じるジレンマ
目的	対象廃棄物が素材的な価値があるものが多く有価取引市場において、売買されていることから、法令が施行されてからも対象品が集まらないことが想定される。そのため、この章では、ジレンマを伝えることでコンプライアンスの重要性と潜在的なビジネスニーズがあることを伝える。
詳細	ベトナム国の社会事情と Decision16 のジレンマ Decision16 の遵守のためのプラットフォームサービスの可能性

第三章	C3 ソリューションのご案内
目的	日立物流の日本国内の実績を元にした Decision16 に対応する必要がある事業者向けに法令対応を代行し、事業者の負担を軽減すると同時に法令遵守も強化できるサービスを案内するため。
詳細	C3 ソリューションの概念 サービス内容(回収拠点の運営代行、適正処理の管理代行、行政報告代行) 日立物流の物流ネットワークと情報システム 料金プラン

iii) PR 動画効果

視聴回数 (2018年3月16日現在)	日本語 : 181回 英 語 : 22回 ベトナム語 : 70回 合計 : 273回
効果	セミナー開催の9回分以上の効果を得ることが出来た。 日本のリサイクル会社も興味を示していた。

(2) ワークショップ

i) ワークショップ概要

ワークショップは調査開始スケジュールの遅れ並びに実施効果を考慮し、下記のとおり変更を行った。

	計画	変更点、結果
概要	潜在顧客と現地行政当局を招待し、調査結果報告や C3 ソリューション内容の紹介を、主要都市を中心に合計 7 回行う。	潜在顧客と現地行政当局を招待し、調査結果報告や C3 ソリューション内容の紹介を、主要都市を中心に合計 3 回行う。
時期及び日程	2018 年 2 月 半日×7 回	2018 年 3 月 半日×3 回 ハノイ：2018 年 3 月 7 日午後 ダナン：2018 年 3 月 8 日午後 ホーチミン：2018 年 3 月 9 日午後
開催地	ハノイ地域、ダナン、ホーチミン周辺 7 回	ハノイ：HANOI CLUB HOTEL ダナン：BELLE MAISON PAROSAND ホーチミン：PALACE HOTEL SAIGON
参加者	合計 350 人程度 (50 人/回)	合計 150 人程度 (50 人/回) を目標とした。
内容	①調査結果報告 ②C3 ソリューションとそのサービス内容の披露 ③関心度アンケートの実施	①関連法令の最新動向報告 ②ヒアリング調査結果報告 ③対象製品処理状況調査結果報告 ④C3 ソリューションとそのサービス内容の披露 ⑤関心度アンケートの実施

結果	<p>ワークショップを開催した結果、参加者は、3回合計で62社121名であった。法律の啓蒙や対象事業者からのヒアリング結果報告、対象製品の現状の処理状況報告、そしてC3ソリューションのサービス案内を詳細にすることができ、効果的であったと考えている。また、休憩時に動画を上映し参加者の関心を促すことができたと感じている。なおワークショップに終了後に、関心度を問うアンケートを配布し、参加者から多様な意見を伺うことができた。中部・南部エリアでは、質問を頂いたのが代表的な質疑応答を以下にまとめる。</p> <p>質問1：企業が適切に Decision16 対応を行うことによって得られる優遇策のようなものはあるのか？</p> <p>⇒現状では、企業ブランドイメージの向上が上げられる。しかし、今後罰則等が規定されれば、インセンティブに関わらず Decision16 対応を迫られることとなる。</p> <p>質問2：有価取引市場や独自のリサイクル網が形成されている中で、企業としてはどういったスタンスで臨めばいいか？</p> <p>⇒ベトナム国の方針としての Decision16 を理解していただき、法律の普及・啓蒙活動に努めて欲しい。</p> <p>質問3：回収した対象品を処理していく中で、リサイクル村のような方々との協力も考えているのか？</p> <p>⇒C3 ソリューションではコンプライアンスの遵守を重視しているため、許可を持ち、適切な処理を行えるリサイクル業者との提携を目指している。</p>
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ii) 関心度アンケートまとめ

項目	内容
関心表明	<p>62 の企業と団体、合計 121 名にアンケートを実施した結果、『C3 ソリューションに対して関心があるか』との問いに 65 名が『はい』との回答を示した。</p> <p>【内訳】 はい:65 件、いいえ:6 件、無回答:50 件</p> <p>C3 ソリューションはベトナム国にとって有益であるという意見を多数いただき、C3 ソリューションへの関心の高まりを確認することができた。</p> <p>また運用面においては、会費の設定に関する意見もいただいた。</p>
主な意見・感想	<ul style="list-style-type: none"> ・C3 ソリューションはベトナム国において有益であるため、早く実現して欲しい。 ・法令に関する知識がなかったため、有意義なワークショップであった。 ・今後も情報展開を行って欲しい。 ・廃棄物量、回収価値などに基づき、会員を分類した適用会費も検討して欲しい。
支払可能額の調査結果	<p>年会費を提示した結果、参加者の半数以上より『関心がある』との回答を得たため、C3 ソリューションに対しての支払可能額は適正と判断できた。</p>

iii) ワークショップ開催風景

表 8-1: セミナー開催要綱

ハノイ 2018年3月7日	ダナン 2018年3月8日	ホーチミン 2018年3月9日
		
<p><開催地> HANOI CLUB HOTEL</p>	<p><開催地> BELLE MAISON PAROSAND</p>	<p><開催地> PALACE HOTEL SAIGON</p>
<p><参加者> メーカー各社 環境関連企業、物流会社等 合計 29 社 46 名</p>	<p><参加者> メーカー各社 環境関連企業、物流会社等 合計 18 社 26 名</p>	<p><参加者> メーカー各社 環境関連企業、物流会社等 合計 15 社 49 名</p>

【添付資料】

1. Decision16/2015/QD-TTg(英文)
2. Circular34/2017/TT-BTNMT(英文)
3. セミナー資料(抜粋)
4. PR 動画シナリオ
5. 回収拠点リスト
6. アライアンス準備 MOU

THE PRIME MINISTER

THE SOCIALIST REPUBLIC OF VIETNAM

Independence - Freedom - Happiness

No. 16/2015/QĐ-TTg

Hanoi, May 22, 2015

DECISION

PROVIDING REGULATIONS ON RECALL AND TREATMENT OF DISCARDED PRODUCTS

Pursuant to the Law on Government Organization dated December 25, 2001;

Pursuant to the Law on Environmental Protection dated June 23, 2014;

Pursuant to the Government's Decree No. 38/2015/NĐ-CP dated April 24, 2015 on waste and scrap management;

After considering the request of the Minister of Natural Resources and Environment,

The Prime Minister hereby grants the Decision on providing regulations on recall and treatment of discarded products.

Chapter I

GENERAL PROVISIONS

Article 1. Scope of application and applicable entities

1. Scope of application:

This Decision provides regulations on recall and treatment of discarded products throughout the Socialist Republic of Vietnam.

2. Applicable entities:

This Decision shall apply to manufacturers, consumers and other organizations or individuals involving recall and treatment of discarded products in Vietnam.

Discarded products discharged from production, trading and service establishments that do not belong to the applicable entities defined in this Decision shall be governed by regulations laid down in the Government's Decree No. 38/2015/NĐ-CP dated April 24, 2015 on providing regulations on waste and scrap management.

Article 2. Interpretation of terms

Terms used herein shall be construed as follows:

1. Discarded product refers to wastes derived from products of which the useful life has expired or products discarded after being used in the list annexed to this Decision.

2. Recall of discarded products refers to the act of receiving and collecting discarded products for management and treatment in accordance with legal regulations.

3. Manufacturer refers to the generic name of production, trading and service establishments, including:

a) Production establishments that belong to the list annexed to this Decision and are located within Vietnam;

b) Any establishment fulfilling the role as an official importer or official distributor (also known as level-one distributor) of products made in foreign countries or manufactured by exporting and processing enterprises or those operating in free tariff zone in the list annexed hereto.

4. Distributor refers to wholesaling and retailing establishments or sales agent defined in the list annexed hereto (except for official importers or official distributors).

5. Point of recall refers to the station where discarded products are collected and which is established directly by manufacturers, or by manufacturers in association with distributors.

6. Consumer refers to the end user of products before these products are discarded, including: Household families; individuals; offices of State administrative agencies; educational institutions.

7. Collecting organization or individual refers to any organization or individual carrying out operations of direct collection of discarded products from consumers and transportation of these products to the point of recall.

Article 3. List of discarded products and schedule of recall or treatment

1. The list of discarded products and schedule of recall and treatment shall be defined in the Appendix attached hereto.
2. The list of discarded products and schedule of recall and treatment are submitted to the Prime Minister by the Ministry of Natural Resources and Environment for any amendment or supplementation to be considered to ensure conformity with conditions in Vietnam for specific periods.

Article 4. Method for recall and treatment of discarded products

1. Discarded products shall be recalled in the following manners:
 - a) Direct manufacturers carry out or enter into cooperation with one another to carry out the recall through the point of recall or a system of points of recall;
 - b) Manufacturers work with or authorize waste transportation or treatment organizations with appropriate competence to carry out the recall;
 - c) Waste transportation and treatment organizations with appropriate competence directly carry out the recall in accordance with regulations on waste management without any of the manufacturer's collaboration or authorization.
2. The point of recall shall recall discarded products by types in a consistent manner without possible reliance on trademarks or manufacturers.
3. Transfer, collection, storage and transportation of hazardous products discharged from consumers to points of recall shall not require the permit for hazardous waste management but must conform to the technical regulations on environment which govern collection, storage and transportation of discarded products.
4. Discarded products after being discarded must be managed and treated in accordance with legal regulations on waste management.

Chapter II

RESPONSIBILITY AND RIGHT CONCERNING RECALL AND TREATMENT OF DISCARDED PRODUCTS

Article 5. Responsibility of manufacturers

1. Manage collection of discarded products sold out to Vietnam's market.
2. Establish points or system of points of recall by taking the following forms:
 - a) Establish at their own expense or collaborate with other manufacturers in establishing this kind of point of recall;
 - b) Establish this kind of point of recall in the separate area or collaborate with distributors in establishing points of recall at the facility of distributors.
3. Points of recall must conform to technical regulations on environment which govern collection, storage and transportation of discarded products.
4. Take responsibility to accept their own discarded products; encourage receipt of discarded products of the same type as theirs sold out to the market, regardless of trademarks or manufacturers.
5. Receive their discarded products in the market recalled by other manufacturers for the purpose of treatment as requested.
6. Establish and implement appropriate, preferential and communicative policies for consumers or collecting organization or individual so that they transfer discarded products to receiving stations.
7. Manage the transportation of discarded products from points of recall to intermediate stations (if available) and treatment establishment in accordance with regulations on waste management.
8. Manage treatment of discarded products which have been recalled in accordance with regulations on waste management in the following forms:
 - a) Direct treatment;
 - b) Transfer of discarded products to domestic waste treatment with appropriate competence;
 - c) Outward export of discarded products for treatment;
 - d) Recycling;
 - dd) Other forms in accordance with regulations.

9. When hazardous discarded products are transferred to organization competent to carry out the treatment from points of recall directly established by themselves, they are required to provide and use hazardous waste documents in the name of the representative of the owner of hazardous discharge in accordance with regulations.

10. Submit the annual report to Vietnam Environment Administration on the following information:

- a) Amount of manufactured or imported products which have been sold in Vietnam's market;
- b) List of points of recall and discarded product treatment stations;
- c) Result of recalling and treating discarded products;
- d) Circumstances under which discarded products are refused and reasons for this refusal.

11. Report to the Department of Natural Resources and Environment on points of recall outside of distribution facilities and the precincts of manufacturing establishments.

12. Publicly communicate information about the list of points of discarded product recall and treatment; result of discarded product recall and treatment through the website of Vietnam Environment Administration and their own website (if available).

13. The Ministry of Natural Resources and Environment shall provide regulations on warning signs and symbols as well as procedures for management of points of recall.

Article 6. Right of manufacturers

1. If they decide to recall and treat discarded products at their own expense, they will be given supportive and preferential policies in accordance with legal regulations.

2. Have access to partnership with other manufacturer in order to recall and treat discarded products with different trademarks but same types.

3. Appoint manufacturers' association of which they are member to act on their behalf to recall and treat their discarded products.

4. Recall of discarded products with different trademarks but same types shall make up the recall efficiency of such manufacturer.

5. Request other manufacturers to take their discarded products in the market back for treatment after being recalled by the requesting manufacturer.

6. Sign a contract with waste transportation and treatment organizations with appropriate competence in accordance with regulations.

7. Recall discarded products which are not directly manufactured by themselves but are considered as constituents of products made by themselves and sold in the market.

8. Establish intermediate stations used for transporting discarded products from points of recall to storage facilities before taking them to treatment facilities.

9. Refuse to receive discarded products under the following circumstances:

- a) Discarded products are delivered by waste transportation and treatment organization without any authorization or cooperation;
- b) Discarded products with same types but different trademarks are made by other manufacturers.

Article 7. Responsibility of consumers, distribution facilities, waste transportation and treatment organizations, and collecting organizations or individuals

1. Consumers shall assume responsibility to transfer discarded products in the following forms:

- a) Carrying discarded products to points of recall at their own expense;
- b) Transferring discarded products to collecting organizations or individuals to transport them to points of discarded product recall;
- c) Handing discarded products over to waste transportation and treatment organizations with appropriate competence;
- d) Bringing discarded products back to organizations or individuals specializing in repair, maintenance and replacement of products. Receiving organizations or individuals are required to assume their responsibilities as the owner of discharge in accordance with regulations.

2. Distribution facilities shall assume the following responsibilities:

- a) Coordinating with manufacturers in establishing points of recall and receiving discarded products at their own facilities as requested by manufacturers;

b) Storing discarded products at points of recall in accordance with regulations;

As for transfer of hazardous discarded products, they are required to provide and use hazardous waste documents in the name of the representative of the owner of hazardous discharge in accordance with regulations;

d) Providing information used for manufacturers' reporting to the Ministry of Natural Resources and Environment by completing the given form.

3. Waste transportation and treatment shall take the following responsibilities:

a) Comply with regulations on waste management while recalling and treating discarded products as agreed upon with manufacturers;

b) Do not carry hazardous discarded products to points of recall after collecting them from production, trading and service facilities without any authorization or cooperation confirmed by manufacturers;

c) Upon receiving discarded products from points of recall, they must transfer them to appropriate waste treatment facilities in accordance with regulations on waste transportation.

4. Collecting organizations or individuals must, after receiving discarded products from consumers, transfer them to points of recall in accordance with regulations.

Article 8. Right of consumers, collecting organizations or individuals and distribution facilities

1. Consumers, collecting organizations or individuals, when carrying discarded products to points of recall, shall have the following rights:

a) Enjoy benefits specified in the manufacturer's policy;

b) Have the right to request manufacturers to accept discarded products launched in the market by such manufacturers;

c) Report to the Ministry of Natural Resources and Environment or the local Department of Natural Resources and Environment on any refusal of manufacturers to receive discarded products.

2. Distribution facilities that belong to the entities stipulated at Point 3, Appendix IV of the Government's Decree No. 18/2015/NĐ-CP on providing regulations on environmental protection planning, strategic environment assessment, environmental impact assessment and environmental protection plan, are not required to establish the environmental protection plan when participating in collection of distributed products.

3. Transportation of hazardous discarded products from consumers to points of recall does not require the permit for hazardous waste transportation but is not allowed to exceed load limits defined in the technical regulations on environment in terms of collection, storage and transportation of discarded products.

Chapter III

RESPONSIBILITY OF REGULATORY AGENCIES FOR COLLECTION AND TREATMENT OF DISCARDED PRODUCTS

Article 9. Responsibility of the Ministry of Natural Resources and Environment

1. Issue documents providing guidance on implementation of this Decision and technical regulations on environment in terms of collection, storage and transportation of discarded products; provide instructions on and manage implementation.

2. Develop and manage data about recall and treatment of discarded products; publicly announce the list of points of recall which conform to technical environmental requirements in accordance with regulations.

3. Propagate, raise awareness of organizations or individuals so that they get involved in discarded product recall and treatment.

4. Examine, inspect, monitor and impose penalties on organizations or individuals that commit violations against regulations on discarded product recall and treatment.

5. Preside over, cooperate with relevant Ministries, departments in submission of report to the Prime Minister to seek any amendment and supplementation to the List of discarded products and schedule of recall and treatment annexed hereto.

Article 10. Responsibility of provincial People's Committees

1. Propagate, raise awareness of organizations or individuals so that they get involved in discarded product recall and treatment.

2. Introduce policies, support and provide favorable conditions for manufacturing enterprises to establish points of recall and manage discarded product recall and treatment within their areas in accordance with regulations laid down in the Government's Decree No. 19/2015/NĐ-CP dated February 14, 2015 on providing specific provisions on

implementation of several articles of the Law on Environmental Protection.

3. Manage, inspect and examine recall and treatment of discarded products within their areas in accordance with legal regulations on environmental protection.

4. Direct the People's Committees at all levels to carry out recall and treatment of discarded products within their jurisdiction.

Chapter IV

IMPLEMENTARY PROVISIONS

Article 11. Effect

1. This Decision shall come into force from July 15, 2015.

2. The Decision No. 50/2013/QĐ-TTg of the Prime Minister dated August 9, 2013 on providing regulations on recall and treatment of discarded products shall be abolished from the effective date of this Decision.

3. Ministers, Heads of ministerial-level agencies, Heads of Governmental agencies, the President of the People's Committees of centrally-affiliated cities or provinces and related organizations or individuals, shall be responsible for implementing this Decision./.

THE PRIME MINISTER

Nguyen Tan Dung

APPENDIX

LIST OF DISCARDED PRODUCTS AND SCHEDULE OF RECALL AND TREATMENT

(Issued together with the Decision No. 16/2015/QĐ-TTg of the Prime Minister dated May 22, 2015)

No.	DESCRIPTION	SCHEDULE OF RECALL AND TREATMENT
I	ACCUMULATOR AND BATTERY	
1	Accumulators of all types	01/7/2016
2	Batteries of all types	01/7/2016
II	ELECTRIC AND ELECTRONIC EQUIPMENT	
1	Compact light; fluorescent light	01/7/2016
2	Desktop or laptop; computer monitor; CPU (micro processor)	01/7/2016
3	Printer; fax machine; scanner	01/7/2016
4	Photo camera; movie camera	01/7/2016
5	Cell phone; tablet computer	01/7/2016
6	DVD, VCD, CD recorder and other tape or disc player	01/7/2016
7	Photocopier	01/7/2016
8	Television; refrigerator	01/7/2016
9	Air conditioner; laundry machine	01/7/2016
III	DIFFERENT KINDS OF LUBRICANTS	01/7/2016
IV	INNER TUBE, TYRE	
1	Inner tubes of all kinds	01/7/2016
2	Tires of all kinds	01/7/2016
V	VEHICLE	
1	Motorcycles, motorbikes of all kinds	01/01/2018
2	Automobiles of all kinds	01/01/2018

This translation is made by LawSoft

No. 34/2017/TT-BTNMT

Hanoi, October 04, 2017

CIRCULAR

ON RECALL AND TREATMENT OF DISCARDED PRODUCTS

Pursuant to the Law on Environmental Protection dated June 23, 2014;

Pursuant to the Government's Decree No. 36/2017/NĐ-CP dated April 04, 2017 defining the functions, tasks, powers and organizational structure of the Ministry of Natural Resources and Environment;

Pursuant to the Decision No. 16/2015/QĐ-TTg dated May 22, 2015 of the Prime Minister on recall and treatment of discarded products;

Pursuant to the Decision No. 38/2015/NĐ-CP dated April 24, 2015 of the Prime Minister on management and waste and discarded materials;

At the request of the Director General of Vietnam Environment Administration, Director General of Department of Legal Affairs;

The Minister of Natural Resources and Environment hereby adopts a Circular on recall and treatment of discarded products.

Article 1. Scope

This Circular elaborates Clause 13, Article 5 and Clause 1, Article 9 of the Decision No. 16/2015/QĐ-TTg dated May 22, 2015 of the Prime Minister on recall and treatment of discarded products (hereinafter referred to as "Decision No. 16/2015/QĐ-TTg").

Article 2. Regulated entities

This Circular applies to manufacturers, consumers and other organizations or individuals related to recall and treatment of discarded products within the territory of the Socialist Republic of Vietnam.

Article 3. Types, number and locations of recall stations

1. Recall stations include:

- a) Internal recall station: a fixed station where discarded products from consumers are collected;
- b) Stationary recall station: a fixed station that is used for gathering and storing discarded products from other recall stations and consumers;
- c) Mobile recall station: a mobile station that is established by the manufacturer or the manufacturer in cooperation with the local government during a campaign to receive discarded products from consumers.

2. The number and locations of recall stations are based on:

- a) The quantity of products sold in Vietnamese market;

b) The supply chain of the manufacturer;

c) The distance to the intended discarded product treatment and recycling establishment.

3. The manufacturer shall, according to the contents specified in Clauses 1 and 2 of this Article and other conditions (if any), decide the number and types of recall stations and build a road map for establishment of appropriate recall stations.

Article 4. Technical requirements applied to recall stations

1. The internal recall station and stationary recall station must be compliant with the requirements specified in the Appendix I enclosed herewith.

2. The mobile recall station must ensure safe storage, and no leak or overflow of discarded products into the environment.

3. Signs and warning signs must be put up at recall stations according to regulations specified in the Appendix I enclosed herewith.

Article 5. Procedures for management of recall stations

1. The manufacturer must cooperate with the owner or operator of the internal recall station in complying with the following management procedures:

a) They must provide and use hazardous waste documents in the name of the representative of the hazardous waste generator when discarded products that are hazardous wastes are transferred to an establishment licensed to treat hazardous wastes. The manufacturer and owner or operator of the recall station may reach an agreement on providing and using hazardous waste documents in the name of the representative of the hazardous waste generator.

b) A transfer book provided in the Appendix II enclosed herewith shall be used when discarded products are transferred to a stationary recall station or another manufacturer in accordance with regulations specified in Clause 5, Article 5 of the Decision No. 16/2015/QĐ-TTg or when the discarded products that are conventional wastes are transferred to an establishment licensed to treat and recycle wastes.

c) In the cases where the recall station owner or operator is required to apply for registration of a hazardous waste generator according to regulations of the Government's Decree No. 38/2015/NĐ-CP dated April 24, 2015 on management of wastes and discarded materials, they do not have to assume responsibility of a hazardous waste generator for the recall of discarded products that are hazardous wastes when establishing a recall station;

d) They must report on discarded product recall in accordance with regulations specified in Article 7 of this Circular.

2. The manufacturer must cooperate with the owner or operator of the stationary recall station in complying with the following management procedures:

a) A transfer book provided in the Appendix II enclosed herewith shall be used when discarded products are collected from the internal recall stations or mobile recall stations, or transferred to another manufacturer in accordance with regulations specified in Clause 5, Article 5 of the Decision No. 16/2015/QĐ-TTg or when the discarded products that are conventional wastes are transferred to an establishment licensed to treat and recycle wastes;

b) They must provide and use hazardous waste documents in the name of the representative of hazardous waste generator when discarded products that are hazardous wastes are transferred to an establishment licensed to treat hazardous wastes;

c) They must comply with regulations of the Basel Convention on the control of transboundary movements of hazardous wastes and their disposal upon the export of discarded products that are hazardous wastes across the border for treatment and recycling;

d) They must report on discarded product recall in accordance with regulations specified in Article 7 of this Circular.

3. When recalling discarded products at mobile recall stations, the manufacturer must comply with the following management procedures:

a) A transfer book provided in the Appendix II enclosed herewith shall be used when recalled discarded products are transferred to a stationary recall station or when the discarded products that are conventional wastes are transferred to an establishment licensed to treat and recycle wastes.

b) They must provide and use hazardous waste documents in the name of the representative of the hazardous waste generator when discarded products that are hazardous wastes are transferred to an establishment licensed to treat hazardous wastes.

Article 6. Collection, storage, transport and treatment of discarded products

1. Transport means of hazardous wastes must satisfy the following technical requirements:

a) Transport means of hazardous wastes that are hazardous wastes must satisfy technical requirements for management of hazardous wastes, except for the collection and transport from consumers to each recall station;

b) The GPS must be installed in the transport means of discarded products transported from stationary recall stations to treatment establishments.

2. Requirements for storage of discarded products:

a) Discarded products shall be stored for a maximum of 06 months from the date of receipt at a stationary recall station. In case such discarded products must be stored for more than 06 months because a suitable waste treatment and recycling establishment is yet to be selected, types and quantity of the stored discarded products must be reported to the Department of Natural Resources and Environment of the province where a stationary recall station is located;

b) Discarded products shall be stored at an internal recall station for unlimited time but the maximum allowable storage quantity specified in the Appendix III enclosed herewith must not be exceeded.

3. The transport of discarded products that are hazardous wastes to a recall station shall not require the hazardous waste management license or hazardous waste treatment license but the maximum quantity per shipment must not be exceeded (applicable to means of transport). To be specific:

a) 100 kg or 50 discarded products, whichever comes first, applicable to the discarded product that is small electronic equipment (computer, monitor, CPU, printer, fax machine, scanner, photo camera, movie camera, cell phone, tablet, disc player, reader) and discarded battery and accumulator, discarded compact light; discarded fluorescent light;

b) 01 discarded product, applicable to the discarded product that is large electric and electronic equipment (photocopier, television, refrigerator, washing machine, air conditioner), cars and motorbikes;

c) 20 liters, applicable to waste oil;

d) The transport of discarded products that are hazardous wastes with quantity in excess of the legal limit specified in Points a, b and c, Clause 3 of this Article must be carried out by the unit issued with the hazardous waste management license or hazardous waste treatment license.

4. The transport of discarded products that are hazardous wastes from recall stations to a stationary recall station is specified as follows:

a) The transport shall be carried out by the unit issued with the hazardous waste management license or hazardous waste treatment license;

b) In case a manufacturer or unit without the hazardous waste management license or hazardous waste treatment license transports discarded products, the regulation specified in Point d, Clause 1, Article 13 of the Government's Decision No. 38/2015/NĐ-CP on management of wastes and discarded materials shall be complied with.

5. The transport of discarded products that are hazardous wastes from recall stations to a treatment and recycling establishment must be carried out by the unit issued with the hazardous waste management license or hazardous waste treatment license.

6. The transport of discarded products that are conventional wastes shall not require the license and is not limited to the quantity per shipment but must satisfy the technical requirements for management of conventional wastes.

7. If the discarded vehicles are cars and motorbikes that are still usable in accordance with applicable regulations of law, they may be moved to the recall station by their operator.

8. In the cases where the manufacturer sets up programs and projects to directly collect discarded products from consumers, such discarded products shall be transported to stationary recall stations or treatment and recycling establishments in the following forms:

a) The transport shall be carried out by the unit issued with the hazardous waste management license or hazardous waste treatment license;

b) In case the transport is carried out by a manufacturer or unit without the hazardous waste management license or hazardous waste treatment license, the regulation specified in Point d, Clause 1, Article 13 of the Government's Decision No. 38/2015/NĐ-CP dated April 24, 2015 on management of wastes and discarded materials shall be complied with.

9. The discarded products after the recall must be managed and handled as prescribed in Clause 4, Article 4 of the Decision No. 16/2015/QĐ-TTg.

Article 7. Report on recall and treatment of discarded products

1. The manufacturer shall prepare an annual report on recall and treatment of discarded products (beginning from 01 January to 31 December inclusive) according to the form provided in the Appendix IV (A) enclosed herewith and submit it to the Vietnam Environment Administration before 31 January of the succeeding year.

2. The owner or operator of the stationary recall station shall prepare an annual report on recall and transfer of discarded products (beginning from 01 January to 31 December inclusive) according to the form provided in the Appendix IV (B) enclosed herewith and submit it to the Department of Natural Resources and Environment before 31 January of the succeeding year.

3. The owner or operator of the internal recall station (except for the owner or operator mentioned in Point c, Clause 1, Article 5 of this Circular) shall prepare an annual report on recall and transfer of discarded products (beginning from 01 January to 31 December inclusive) according to the form provided in the Appendix IV (C) enclosed herewith and submit it to the Department of Natural Resources and Environment before 31 January of the succeeding year.

4. The waste collection and treatment establishment shall prepare an annual report on collection and treatment of discarded products (beginning from 01 January to 31 December inclusive) according to the form provided in the Appendix IV (D) enclosed herewith and submit it to the Vietnam Environment Administration and Department of Natural Resources and Environment of the province where the establishment is located before 31 January of the succeeding year.

5. The hazardous waste documents and transfer books provided and used in accordance with regulations of this Circular shall be attached to the reports of the manufacturer, owner or operator of the stationary and internal recall stations and report of the discarded product collection and treatment establishment according to regulations of this Article. In the cases where the owner or operator is mentioned in Point c, Clause 1, Article 5 of this Circular, hazardous waste documents and transfer books shall be retained at the recall station.

Article 8. Establishment and management of data on recall and treatment of discarded products

1. The database on discarded products includes the following information:

a) List of manufacturers and importers that must be responsible for recall and treatment of discarded products;

b) System of recall stations and treatment establishments;

c) The annual quantity of products sold in Vietnamese market;

d) The annual quantity of discarded products already recalled and treated in Vietnam;

dd) The annual quantity of discarded products already recalled and transported across the border for treatment and recycling.

2. The Vietnam Environment Administration shall establish a database on discarded products.

Article 9. Announcement of list of recall stations satisfying environmental requirements

1. The Vietnam Environment Administration shall publish the list of recall stations satisfying environmental requirements on its website (www.vea.gov.vn).

2. The Vietnam Environment Administration shall cooperate with the Department of Natural Resources and Environment in carrying out physical survey of recall stations, which serves as a basis for announcement of the list of recall stations satisfying environmental requirements.

Article 10. Effect

This Circular comes into force from November 20, 2017.

Article 11. Implementation

1. The People's Committees at all levels shall enable manufacturers to establish recall stations, treat or cooperate in treating discarded products. The People's Committees of provinces shall direct the Departments of Natural Resources and Environment to inspect the recall and treatment of discarded products within their provinces.

2. The Vietnam Environment Administration shall instruct, inspect and monitor the recall and treatment of discarded products.

3. Ministries, ministerial agencies, Governmental agencies, People's Committees at all levels and relevant organizations and individuals are responsible for the implementation of this Circular.

4. Difficulties that arise during the implementation of this Circular should be reported to the Ministry of Natural Resources and Environment./.

**PP. MINISTER
DEPUTY MINISTER
Vo Tuan Nhan**

APPENDIX I

TECHNICAL REQUIREMENTS APPLIED TO RECALL STATIONS
(Enclosed with the Circular No. 34/2017/TT-BTNMT dated October 04, 2017 of the Minister of Natural Resources and Environment)

I. Regarding discarded accumulators and batteries

1. Regarding discarded accumulators

1.1. The sign “Điểm thu hồi ắc quy thải bỏ” (“Discarded accumulator recall station”) must be available.

1.2. The area for storage of discarded accumulators must satisfy the following general requirements:

1.2.1. A roof must be built to cover the entire area and prevent overflowing rainwater. A drain must be built lower than the floor to take liquid to the manhole.

1.2.2. Regarding stationary recall stations, it is additionally required to equip:

- Fire-fighting equipment (including at least foam extinguishers and fire sand buckets) installed under the guidance of a competent fire authority in accordance with regulations of the law on fire prevention and fighting;

- Absorbent materials (like dry sand or sawdust) and shovels used in case of leaks, splashes and spills;
- First aid kits; domestic soda containers used to neutralize acid burns;
- Warning signs in conformity with each stored hazardous material according to TCVN 6707:2009, with at least 30 (thirty) cm in width and length;
- Evacuation diagrams and exit signs put up at the turns.

1.3. In case the stored discarded accumulators are stacked, measures must be taken to prevent any drop during storage.

2. Regarding discarded batteries

2.1. The sign “Điểm thu hồi pin thải bỏ” (“Discarded battery recall station”) must be available.

2.2. Instruments and equipment containing discarded batteries must be solid with firm wall and bottom, must not be damaged, deformed or broken by the weight of the batteries during use.

2.3. The area for storage of discarded batteries must satisfy the following general requirements:

2.3.1. A roof must be built to cover the entire area and prevent overflowing rainwater.

2.3.2. Regarding stationary recall stations, it is additionally required to equip:

- Fire fighting equipment (including at least foam extinguishers and fire sand buckets) installed under the guidance of a competent fire authority in accordance with regulations of the law on fire prevention and fighting;

- Absorbent materials (like dry sand or sawdust) and shovels used in case of leaks, splashes and spills;

- Warning signs in conformity with each stored hazardous material according to TCVN 6707:2009, with at least 30 (thirty) cm in width and length;

- Evacuation diagrams and exit signs put up at the turns.

2.3. Storage and arrangement of discarded batteries:

2.3.1. Discarded batteries must be stored in storage equipment or instruments.

2.3.2. In case the storage equipment or instruments are stacked, measures must be taken to prevent any drop during storage.

II. Regarding discarded compact and fluorescent lights

1. The sign “Điểm thu hồi bóng đèn compact, bóng đèn huỳnh quang thải bỏ” (“Discarded compact and fluorescent light recall station”) must be available.

2. Instruments and equipment containing discarded compact and fluorescent lights must be solid with firm wall and bottom, must not be damaged, deformed or broken by the weight of the lights during use.

3. The area for storage of discarded lights must satisfy the following general requirements:

3.1. A roof must be built to cover the entire area and prevent overflowing rainwater.

3.2. Regarding stationary recall stations, it is additionally required to equip:

- Fire fighting equipment (including at least foam extinguishers and fire sand buckets) installed under the guidance of a competent fire authority in accordance with regulations of the law on fire prevention and fighting;

- Warning signs in conformity with each stored hazardous material according to TCVN 6707:2009, with at least 30

(thirty) cm in width and length;

- Evacuation diagrams and exit signs put up at the turns.

4. Storage and arrangement of discarded compact and fluorescent lights:

- Discarded compact and fluorescent lights must be stored in storage equipment or instruments;

- The discarded lights must not be dropped and broken, affecting the environment.

III. Regarding types of waste oil

1. The sign “Điểm thu hồi dầu nhớt thải bỏ” (“Waste oil recall station”) must be available.

2. The instruments and equipment containing types of waste oil must satisfy the following requirements:

2.1. They must be tight without any leaks and osmosis during storage, ensure anti-corrosion, no rust, and non-chemical reaction with the waste oil.

2.2. They must have a solid structure withstanding impact, must not be damaged, deformed or broken by the weight of the waste oil during use and must be covered with a lid.

3. The area for storage of waste oil must satisfy the following general requirements:

3.1. A floor must be built so that it cannot be flooded. In case of use of an underground storage tank, it must be designed to prevent overflowing rainwater.

3.2. A roof must be built to cover the entire area, except for the storage equipment with a capacity of more than 5 m³, which shall be located outdoor.

3.3. There must be walls, dykes or edges surrounding entire or part of the area to prevent waste oil spills in case of emergency. Drains must be built lower than the floor to take liquid to the manhole.

3.4. Fire fighting equipment (including at least foam extinguishers and fire sand buckets) must be installed under the guidance of a competent fire authority in accordance with regulations of the law on fire prevention and fighting.

3.5. There must be absorbent materials (like dry sand or sawdust) and shovels in case of leaks, splashes and spills.

3.6. There must be warning signs in conformity with each stored hazardous material according to TCVN 6707:2009, with at least 30 (thirty) cm in width and length.

3.7. There must be evacuation diagrams and exit signs put up at the turns.

4. Waste oil storage instruments and equipment must not be stacked.

IV. Regarding discarded electric and electronic equipment

1. The sign “Điểm thu hồi thiết bị điện, điện tử thải” (“Discarded electric and electronic equipment recall station”) must be available.

2. Instruments and equipment containing discarded electric and electronic equipment must be solid with firm wall and bottom, must not be damaged, deformed or broken by their weight during use.

3. The area for storage of discarded electric and electronic equipment must satisfy the following general requirements:

3.1. A roof must be built to cover the entire area and prevent overflowing rainwater.

3.2. Regarding stationary recall stations, it is additionally required to equip:

- Fire fighting equipment (including at least foam extinguishers and fire sand buckets) installed under the guidance of a competent fire authority in accordance with regulations of the law on fire prevention and fighting;
- Warning signs in conformity with each stored hazardous material according to TCVN 6707:2009, with at least 30 (thirty) cm in width and length;
- Evacuation diagrams and exit signs put up at the turns.

4. In case the storage equipment or instruments are stacked, measures must be taken to prevent any drop during storage.

V. Regarding discarded inner tubes and tires

1. The sign “Điểm thu hồi săm, lốp thải bỏ” (“Discarded inner tube and tire recall station”) must be available.

2. The area for storage of discarded inner tubes and tires must satisfy the following general requirements:

2.1. A roof must be built to cover the entire area and prevent warehouse floor from being flooded.

2.2. In case of outdoor storage, the following requirements must be satisfied:

- Cover and mitigate weather effects on discarded inner tubes and tires.
- Do not place discarded inner tubes and tires directly on the ground and non-flooded storage ground.
- In case of stacked discarded inner tubes and tires, take measures to prevent any drop during storage.

2.3. Fire fighting equipment (including at least foam extinguishers and fire sand buckets) must be installed under the guidance of a competent fire authority in accordance with regulations of the law on fire prevention and fighting.

2.4. There must be evacuation diagrams and exit signs put up at the turns.

VI. Regarding discarded vehicles

1. The sign “Điểm thu hồi phương tiện giao thông thải bỏ” (“Discarded vehicle recall station”) must be available.

2. Fuel must be removed from discarded vehicles before storage.

3. The area for storage of discarded vehicles must satisfy the following general requirements:

3.1. Fire fighting equipment (including at least foam extinguishers and fire sand buckets) must be installed under the guidance of a competent fire authority in accordance with regulations of the law on fire prevention and fighting.

3.2. There must be evacuation diagrams and exit signs put up at the turns.

APPENDIX II

SPECIMEN OF DISCARDED PRODUCT TRANSFER BOOK
(Enclosed with the Circular No. 34/2017/TT-BTNMT dated October 04, 2017 of the Minister of Natural Resources and Environment)

I. Specimen of book cover

NAME OF MANUFACTURER ESTABLISHING RECALL STATION
NAME OF RECALL STATION

DISCARDED PRODUCT TRANSFER BOOK

Place, year.....

II. Book contents

.....date...

1. Transferor:

Representative:

Title:

ID Number:

2. Transferee:

Representative:

Title:

ID Number:

Reach an agreement on transfer of discarded products. To be specific:

No.	Type of discarded product	Manufacturer*	Unit	Weight (converted into kg)	Total quantity transferred (kg)	Notes
1						
2						
3						
Total						

(*) In case of failure to clearly identify what manufacturer the product belongs to, write "Không xác định" ("Unknown")

The abovementioned product (specify packaging specifications) is transported by the vehicle of license plate

Representative of transferor

Representative of transferee

(Signature)

(Signature)

Notes:

- The transfer book shall be made into 02 copies. Each party shall keep 01 copy. When transferring waste, two parties must specify waste-related information in their own transfer books with certification by the other party to serve monitoring, comparison and management purposes;

- Revisions to the book should be limited. In case of revisions, seals and signatures of representatives of parties must be given.

APPENDIX III

MINIMUM QUANTITY OF DISCARDED PRODUCTS STORED AT INTERNAL RECALL STATIONS

(Enclosed with the Circular No. 34/2017/TT-BTNMT dated October 04, 2017 of the Minister of Natural Resources and Environment)

No.	Type of discarded product	Minimum storage quantity
1	Batteries, accumulators	1,000 kg
2	Oil	1,000 liters
3	Compact and fluorescent lights	500 kg
4	Other discarded products	Unspecified

APPENDIX IV

(Enclosed with the Circular No. 34/2017/TT-BTNMT dated October 04, 2017 of the Minister of Natural Resources and Environment)

A. REPORT ON RECALL AND TREATMENT OF DISCARDED PRODUCTS OF MANUFACTURER

.....(1).....

THE SOCIALIST REPUBLIC OF VIETNAM
Independence - Freedom - Happiness

(Place), ...date...

To: The Vietnam Environment Administration

.....(1).....hereby reports on recall and treatment of discarded products of the year..... as follows:

I. Information about the manufacturer

1. Name:

2. Address:

3. Telephone: Fax: Email:

II. Information about the products sold during the reporting period that have to be recalled

No.	Name of product	Unit	Weight (converted into kg)	Total quantity (kg)
1				
2				
3			
Total				

III. Report on system of recall stations by province

No.	Name of recall station	Address (telephone, fax, email)	Forms (internal, stationary or mobile recall stations)
1			
2			
3		

IV. INFORMATION ABOUT TREATMENT OF DISCARDED PRODUCTS

Information about the treatment establishment of the manufacturer:

No.	Name of treatment establishment	Address (telephone, fax, email)	Name of transferred discarded product	Quantity already transferred for treatment (kg)
1				
2				
3			

Total	
-------	--

V. Results of recall and treatment of discarded products

1. Self-recall and treatment of discarded products

Results of recall and treatment.

No.	Name of discarded product already recalled and treated	Unit	Weight (converted into kg)	Total recalled quantity (kg)*	Total quantity already transferred for treatment (kg)	Quantity of discarded products already treated (kg)
1						
2						
3					
Total						

Notes: * already included in quantity of other manufacturers' discarded products transferred as prescribed in Clause 5, Article 5 of the Decision No. 16/2015/QĐ-TTg

2. Cooperation in recall and treatment of discarded products

List of manufacturers and importers that cooperate with each other in recall and treatment of discarded products:

No.	Name of cooperating manufacturer	Address (telephone, fax, email)	Name of discarded products subject to cooperation in recall and treatment	Quantity received (kg)	Quantity transferred (kg)
1					
2					
3				
Total					

3. In case of rejection of discarded products and explanation

No.	Name of discarded products rejected	Place of rejection	Unit	Weight (converted into kg)	Quantity (kg)	Explanation
1						
2						
3					
Total						

.....(1) is responsible to law for the accuracy and truthfulness of this report./.

LEGAL REPRESENTATIVE
(Signature, fullname, title and seal)

Notes: (1) Name of manufacturer

B. REPORT ON RECALL AND TRANSFER OF DISCARDED PRODUCTS OF STATIONARY RECALL STATION OWNER OR OPERATOR
(Enclosed with periodic report on hazardous wastes or periodic report on management of conventional wastes)

.....(1).....

THE SOCIALIST REPUBLIC OF VIETNAM
Independence - Freedom - Happiness

(Place), ...date...

To: The Department of Natural Resources and Environment (of the area where the recall station is located)

.....(1).....hereby reports on collection and transfer of discarded products of the year.....as follows:

1. Information about recall station

- Name:

- Address:

- Telephone:..... Fax:..... Email:

- Enterprise registration certificate/Investment certificate:

2. Information about results of recall and transfer of discarded products

a) Information about manufacturers signing an agreement on recall and transfer of discarded products:

- Name of manufacturer:

- Address:

- Type of discarded products that need to be recalled and treated.....

b) Results of recall and transfer of discarded products:

No.	Name of discarded product already recalled	Name of manufacturer signing an agreement on recall and treatment of discarded products	Unit	Weight (converted into kg)	Total quantity recalled (kg)	Total quantity already transferred for treatment (kg)	Name of collection and treatment establishment
1							
2							
3						
	Total						

.....(1)..... is responsible to law for the accuracy and truthfulness of this report./.

LEGAL REPRESENTATIVE
 (Signature, fullname, title and seal)

Notes: (1) name of the owner or operator of the stationary recall station

**C. REPORT ON RECALL AND TRANSFER OF DISCARDED PRODUCTS OF
INTERNAL RECALL STATION OWNER OR OPERATOR**
*(Enclosed with periodic report on hazardous wastes or periodic report on management of
conventional wastes)*

.....(1).....

THE SOCIALIST REPUBLIC OF VIETNAM
Independence - Freedom - Happiness

(Place), ...date...

To: The Department of Natural Resources and Environment (of the area where the recall station is located)

.....(1).....hereby reports on collection and transfer of discarded products of the year.....as follows:

1. Information about recall station

- Name:
- Address:
- Telephone:.....Fax:.....Email:
- Enterprise registration certificate/Investment certificate:

2. Results of recall and treatment of discarded products

a) Information about manufacturers signing an agreement on recall of discarded products:

- Name of manufacturer:
- Address:
- Type of discarded products that need to be recalled and treated:

b) Results of collection and treatment of discarded products:

No.	Name of discarded product already recalled	Name of manufacturer signing an agreement on recall of discarded products	Unit	Weight (converted into kg)	Total quantity received (kg)	Total quantity already transferred for treatment (kg)	Name of collection and treatment establishment or stationary recall station
1							
2							
3						
Total							

....(1) is responsible to law for the accuracy and truthfulness of this report./.

LEGAL REPRESENTATIVE
(Signature, fullname, title and seal)

Notes: (1) name of the owner or operator of the internal recall station

D. REPORT ON COLLECTION AND TREATMENT OF DISCARDED PRODUCTS OF WASTE COLLECTION AND TREATMENT ESTABLISHMENT

(Enclosed with periodic report on hazardous wastes or periodic report on management of conventional wastes)

.....(1).....

THE SOCIALIST REPUBLIC OF VIETNAM
Independence - Freedom - Happiness

(Place), ...date...

To: - The Vietnam Environment Administration;
 - The Department of Natural Resources and Environment *(of the area where the treatment establishment is located)*.

.....(1).....hereby reports on collection and treatment of discarded products of the year.....as follows:

1. Information about waste collection and treatment establishment

- Name:
- Address:
- Telephone:.....Fax:.....Email:
- Enterprise registration certificate/Investment certificate:
- Hazardous waste treatment license of the waste collection and treatment establishment (in case the discarded products are hazardous wastes):

2. Information about results of collection and treatment of discarded products

a) Information about manufacturers signing an agreement on collection and treatment of discarded products

- Name of manufacturer
- Address:
- Type of discarded products that need to be recalled and treated:

Results of collection and treatment of discarded products:

No.	Name of discarded product already collected and treated under agreement signed with manufacturer	Unit	Weight (converted into kg)	Total quantity received (kg)	Total quantity already treated (kg)	Name of manufacturer signing an agreement on collection and treatment of discarded products
1						
2						
3					
Total						

....(1) is responsible to law for the accuracy and truthfulness of this report./.

LEGAL REPRESENTATIVE
(Signature, fullname, title and seal)

Notes: (1) name of the waste collection and treatment establishment

出典: **LawSoft**

添付資料3. セミナー資料(抜粋)

第一部: ベトナムにおける拡大製造者責任の動向

公演: CUES

1. 拡大製造者責任とは(一般論)

6

従来の“製造者責任”との違い

CUES

2. 国際トレンド、各国の動向

3. ベトナムにおける拡大責任者責任関連法

22

CUES

“Decision 16”とは?

Decision 16は、対象製品を製造若しくは輸入してベトナム市場に販売した事業者に対して、消費者が廃棄した際にその回収と適正処理を行うことに加え、行政に対して関連活動の報告を義務づけるもので、その運用に関して大まかな規定をしたものです。

CUES

“Decision16を守ること” = “企業の責任としての法令遵守”



- ・ 現在は目標値も罰則規定も無い
 - ・ 対象製品のほとんどは有価物取引市場で活発に取引されている
 - ・ 有害であっても無価値な対象製品は生活廃棄物などと一緒に廃棄される
- = 回収拠点を設置しても対象製品が持ち込まれる可能性は現時点で限りなく低い

現時点において、対象事業者としては回収拠点を設置したり回収・処理や報告の仕組みを準備をすることは費用対効果が無いと考える可能性はある。

CUES

ベトナムの拡大製造者責任・まとめ

- ・ 対象事業者は輸入総代理店や正規販売店を含む製造業者である
- ・ 対象製品の多くは有価物を含むand/or有害物質を含む
- ・ EPRを運営するための資金確保とその利用(=財務的責任の所在)は製造業者にある
- ・ 対象廃棄物の回収・処分を含む物質的責任の所在についても製造業者にある

CUES

第二部: C3 (CommonCollectionCenter) ソリューションのご案内

公演: 日立物流

1. 日立物流について

1. 日立物流について (ベトナム現地法人)

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名称	Hitachi Transport System (Vietnam) Co., Ltd.
設立	2011 年11 月
代表者	Mr. Ryuta Saito
本社所在地	No.20, Song Thao Street, Ward 2, Tan Binh District, Ho Chi Minh City, Vietnam [ホーチミン窓口] (84)-8-3547-1383 ※日本語/英語可能
資本金	600,000USD
事業拠点	[ハノイ支店] …日本語・英語対応可 Room No. 1804, 18th Floor, Thang Long Building, No. 98A, Nguy Nhu Kon Tum Street, Thanh Xuan District, Hanoi, Vietnam. [ハイフォン事務所] …英語対応可 630 Le Thanh Tong St., Ngo Quyen Dist., Hai Phong City
事業内容	○ フォワーディング ・インドシナ諸国・中国との陸上輸送、日越間一貫輸送サービス ○ 倉庫管理 ・流通加工（パレットの検針・検品など）の付加価値保管サービス ○ 機工作業・重量物輸送 ・社会インフラ設備（発電所・鉄道など）重量物輸送 及び工場生産設備搬入据付サービス




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2. 日立物流 Gr の環境事業について(コンセプト)

2. 日立物流Grの環境事業について (コンセプト)

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静脈物流サービスの提供による、資源循環形成社会への貢献



静脈物流

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3. 日立物流 Gr の環境事業事例(ベトナム)

3.日立物流Grの環境事業事例②（ベトナム）

【2015年度 NEDO殿JCM実現可能性調査を実施】

ベトナム国における輸配送管理システムの導入による**静脈物流効率化支援プロジェクト**

ベトナムにおいて、今後物量増加が見込まれる市内から埋立処分場への都市ごみ輸送に、**輸配送管理システム（Transfer Management System）**を導入することで、**輸送効率の向上による燃料消費の削減を図り、GHGの排出削減を目指す事業である。**



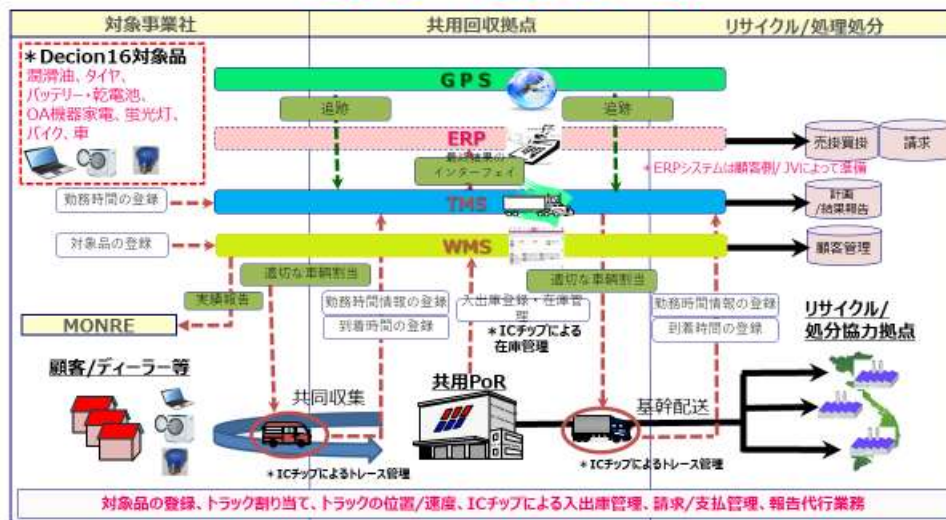
【導入技術】



4. C3ソリューションについて

4.C3ソリューションについて

C3サービススキーム



CSR向上・コンプライアンス管理を実現

5. C3ソリューション ポイント

5.C3ソリューション ポイント①ネットワーク

既存インフラをPoR（回収拠点）として活用し、ベトナム全土で回収～保管対応可能



北部



中部



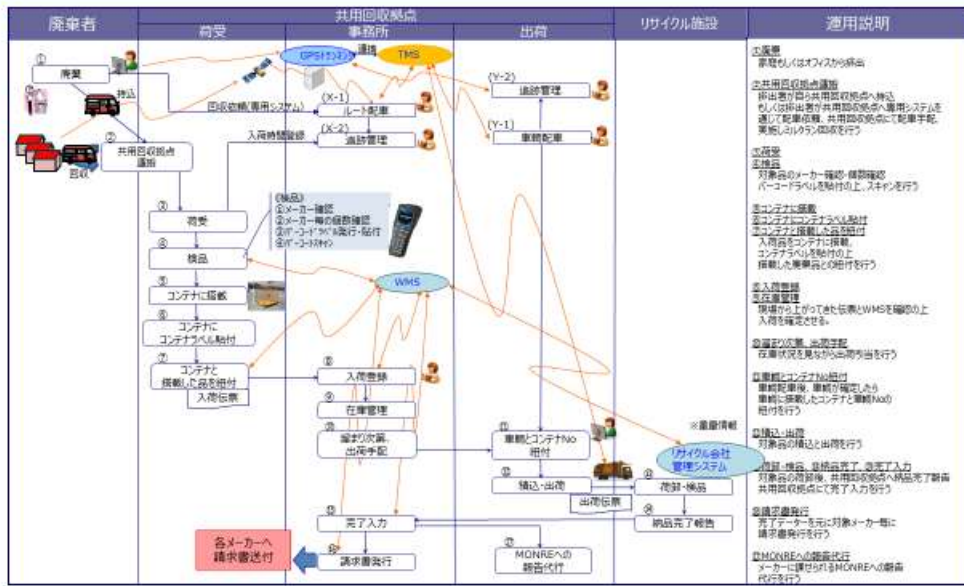
南部



6. C3ソリューション(想定運用フロー)

5.C3ソリューション（想定運用フロー）

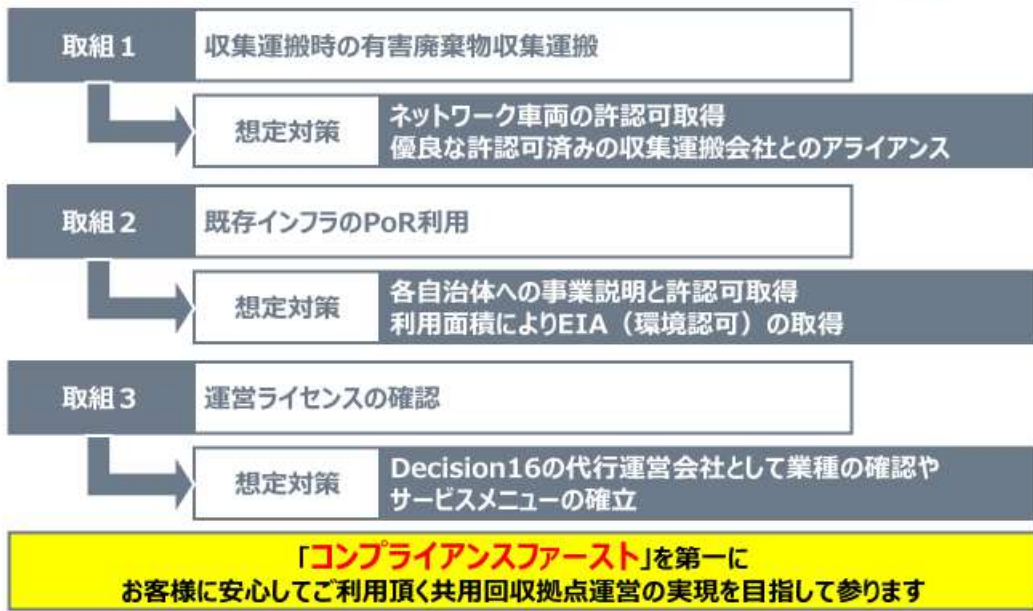
各品目毎の運用フローを検討中、対象事業者様とご相談の上、最適運用をご提案



7. サービス開始に向けた許認可への今後の取組

6. サービス開始に向けた許認可への今後の取組

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8. 今後のスケジュール(案)

7. 今後のスケジュール (案)

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添付資料4. PR 動画シナリオ

PR 動画
製作：日立物流・CUES・レティクル
対応言語：日本語・英語・ベトナム語の3パターンの動画を製作
動画時間：約20分（言語により変動）
製作目的：法律内容とC3ソリューションのビジュアルを用いた幅広い周知および啓蒙
物理的・時間的制約を受けず視聴可能となることで波及効果を見込める
または、セミナーに参加できない対象事業者への補完的なツール活用

第1章：①ナレーション原稿

ベトナムでは現在、著しい社会・経済発展に伴って消費者の生活がますます豊かになってきています。

それと同時に様々な環境問題が露呈してきています。

廃棄物の種類もこれまでに比べて増加していると同時に多様化してきています。

廃棄物は、その分別や処理方法にも留意しなければ、含まれる物質による大気汚染・水質汚濁・土壌汚染を経て、人間を含む生態系に対して静かに害を及ぼします。

こうした被害を未然に防ぐためにも、製品の製造から廃棄・リサイクルに至るまでの一連の活動について、行政や製造・販売業者及び消費者に対して一定の責務を負わせる流れになりつつあります。特に製造事業者に対しては、製品の廃棄やリサイクルに至るまでの広い範囲に対して責任を負うべき、という考え方が主流となりつつあります。この幅広い範囲における責任を“拡大製造者責任”と言っています。

こうした国際的な流れや国内での環境課題及び社会経済情勢の変化を受け、ベトナムでも2014年に環境保護法を改正し、そのなかで使用済製品に対する行政・事業者・消費者の責務が明記されました。この改正を受け、ベトナム国内市場向けに特定の製品を製造販売・輸入販売している事業者に対して、使用済製品やリコール品の回収、適正処理、行政報告に至るまでのプロセスについて責任を負うよう義務化されました。この義務並びに運用ルールについて規定したものが、2016年に施行となった首相決定“Decision16”です。

Decision16は、対象製品を製造若しくは輸入してベトナム市場に販売した事業者に対して、消費者が廃棄した際にその回収と適正処理を行うことに加え、行政に対して関連活動の報告を義務づけるもので、その運用に関して大まかな規定をしたものです。

それではわかりやすく、Decision16のおさらいをしていきましょう。

Decision16の及ぶ範囲は、ベトナム国内市場向けに販売された対象製品が消費者によって廃棄される、または製品リコールによって回収される、といった場合に限り、産業活動から排出された対象製品の廃棄の場合は範囲外となります。

このDecision16ですが、実は自動車及びバイク以外の対象製品に対する運用は、2016年7月から既に始まっています。自動車及びバイクについても2018年1月から運用されることになっています。

現時点では規定に従っていない場合でも対象事業者に対する罰則規定も無いので、各事業者の対応も比較的緩やかな動きのようです。

次にDecision16が対象事業者に課している義務についてご説明いたします。対象事業者に課せられた義務は大きく分けて次の3つです。

一つ目の義務は“対象製品が排出される可能性のある地域への回収拠点の設置”です。2017年11月20日から施行になったCircularにおいては、対象製品ごとに回収拠点に求められる整備要件が規定されており、対象事業者はこの規定に準じた回収拠点を設置することを求められます。また

Decision16 では、対象製品が排出される可能性のある地域へ回収拠点を設置することも求められます。しかしどの対象製品を取ってみてもベトナム国内のあらゆる地域で排出されてもおおしくないものばかりです。将来的に Decision16 の運用が強化されていくことを想定すれば、対象事業者の負担は大きくなることが予想されます。

二つ目の義務は、“回収拠点に持ち込まれた対象製品の回収並びに適正処理の実施”です。対象製品には有害廃棄物に指定されているものもあるため、対象事業者は許認可を持つ運搬事業者や廃棄物処理事業者の選定及び適正な業務実施の管理を行うことが義務となります。こちらも全国整備していくとなると大きな負担となると考えられます。

三つ目の義務は、“持ち込まれた対象製品の回収・適正処理等の実施結果に関する行政報告”です。対象事業者は現状では年に一回、天然資源環境省内の担当部局に対して、Decision16 にまつわる活動に関する報告の義務があります。活動報告に関しては対象製品の品目数が多いほど、また将来的に回収量が増えるほど、対象事業者にとって負担となると考えられます。

第1章②：画面（抜粋）



第2章①：ナレーション原文

続いて、Decision16 が目指す理想と、ベトナム社会経済状況のギャップに起因する“ジレンマ”についてご説明致します。

行政が Decision16 の本格施行を様子見している理由としては、対象使用済製品が集まりにくい状況下にある中で、対象事業者がどのような準備を行っていくかを見守っているからと言えます。

更に Decision16 では罰則規定も特段用意されていないことから、対象事業者は現時点では費用をかけて回収拠点を設置したり、回収・処理・報告等の仕組みの整備については大掛かりな対策はしない或いは一切何もしないようです。

ベトナムでは現在、対象製品の殆どが経済原理の中で自然発生的につくられた有価物市場で活発な取引が行われています。また電池や蛍光灯のように有価物市場には回らない無価値で有害なものについては、そのほかの家庭ごみ等と一緒に捨てられていることが多いです。

将来的には目標値を導入するという話もありますが、Decision16 では今のところ対象事業者に対する使用済製品の積極的な回収は要求していません。更に有価物市場が既にあることから、仮に回収拠点が設置されたとしても、そこで使用済製品が買い取られなければ、消費者には回収拠点

に持ち込む動機付けがありません。従って現時点でいえば対象事業者にとって効果が見込めないことに対して投資することになる一方で、履行しなくても直接的な罰則は無いという中途半端な状況に置かれていると言えます。

ただし、Decision16の主旨は改正環境保護法にも述べられている基本原則の実行であることから、将来的には対象事業者への要求は高まっていくことは確実です。企業の社会的な責任として、特に国際的な企業においてはCSRの一環として更なる高みを目指すべきという潮流もあり、またASEAN圏内の関税撤廃による対象製品の輸入拡大が予想されるので、私共ではこのジレンマを早々に打開することに潜在的なニーズがあると考えました。

第2章②：PR画面（抜粋）

Decision16：首相決定の狙いとベトナムの社会事情のギャップから生じるジレンマ

日立物流 Hitachi Transport System **“Decision16を守ること”** **CUES**
= “企業としての社会的責任・法令遵守”

↑ ↓

特段の罰則規定も無いことから
企業間の遵法精神にばらつき、競争に不公平感

現状において、ベトナムでは対象製品の殆どにおいて
有価取引市場が出来ている、
若しくは電池や蛍光灯のように
無価値・有害なものは家庭ごみに混入していることが多い

= PoRを設置しても対象製品が集まらない可能性が高い

第3章①：ナレーション原稿

私共では次のようなコンセプトに基づいた仕組みを構築することによって、広い範囲の対象事業者が参加しやすく、安価で安心な代行サービスができると考えました。

1. 対象製品や企業規模の大小、資本の違いを問わず、誰でも参加しやすい“仕組み”を整備すること
2. 既存の自社インフラ並びに企業間連携を軸として、Decision16の要件を満足する全国規模の回収網及び適正処理網を整備すること

その結果、生まれたのが“使用済製品の回収→処理/リサイクル→報告”に至るインフラの共用化を軸とした“共同回収倶楽部”によるソリューションです。英語名が“Common Collection Club”となりますので、三つのコトバの頭文字をとって、以降はC3ソリューションと呼ばせていただきます。

Decision16では回収拠点を共用することが許されており、C3ソリューションはそれを拡大解釈したご提案となります。

“C3ソリューション”は、倶楽部の運営法人と、倶楽部の顧客であり会員であるDecision16の対象製品を製造販売・輸入販売されている対象事業者の一群で構成されます。

倶楽部の運営法人は日立物流と日本環境コンサルタントに加え、処理・リサイクルを担う企業を中心として構成する予定です。

さて倶楽部の運営は会員の皆様からの会費で賄われますが、この会費は基本料金と従量料金の大きく2つに分けられます。この点がC3ソリューションの大きな特徴の一つです。

1つ目基本料金は、C3ソリューションを支えるインフラの維持管理に充てる“年会費”です。年会

費は主に次の3つの業務に充てられます：

1. 全国整備される回収拠点を含む回収網の整備と管理、
2. 全国各地の優良廃棄物処理/リサイクル企業との提携及び共通基準に基づいた業者水準管理、
3. 日立物流の持つ物流管理・在庫管理システムを核とした活動報告システムなど倶楽部の基幹インフラの維持管理

こちらはすべての会員様に年1回、固定額でお支払いいただくものです。年会費のお支払いにより、会員様は行政機関に対して全国規模の回収網を持っているとご報告いただくことができ、この点での法令遵守が達成できます。

次に従量料金です。先に述べました通り、Decision16では回収拠点に使用済製品が持ち込まれない可能性が高いという部分が懸念点でした。そこでC3ソリューションではインフラ維持のために必要な最低限の年会費を戴いておき、使用済製品が回収された場合にのみ使用済製品の回収・処理/リサイクル・活動報告に至る一連の業務代行料を別途ご請求する形をとり、会員様のご負担を軽減します。

C3ソリューションのもう一つの特徴は“徹底した使用済製品管理・報告体制の運用”にあります。日立物流グループがこれまで蓄積してきた物流管理や在庫管理ノウハウを活用し、持ち込まれた使用済製品の入り口から出口までの管理を行い、会員様の行政報告負担を軽減するシステムを構築・運用してまいります。

C3ソリューションの最大の強みは日立物流現地法人並びに関連企業が回収拠点として運用可能なストックヤードを既に63市省で合計87か所保有しているところにあります。回収拠点は会員様の増加や要望など必要に応じて順次拡大していきたいと考えています。

私共の回収拠点では、持ち込まれた使用済製品を特定し、仕分け並びに管理システムへの登録を行います。回収拠点ではセキュリティも考慮してまいります。

仕分けられた対象使用済製品は、各会員様のご意向を踏まえたうえで、C3ソリューションが提携する企業の中で最適な処理やリサイクルができる事業者を持ち込みます。

提携企業はC3ソリューションが設定する水準を満たす各種管理体制や経験・能力を有しています。

リサイクルや適正処理などのあらゆる方法をご提示させていただき、会員様のご納得される方法を選択していただけます。

有価物に関しては買い取りもさせていただきます。

C3ソリューションは2018年第4四半期を目標に開始する予定です。

本事業に関しましては現在、環境省の支援を受けた事業可能性調査を行っており、こちらが2018年3月に終了いたします。その前の2018年2月頃には最終的なビジネスプランや料金体系・契約方法等の概要を発表するセミナーを開催いたしますとともに、この動画につきましても更新次第、改めてご案内をさせていただきます。

Decision16に基づいた使用済製品の持ち込みや万が一のリコールの発生時の対応はもちろんのこと、将来的にはC3ソリューションとしてこれまでご紹介したインフラ・料金体系・管理システムを応用することで、静脈物流・動脈物流の両面において会員様の個別な要望にお応えしていきたいと考えています。

日立物流並びに日本環境コンサルタントでは、C3ソリューションの展開を通じて対象事業者様の負担軽減・法令遵守を確実にするとともに、会員各社様と手を取り合っベトナムの社会構造の変化への対応や環境改善に貢献するモデルを作り上げていきたいと考えております。

第3章②：PR画面（抜粋）

C3ソリューションのご提案

C3 = Common Collection Club Decision16対応共用プラットフォームサービス



添付資料5. 拠点リスト

N	国	市/県	住所	名称
1	北	HA NOI	KCN Liên Phương, Thường Tín, Hà Nội	Kho Logistics Miền Bắc
2	中	DA NANG	59 Nguyễn Hữu Dật, P. Hòa Cường Bắc, Q. Hải Châu, TP. Đà Nẵng	Kho Logistics Miền Trung
3	南	BINH DUONG	ICD Tân Cảng, Dĩ An, Bình Dương	Kho Logistics Miền Nam
4	北	HA NOI	Số 47 Tân Xuân, Từ Liêm, Hà Nội	Kho hàng nhanh Miền Bắc
5	南	HO CHI MINH	Phan Huy Ich, Phường 15, Tân Bình, Hồ Chí Minh	Kho hàng nhanh Miền Nam
6	北	HA NOI	Số 4 Ngõ 69 Đặng Văn Ngữ – Đống Đa – Hà Nội	TTGD Ba Đình
7	北	HA NOI	Số nhà 16 Lô 11 (Ngõ 71 Thanh Nhân) - Phường Tân Lập, Quận Hai Bà Trưng - Hà Nội	TTGD Hai Bà Trưng
8	北	HA NOI	25 Lê Văn Lương, Quận Thanh Xuân, Hà Nội	TTGD Cầu Giấy
9	北	HA NOI	KM số 1 QL 23B Nam Hồng Đông Anh Hà Nội	TTGD Đông Anh
10	北	HA NOI	số 78 Ngõ 640 Nguyễn Văn Cừ - Long Biên - Hà Nội	TTGD Long Biên
11	北	HA NOI	Số nhà 20 liên kề 9 khu đô thị Xa La, Hà Đông, Hà Nội	TTGD Hà Đông
12	北	HUNG YEN	106 Phố Nội, Mỹ hảo, Hưng Yên	TTGD Hưng Yên
13	北	HAI DUONG	115D Phan Đình Phùng, TP Hải Dương	TTGD Hải Dương
14	北	QUANG NINH	Số 20 Tổ 8 Khu 4, Phố Trần Hưng Đạo, Hạ Long, Quảng Ninh	TTGD Quảng Ninh
15	北	BAC NINH	26 Lê Thánh Tông, TP Bắc Ninh	TTGD Bắc Ninh
16	北	BAC GIANG	Số 4 - Á Lữ - Thành phố Bắc Giang	TTGD Bắc Giang
17	北	THAI NGUYEN	Số 11A Đường Minh Cầu, TP Thái Nguyên	TTGD Thái Nguyên
18	北	VINH PHUC	Ngõ 1 Đường Nguyễn Tất Thành, Phường Khai Quang, Vĩnh Yên, Vĩnh Phúc	TTGD Vĩnh Phúc
19	北	LAO CAI	98 Trần Nhật Duật, Lào Cai	TTGD Lào Cai
20	北	PHU THO	60 Tân Việt – Tân Dân – Việt Trì – Phú Thọ	TTGD Việt Trì
21	北	HA NAM	Đường Tô 1, Trần Hưng Đạo, Thị Xã Phú Lý Tỉnh Hà Nam	TTGD Hà Nam
22	北	NAM DINH	148 Phạm Ngũ Lão-TP.Nam Định	TTGD Nam Định
23	北	NINH BINH	18 Trần Phú Phường Nam Thành TP. Ninh Bình	TTGD Ninh Bình
24	北	THAI BINH	53 Kỳ Đông, Phường Trần Hưng Đạo, TP Thái Bình, Tỉnh Thái Bình.	TTGD Thái Bình
25	北	THANH HOA	199 Nguyễn Chí Thanh, TP Thanh Hóa	TTGD Thanh Hóa
26	北	NGHE AN	131 Hà Huy Tập - Vinh - Nghệ An	TTGD Vinh
27	北	HA TINH	số 233 đường Nguyễn Công Trứ, TP Hà Tĩnh	TTGD Hà Tĩnh
28	北	YEN BAI	Số 818 Đường Điện Biên - Phường Minh Tân - Tp Yên Bái	TTGD Yên Bái
29	北	HOA BINH	Khu 1 Thị Trấn Kỳ Sơn – Hòa Bình	TTGD Hòa Bình
30	南	HO CHI MINH	243/9/3 Tô Hiến Thành ,Phường 13, quận 10 , Tp. HCM	TTGD Quận 5
31	南	HO CHI MINH	220/53 Đường số 10. Phường 9. Quận Gò Vấp. Hồ Chí Minh	TTGD Gò Vấp
32	南	HO CHI MINH	Số 21 Lê Văn Huân, P13, Q. Tân Bình, TP.Hồ Chí Minh.	TTGD Tân Bình
33	南	HO CHI MINH	Số 2 đường 225 B, Khu Phố 2, Phường Tân Phú, Quận 9, HCM	TTGD Quận 2
34	南	HO CHI MINH	Số 18 - Đường số 05 - Ấp Bàu Sim- Xã Tân Thông Hội - Huyện Củ Chi - TP.HCM	TTGD Củ Chi
35	南	DONG NAI	Số 26 - Ấp 3- Xã Hiệp Phước- H. Nhơn Trạch- Tỉnh Đồng Nai.	TTGD Nhơn Trạch
36	南	DONG NAI	F6D, Khu phố 4 – Phường Tân Hiệp – Biên Hòa – Đồng Nai	TTGD Đồng Nai
37	南	BINH DUONG	Ô 87, DC 14, Đường D11, KDC Việt Sing, An Phú, H. Thuận An, Bình Dương	TTGD Bình Dương
38	南	BINH DUONG	Đường N2, KCN Mỹ Phước 1, Bến Cát, Bình Dương	TTGD Bến Cát
39	南	DA NANG	50/32 Phạm Ngọc Thạch , P9, Tp. Vũng Tàu	TTGD Vũng Tàu
40	南	BINH THUAN	Thôn Xuân Phong - Xã Phong Năm - TP. Phan Thiết - Bình Thuận	TTGD Bình Thuận
41	南	NINH THUAN	02 Trần Quốc Thảo, TP.Phan Rang, Ninh Thuận.	TTGD Ninh Thuận
42	南	KHANH HOA	02 Lam Sơn, TP.Nha Trang, Khánh Hòa.	TTGD Nha Trang
43	南	PHU YEN	3/49 Nguyễn Trung Trục - Phường 8 - Tuy Hòa - Phú Yên	TTGD Phú Yên
44	南	LAM DONG	22/9 Đường Thái Phiên - Phường 12 - TP. Đà Lạt - Lâm Đồng	TTGD Đà Lạt
45	南	LONG AN	Số 2, Đường PHẠM VĂN CHIỂU. P6. TP. TÂN AN. LONG AN	TTGD Long An
46	南	LONG AN	Ấp Bình Tiến 2, Đức Hòa Hạ, Đức Hòa, Long An.	TTGD Đức Hòa
47	南	TIEN GIANG	124 Ấp Bắc, Phường 10, Mỹ Tho, Tiền Giang	TTGD Tiền Giang
48	南	VINH LONG	242 Ấp Tân Thuận An , Tân Ngãi Vĩnh Long	TTGD Vĩnh Long
49	南	AN GIANG	146/3B Trần Hưng Đạo, P.Mỹ Phước, TP Long Xuyên, An Giang	TTGD An Giang
50	南	CAN THO	99 đường D6, Cty Hồng Loan (KDC Lô số 6), KĐT mới Nam Sông Cần Thơ, P.Hung Thạnh, Q. Cái Răng, TP.Cần Thơ	TTGD Cần Thơ
51	南	DONG THAP	123A Khóm 2, Phường 3, Sa Đéc ,Đồng Tháp.	TTGD Sa Đéc
52	南	CA MAU	Lô H, đường Tô Hiến Thành ,Khóm 8, Phường 5, TP, Cà Mau.	TTGD Cà Mau
53	南	SOC TRANG	873 Quốc Lộ 1A, Phường 2, TP Sóc Trăng	TTGD Sóc Trăng
54	南	KIEN GIANG	số 7 Ngõ Gia Tự, P.An Hòa, TP Rạch Giá, Kiên Giang	TTGD Kiên Giang
55	南	KIEN GIANG	Ấp Lê Bát - Xã Cửa Cạn - Phú Quốc - Kiên Giang	TTGD Phú Quốc
56	北	HA NOI	Bình Phú, Thạch Thất, Hà Nội	TTGD Thạch Thất
57	南	HO CHI MINH	424/6 Đường Nguyễn Tất Thành, P. 18, Quận 4, Hồ Chí Minh	TTGD Quận 1
58	南	HO CHI MINH	Số 6 Đường DC8 khu CN Tân Bình, TP.HCM	TTGD Tân Phú
59	北	HAI PHONG	Số 1R Chương Dương, Phường Hạ Lý, Q. Hồng Bàng, Hải Phòng	TTGD Hải Phòng
60	中	QUANG BINH	36 Nguyễn Văn Trỗi, Đồng Hới, Quảng Bình.	TTGD Quảng Bình(Mới)
61	中	QUANG TRI	Quốc Lộ 1A - Cam An - Quảng Trị	TTGD Quảng Trị(Mới)
62	中	THUA THIEN HUE	Khu Quy Hoạch-Vị Giã 7-Đường Cao Xuân Dục-TP. Huế	TTGD Huế(Mới)
63	中	QUANG NAM	Đường Nguyễn Hoàng-Khối 6-P. An Sơn-Tam Kỳ-Quảng Nam	TTGD Quảng Nam(Mới)
64	中	QUANG NGAI	Đường tránh Đông, Quốc lộ 1A, phường Nghĩa Chánh, TP Quảng Ngãi	TTGD Quảng Ngãi(Mới)
65	南	DAKLAK	08 Lê Văn Huu-eastam-Buôn Mê Thuột-Đắk Lắk	TTGD Đắk Lắk(Mới)
66	中	TP. DA NANG	34 Nguyễn Hữu Thọ-Q. Hải Châu -TP. Đà Nẵng	TTGD Đà Nẵng(Mới)
67	北	HA NOI	1114 La Thành, Sơn Tây, Hà Nội	TTGD Sơn Tây
68	北	HA NOI	81 Hoàng Tăng Bí, Quận Bắc Từ Liêm, Hà Nội	TTGD Từ Liêm(mới)
69	北	HA NOI	25 Lê Văn Lương, Quận Thanh Xuân, Hà Nội	TTGD Thanh Xuân(mới)
70	北	HA NOI	Số nhà 16 Lô 11 (Ngõ 71 Thanh Nhân) - Phường Tân Lập, Quận Hai Bà Trưng - Hà Nội	TTGD Hoàn Kiếm(mới)
71	南	HO CHI MINH	424/6 Nguyễn Tất Thành, P.18, Quận 4, Hồ Chí Minh	TTGD Quận 4(mới)
72	南	HO CHI MINH	21 Lê Văn Huân, P13, Q.Tân Bình, TP.Hồ Chí Minh	TTGD Phú Nhuận(mới)
73	南	BINH PHUOC	Tổ 3, Khu phố Thanh Bình, P. Tân Bình, Đông Xoài, Bình Phước.	TTGD Bình Phước
74	南	BINH DINH	07 Đội Cấn, TP. Quy Nhơn, tỉnh Bình Định	TTGD Bình Định(Mới)
75	南	HO CHI MINH	Au Co street, Tân Bình District	
76	南	HO CHI MINH	Do Xuan Hop, District 9	
77	中	DA NANG	Asiatrans Vietnam (Hoa Cam 工業団地)	
78	中	DA NANG	Portserco (Lô B1-B13, đường Bùi Quốc Hưng, quận Sơn Trà, thành phố Đà Nẵng)	
79	中	DA NANG	Vietranstimax (Lô B3-1,B3-2,B3-4, đường Bùi Quốc Hưng, quận Sơn Trà, thành phố Đà Nẵng)	
80	北	BAC NINH	Plot No. 66, SIP Bac Ninh Integrated Township and Industrial Park, Phu Chan Commune, Tu Son Town,Bac Ninh Province.	Tu Son Bonded Warehouse
81	北	BAC NINH		Que Vo Bonded and General Warehouse
82	南	DONG NAI	Nhon Trach 3 Industrial Park, Dong Nai Province	
83	北	HA NOI	Nam Tu Liem Industrial zone	

添付資料6. アライアンス準備 MOU

Basic agreement on being the “Alliance partner” of C3 Solution Service

XXXXXXXXXXXXXXXXXXXX(Location of Head office, hereafter“Party A”) had agreed the following idea which Japan Environmental Consultants Co., Limited (1-33-33 Ebisu-Nishi, Shibuya, Tokyo, Japan, hereafter“Party B”) had proposed, concerning “the agent business supporting manufacturers and importers which are targeted in Decision 16/2015/QD-TTg (hereafter“C3 solution service”)”.

Basic agreed contents;

1. “Party B” will develop “C3 solution service operation company (hereafter“C3 Company”)”within FY2018. This company concludes the contract with the “manufacturers and importers which are targeted in Decision 16/2015/QD-TTg (hereunder “Client”)” to provide “C3 solution services”.
2. After “C3 company” is established, “Party A” will agree to be the official alliance partner of“C3 Company”, to support“C3 Company”on collection, transportation, treatment, recycling and data management/reporting of the targeted waste products (such as Automobile, Motorcycle/ Electric bike, lubricant oil, lamps, batteries, home and office electronics, tires).
3. “Party A”will accept the management rule specified for“C3 solution service”. Details will be discussed after the establishment of “C3 Company”.
4. “C3 Company” will pay to “Party A” for the service done under the management rule of the “C3 Company” . Details including fee will be discussed after the establishment of “C3 Company”.
5. “Party A” also can be the official agent to “C3 Company”, in discovering new “Client” to join “C3 solution service”.Details including fee will be discussed after the establishment of “C3 Company”.
6. This is not an exclusive agreement, as the “C3 solution service”will be operated widely throughout the nation, and the“Client” will be the final decision maker of the method of treatment recycling for their targeted waste products.

Signed Date: DD/YY/2018

Party A: YYYYYYYYYYYYYYYY	Party B: Japan Environmental Consultant Co., LTD
Mr/Mrs: XXXXXXXXXXXXXXXX	SojiKurasawa, Executive Director