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Understanding the arrest of energy think tank chief Ngo Thi To Nhien

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After jailing the leadership of the climate change movement on false charges of tax evasion, Vietnam has arrested Ngo Thi To Nhien, the head of the Vietnam Initiative for Energy Transition Social Enterprise (VIETSE). On September 15, 2023, Nhien was detained. Five days later, on September 20, police charged Nhien with 'stealing, buying, selling, or destroying the seal or documents of a state agency or organization' under Article 342 of the country's 2015 Criminal Code.

Nhien, 48, is a government insider. She started her career at the Ministry of Science and Technology, where she developed software systems to assess and manage the risk of natural disasters. By 2010, she was

working with Minister of Posts and Communications Do Trung Ta, who, in 1996, had persuaded the Central Party Committee to introduce the internet to Vietnam.¹ Ta and Nhien collaborated on a special research and development project that aimed to create advanced technologies, including artificial intelligence, cloud computing, intelligent traffic management systems, and a 4G mobile communications network.²

While still employed by the government, Nhien started working as an energy consultant in 2009. For more than a decade, she worked as a consultant on energy projects for the World Bank (where she was also a member of the staff), the Asian Development Bank, the European Union, USAID, as well as for the German and Dutch governments.³ Many of these projects

involved the Ministry of Industry and Trade, the government department responsible for setting the country's energy policy.

In 2018, Minh Ha Duong, a Nobel Peace Prize-recognized climate scientist, founded VIETSE. Nhien joined as the organization's Executive Director the following year. According to Nhien, VIETSE's mission is 'to accelerate the energy transition of Vietnam towards a carbon-neutral society'.⁴ She sees the organization as playing a 'crucial role in the ... policymaking process' by providing a 'bridge between science and policy'.⁵ The organization also serves as a bridge between the Vietnamese government and foreign governments and corporations that are keen to support, and profit from, reform of the country's energy sector.



Nhien (third from right, top row), Duong Viet Duc (second from left, bottom row), Le Quoc Anh (third from left, bottom row) pose for a photo with the VIETSE team⁶

In the early 2020s, VIETSE started working closely with the United Nations Office for Project Services (UNOPS) on its Southeast Asia Energy Transition Partnership (ETP) program. ETP brings together governments and philanthropies to accelerate energy transitions in the region.⁷ The program also aims to create markets in energy sectors where they did not previously exist and promote 'greater participation from the private sector'.⁸

In 2021, UNOPS hired Nhien to conduct what Sirpa Jarvenpaa, then ETP Fund Director, described as 'a very sensitive undertaking to assess the coal abatement options'.⁹ The sensitive research, which cost over

\$200,000, imagines a future of an electricity sector without coal and envisages an 'optimal scenario [...of...] decreases [in] carbon emissions by 59% when compared to the business-as-usual scenario' (p.13).¹⁰

To realize this scenario, Nhien drew on her knowledge of political actors involved in setting energy policy agendas to design an advocacy strategy that targeted senior state and party leaders. Her message to them was clear: 'no new coal power plants' (p.24).¹¹

Ahead of COP26, a 'high-level dialogue' was planned to communicate the findings of the study to Vietnam's leaders.¹² That November in Glasgow, Prime Minister Pham Minh Chinh made the surprise announcement that Vietnam had adopted a policy of Net Zero carbon emissions by 2050. This announcement forced drastic cuts to emissions and coal power capacity in Power Development Plan 8 (PDP8), a national energy plan that was still being debated.¹³

The UNOPS study, which appears to have been instrumental in pushing Vietnam to commit to decarbonizing its economy, was perceived by some as too bold. John Cotton Senior Program Manager of the Energy Transition Partnership (ETP) at UNOPS, said

we were advised that it was too ambitious, but ETP's technical agents were able to leverage on the RRF's [Rapid Response Facility] political network, deliver this paper...and we believe...that it led to the announcement by Vietnam last year at COP26 [...of] their Net Zero pathway.¹⁴

The cautionary advice Cotton received about the study appears to have been well founded. In June 2021, three climate activists who were campaigning for the government to reduce its reliance on coal in PDP8 were arrested on charges of tax evasion. Then, two months after Prime Minister Chinh's announcement, Nguy Thi Khanh, an ETP advisor who had been working with the activists, was also arrested.¹⁵

The successful energy policy activism that led to Vietnam's Net-Zero policy created new aid and financing opportunities for the government. In December of 2022 a consortium of governments led by the European Union and the UK announced the Just Energy Transition Partnership (JETP), a \$15.5 billion project that aims to help Vietnam transition away from fossil fuels.¹⁶



Nhien, along with then ETP Fund Director Sirpa Jarvenpaa, meeting officials from the Ministry of Natural Resources and Environment to discuss the JETP Resource Mobilization Plan in March 2023.¹⁷

Analysts at UNOPS quickly identified the energy sector, which is dominated by three state-owned monopolies that are deeply invested in coal, as a major impediment to the planned energy transition. Undeterred by the arrest of one of their Vietnamese advisors, in 2022 UNOPS again contracted Nhien (also an ETP advisor) to lead a contentious project to reform Vietnam's energy sector.¹⁸



Nhien (left) meets state energy companies on behalf of UNOPS in Sep. 2022.¹⁹

The project sought to assess the potential for decommissioning 26 coal power plants that are owned by PetroVietnam, the Vietnam National Coal and Mineral Industries Group (VINACOMIN), and Vietnam Electricity (EVN), state-owned companies that account for 50% of the total coal-fired power capacity of the country.²⁰



Nhien (center), Duong Viet Duc (to her left), and members of the Commission for Management of State Capital meeting representatives of the Pha Lai coal power plant, a subsidiary of EVN, in Oct. 2022, two months before Duc was interrogated by the police.²¹

Aware that that support from international donors 'will require in depth analysis and a bankable plan', UNDP Vietnam joined the project and started searching for a Vietnamese organization 'to assess current and planned coal-thermal electricity generation in Viet Nam ... and formulate bankable proposals for decommissioning, repurposing and/or refurbishing ... coal-thermal power plants.'²² Sources report that Nhien's VIETSE was selected for the job.

Detentions, arrests, and charges

Nhien was detained on Sept. 15, 2023. Police, however, have stated that she was only charged on Sept. 20,²³ which means that she was held without charge for five days. Nhien's arrest and the charge against her were not announced by the police until September 30.²⁴ Two consultants hired by VIETSE—Le Quoc Anh and Duong Viet Duc²⁵—were also arrested and charged under Article 342, 'stealing, buying, selling, or destroying the seal or documents of a state agency or organization'.²⁶

Anh is the head of the system analysis department of Power Engineering Consulting JSC 1 and Duc is the senior specialist of the investment management committee of the National Power Transmission Corporation, both subsidiaries of state electricity utility, EVN.²⁷ If convicted, Nhien, Anh, and Duc each face up to five years' imprisonment.

Lieutenant General To An Xo, a representative of the Ministry of Public Security, revealed details about Nhien's arrest when journalist Huong Giang from Thanh Tra newspaper questioned him at the government's press conference on Sept. 30.²⁸ According to Xo, Nhien was arrested and charged by the Hanoi Security Investigation Agency after she paid Anh and Duc for documents regarding the planning and development of electricity grids that belong to EVN.²⁹ Xo explained, 'those are documents for internal use only, which cannot be shared or made public. They are categorized as confidential documents.'³⁰ He denied accusations that she was arrested for engaging in 'environmental activism'.³¹ Rather, he alleged that Nhien hired Anh and Duc as consultants in 2020, and, in return, the two men provided her with documents related to the planning and development of EVN's 500 kV and 220 kV electricity grids.³²



Duong Viet Duc (above) and Le Quoc Anh (below), EVN employees who Nhien hired to conduct research for VIETSE.³³



On June 23, 2020, Nhien organized a workshop that was attended by Duc and Anh.³⁴ The workshop explored the potential to integrate renewable energy sources into Vietnam's electricity grid. VIETSE's research team presented information that drew on EVN planning documents—documents that outlined a strategy for expanding the country's electricity grid.³⁵ That year, the three also coauthored a paper titled 'Options for integration of renewable energy into Vietnam's power grid system'. It appears that the documents used to inform the workshop and the report are the documents that Lt. Gen. To An Xo referred to.

In December 2022, Duong Viet Duc was interrogated by the police. Duc was accused of stealing state secrets—the police alleged that the information he shared with Nhien about Vietnam’s power grids was classified as secret. Fearing that she would be arrested, Nhien, who was out of the country at the time, decided to delay her return to Vietnam. Satisfied that the police had concluded their investigation and had decided not to prosecute the case, Nhien returned to Vietnam at the beginning of 2023. Upon returning, police confiscated her passport, thereby preventing her from leaving the country. Nine months later she was arrested.

Domestic law

Vietnamese law purports to protect the people’s right to access information held by public bodies. Lofty principles espoused in the country’s constitution guarantee that this right is far reaching and circumscribed by only narrow, and necessary, exceptions.

Article 25 of the 2013 Constitution of the Socialist Republic of Vietnam states, ‘citizens have the right to...access to information...The exercise of [this right] shall be provided by law.’³⁶ This provision is given effect by Vietnam’s 2016 Law on Access to Information. Article 3 of the law states that information must be provided for citizens in timely, transparent, and convenient methods.³⁷ Article 5 clarifies that ‘citizens may access information of state agencies.’ The exceptions to this right echo language found in international human rights treaties (see International Law section below). That is, restrictions are permitted ‘when it is necessary to ensure national defense and security, social order and safety, social morality or community well-being.’³⁸

In practice, however, an expansive legal framework has been designed and enacted to prevent access to information of public interest on a broad range of topics.

Article 6 of the Law on Access to Information outlines information that citizens do not have the right to access. This includes: (1) information classified as state secrets, including information with important content relating to science and technology; (2) information that if made public could harm the interests of the state; (3) information that could harm the life, liberty, or property of others; (4) work secrets; (5) information on internal meetings of state agencies; and (6) documents drafted by state agencies for their internal affairs.³⁹

The State Secrets Protection Law (2018) further restricts what information citizens are allowed to access. The law creates blanket provisions that render large swaths of information of legitimate public interest off limits, including undisclosed information about 'politics', 'policies of the Communist Party and the State', and activities 'of the Central Party Committee, Politburo, Secretariat and leaders of the Communist Party and the State' (Art. 7).⁴⁰

Restrictions on access to information are enforced through legal sanctions. Vietnam's criminal code contains several provisions relevant to the illegal appropriation of information.

Article 342 of the criminal code, under which Nhien, Duc, and Anh were charged, criminalizes the 'stealing, buying, selling, destroying the seal or documents of a state agency or organization that is *not a state secret or work secret* [emphasis added]' (p.226). Article 342 carries a maximum punishment of five years' imprisonment.⁴¹

Articles 337 (intentionally disclosing classified information), 338 (unintentionally disclosing classified information), 361 (intentionally disclosing work secrets) and 362 (unintentionally disclosing work secrets) also prevent citizens from accessing information.

- Article 337 criminalizes the deliberate disclosure, appropriation, trading, or destruction of classified information and state secrets. This offense carries a maximum penalty of 10 years' imprisonment.⁴²
- Article 338 criminalizes the involuntary disclosure of classified information or loss of a classified document. Those convicted under this provision face up to seven years' imprisonment.

- Under Article 361, it is illegal to deliberately reveal, appropriate, trade, or destroy work secrets. Under Vietnamese law, 'work secret' is only vaguely defined. This offense carries a maximum penalty of seven years' imprisonment.
- Finally, Article 362 criminalizes the involuntary disclosure of work secrets. Those convicted under this provision may face up to three years' community service or, if employed, garnished wages. In more severe circumstances, those convicted may face up to two years' imprisonment.

In sum, Vietnamese law restricts access to information across a wide range of topics, while imposing harsh sanctions for various actors who violate these limits. The following section will explore how this legal framework and its application to charge Nhien are incompatible with international human rights law.

International human rights law

Nhien's arrest violates international human rights law due to the nature of the charge, the way in which it was applied, and the process by which Nhien was detained.

The charge

The charge itself—'stealing, buying, selling, or destroying the seal or documents of a state agency or organization that is not a state secret or work secret'—is vague and incompatible with international human rights law. A law restricting the right to access information must be precise enough 'to enable an individual to regulate her conduct accordingly, and it must be made accessible to the public.'⁴³ The sweepingly broad scope of Article 342, covering seemingly all documents that are not either a state or work secret, raises a concern that there is insufficient guidance to both subjects and enforcers of the law. This concern seems founded in cases such as Nhien's, where the law appears to be used as pretext to target her for energy policy activism.

The right to seek and receive information is an essential aspect of the right to freedom of expression. Under Article 19 of the International Covenant on Civil and Political Rights (ICCPR), states must guarantee the right to 'seek, receive and impart information.'⁴⁴ This right includes access to records held by a public body that are of public interest. As the UN Special Rapporteur on freedom of opinion and expression explains:

public authorities act as representatives of the public, fulfilling a public good; therefore, in principle, their decisions and actions should be transparent. A culture of secrecy is acceptable only in very exceptional cases, when confidentiality may be essential for the effectiveness of their work. There is consequently a strong public interest in the disclosure of some types of information (p.6).⁴⁵

Limitations on the right to access information are permitted only to the extent provided for in Article 19(3) of the International Covenant on Civil and Political Rights (ICCPR). First, Article 19 stipulates that any restriction must be provided by law. Second, any restriction must be made in only limited circumstances—to protect the rights or reputations of others, to protect national security or the public order, or to protect public health or morals. Finally, a restriction must be necessary to achieve its protective function. That is, it must be the least intrusive means of achieving the permissible government interest.⁴⁶

Article 342 is far more restrictive of the right to access information than is permissible under international law.

Application of the charge

In charging Nhien for accessing information about the planning and development of Vietnam's electricity grids, the Ministry of Public Security violated her right to seek and receive information from a public body.⁴⁷ The documents obtained by Nhien contain information of legitimate public interest, and the ministry, which has the burden of proof, has not demonstrated that the documents meet one of the narrow exceptions described in Article 19(3).

While there are circumstances where restrictions on the right to access to information are permissible under international law, it is never permissible to use those restrictions to attack members of civil society because of their research topic or sources of funding.

There is also evidence to suggest that the police arbitrarily wielded the charge against Nhien. To start, there is a contradiction in Lt. Gen. To An Xo's comments on Nhien's arrest. He referred to the documents as both internal documents and as documents classified as confidential. If the documents Nhien is accused of buying are in fact classified as confidential, as Xo has claimed, a charge under Article 342 is inappropriate. This is because Article 342 only applies to a 'document of a state agency or organization that is *not a state secret or work secret*' [emphasis added]. The illegal appropriation of classified documents is actually covered by Article 337 or 361. This discrepancy indicates that the charges may be merely pretextual, and that the motivation behind Nhien's arrest may have little to do with any criminal wrongdoing.

Second, Article 342 is an obscure and rarely used charge. The few case law precedents that Project88 found in which an individual had been convicted for violating this article concerned the destruction of marriage certificates, appropriation of land use certificates, or theft of organizational seals. Project88 has found no known examples of people being charged under Article 342 for accessing documents related to energy policy.

Finally, several irregularities are apparent in the process by which Nhien was detained. The police raided the VIETSE office and interrogated Nhien's staff, they chose not to publicly announce Nhien's arrest, and they continue to hold Nhien in pre-trial detention, keeping her isolated even though she poses no danger to society. An important consequence of this police operation is that

VIETSE was forced to shut down. The events described above follow the same pattern of arrests of the five climate activists between 2021-2023, arrests that led to the closure of the environmental organizations that these activists ran.

Our evaluation of the evidence suggests that the Vietnamese government deliberately and arbitrarily applied criminal law to arrest Nhien in an effort to stop her research and advocacy on energy policy and discourage others from working in this field.

Detention without charge

Vietnam's actions constitute a violation of Nhien's right to liberty under Article 9 of the ICCPR, which Vietnam ratified in 1982.

Under international law, persons who are deprived of liberty must be "informed, at the time of arrest, of the reasons for the arrest."⁴⁸ In addition, while it does not have to be at the time of arrest, detained persons must be 'promptly' informed of any charges against them.⁴⁹ According to the UN Human Rights Committee, prompt notice of charges is necessary 'to enable a detained individual to request a prompt decision on the lawfulness of his or her detention by a competent judicial authority.'⁵⁰

What constitutes 'prompt' notice of charges is not clearly defined under international law. In *Peter Grant v. Jamaica*, the UN Human Rights Committee held that detention for seven days without charge constituted a violation of the ICCPR.⁵¹ Looking at the practice of states around the world, many states require detained persons to be informed of charges in far less than five days.⁵²

Nhien was detained on Sept. 15 but only charged on Sept. 20. A five-day wait before pressing charges, particularly in this case, where charges had been contemplated months, and perhaps years, in advance, likely

does not constitute 'prompt' notice, and would therefore be a violation of Nhien's right to liberty under international law.

After reviewing the nature of the charge, the way in which it was applied, and the process by which Nhien was detained, we conclude that Nhien's arrest constitutes a violation of human rights law.

Politically-motivated arrest

The Vietnamese government had an ulterior motive for arresting Nhien. Her arrest comes during an effort by the government to criminalize energy policy activism. Since 2022, five environmental activists have been convicted and imprisoned on false charges of tax evasion.⁵³ Most recently, on Sept. 28, Hoang Thi Minh Hong was sentenced to three years' imprisonment for alleged tax evasion.⁵⁴

A human rights investigation published by Project88 in April of 2023 documents clear evidence that these prosecutions are politically driven and designed to criminalize policy activism.⁵⁵ The investigation also highlights how the activists' efforts to organize non-profits into powerful advocacy coalitions and promote a civil society movement, brought them into conflict with the Communist Party of Vietnam.

While the five activists imprisoned for tax evasion were engaged in policy activism and building civil society movements, Nhien is a researcher. Nevertheless, her research was clearly designed to influence state policy. The common thread in these cases is that all of the individuals involved ran organizations that conducted advocacy on energy policy and all received foreign funding to carry out this work.

Another indication that Nhien's arrest is political is evident in a warning that appeared in state media on the same day that she was detained. On Sept. 15, Nhan Dan, the official newspaper and mouthpiece of the Communist Party of Vietnam, took aim at foreign donors who are funding policy research in Vietnam.⁵⁶ The editorial claimed that a subset of the 388 foreign NGOs operating in the country are using international cooperation on certain issues, including environmental protection, as a cover to interfere in Vietnam's internal affairs:

Some foreign non-governmental organizations take advantage of sponsorship activities to entice non-governmental organizations operating in the field of science and technology⁵⁷ to participate in projects that risk violating the country's security, social order, and safety. By commissioning research, they direct individuals and organizations operating in the field of science and technology to conduct research and publish a series of reports and surveys containing one-sided, negative content, tarnishing the situation of the country and people of Vietnam.⁵⁸

This editorial, which represents the official view of the communist party, came amid a deepening crackdown upon civil society and efforts to securitize foreign aid. In 2016, the party leadership passed Resolution 04-NQ/TW, which expressed hostility to the very concept of civil society in official party policy.⁵⁹

Resolution 4 warns that party members calling for the development of civil society 'undermines the leadership role of the party' (p.51).⁶⁰ A guidance note on the implementation of the resolution warns that the 'enemy and reactionary forces have stepped up activities against us', singling out 'the US and other Western countries [that] are using aid to shape [Vietnam's] law and policy', while 'providing aid to domestic "non-governmental" organizations to promote a Western model of "civil society"'.⁶¹

At the time of her arrest, Nhien was advocating for the government to make a commitment to stop constructing coal power plants. Nhien was also leading a contentious institutional reform project that aimed to push state energy companies to divest from coal. Her policy activism, like that of the climate activists, was likely perceived by Vietnam's leaders as an effort to 'undermine the leadership role of the party' in that it challenged the party's monopoly on policymaking.

Finally, Nhien, as with Dang Dinh Bach and Nguy Thi Khanh, was arrested and charged by the Hanoi Security Investigation Agency, a specialized criminal investigation agency under the Ministry of Public Security. The Law on the Organization of Criminal Investigation Bodies, however, clearly stipulates that the Security Investigation Agency only has the authority to investigate 'national security crimes', 'war crimes', and 'serious crimes'—categories of crimes that do not include Article 342 under which Nhien was charged.⁶² According to the law, this agency can only investigate other crimes if the minister of public security authorizes an exception. Since the crime of appropriating internal documents does not fall under the Security Investigation Agency's mandate, and there is no reason to suggest that this agency acted outside of its legal authority, it is reasonable to infer that the agency was instructed to investigate Nhien by Minister of Public Security To Lam.

Nhien's arrest does however differ from the arrests of the climate activists in one important respect. While the climate activists were charged with tax evasion, Nhien was charged with buying confidential documents. This difference is likely due to the fact that VIETSE is a registered business that, unlike the activists' non-profit organizations, is required to pay corporate taxes. If VIETSE was fulfilling its tax obligations, Vietnamese authorities may have come to the conclusion that there was a lack of prosecutable evidence on which to charge her for tax evasion. Alternatively, the authorities may simply be shifting tactics in response to the widespread international outcry surrounding the arbitrary use of tax provisions in the criminal code to silence the country's leading climate activists.

In any event, after reviewing the facts of Nhien's arrest against the context of the criminal prosecution of five other climate activists and the ulterior motivation of Vietnamese authorities made clear in the

Nhan Dan editorial and in Resolution 4, Nhien's arrest appears to be politically motivated.

Our evaluation of the evidence suggests that Vietnam is once again weaponizing the law to target researchers and activists that conduct work on energy policy, this time simply weaponizing a different provision of the country's criminal code. By arresting Nhien, the Vietnamese government has sent the message that research on energy policy is now off limits to civil society. As *Le Monde* journalist Brice Pedroletti puts it, 'Vietnam wants an energy transition without environmentalists.'⁶³

In spite of this latest attack on civil society, Vietnam has committed as part of the JETP to consult with non-government stakeholders in its transition away from fossil fuels. Member states of the G7, including the United States, United Kingdom, Germany and France, as well as the European Union, have all expressed concerns about Vietnam's attack on environmentalists in the country, but they have yet to condition disbursement of funding on the release of climate activists from prison and a guarantee of no further arrests.

At the same time, UNOPS and UNDP Vietnam, organizations that were working with Nhien at the time of her arrest, have chosen to remain silent. So far, neither of these agencies have issued a public statement about Nhien's arrest and how it violates human rights law or the commitment made by the Vietnamese government to consult with non-governmental stakeholders as part of the JETP agreement.

Recommendations

To the Vietnamese government:

- Immediately and unconditionally release Dang Dinh Bach, Hoang Thi Minh Hong, and other environmental activists from prison.
- Stop arresting environmental activists and suppressing organizations that are working to address climate change.
- Ensure that civil society can fully participate in the country's energy transition free from threats of intimidation, harassment, and reprisals.

To the JETP funders:

- Issue public statements in response to the arbitrary arrest of Ngo Thi To Nhien.
- Provide adequate financial resources, especially in the form of grants, for Vietnam's energy transition, while conditioning the disbursement of these funds on the release of all imprisoned environmental activists and a guarantee of no further arrests.
- Take steps to ensure that Vietnam respect its obligations to promote transparency in the implementation of the JETP and the full participation of Vietnamese civil society in the country's energy transition.

To UNOPS and the UNDP:

- Make a statement in response to the arbitrary arrest of Ngo Thi To Nhien.
- Demand that Vietnamese authorities commit to refrain from arresting any more environmental activists.
- Ensure that UNOPS and the UNDP only enters into agreements that promote human rights, further the safety of human rights defenders, and, in general, comply with the United Nations values, principles, and goals.
- Conduct rigorous due diligence in accordance with UN policies on the current threats to environmental and human rights defenders and the operation of civil society organizations with regards to Vietnam's energy transition.

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¹⁷ Energy Transition Partnership (2023). January- February 2023 ETP Newsletter. Retrieved Oct. 23, 2023, from <https://mailchi.mp/3a1be74cacc8/etp-newsletter-april-may-17022980>

¹⁸ VIETSE, Economica, NHQuang&Associates, Carbon Trust. (n.d). Roadmap for the Commission for Management of State Capital toward Net-Zero Emission in Energy State-Owned Enterprises: South-east Asia Energy Transition Partnership. Retrieved Oct. 5, 2023, from http://gizenergy.org.vn/media/app/media/Ngay_2_phien_3_Bai_4_EN.pdf

The terms of reference for Nhien's position in this project states that 'The TA [technical advisor] will require the services of an experienced consultant with deep international experience and knowledge of energy sector SOE financial and governance, change management, asset management and disengagement processes, combined with a strong background in Vietnam's energy sector development, opportunities and challenges to accelerate energy transition. The consultant is expected to be able to expose CMSC [Commission for Management of State Capital] and its energy sector SOEs to international experience in divestment from GHG emitting energy production assets and point to experience for expanding international and national finance for the energy sector to reduce physical infrastructure and energy production impediments and enable acceleration toward energy transition.'

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¹⁹ Energy Transition Partnership (2022). August- September 2022 ETP Newsletter. Retrieved Oct. 23, 2023, from <https://mailchi.mp/cd7e4f996404/etp-newsletter-april-may-16534408>

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