

Sustainable Development and Safeguards Assessment Report



Thailand Voluntary Emission Reduction Program	T-VER-P-F006-SDG
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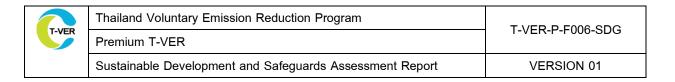
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Project Details		
Project Title	Thailand Logistic Programme PoA02-CPA01	
Name of Project	Thai EV Co., Ltd	
participant		
Name of Co-project	-	
Participant		
Name of Project Owner	Thai EV Co., Ltd	
Project Location	The geographical boundaries of the mitigation activity are	
Project Location	implemented within the country of Thailand.	
	Project status on30/04/2025	
(D/M/Y)		
Implementation Status	✓ Not yet implemented	
	☐ Preparation for implement	
	☐ Implement on(D/M/Y)	

Details of report preparation		
Finish date	25 March 2025	
Version	01	
Name of reporter	Name	Warinthorn Premrasmi
	Title	Consultant
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Note of Reference:

- 1) Project attach figure, document, or other evidence for consideration.
- 2) Project can add other beside to those specified by the TGO as appropriate.



Report Certificate

Projec	t Title	Thailand Logistic Programme Po	A02-CPA01
			.30/04/2025
	This certificate certifies that	at Charubutr Asavaroengchai	
prepare	ed this Sustainable Developm	nent and Safeguards Assessment Ro	eport of Project
	Thailand Logistic Progra	mme PoA02 - CPA01	of Thai EV Co., Ltd
located	l in <u>89, Moo 1, Racha T</u> l	hewa, Bang Phli, Samut Prakan, 10	540, Thailand
The re	port was prepared by the con		
No.	Name	Position	Signature
1.	Chacharee Theerapong	Associate Partner	Chacharee T
2.	Supeerapat Kraidech	Managing Consultant	Superaget k.
3.	Warinthorn Premrasmi	Consultant	Mark Sheet
		Signature (Mr. Kitt	tikorn Phinitwongwitthaya) oject Owner
		Se	eal (if any)

Part 1: General information



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season, sees PM2.5 lev certain province reachin exceeding WHO guidelin haze, agricultural burnin industry. To combat this	, especially during the dry
season, sees PM2.5 lev certain province reachin exceeding WHO guidelin haze, agricultural burnin industry. To combat this	, especially during the dry
certain province reachin exceeding WHO guidelii haze, agricultural burnin industry. To combat this	
exceeding WHO guideling haze, agricultural burning industry. To combat this	els dangerously high, with
haze, agricultural burnin industry. To combat this	g over 200 μg/m³ in 2023, far
industry. To combat this	nes, due to transboundary
	g, vehicle emissions, and
Conservation of National	s, The Enhancement and
Consolvation of National	al Environmental Quality Act
B.E. 2535 (1992) sets s	tandards, while the drafted
Management of Clean A	Air Act aims to strengthen air
quality control.	
1.2 Water pollution Not applicable	
1.3 Soil pollution Not applicable	
1.4 Noise pollution Noise pollution is preva	alent in urban areas and along
major transportation ro	utes in Thailand, primarily due
to traffic, construction a	activities, industrial operations,
and entertainment venu	ues. Excessive noise levels can
negatively impact publi	c health, leading to stress,
sleep disturbances, and	d hearing problems. The PCD
sets noise level standa	rds and regulations under the
Enhancement and Con	servation of National
Environmental Quality	Act B.E. 2535 (1992).
Enforcement can be ch	nallenging, particularly in rapidly
developing urban envir	onments.
1.5 Smell pollution Not applicable	
1.6 Water for consumption Not applicable	
1.7 Solid waste Not applicable	



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Issues	Details
1.8 Hazardous waste/Infectious	The management of hazardous waste and electronic
waste/Electronic waste	waste (e-waste) presents a complex environmental
	challenge. E-waste, containing toxic substances like
	lead, mercury, and cadmium, can contaminate soil
	and water if improperly disposed of. Like the
	transboundary haze contributing to air pollution, e-
	waste often crosses borders, making regulation
	difficult. Industrial processes, analogous to the
	industrial emissions in Thailand's air pollution, are
	significant sources of hazardous waste.
	To address this, robust legal frameworks are
	essential, mirroring the role of Thailand's
	Enhancement and Conservation of National
	Environmental Quality Act. These frameworks should
	establish clear standards for handling, storage, and
	disposal, and promote recycling and responsible e-
	waste management. Furthermore, like the proposed,
	Furthermore, proposed disposal and Management of
	Waste Electrical and Electronic Equipment Act
	dedicated legislation focused on hazardous waste is
	needed to strengthen control and enforcement. This
	includes promoting extended producer responsibility
	(EPR) where manufacturers take back their products
	at end-of-life to reduce environmental impact.
1.9 Energy (i.e. Wasted Energy,	The need to reduce vehicle and industrial emissions in
Renewable Energy)	Thailand's air pollution crisis highlights the importance
	of transitioning to cleaner energy sources. Similarly,
	adopting renewable energy sources like solar, wind,
	and biomass is crucial for mitigating the environmental
	impact of traditional energy production. These
	renewable sources produce significantly less pollution



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Issues	Details
	and greenhouse gases, addressing the root cause of
	many environmental issues.
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	Just as Thailand's environmental acts aim to control air
	pollution, policies promoting renewable energy are
	necessary. This includes incentives for renewable
	energy adoption, investment in grid infrastructure to
	accommodate renewable sources, and regulations
	mandating a gradual shift away from fossil fuels. The
	transition to renewable energy requires a
	comprehensive strategy involving government,
	industry, and consumers, like the multi-faceted
	approach needed to combat air pollution
1.10 Land Use	Not applicable d
1.11 Biodiversity	Not applicable.
1.12 Wild/Aquatic animal ecosystem	Not applicable
2. Society	
2.1 Social and cultural	Not applicable
2.2 Public health and safety	Not applicable
2.3 Traditions, cultures and/or valuable	Not applicable
places worthy of conservation	
2.4 Race, religion, and ethnic group	Not applicable
2.5 Transportation	Transportation in Thailand is heavily reliant on private
	vehicles, particularly in urban areas, contributing
	significantly to traffic congestion and air pollution.
	Public transportation systems are developing but vary
	in coverage and efficiency across different regions.



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Issues	Details
	The government has been promoting public transport,
	investing in infrastructure projects (e.g., mass transit
	in Bangkok), and exploring alternative transportation
	modes.
3. Economic	
3.1 Overall local economy (i.e.	Not Applicable
income, expenditure, etc.)	
3.2 Employment/Career	Not applicable
3.3 Main agriculture in the area	Not applicable
3.4 Main industry in the area	Not applicable
3.5 Main service sector in the area	Not applicable
3.6 Basic infrastructure (i.e. road,	Not applicable
school, etc.)	

^{*}Project Participant explains in detail of provenance and importance of issue consider about <u>before</u> project implement and specify if the project is rightful/environmental law, social, and economy. To have Negative impact assessment (Do-no-net-harm) with supporting documents.



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Part 2: Sustainable Development Goals

2.1 Sustainable Development Goals Assessment

Please mark ✓	in the box \square has related with	Sustainable Development	Goals that the project
will contribute to	support at least 2 topics besi	des SDG13: Climate Actio	on

Sustainable Development	Relevant indicators	Details of indicators
Goals: SDGs	(Please specify)	
☐ GOAL 1: No Poverty		
GOAL 2: Zero Hunger		
GOAL 3: Good Health and Well-being		
✓ GOAL 4: Quality Education	participants who	The number of participants who join
	receiveThai EV	Thai EV training session
	training session	
GOAL 5: Gender Equality		
GOAL 6: Clean Water and Sanitation		
✓ GOAL 7: Affordable and Clean	Renewable energy	Tracked by the increase in renewable
Energy	generation and	energy generation and consumption
	consumption	from partic-ipant's truck fleets collected
		via telemetric boxes.
GOAL 8: Decent Work and		
Economic Growth		
GOAL 9: Industry, Innovation		
and Infrastructure		
GOAL 10: Reduced		
Inequality ✓ GOAL 11: Sustainable Cities	Reduction of	Transland by study domain strations the
and Communities		Tracked by study demon-strating the
and communico	Emission	effect of EVs sub-stitution and
	reductions per	reduction of urban pollution. The
	capita in cities	decrease of urban pollution is calculat-
		ed on the difference between level of



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Sustainable Development	Relevant indicators	Details of indicators
Goals: SDGs	(Please specify)	
		fine particles (PM 2.5 and PM 10 in
		g/km) produced by project's EVs and
		baseline ICE vehicles.
GOAL 12: Responsible		
Consumption and Production		
✓ GOAL 13: Climate Action	GHG Reduction	GHG Reduction contribute to Global
	from project activity	GHG emission
	from increasing	
	EVs and displacing	
	ICE vehicles	
GOAL 14: Life Below Water		
GOAL 15: Life on Land		
GOAL 16: Peace and		
Justice Strong Institutions		
GOAL 17: Partnerships to		
achieve the Goal		

^{*}Project Participant describes the related indicators to support the selected Sustainable Development Goals. and present to currently available datasets along with supporting documents.

2.2 Monitoring Sustainable Development Goals

Specify the details follow by the impacts in section 2.1

(able to be copy the table by number of SDGs)

SDG Target	GOAL 3: Quality Education	
SDG Indicator	Target 4.3: By 2030 ensure equal access for all women and men to affordable quality technical, vocational and tertiary education, including university	
Project's Contribution	Increase in participant MRV knowledge	
Period/frequency	Once per year	



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Methodology/Tools	Thai EV will record the number of participants every training
	session.
Responsible person	Thai EV Company Limited
•	
	Increase in number of participants who understand MRV
Expected results	system including technology implementation and data
	collection.

SDG Target	GOAL 7: Affordable and Clean Energy
SDG Indicator	Target 7.2: Increase the share of renewable energy in the global energy mix.
Project's Contribution	Renewable energy generation and consumption
Period/frequency	Once per year
Methodology/Tools	Increase in renewable energy generation and consumption measured by Telematic tool
Responsible person	Thai EV Company Limited
Expected results	Increase in share of renewable energy in logistic sectors

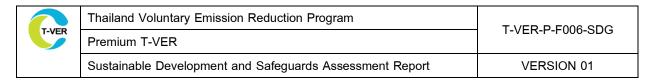
SDG Target	GOAL 11: Sustainable Cities and Communities
SDG Indicator	Target 11.6: Reduce the adverse per capita environmental impact of cities, including air quality.
Project's Contribution	Emission reductions per capita in cities
Period/frequency	Once per year



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Methodology/Tools	Published studies on substitution effect of EVs and its
	connection to pollution reduction.
Responsible person Thai EV Company Limited	
Expected results	Replacing an ICE truck with an EV truck reduces air
Expected results	pollution (PM 2.5), leading to cleaner air in urban area.

SDG Target	GOAL 13: Climate Action			
SDG Indicator	Target 13.2: Integrate climate change measures into national policies, strategies and planning			
Project's Contribution	Reduction of greenhouse gas emission resulting from increasing EVs adoption and replacing ICE vehicles			
Period/frequency	Once per year			
Methodology/Tools	Project's emission reduction calculated according to T-VER premium			
Responsible person	Thai EV Company Limited			
Expected results	Project's GHG Reduction contributes to a decrease in global GHG			

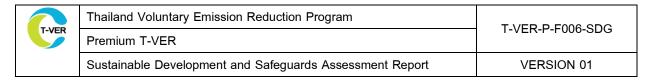


Part 3: Safeguards and Do-No-Harm

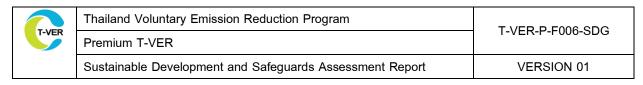
Project Safeguard assessment

Thailand Logistic Programme aims to increase the adoption of electric vehicles and promote transitioning to a cleaner energy. Supporting logistic sectors transition to EVs could create positive impacts such as reducing greenhouse gas emission and air pollution, indirectly contributing to the decreasing respiratory sickness and other air pollution related diseases and helping to achieve climate goal and sustainability in the long run. However, there might be potential negative impacts regarding electronic waste. Following SD safeguard guidelines, the programs consider laws involving land transport, pollution, and waste treatment. The result of the initial assessment indicates that the program does not violate regulations listed below:

- Enhancement and Conservation of National Environmental Quality Act, B.E. 2535 (1992):
 - O Relevance: This act provides the overarching framework for environmental protection in Thailand. It emphasizes control of air and noise pollution. For EV deployment, this means that the operation of EVs must comply with the noise standards set under this act. Additionally, its broader scope on waste disposal and maintaining environmental quality is relevant to the eventual disposal and management of EV-related waste, although it doesn't specifically address batteries.
- Hazardous Substance Act, B.E. 2535 (1992)
 - O Relevance: This act plays a crucial role in managing the hazardous components found in electronic waste, including EV batteries. It regulates the handling, storage, transportation, treatment, and disposal of substances classified as hazardous. Given that EV batteries contain materials like lithium, cobalt, and nickel, which can be hazardous if not managed properly, this law provides a framework for controlling these aspects throughout the lifecycle of the battery, from manufacturing to end-of-life management.



- Ministry of Commerce Notification on Determination of Electronic Waste as Prohibited Good for Importation into the Kingdom B.E. 2563
 - O Relevance: This notification directly impacts the sourcing of materials and the management of end-of-life EVs and their components. By prohibiting the import of electronic waste for use as raw materials, it aims to prevent Thailand from becoming a dumping ground for e-waste and encourages the development of domestic recycling and material recovery capabilities. This is relevant to the long-term sustainability of EV deployment, as it pushes for responsible domestic management of EV waste rather than relying on imports for recycling or disposal solutions.



3.1 Establishing Safeguards and Do-No-Harm Risk Assessment



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Impact of Project Activity		Impact severity level		Details of impacts	Preventive and mitigative impacts measure	
	No	Low	Moderate	High		(registration)
1. Environmental and natural re	sources					
1.1 Physical resources						
					Main activity of the project is to	Project does not create related impacts
					convince fleet operator to switch	
Water pollution	x				from ICE truck to EV truck. Water	
					usage and effluence does not	
					involve in project activity.	
					Chemical usage in the soil,	Project does not create related impacts
Soil pollution	x				resulting in soil pollution, is not	
					present in the project activity.	
					Thailand has periodically affected	Project does not create related impacts
					by air pollution from various	
					sources such as, smog from	
					agricultural burning, and emission	
Air pollution	х				from fossil fuel. The project intends	
					to introduce EV truck, which	
					produces zero air emission, and	
					does contribute to lessening air	
					pollution.	



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	J			- \				B
				EV truck	ks gene	rally p	roduce	Project does not create related impacts
				minimal	sound	relativ	e to	
				traditional	ICE tr	ucks c	due to	
~				electric mo	otors havir	ng less	parts in	
*				combination	on with a	an abse	ence of	
				exhaust s	system. Th	hus, the	e noise	
				does not	exceed i	noise p	ollution	
				limits.				
				EV trucks	lack an ex	xhaust s	system,	Project does not create related impacts
x				which 6	emits p	ollution	and	
				unpleasan	nt smell. Th	hus, the	re is no	
				identifiable	e smell -re	elated in	npacts	
				Project o	does not	regar	d soil	Project does not create related impacts
х				erosion o	or river	erosion	since	
				project ad	ctivity doe	es not	involve	
				land le	eveling,	or	coastal	
				modification	on.			
				Project is	not imple	emented	I in the	Project does not create related impacts
x				area wher	re natural	disaste	r would	
				rarely affe	ct its cont	tinuity.		
1.2 Waste management								
	x	x	x x	x x	x minimal traditional electric maccombination exhaust so does not limits. EV trucks which continues and identifiable of the project of the project and land letter modification x x minimal traditional electric maccombination exhaust so does not limits. EV trucks which continues and identifiable of the project of the project of the project and land letter modification project is area when	minimal sound traditional ICE tr electric motors havi combination with a exhaust system. To does not exceed limits. EV trucks lack an e which emits p unpleasant smell. To identifiable smell -re Project does not erosion or river project activity doe land leveling, modification. Project is not imple area where natural	minimal sound relative traditional ICE trucks of electric motors having less combination with an abservation with a second with	traditional ICE trucks due to electric motors having less parts in combination with an absence of exhaust system. Thus, the noise does not exceed noise pollution limits. EV trucks lack an exhaust system, which emits pollution and unpleasant smell. Thus, there is no identifiable smell -related impacts Project does not regard soil erosion or river erosion since project activity does not involve land leveling, or coastal modification. Project is not implemented in the area where natural disaster would



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1.3 Biological resources					
				The project does not contribute to	Project does not create related impacts
				deforestation or land use change,	
				as it focuses on replacing existing	
				internal combustion engine (ICE)	
Forest areas and land use change	х			trucks with electric vehicles (EVs)	
				within existing transportation and	
				logistics infrastructure. No new	
				land development or forest	
				clearing is required.	
				The project does not affect the loss	Project does not create related impacts
	x			of land and wildlife ecosystem as	
oss of land and wildlife ecosystems				its activity does not concern	
				transforming land or developing	
				infrastructure which disrupts the	
				ecosystems.	
				The project won't negatively	Project does not create related impacts
				impact aquatic ecosystem and	
Aquatic ecosystems and water loss	х			water loss since replacing ICE	
				trucks with EVs requires no water	
				or aquatic resources to implement.	



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				The project will not exacerbate	Project does not create related impacts
				forest products since the entire	
Farrant man do at hanna at				activity involves transportation	
Forest product harvest	х			infrastructure. Wood harvest and	
				timber extraction are not in activity	
				boundary.	
				The project does not affect food	Project does not create related impacts
				production or security. The	
				replacement of ICE trucks with	
Food	x			EVs pertains to transportation and	
				logistics and does not involve	
				agricultural activities or food supply	
				chains.	
1.4 Human resource utilization value			•		
				The project does not involve	Project does not create related impacts
	x			draining or altering any waterways.	
Draining or changing waterways				The transition from ICE trucks to	
				EVs occurs within existing	
				transportation networks and	
				logistics operations and has no	



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			impact on watercourse	
			modification or drainage patterns.	
			The project will not result in any	Project does not create related impacts
			significant changes in water	
			consumption. The operation of EV	
			trucks requires minimal water	
			compared to the manufacturing	
			and fuel extraction processes	
Changes in water consumption	x		associated with ICE trucks. Any	
			minor water usage for vehicle	
			washing or maintenance will be	
			consistent with existing operational	
			practices and will not create a	
			substantial increase in overall	
			water demand.	
			The project does not entail any	Project does not create related impacts
Change in land ownership			changes in landownership. The	
	x		replacement of ICE trucks with	
			EVs is an operational change	
			within existing logistics and	
			transportation businesses and	



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	-		1		
				does not involve the acquisition,	
				transfer, or modification of land	
				titles.	
2. Society					
Public safety (i.e. crime risk)				The project will not increase crime	Project does not create related impacts
				risk or negatively impact public	
				safety. The transition to EV trucks	
				is an operational change within	
	х			existing logistics and	
				transportation activities and does	
				not introduce any new factors that	
				would contribute to criminal	
				activity.	
Health effects				The project is expected to have	Project does not create related impacts
				positive health effects. Replacing	
				ICE trucks with EVs will reduce air	
				pollution, leading to improved air	
	Х			quality and a decrease in	
				respiratory health risks for	
				communities along transportation	
				routes. Reduced noise pollution	



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			from EVa may also contribute to	
			from EVs may also contribute to	
			improved public health.	
Temporary or permanent loss of land			The project will not result in any	Project does not create related impacts
			temporary or permanent loss of	
			land. The replacement of ICE	
	~		trucks with EVs occurs within	
	Х		existing transportation networks	
			and logistics operations and does	
			not require any land acquisition or	
			modification.	
Income/career loss			The project is not expected to	Project does not create related impacts
			result in income or career loss.	
			While some maintenance skills	
			may need to be updated, the	
	v		transition to EVs is more likely to	
	Х		create new opportunities in EV	
			maintenance and related sectors.	
			Overall, the project aims to	
			improve operational efficiency	
			without causing job displacement.	



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Utilities such as electric power,			The project will increase demand	Project does not create related impacts
telephone			for electric power for EV charging.	
			However, this demand will be	
			managed through existing and	
	Х		planned charging infrastructure	
			and will not significantly disrupt	
			other utilities such as telephone	
			services.	
Traffic			The project does not contribute to	Project does not create related impacts
			the trarffic congestion as the	
			project activity is done through the	
			displacement of ICE trucks. The	
			transition to EVs will not	
	х		significantly alter existing traffic	
			patterns during the initial stages.	
			The project does not involve any	
			road construction or modifications	
			that would directly impact traffic	
			flow.	
Community conflict	,		The project is not expected to	Project does not create related impacts
	X		generate community conflict. The	



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			transition to EVs is a positive	
			environmental initiative that aligns	
			with broader sustainability goals.	
Employment and Labor			The project will not result in	Project does not create related impacts
			significant job displacement. While	
			some maintenance roles may	
	Х		evolve, new opportunities in EV	
			maintenance and charging	
			infrastructure are expected.	
Race, Religion, and Ethnic Group			The project does not have any	Project does not create related impacts
			discriminatory impact on any race,	
			religion, or ethnic group. The	
			transition to EVs is an operational	
	х		change that applies equally to all	
			transportation and logistics	
			activities, regardless of the	
			demographics of the workforce or	
			affected communities.	
causing damage to areas of high			The project does not cause	Project does not create related impacts
conservation value (i.e. religious	x		damage to areas of high	
places, historical sites, monuments,			conservation value. The transition	
important places of the community etc.)			Tanasa Ta	



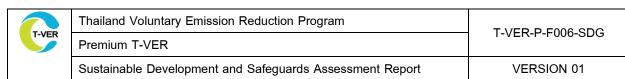
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				,	
				to EV trucks occurs within existing	
				transportation routes and logistics	
				operations and does not involve	
				any activities that would impact	
				religious places, historical sites,	
				monuments, or important	
				community areas.	
Human rights (i.e. education, freedom				The project does not generate	Project does not create related impacts
of thought, religion, etc.)				negative impact on human rights.	
				The replacement of ICE trucks with	
				EVs is an operational change that	
				does not affect education, freedom	
	X			of thought, religion, or any other	
				fundamental human rights. The	
				project operates within the	
				framework of existing labor and	
				human rights laws.	
Gender equality (i.e. employment,				The project does not cause	Project does not create related impacts
promotion, salary, welfare, termination				negative impact on gender	
of contract, etc.)	Х			equality. The transition to EV	
				trucks is an operational change	
		l L			



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			that applies equally to all	
			employees, regardless of gender.	
			The project adheres to equal	
			opportunity employment principles	
			and does not discriminate in	
			employment, promotion, salary,	
			welfare, or termination of contract.	
			The project does not directly	Project does not create related impacts
			provide financial support to	
			communities. However, by	
			promoting the adoption of EV	
Х			trucks, the project contributes to	
			improved air quality and reduced	
			noise pollution, which indirectly	
			benefits community well-being.	
			The project will not result in	Project does not create related impacts
			significant job displacement. While	
X			some maintenance roles may	
			evolve, new opportunities in EV	
	x			employees, regardless of gender. The project adheres to equal opportunity employment principles and does not discriminate in employment, promotion, salary, welfare, or termination of contract. The project does not directly provide financial support to communities. However, by promoting the adoption of EV trucks, the project contributes to improved air quality and reduced noise pollution, which indirectly benefits community well-being. The project will not result in significant job displacement. While some maintenance roles may



			maintenance and charging	
			infrastructure are expected. The	
			project will support workforce	
			training and development to	
			facilitate a smooth transition. The	
			project itself does not directly hire	
			new employees.	
Domestic investment support			The project supports domestic	Project does not create related impacts
			investment by promoting the	
			adoption of EV technology and	
			infrastructure. This can stimulate	
			demand for EV charging stations,	
	Х		maintenance services, and related	
			industries, thereby encouraging	
			domestic investment in these	
			sectors. The project also works to	
			increase domestic EV truck sales.	
Other				

^{*}Criteria for assessing the severity of the impact

^{1.} No impact: It does not cause any changes or direct or indirect impacts on the environment or society or economy.

^{2.} Low impact: There was a change in the status quo but does not affect environmental and social quality and economy. The extent of the affected area is not large. It occurs for a short time and is temporary (around 1 km.)

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- 3. Moderate impact: There was a change in the status quo that affected the values or quality of the environment and society and economy. The extent of the affected area is large but confined to the relevant area only. It occurs for a long time, but temporarily (around 2 kilometers).
- 4. High impact: There was a change in the status quo. That affects the values or quality of the environment and society and economy and may affect the ecosystem. The extent of the affected area is extensive and permanent (around 3 kilometers)



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3.2 Monitoring negative impact

Negative impact category
Subcategory-negative impact
Risk group
Possible negative impact



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	management. They will establish plans and	
	guidance to communicate with project	
	participants about life-cycle assessment and e-	
	waste management including collaborating with	
	waste management partners and SMEs to	
	guarantee that waste is addressed properly,	
	reducing the negative outcomes.	
	Weight of toxic and e-waste from end-of-life	
Parameter/indicator	vehicle	
	Describe the reference or parameter or indicator	
Defenses	Data and statistics from Pollution	
Reference	Control Department	
	Thai EV owned data collection of end-of-life	
	vehicle under the programme	
Period/frequency	Annually	



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Methodology/Tools	Guideline on electronic waste management appliances Draft of the Disposal and Management of Waste Electrical and Electronic Equipment Act
Responsible person results	Mr. Chatchawan Chuleekeit from Thai EV
Expected results	Weight of toxic and e-waste from programme's vehicle are reduced and managed