

IV. GRM – FSM

COMPLAINTS PROCESS

for the Pacific Regional Oceanscape Program (PROP) Project

(aka Grievance Redress Mechanism (GRM))

Principles of the Complaints Process

1. The Complaints process is for people seeking satisfactory resolution of their complaints on the environmental and social performance of the PROP project at the National Oceanic Resource Management Authority (NORMA) in the Federated States of Micronesia (FSM).
2. This Process is consistent with the Project's Environmental and Social Management Framework (ESMF) Grievance Redress Mechanism (Section VIII).
3. The mechanism will ensure the following:
 - a. the basic rights and interests of every person affected by poor environmental performance or social management of the project are protected; and
 - b. their concerns arising from the poor performance of the project during the phases of design, construction and operation activities are effectively and timely addressed.

How to get in touch:

Anyone can make a complaint or grievance, ask for information on the project or get in touch for any reason. Complaints can be anonymous. The various ways to get in touch are:

1. By Phone: (691) 320-2700 at FSM NORMA Office
2. By email: ocean.ehmes@norma.fm with copy to beulah.fsm@gmail.com, wkilmete@yahoo.com and steve@iasaustralia.com.
3. By mail: Post Office Box PS-122, Palikir, Pohnpei, FSM 96941
4. In person: 2nd Floor, Ambros Building in Kolonia, Pohnpei, Federated States of Micronesia. Give to Mr. Okean Ehmes or put in complaints/suggestion box.
5. Website: www.norma.fm

This information, and a brief summary of the process for answering queries and managing grievances, will be published on the NORMA website, FSM Government information website on the NORMA public bulletin board, and in consultation discussions particularly when involving the States and other Stakeholders.

Roles and responsibilities:

The following are persons involved in the complaints process and their supporting roles and responsibilities.

1. Focal Point for managing the FSM PROP Complaints Process: Mr. Okean Ehmes, Project Coordinator for the PROP Project.
2. Person who will manage the database and record keeping: Ms. Beulah Daunakamakama at the Central Implementation Unit (CIU) of the FSM Government Department of Finance & Administration.
3. Person who will answer simple queries and manage simple complaints: Mr. Okean Ehmes, Project Coordinator for PROP Project.
4. Person who will manage difficult complaints or grievances: Mr. Mathew Chigiyaal, Deputy Director of FSM NORMA with support from CIU.
5. Person who will prepare report for World Bank reporting: CIU.
6. Grievance Committee will be formed on an ad hoc basis for complex or significant grievance management. This will be made up of appropriate senior officials (Assistant Secretary level or above) from the following:
 - a. Department of Finance & Administration with support from CIU Safeguards Specialist
 - b. Department or Office managing the project at which the complaint is aimed (NORMA Deputy Director in the case of PROP Project)
 - c. Department of Health & Social Affairs
 - d. Department of Environment, Climate Change and Emergency Management

The complaints process:

1. All complaints or grievances are entered into an assigned database that tracks progress of each complaint/grievance. Complaints records (letter, email, record of conversation) are stored together, electronically or in hard copy. Each record has a unique number reflecting year and sequence of received complaint (i.e. 2018-01, 2018-02 etc.).
2. Each complaint/grievance is assigned a specific person responsible for close out.
3. Each complaint or grievance will have a plan for addressing and closing out:
 - a. Contractor or Fisheries officer or similar project person can address issues on site as required.
 - b. If it relates to Contractor activities, Project should ensure the Contractor remedies any damage, pays compensation for damage or loss, etc.
 - c. Use of community leaders and customary methods of conflict resolution is encouraged if necessary and appropriate when an issue emerges.
 - d. If an issue/complaint cannot be resolved on site, it is elevated to the Project Manager for resolution (with support from the Safeguards Specialist in the CIU). If the Project Manager and Safeguards Specialist cannot resolve the issue, it is referred to the ad hoc Grievance Committee.

- e. If a resolution cannot be found through the Grievance Committee, the next course of action is the courts of FSM or an independent mediator.
4. All simple complaints and grievances must aim to be closed out within 1 month. Complex complaints should aim to be closed out within 3 months or deferred to the Grievance Committee.
5. All complainants have the right to use the courts of FSM at any time to seek resolution.
6. The Project Manager will make adjustments to consultations, the GRM, community engagement, project implementation and other aspects as necessary to avoid future complaints and grievances.

Reporting and Evaluation

1. Complaints shall be reported in the regular project reporting to the World Bank. It should contain:
 - a. Total number of complaints / grievances received
 - b. Total number resolved.
 - c. Total number under investigation / not yet resolved.
 - d. Total number not yet resolved and also exceeds the recommended close out time of 1 month or 3 months.
 - e. Short paragraph on any significant grievances currently not yet resolved and any risks to project implementation.
2. If there are more than 30 complaints / grievances recorded, the Project Manager may decide to investigate any patterns or repetition of issues that need addressing. The Project Manager may decide to get an independent consultant to review and provide advice.

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