

FEDERATED STATES OF MICRONESIA

Programmatic Preparation Advance
(PPA)

No. IDA P176918-FM

Stakeholder Engagement Plan (SEP)

JUNE 2021

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1 INTRODUCTION

Federated States of Micronesia (FSM) has requesting access to funds from the World Bank (WB) that will be used to prepare World Bank-funded projects within the FSM – the Programmatic Preparation Advance (PPA) will be operative from July 2021 to June 2026. The funds will be used to prepare safeguards instruments, recruit project managers, engage short term project-specific professional international technical Advisors (individuals and firms) for inputs specifically related to project design and preparation and FSM CIU consultants. It may also be used to fund incremental costs associated with Travel, consultation, office equipment etc.

FSM will apply to draw down on the fund as and when required.

Work funded under the PPA falls under the World Banks (WB) Environmental and social Framework (“ESF”), which requires that FSM needs to prepare safeguards instruments for the activities that could be funded, these instruments are:

- Environmental and Social Commitment Plan (ESS1);
- Stakeholder Engagement Plan (ESS10); and
- Labor Management Procedure (ESS2), which includes a labor Grievance Mechanism (GM).

This document is the Stakeholder Engagement Plan (ESS 10).

2 SUMMARY OF EXPECTED ENVIRONMENTAL, SOCIAL, HEALTH AND SAFETY IMPACTS

The activities for which the PPA is provided are generally administrative, principally office based with in-country field site visits. These activities do not have external or third party impacts, with the principal Environmental and Social risks relating to Occupational Health and Safety (OH&S) and employment/recruitment risks relating to Labor Management. Activities funded under the PPA will include project design works, policy review and preparation of safeguards instruments all of which will interact with stakeholders, throughout the FSM with the possibility of adverse perceptions relating to cultural sensitivity or other communications-related impacts.

OH&S and employment/recruitment risks are addressed in the Labor Management Plan (LMP). This SEP focuses on cultural awareness and appropriate communications associated with stakeholder interactions as a main area of Project residual risk and includes a step by step Grievance Mechanism (GM).

3 STAKEHOLDER ENGAGEMENT ACTIVITIES PRIOR TO DEVELOPMENT OF SEP

No consultation or disclosure activities have been undertaken to date in the preparation of the PPA fund. The SEP will be disclosed on the DOFA website.

4 STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholder analysis determines the likely relationship between stakeholders and the Project and assists to identify the appropriate consultation methods for each stakeholder group during the life of the project. The following four groups of stakeholders are identified for activities funded by the PPA:

- Project Partners;
- People or groups likely to be affected by the project (project-affected parties);
- Other interested parties that may have an interest in the project; and
- Vulnerable segments of population.

The identified groups are further described below. Stakeholder identification and analysis will continue throughout the Project cycle and will remain flexible and dynamic in its approach.

4.1 Project Partners

Project partners are defined as stakeholders that contribute to the execution and implementation of the Projects. Project partners identified as potentially relevant for preparatory activities under the PPA are:

- National and State Government Ministries, Departments and Agencies;
- Municipal and Local Government Agencies;
- Traditional and Customary Leaders;
- Civil Society including business entities;
- Non-Government Agencies (international, national, State and community, NGO's etc);
- The World Bank Regional Office;
- Other development partner donors; and
- Consultants.

4.2 Project Affected Parties (PAPs) and Other Interested Parties

A number of PPA related activities will set the tone and direction for Project investment and will potentially have direct or indirect impacts on communities and citizens. To mitigate the risk of adverse impacts, stakeholder engagement will need to commence as soon as practicable, involving stakeholders early on in all PPA-funded studies and technical advisory stages, and adopting culturally appropriate and effective consultation techniques at the national and state levels.

4.3 Disadvantaged/Vulnerable Individuals or Groups

At this stage it is not possible to identify specific disadvantage – vulnerable candidates, however during all PPA activities attention will be given to ensure the inclusion of women, the elderly, youth, the disabled, and other vulnerable members of society in any stakeholder engagement.

5 STAKEHOLDER ENGAGEMENT

5.1 Purpose and Timing of Stakeholder Engagement Program

The objective of PPA related stakeholder engagement is to disseminate information and raise awareness about the Project that is being prepared and elicit input and advice from a range of stakeholders who may be affected by the Project or may have specific expertise in the subject area. This information exchange will provide valuable information to:

- Create and maintain confidence and trust;
- Ensure local awareness, understanding and ownership;
- Ensure a wide range of stakeholder groups are involved in the participation processes and benefit distribution;
- Provide avenues for conflict resolution by consensus; and
- Disseminate results and lessons learned to the wider community, including government (National and State), customary traditional leaders, business community and non-government agencies.

Stakeholder participation is expected to allow the Project to:

- Relate better to the local context;

- Provide technical excellence;
- Follow international good practice;
- Harmonize with other development partners; and
- Reflect a broad range of information and perspectives.

It is envisaged that two types of consultation scenarios are potentially associated with the Project as described below:

Type of Stakeholder Consultation	Features of Stakeholder Consultation
<p>Scenario 1: Consultation on a specific project preparation funded under the PPA.</p>	<ul style="list-style-type: none"> • This will be a broader stakeholder consultation relating to the overall project activities (awareness/understanding) including broader project issues and potential impacts. • The aim of this consultation will be to provide overview information, with a focus on potential environmental and social issues and impacts and associated mitigation measures. • The focus of this consultation should be on appropriate and sensitive communication with the broader community and all project relevant stakeholders. • Accurate and understandable analyses outputs such that stakeholder issues relating to the project are objectively identified. • Typically carried out as part of the environmental and social assessment work program and led by the CIU safeguards team and/or the environmental and social consultants. Consideration of the delivery of all or part thereof in a local language will be determined on a case by case basis.
<p>Scenario 2: Consultation to inform a specific scope of works funded by the PPA (e.g., policy review, gender study, concept design of infrastructure etc).</p>	<ul style="list-style-type: none"> • The consultation will be narrower in range of stakeholders, focusing on special interest groups and sectors associated with the Project. • A high level of pre-consultation information exchange and awareness will be necessary, including delivery of information exchange undertaken with appropriate recognition of cultural, traditional and gender based sensitivities. • Typically led by the consultancy team as part of the technical advisory work program with support from the CIU safeguards team; or may be led by the CIU safeguards team if the consultants do not have the required capacity. Consideration of the delivery of all or part thereof in a local language will be determined on a case by case basis.

Principles of good stakeholder engagement practice will be observed in all PPA related consultations specifically including protocols and mechanisms for consultation to ensure State, municipal, local traditions and culture values are respected and integrated into project development.

5.2 Proposed Strategy for Information Disclosure and Consultation

A critical element in planning a participatory consultation strategy is the selection and use of wide range of participation techniques to meet the Projects' desired objectives. The following participation techniques may be used to deliver PPA related consultations:

Information Dissemination, Sharing and Awareness: To inform and update stakeholders on the PPA status, actions taken and results. This technique can be delivered through written (emails, fact sheets, newsletter, websites) or face to face methods (meetings, workshops including virtual

activities using the internet). For information dissemination to community representatives, PPA will use culturally appropriate techniques and delivered in local languages as required. Local counterpart safeguard colleagues and/or translators are to be engaged as required.

Information Gathering: Quantitative and qualitative information will be acquired detailing the specific project needs, best practices, lessons learnt, potential synergies with past and current projects and can be gathered either in written form (i.e., questionnaire surveys) or in face to face interactions (meetings, focus group discussions) with stakeholders. When dealing with information elicited from community representatives, the use of culturally appropriate techniques such as focus group discussions; women’s gatherings, church groups and community associations etc., delivered in local language to ensure that information is collected separately from different segments of community (elders, youth, women etc.) as appropriate for the local traditional and cultural systems.

Awareness Raising Techniques: Awareness, particularly of communities, about the forthcoming implementation process and project/s can be raised using oral and culturally appropriate techniques in local language/s (including information boards) as appropriate to ensure community understanding.

Two-way Knowledge and Information Exchange: To be applied throughout the Project cycle with all key stakeholder and potentially affected or involved communities.

Particular attention will be towards identification and engagement with the vulnerable groups. Additional support or resources that may be required to enable vulnerable people to participate in the consultation process will be identified on a specific case by case basis, which may include choosing accessible venues for events, providing transportation, choosing appropriate time of the day, having small, focused meetings where vulnerable stakeholders are more comfortable asking questions or raising concerns.

Different approaches will generally be adopted for each of the two scenarios identified above:

Scenario 1: A Project-specific SEP will be prepared for each project under the PPA that will cover approaches to both Preparation Phase and Implementation Phase consultations.

Scenario 2: Consultation will be one on one interviews and meetings as required (the scope of consultation will be included in the TOR and the details confirmed in the consultants work program).

5.3 Timelines

For broader consultation around a Project prepared under the PPA, it is anticipated that stakeholder engagement will be undertaken during the early stages of PPA preparation. However, it will not be until the specific PPA initiative’s procurement plan is finalized which includes the information to develop a detailed activity timeline.

Consultation/s to inform a specific scope of work paid for by the PPA can take place at any time, independent of project timelines. In these circumstances consideration should be given by parties undertaking consultation to ensure stakeholder are given sufficient time to prepare for consultation, particularly if the topic is a specialist area and be flexible in time and delivery.

5.4 Covid-19-related constraints

If Covid-19-related restrictions are in place as set by the FSM Government, the activities under the PPA will follow the requirements of the FSM government in terms of physical distancing, wearing of personal protective equipment, nature and scale of public and private gatherings and other measures as per the Covid-19 response protocols of FSM. Consultations may continue with

the use of phone, email, voice or video (virtual) conferencing, social media and other measures that would achieve the goals of physical distancing.

5.5 Review of Comments

For broader consultation around a Project being prepared under the PPA, results of consultation will be incorporated in safeguards instruments as required. Concerns voiced by the stakeholders and commitments consequently made by the project will be recorded in the SEP Commitment Registrar (Annex A).

For consultation relating to a specific scope of work paid for by the PPA, results will be part of the annexures of the deliverable.

6 IMPLEMENTATION OF SEP

6.1 Roles and Responsibilities

Type of Stakeholder Consultation	Roles and Responsibilities
Scenario 1: Consultation on a specific project preparation funded under the PPA.	Managed and led by the CIU Safeguard Team (or the E&S consultant as part of the environmental and social assessment) and be undertaken in conjunction with the preparation of the environmental and social risk management instruments.
Scenario 2: Consultation to inform a specific scope of works funded by the PPA (e.g., policy review, gender study, concept design of infrastructure etc).	In most cases led by the external contracted consultant/s under the broader management and oversight of the CIU Safeguard Team. The exact arrangement of duties will be developed on a project activity basis and delivered to ensure maximum awareness and understanding.

6.2 Grievance Mechanism (GM)

A formal PPA related Grievance Mechanism (GM) has been developed to take into account culturally appropriate ways of managing community concerns/issues. Processes for documenting complaints and concerns have been specified, including time commitments to resolve issues. The Grievance protocol is set out in Annex B of this SEP.

The existence of the grievance mechanism will be communicated to all stakeholder groups during each planned engagement activity. Special communications will be held with the vulnerable groups identified at each location as required.

6.3 Monitoring and Reporting

CIU Safeguard team will maintain an “activity file” detailing all public consultation, disclosure information and grievances collected throughout the PPA preparation process on all projects, which will be available for the World Bank and public review on request.

7 Annex A. Project Commitment Registrar Template

Date	Contact person details	Concern voiced	Recipient community /group	Related Documents & location	Further background	Related risks	Commitment by project	Project cost	Follow up action, date & task owner	Outcome	Signed Off	Comments

8 Annex B: Grievance (Complaint) Process for the FSM PPA

Introduction

The PPA allows those that have a complaint or that feel aggrieved by project activities to be able to communicate their concerns and/or grievances through an appropriate process. The GM set out below is to be used as part of the PPA and will provide an accessible, rapid, fair and effective response to concerned stakeholders, especially any vulnerable group who often lack access to formal legal regimes.

This Process is intended to ensure the following:

- That the basic rights and interests of every person affected by poor environmental performance or social management of the project are protected; and
- That their concerns arising from the poor performance of the project during the phases of design, construction and operation activities are effectively and timely addressed.

While recognizing that many complaints may be resolved immediately, the Complaints Register and Grievance Mechanism (GM) set out below encourages mutually acceptable resolution of issues as they arise. The Complaints Register and GM has been designed to:

- a) Be a legitimate process that allows for trust to be built between stakeholder groups and assures stakeholders that their concerns will be assessed in a confidential, fair and transparent manner;
- b) Allow simple and streamlined access to the Complaints Register and GM for all stakeholders and provide adequate assistance for those that may have faced barriers in the past to be able to raise their concerns;
- c) Provide clear and known procedures for each stage of the GM process, and provides clarity on the types of outcomes available to individuals and groups;
- d) Ensure equitable treatment to all concerned and aggrieved individuals and groups through a consistent, formal approach that, is confidential, fair, informed and respectful to a complaint and/or concern;
- e) Provide a transparent and confidential approach, by keeping any aggrieved individual/group informed of the progress of their complaint, the information that was used when assessing their complaint and information about the mechanisms that will be used to address it; and
- f) Enable continuous learning and improvements to the GM. Through continued assessment, the learning's may reduce potential complaints and grievances.

Overview

This GM covers the activities that could be funded under the PPA. These activities generally consist of the following:

- Activities necessary for the identification of the pipeline of Projects;
- Conducting reviews, studies, assessments and analyses to identify Project designs;
- Activities to identify and establish the implementation and institutional arrangements necessary for the projects;
- Supporting the engagement and consultations to develop project safeguard instruments and with relevant project stakeholders: including national, state and municipal governments, community and private sector and traditional leaders associated with the development of scope of works and design of the Projects; and
- All activities related to the preparation and implementation-readiness of the Projects, including but not limited to, travel and the hiring of consultants and experts with qualification, experience

and under terms of reference acceptable to the World Bank to support preparatory activities.

A number of PPA related activities will set the tone and direction for investment and will potentially have direct or indirect impacts on communities and individuals within these communities. To mitigate the risk of adverse impacts, stakeholder engagement including public awareness and understanding of the project will need to commence as soon as practicable, which requires involving stakeholders early on in PPA studies and technical advisory stages, and adopting culturally appropriate and effective consultation techniques. The principal Environmental and Social risks associated with these activities relate to Occupational Health and Safety (OH&S); cultural and gender based sensitivity issues associated with stakeholder interactions; and employment/recruitment risks relating to Labor management.

Eligibility Criteria for the GM

- a) Perceived negative economic, social or environmental impact on an individual and/or group, or concern about the potential to cause an impact;
- b) Clearly specified kind of impact that has occurred or has the potential to occur and explanation of how the project caused or may cause such impact; and
- c) Individual and/or group filing of a complaint and/or grievance is impacted, or at risk of being impacted; or the individual and/or group filing a complaint and/or grievance demonstrates that it has authority from an individual and/or group that have been or may potentially be impacted on to represent their interest.

Local communities and other interested stakeholders may raise a grievance/complaint at all times to the traditional and government elected officials. Affected local communities will be informed of the PPA safeguard instrument provisions, including its grievance mechanism and how to make a complaint through stakeholder awareness and engagement activities.

During all Stakeholder Engagement Activities, there will be a statement announcing that there is a Grievance Mechanism where Stakeholders can raise complaints and have them processed. Information will include the provision of names, contact details and locations (physical address, email, phone numbers and web sites) to where stakeholders can log their complaints. All information including the GM and associated PPA safeguard instruments will be disclosed on DOFA and DCT&I official government websites and up loaded to FSM government web pages (e.g., facebook) to ensure access to all.

The project level process (this GM) will not impede affected persons access to the FSM legal system. At any time, a complainant may take the matter to the appropriate legal (Police) or judicial authority as per the laws of the FSM. These matters may include illegal drug trafficking, human trafficking, prostitution, child labor, gender based violence and so forth.

Complaint/Grievance Report Form

Complaints may be received in any form, from anyone, including anonymous. Anyone in the team may receive a complaint at any time. All complaints shall be immediately forwarded to the DTC&I (national government (PIU) and/or Project Manager – once a PM is on board) and/or the DTC&I State counter part agency (to be developed on a case by case basis) and/or the CIU National Safeguard Coordinator and/or CIU Program Manager. All such contacts will be recorded and screened to determine whether the complaint is PPA related and as such needs to be addressed. If the complaint is not PPA-related then it is closed (or referred to the correct agency). All grievances and/or complaints are to be recording using the grievance recording template included below.

GM Complaints Process

The GM has been designed to be problem-solving mechanism with voluntary good-faith efforts. The GM is not a substitute for the legal process. The GM will as far as practicable, try to resolve complaints and/or grievances on terms that are mutually acceptable to all parties. When making a complaint and/or grievance, all parties must act at all times, in good faith and should not attempt to delay and/or hinder any mutually acceptable resolution.

The process for the GM is as follows:

Stage	Grievance Process	Duration
A	<ul style="list-style-type: none"> Aggrieved Party (AP) takes their grievance to the DTC&I (national government PIU and/or Project Manager – once a PM is on board) and/or the DTC&I State counterpart agency and/or the CIU National Safeguard Coordinator and/or Program Manager¹. If the AP takes a grievance-issue to the project consultant/s they are to immediately notify one of the above to address the issue. 	Anytime & immediately grievance is recorded.
B	<ul style="list-style-type: none"> The above, identified agencies/personnel will endeavor to resolve any and all complaints – issues immediately. For complaints that were satisfactorily resolved for the incident the resultant resolution will be logged and reported to the CIU Program Manager whom will inform the CIU safeguard team, PIU (i.e., DTC&I), Project Manager if engaged. Through normal CIU reporting processes the DoFA Assistant Secretary and Secretary will be informed. All complaints records (letter, email, record of conversation) are to be stored together (electronically and in hard copy) and housed within the CIU. Each record is to be allocated a unique number, reflecting year and sequence of received complaint (i.e., 2021-01, 2021-02 etc.). 	Immediately Resolution within one week.
C	<ul style="list-style-type: none"> For complaints that the Aggrieved Person is not satisfied with the outcome (stage B), the above identified agency/personnel will refer the Aggrieved Person to the PPA Project Manager (if engaged) or DTC&I PIU (until a PM is engaged) and the Central Implementation Unit - CIU (Program Manager and Safeguard team). The complaint/issue is to be resolved by the PPA Project Manager (if not engaged DTC&I (PIU) and/or CIU team) and inform the Aggrieved Party. For complaints that were satisfactorily resolved for the incident the resultant resolution will be logged and reported to the CIU Program Manager whom will inform the CIU safeguard team, PIU (i.e., DTC&I), Project Manager if engaged. Through normal CIU reporting processes the DoFA Assistant Secretary and Secretary will be informed. All complaints records (letter, email, record of conversation) are to be stored together (electronically and in hard copy) and housed within the CIU. Each record is to be allocated a unique number, reflecting year and sequence of received complaint (i.e., 2020-01, 2020-02 etc.). 	Logged immediately once notified. Resolution within two weeks.
D	<ul style="list-style-type: none"> For complaints that the Aggrieved Person is not satisfied with the outcome (stage C), the complaint/issue will be referred to the DTC&I and/or DoFA Secretary (depending on the content of the complaint). The complaint/issue is to be resolved by the Secretary (DTC&I and/or DoFA) and inform the Aggrieved Party. For complaints that were satisfactorily resolved for the incident the resultant resolution will be logged and reported to the CIU Program Manager whom will inform the CIU safeguard team, PIU (i.e., DTC&I), Project Manager if engaged. All complaints records (letter, email, record of conversation) are to be stored together (electronically and in hard copy) and housed within the CIU. Each record is to be allocated a unique number, reflecting year and sequence of received complaint (i.e., 2021-01, 2021-02 etc.). 	Logged immediately once notified. Resolution within one month.

¹ All PPA related consultant/s field activities will be accompanied by a staff member from the national and state representative of DTC&I and CIU safeguard team as such all grievances will be able to be received and address on site as the first management level.

Stage	Grievance Process	Duration
E	<ul style="list-style-type: none"> For complaints that the Aggrieved Person is not satisfied with the outcome (stage D) proposed by the Secretary (DTC&I and/or DoFA), the Aggrieved Person may refer the matter to the appropriate legal or judicial authority. The decision of the court will be final. 	Anytime based on legal time lines.

How to Get in Touch

Anyone can make a complaint, raise a 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:

Department of Finance and Administration (DOFA) & Central Implementation Unit (CIU)	Department of Transport, Communications and Infrastructure. (DTC&I)
In Person:	
Division of Investment and International Finances Department of Finance & Administration (DOFA) FSM National Government, Palikir, Pohnpei FSM	Project Management Unit (PMU) Department of Transportation, Communication & Infrastructure (DTC&I) FSM National Government, Palikir, Pohnpei FSM
By Phone:	
CIU Office, DOFA Palikir (691) 320-2639/2640 CIU National Safeguard Coordinator (Mr. Wilmer Kilmete). CIU Program Officer (Mr. Clinton Ngemaes) DoFA Secretary (Mr. Eugene Amor)	PMU Office, DTC&I Palikir: (691) 320-2080/2865/2381 PMU Program Manager (Mr. Robert Goodwin) Assistant Secretary for Infrastructure (Mr. Dickson Wichep) DTC&I Secretary (Mr. Carlson Apis)
Web Site:	
CIU Office, DOFA Palikir (https://dofa.gov.fm/grievance-redress-mechanism/)	PMU Office, DTC&I Palikir https://www.tci.gov.fm/contact.html
By Email:	
Mr Wilmer Kilmete: wilmer.kilmete@dofa.gov.fm Mr. Clinton Ngemaes (clint.ngemaes@gmail.com) Mr. Eugene Amor: eamor@sbof.fm	Mr. Robert Goodwin: rscgoodwin@hotmail.com Mr. Dickson Wichep: wichep66@gmail.com Mr. Carlson Apis: carl@tci.gov.fm
By Mail:	
Central Implementation Unit Division of Investment & International Finance P.O. Box PS-158 Palikir, Pohnpei FSM 96941	Project Management Unit Office Department of Transportation, Communication & Infrastructure P.O. Box PS-2 Palikir, Pohnpei FSM 96941

This information, and a brief summary of the process for answering queries and managing grievances, will be published on the DoFA, DCT&I and CIU government websites.

Grievance Report Form

Grievance Information: Summaries Details		
Name of Complainant (or anonymous), and gender	Employee ID (if Employee)	Telephone Email
Date of Complaint	Date of 1 week deadline for resolution or escalation:	Actual date of close out:
Date, time, and location of Event leading to Grievance:		
Detailed account of Grievance (Include names of persons involved) if known:		
Are there any policies, procedures, guidelines that may have been violated:		
Proposed solution or sought remedy:		
Outcome of Grievance:		

Date and Signature of Entry into Record:

Date and Signature of Close-out: