



FSM National Oceanic  
Resource Management  
Authority

**Federated States of Micronesia**  
**Pacific Islands Regional Oceanscape Program Second Phase for Economic**  
**Recovery and Resilience (PROPER)**  
**(P178237)**

## **Stakeholder Engagement Plan**

**DRAFT FOR DISCLOSURE PURPOSES ONLY**

This document is based upon the original Concept project design for FSM PROPER. Amendments to the Project after the Concept phase are not assessed in this document, and will be assessed in an updated set of instruments (ESMP, SEP, LMP, ESIA) per the ESCP. Therefore, this document does not reflect the full set of Project activities, and includes discussion of activities that are no longer included in the Project, or activities that have been amended. For the current set of Project activities, please refer to the PAD. This document will be replaced by the updated version within 6 months of the Project Effective Date.

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## Document Control

DATE	VERSION	DESCRIPTION	NAME
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DRAFT

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## Abbreviations and Acronyms

ADB	Asian Development Bank
AESIA	Abbreviated Environmental and Social Impact Assessment
CA	Competent Authority
CESMP	Contractors Environmental and Social Management Plan
CIU	Central Implementation Unit
COC	Code of Conduct
DAHT	Division of Anti-Human Trafficking Services
DECSEM	Department for Environment, Climate Change, and Emergency Management
DFAT	Australian Department of Foreign Affairs
DFMR	Kosrae Division of Fisheries and Marine Resources
DHAS	National Department of Health and Social Affairs
DMR	Chuuk Department of Marine Resources
DOFA	Department of Finance and Administration
DoJ	Department of Justice
DRD	Department of Resource and Development
DREA	Kosrae Department of Resources and Economic Affairs
DTI	Kosrae Department of Transport and Infrastructure
EEZ	Exclusive Economic Zone
EIA	Environmental Impact Assessment
EIAS	Environmental Impacts Assessment Statement
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
ESCP	Environmental and Social Commitment Plan
ESIA	Environmental and Social Impact Assessment
E&S	Environmental and Social
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
EPA	Environmental Protection Authority
ESS	Environmental and Social Standard
EU	European Union
FAD	Fish Aggregation Device
FFA	Pacific Islands Forum Fisheries Agency
FFC	Forum Fisheries Committee
FSM	Federated States of Micronesia
GEF	Global Environment Facility
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
GMP	Good Manufacturing Practice
GHP	Good Hygiene Practice
GS	Gender Strategy
HACCP	Hazard Analysis and Critical Control Point
IA	Implementation Agency
IDA	International Development Association
IMS	Information Management System
IN	Infrastructure (refers to the infrastructure and procurement activities in the activities list)
JICA	Japanese International Cooperation Agency
KIRMA	Kosrae Island Resource Management Authority
KPA	Kosrae Port Authority
LMP	Labor management Procedures
MCT	Micronesia Conservation Trust

MPA	Marine Protected Area
MRF	Materials Recovery Facility
MRMD	Yap Marine Resources and Management Division
M&E	Monitoring and Evaluation
NAC	National Aquaculture Center
NORMA	National Oceanic Resource Management Authority
OFA	Pohnpei Office of Fisheries and Aquaculture
OHS	Occupational Health and Safety
PDO	Project Development Objective
PICs	Pacific Island Countries
PIU	Project Implementation Unit
PPA	Project Preparation Advance
PROP	Pacific Islands Regional Oceanscape Program
PROPER	Pacific Islands Regional Oceanscape Program – Second Phase for Economic Resilience
DPWT	Yap Department of Public Works and Transport
REA	Rapid Ecological Assessment
R&D	National Department of Resource and Development
RMC	Resource Management Committee (Kosrae MPAs)
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SIA	State Implementation Agency
SPC	Pacific Community
TA	Technical Assistance (refers to activities in the activities list that do not involve civil works)
VAC	Violence Against Children
VDS	Vessel Day Scheme
WB	World Bank
WCPFC	Western and Central Pacific Fisheries Commission
WCPO	Western and Central Pacific Ocean
YFA	Yap Fishing Authority

## 1 Introduction

The Federated States of Micronesia (FSM) has received financing from the World Bank (WB) International Development Association (IDA) for the preparation of the second phase of the Pacific Islands Regional Oceanscape Program (PROP). PROP comprised a series of Programs, which included separate national Programs in the Federated States of Micronesia (FSM), the Republic of the Marshall Islands, Tuvalu and the Solomon Islands, and a separate but complementary regional Program implemented by FFA. Programs in Kiribati, Tonga and Samoa have also recently joined. The second phase is now called the FSM Pacific Regional Oceanscape Program – Economic Resilience (FSM PROPER). FSM PROPER is envisaged to maintain and expand on the gains achieved through the first phase, PROP.

The FSM PROPER development objective (PDO) is to strengthen regional collaboration and national capacity for the management and the sustainable development of the oceanic and coastal fisheries sector in FSM and the critical habitats on which they depend. The preparation phase of FSM PROPER is currently being progressed by the National Oceanic Resource Management Authority (NORMA) in conjunction with the national and state agencies within the FSM with a Project Preparation Advance (PPA) from the WB. FSM PROPER is scheduled to start implementation in 2024.

FSM PROPER will be prepared under the WB Environmental and Social Framework<sup>1</sup> (ESF) which came into effect from October 2018. FSM PROPER activities (Appendix 1) to be undertaken under the funding are required to comply with the WB's ESF. Activities are a mix of technical assistance, studies and capacity building (labelled TA in Appendix 1) and equipment procurement, infrastructure renovations and a new building for NORMA and the Competent Authority (labelled IN in Appendix 1). The Environmental and Social Standards (ESS) within the ESF that are relevant are:

- ESS1 Assessment and Management of Environmental and Social Risks and Impacts
- ESS2 Labor and Working Conditions
- ESS 3 Resources Efficiency and Pollution Prevention and Management
- ESS4 Community Health and Safety
- ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- ESS6 Biodiversity Conservation & Sustainable Management of Living Natural Resources
- ESS10 Stakeholder Engagement and Information Disclosure.

The following environmental and social (E&S) instruments have been prepared for the Program appraisal and approval by the WB:

- Environmental and Social Commitment Plan (ESCP - ESS1)
- Environmental and Social Management Plan (ESMP - ESS1)
- Labor Management Procedure (LMP -ESS2)
- Stakeholder Engagement Plan (SEP- ESS10).

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<sup>1</sup> <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>

This document provides the Stakeholder Engagement Plan (SEP) for the FSM PROPER. The SEP document is a “live document” that can be updated to meet the demands of the FSM PROPER throughout implementation.

## 1.1 Country Context

FSM is a widely dispersed archipelago in the North Pacific Ocean comprising 607 islands (74 inhabited) in four states; Yap, Chuuk, Pohnpei and Kosrae (**Figure 1**). Islands range from extinct volcanic shields with elevations up to 760m and dense vegetated interiors, to small low-lying forested atoll islands, typically 1-5m elevation.

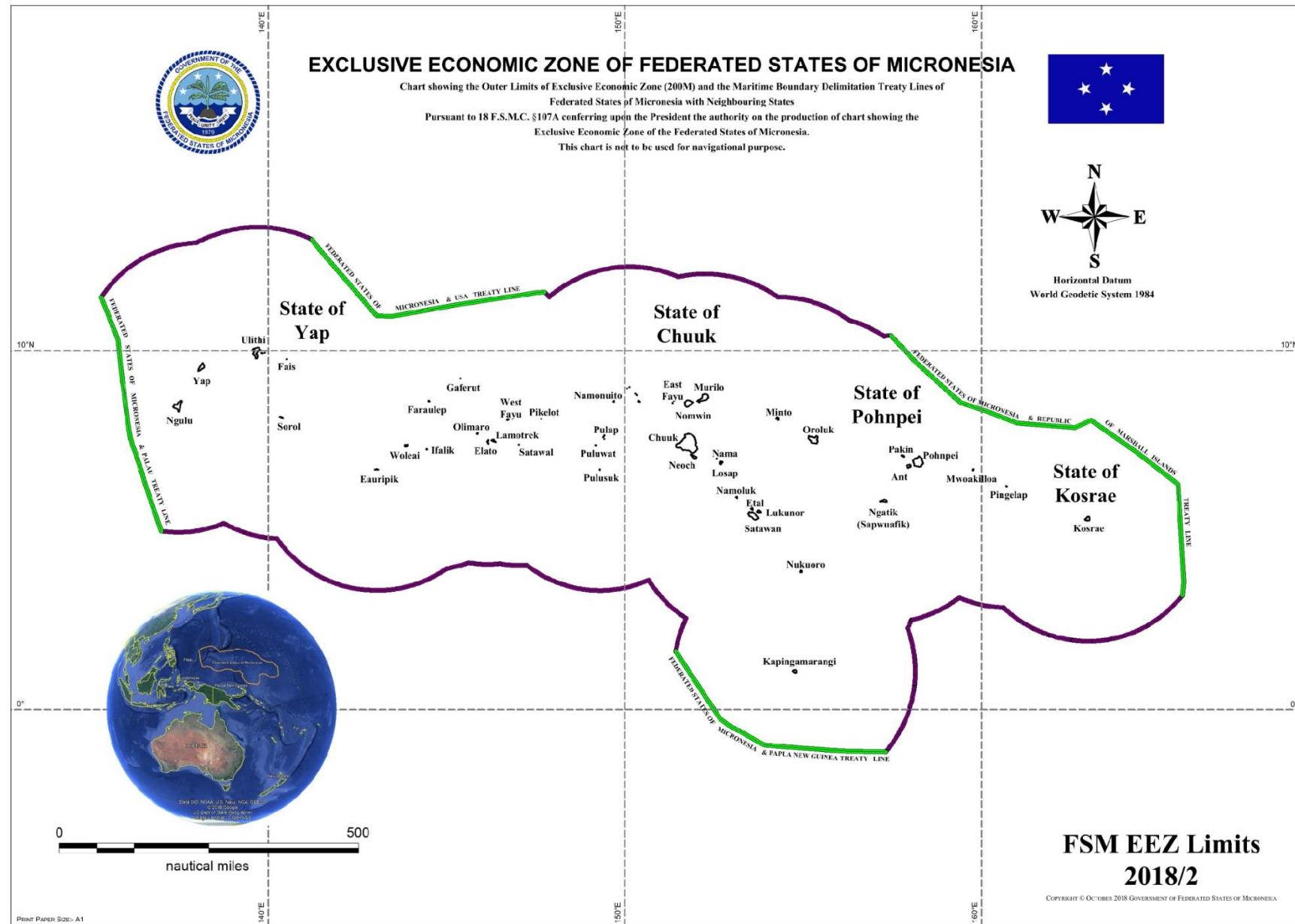
FSM’s estimated population is 113,815 (2019) and is one of the youngest in the Pacific region. FSM is particularly vulnerable to the impacts of natural disasters and climate change and faces significant challenges related to sea level rise, intensified storm surges, increased rainfall, and flooding. Demographic challenges include population decrease due to a declining fertility rate and out-migration, extreme geography and limited economic viability, high poverty rate, limited institutional capacity, urbanization and youth unemployment, poor land governance, and gender-based violence (GBV).

Total land area is only 702km<sup>2</sup> but it is 2,700km between the western-most state of Yap, and the eastern-most state of Kosrae. The FSM Exclusive Economic Zone (EEZ) is the third largest in the Western and Central Pacific Ocean (WCPO) region (**Figure 1**). The WCPO has rich marine biodiversity and ecosystems. Coral reefs, seagrass beds, mangroves and coastal wetland habitats provide vital protection from increasing threats from sea level rise, floods and storm events and help mitigate climate change through carbon sequestration. Although Pacific Island Countries coastal ecosystems produce some of the world’s most significant marine biodiversity, the 2020 State of the Environment in the Pacific Islands report shows ecosystem health and extent are diminishing under increasing pressure.

Regional coastal fisheries play a crucial role in supporting local livelihoods, national food sovereignty and security, nutrition and dietary health. Women are particularly dependent on coastal fisheries for economic opportunities. Recent research found women’s participation in fisheries in the Pacific is often over 50 percent when gleaning and subsistence fisheries are included (Pacific Handbook for Gender and Social Inclusion in Coastal Fisheries and Aquaculture 2021). Traditionally, fish and seafood are primary sources of animal protein in Pacific Islanders’ diets, therefore reef and lagoon fisheries are highly susceptible to over-exploitation, exacerbated by specialized export fisheries.

Marine resources are one of the most precious natural assets of FSM and fisheries is one of FSM’s priority sectors to stimulate economic growth and development. This is in the context of recent negative economic impacts due to COVID with the FSM border closed since March 2020. Program activities will be located throughout FSM, focusing largely on technical programs but with some civil works, a full list of activities under the Program is presented as Appendix 1.

**Figure 1.** Location of FSM with maritime and economic zone boundaries



## 1.2 Project activities and expected environmental and social impacts and risks

The activities proposed for funding (Appendix 1) include:

- Administration of the Program through a Project Implementation Unit (PIU)
- Support for the Project through the Central Implementing Unit (CIU)
- Developing policy, procedures and guidelines
- Undertaking design, modelling and technical studies
- Strengthening capacity through training
- Procurement of equipment, including; safety equipment, boats, vehicles, enforcement equipment, data center equipment
- Infrastructure, including; NORMA building, Reference Laboratory, marinas/pontoons, offices/training centers, moorings and Fish Aggregating Devices (FADs) and waste management facilities.

Some of these activities will have external or third-party impacts, with the principal E&S impacts and risks relating to:

- impacts on resource end user related to policy or regulation changes from Component 1, Strengthening the institutional capacity, governance, and sustainable management of oceanic fisheries in the FSM
- construction impacts related to civil works
- community impacts related to waste management facilities
- Occupational Health and Safety (OHS) related to all activities with particular risks associated with civil works activities
- employment/recruitment risks relating to labor management relevant to all activities.

## 1.3 Objectives of the SEP

The ESF ESS10 recognizes the importance of open and transparent engagement between the Borrower and stakeholders as an essential element of good international practice (GIIP). Effective stakeholder engagement can improve the E&S sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

The objectives of ESS10 are:

- To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular with project-affected people (PAP).
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected people throughout the project life cycle on issues that could potentially affect them.

- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- To provide project-affected people with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.

The operational objectives of stakeholder engagement for the FSM PROPER are:

- To gather information from key stakeholders to assist in environmental and social risk assessment and approval
- To facilitate stakeholders understanding of how they might be affected and their potential role in activity implementation and impact management
- To provide opportunities for stakeholders to express their opinions and concerns in relation to activities affecting them, and for these opinions and concerns to be taken into account in the development of strategies to mitigate impacts and risks
- To facilitate stakeholders understanding of the Program and activities.
- To have confidence in the PIU's and CIU's ability to manage environmental and social risks in a responsible and transparent manner.

Early and ongoing engagement with land owners, local communities, vulnerable groups and traditional or local leaders is important for all stages of the Program.

## 2 Stakeholder Engagement Activities Prior to Development of this SEP

This SEP has been prepared utilizing the PPA for the Program appraisal and approval to provide guidance for stakeholder engagement and information disclosure for the life of the Program. Engagement undertaken to develop the ESF documents and this SEP included ongoing discussions with WB and FSM PROPER implementation partners to develop the Program for appraisal and approval.

Stakeholder engagement was undertaken by MarFishEco consultants in the development of a Project Document (August 2023) to assist the design and identification of activities for the Program. A list of participants and meetings is provided as Appendix 2 and detailed descriptions of the consultations can be found in the Project Document<sup>2</sup>.

Additional consultations were undertaken by the Consultant in the preparation of this SEP and the other ESF instruments during an in-country mission from 7 September to 22 September 2023. **Table 2.1** provides a summary of those engagements, Appendix 3 provides further detail and the factsheet handout for the discussions. The FSM PROPER ESMP Site Assessment Sheets in the ESMP Appendices further details the discussions and onsite assessments undertaken.

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<sup>2</sup> Project Document, FSM PROPER Prepared By MARFISHECO, August 2023

**Table 2.1** Summary of engagements undertaken in September 2023 in preparation of the ESF instruments  
Appendix 3 provides further details on this round of engagement

DATE	STAKEHOLDERS	DISCUSSIONS
<b>KOSRAE</b>		
08/09/2023 to 12/09/2023	Okean Ehmes – PIU Project Manager Shiva Dhakal – CIU Social Safeguards Freddy Nena – Fisheries Extension Officer (DFMR) Delwin Likiak - DREA DFMR Willaim Tossie – General Manager KPA Jason Selo – Port Manager KPA Jessie Tulensru – Airport Manager KPA Osanny Nedfie – DTI Director Likiak Melander – DTI Administrative Office Steven Palik – Director KIRMA	Discussions with relevant authorities on potential E&S impacts and risks of civil works related to the proposed infrastructure activities listed in Appendix 1 Discussion on design and responsible agency for water improvements at the Port with DTI Discussions with KIRMA relating to required environmental permitting for activities
<b>YAP</b>		
13/09/2023 to 16/09/2023	Okean Ehmes – PIU Project Manager Leelkan Southwick – Director R&D Anthony Yalon – Director MRMD Tazman Falan – Yap Cap Protected Areas Network Debra Laan – PAF Women in Climate Change Project Joe Gittug – DPWT Jordan Mautaman – Acting Director EPA John Paul Malefahoy - Manager Yap Solid Waste Management Program, DPWT Maria Sog – Office Administrator, Solid Waste Management Program DPWT	Discussions with relevant authorities on potential E&S impacts and risks of civil works related to the proposed infrastructure activities listed in Appendix 1, required permitting and design of activities with limited descriptions
<b>CHUUK</b>		
18/09/2023 To 20/09/2023	Okean Ehmes – PIU Project Manager Brad Mori Executive Director EPA Dinesto Reuben – Deputy Director DMR Enjoy Rain - Chief DMR Craig Clark – World Bank Social Safeguards Suzanne Dray – World Bank Environmental Safeguards	Discussions with relevant authorities on potential E&S impacts and risks of civil works related to the proposed infrastructure activities listed related to waste management and Weno Marine development Briefing of World Bank Safeguards team on all activities regarding site assessments for FSM PROPER ESMP
<b>PHONPEI</b>		
20/09/2023 to 22/09/2023	Okean Ehmes – PIU Project Manager Eugene Pangelinan – NORMA Executive Director Ben Jackson Amor Jr – Department of Health and Social Affairs Phillip Dianan – Civil Engineer DTCI Shiva Dhakal – CIU Social Safeguards Wilmer Kilmete – CIU Safeguards Coordinator Hon. Hubert Yamada – Director Pohnpei Dept. of Resources & Development	Discussions with relevant authorities on potential E&S impacts and risks of civil works related to the proposed infrastructure activities, NORMA building, Reference Laboratory Building and Dehektik Marina. Discussions with NORMA Executive Director on proposed changes to NORMA building site and CA Discussions with implementing partners on Dehektik marina development and Environmental Assessment and Permitting.

DATE	STAKEHOLDERS	DISCUSSIONS
	Mr. Francisco Celestine - Executive Director Pohnpei Environment Protection Agency Mr. Dahker Abraham – Administrator Pohnpei Office of Fisheries & Aquaculture Mr. Clay Hedson - Marine Specialist FSM National Government, Dept. of Resources & Development Mr. Dave Mathias - Marine Specialist FSM National Government, Dept. of Resources & Develop Kwame Shiroya – Program Manager CIU	Debriefing with CIU

### 3 Stakeholder Identification and Analysis

Stakeholder analysis determines the likely relationship between stakeholders and the Program and assists to identify the appropriate consultation methods for each stakeholder group during the life of the project. The WB ESF defines stakeholders as individuals or groups who:

- are affected or likely to be affected by the project (PAPs)
- may have an interest in the project (other interested parties).

The following four groups of stakeholders are identified for FSM PROPER:

1. FSM PROPER implementation partners.
2. Project affected people or groups (PAPs) likely to be affected by activities undertaken by the Program
3. Other interested parties that may have an interest in the FSM PROPER.
4. Vulnerable people, groups or communities.

The identified groups are further described in **Section 4** and **Table 4.3**. Stakeholder identification and analysis will continue throughout the Program and will remain flexible and dynamic in its approach. **Section 4** and **Table 4.3** lists the key stakeholders within each group and the type of engagement that is recommended.

#### 3.1 FSM PROPER implementation partners

Partners are defined as stakeholders that contribute to the execution and implementation of the Program including any requirement for permits or approvals. The FSM PROPER design involved collaboration and engagement with various national and state partners and stakeholders led by NORMA who is responsible for the management and regulation of oceanic fisheries resources in FSM. The Department of Health and Social Affairs (DHSA), Department of Environment, Climate Change, and Emergency Management (DECEM), and National Resources and Development (National R&D) have been important National partners in the project design process, contributing their expertise in areas such as public health, environmental management, and research.

The FSM PROPER design process has also involved engagement with State governments in the FSM to ensure the coordination of workshops and alignment of the project activities with local priorities and regulations (Project Document, Sept. 2023). Stakeholders consulted have included State agencies responsible for; environmental, marine resources and fisheries, public works, and local communities. Their involvement has been essential in shaping the FSM PROPER design, proposed activities and planned implementation. This multi-stakeholder approach has provided valuable input facilitated FSM PROPER activities to be tailored to the specific needs and aspirations of the relevant communities.

Continued collaboration with partners and stakeholders will be key to the success of the FSM PROPER and will help foster shared ownership and sustainable management of coastal and oceanic resources in FSM. A record of stakeholders and engagements should be kept for reporting and confirmation of engagements and information sharing. This is important particularly at later stages of implementation if there is any disagreements during implementation. An example of a spreadsheet that can be used for a stakeholder engagement register is presented as Appendix 4.

### **3.2 Project affected people**

Project Affected People are defined by the WB as: “includes those likely to be affected by the Project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities”.

Where there is any likelihood that activities may negatively impact people or communities, stakeholder engagement will need to consider the implications of the Program activities, identify the PAPs and initiate engagement as appropriate.

### **3.3 Other interested parties**

The WB defines this category as; “individuals, groups, or organizations with an interest in the Project, which may be because of the Project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women’s organizations, other civil society organizations, and cultural groups”.

Most of the interested parties have been identified (**Table 5.1**) during the development of the Project Document and identification of activities. However, other interested parties may emerge as the activities are implemented and should not be excluded from any process and information flow.

### **3.4 Disadvantaged/vulnerable individuals or groups**

The WB ESF states that: disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits. For this Program, risks that project impacts fall disproportionately on individuals and groups who, because of their particular circumstances, may be disadvantaged or vulnerable, is highly unlikely. As with the PAP, where there is any

likelihood that activities may negatively impact disadvantaged or vulnerable people or communities, stakeholder engagement will need to consider the implications of the Program activities, identify the disadvantaged/vulnerable individuals or groups and initiate engagement as appropriate.

## 4 Stakeholder Engagement Program

The SEPs fundamental role is to ensure that the Program projects/activities are understood, agreed and disclosed to facilitate transparency around the activities of the Program and that there is a conduit and mechanism for receiving information and grievances.

### 4.1 Purpose

The primary purpose of this SEP and ongoing stakeholder engagement is to facilitate the timely disclose of information, raise awareness about the Program activities, and to facilitate a conduit for the flow of information (or grievances) between the Program implementers and stakeholders. Consultation on the nature of the activities has already taken place and is described in the Project Document (2023). The purpose of this SEP is to facilitate the following:

- Facilitate all approvals and permitting required from the implementing partners.
- Create and maintain confidence and trust.
- Establish local awareness and understanding.
- Facilitate key stakeholder group participation where necessary.
- Provide avenues for the flow of information and grievance redress through a Grievance Redress Mechanism (GRM) detailed in Section 6.

This will be delivered through factsheets, websites, direct discussions, written communication, a grievance redress mechanism and the Program Monitoring and Evaluation and reporting obligations. For any information dissemination to communities, culturally appropriate techniques and local languages should be used if required.

As described in Section 1.2 and Appendix 1, activities include administration, policy development, design, modelling and technical studies, capacity building, procurement of equipment, and infrastructure development. The Program has been given a risk rating by the WB as moderate for both environmental and social. As stated in the ESF Guidance Note 10 Moderate Risk projects should include several points of engagement, before the project is approved by the WB and ideally more than one point of engagement during project implementation.

### 4.2 Document disclosure

The mandatory disclosure of relevant project documentation (**Table 4.1**) on the NORMA, DoFA and WB websites is to allow stakeholders to understand the risks and impacts of the project, and potential opportunities. The Project will provide stakeholders with access to information on these websites that provides:

- a) The purpose, nature and scale of the Program and activities
- b) The duration of proposed activities
- c) Potential risks and impacts of activities on local communities, and the proposals for mitigating these, highlighting potential risks and impacts that might disproportionately affect vulnerable and disadvantaged groups and describing the differentiated measures taken to avoid and minimize these
- d) The proposed stakeholder engagement process highlighting the ways in which stakeholders can participate
- e) The time and venue of any proposed public consultation meetings, and the process by which meetings will be notified, summarized, and reported
- f) The process and means by which grievances can be raised and will be addressed.

**Table 4.1 Documentation disclosure**

DOCUMENTATION	TIMEFRAME
Environmental and Social Commitment Plan (ESCP)	Prior to WB approval, updated versions for the life of the Project
Environmental and Social Management Plan (ESMP)	Prior to WB approval, updated versions for the life of the Project
Labor Management Procedures (LMP)	Prior to WB approval, updated versions for the life of the Project
Stakeholder Engagement Plan (SEP)	Prior to WB approval, updated versions for the life of the Project
Abbreviated Environmental & Social Impact Assessment (AESIA)	Consultation and disclosure prior to implementation of the prescribed activities contract
Abbreviated Resettlement Action Plan (ARAP)	Consultation and disclosure prior to implementation of the prescribed activities contract
Contractors Environmental and Social Management Plan (CESMP)	Consultation and disclosure prior to implementation of the prescribed activities contract

### 4.3 Timing and Responsibilities

**Table 4.2** below details the engagement activities that are required and the timing of engagement activities.

**Table 4.2 SEP Program timing**

TIMING	ACTIVITY/ACTION	RESPONSIBILITIES
During Project Appraisal	<p>Consultation, coordination and information updates with Implementing Partners (Table 5.1) on FSM PROPER design and proposed components and activities</p> <p>Where necessary consultation and disclosure with other stakeholders detailed in Table 5.1</p>	<p>PIU Project Manager, State Coordinators, CIU E&amp;S Team Consultants</p>
During Project Implementation	<p>Disclosure and/or consultation with the respective groups as detailed in Table 5.1</p> <p>Direct discussions, factsheets and signs for civil works</p> <p>Regular updates to NORMA and DoFA websites</p> <p>Stakeholder engagement activities to be included in 6 monthly reports as prescribed in the ESCP</p> <p>Where there may be the need for additional E&amp;S assessment or particular stakeholder impacts/risks have been identified (e.g. waste management facilities) the PIU must implement, or direct consultants to implement, additional community based engagement. Such engagement can be guided by a short Communications Plan. A template for a Communications Plan is provided as a guide as Appendix 5</p>	<p>PIU Project Manager, State Coordinators, CIU</p>

#### 4.4 Key stakeholder engagement

Key stakeholders were identified during the preparation of the Project Document (Sept. 2023) and the development of the ESF documents for WB approval of the FSM PROPER.

**Table 4.3** details the key stakeholder groups, the types of engagement required and the preferred channel for engagement.

**Table 4.3 Key stakeholder groups, type of engagement and engagement channel**

GROUPS	ORGANIZATION	TYPE OF CONSULTATION/ENGAGEMENT	CHANNEL
<b>IMPLEMENTATION PARTNERS</b>			
FSM National	Western and Central Pacific Fisheries Commission (WCPFC)	Informational and coordination	Direct consultation where required Updates to Project websites
	Pacific Islands Forum Fisheries Agency (FFA)		
	Pacific Community (SPC)		
	Forum Fisheries Committee (FFC)		
	Department of Transportation, Communications and Infrastructure (DoTCI)	Liaison for implementation of infrastructure component	Direct consultation and written communication

GROUPS	ORGANIZATION	TYPE OF CONSULTATION/ENGAGEMENT	CHANNEL
Pohnpei	Program Management Office (PMO)		
	Department of Health and Social Affairs (DHSA)	Liaison with regards to all issues pertaining to the CA and Reference Laboratory	Direct consultation and written communication
	Department of Environment, Climate Change, and Emergency Management (DECEM)	Informational and coordination	Direct consultation where required Updates to Project websites
	National Resources and Development (National R&D)	Liaison with regards to implementation of relevant components	Direct consultation and written communication
	Department of Finance and Administration (DoFA)	Reporting on Program progress and status	Direct consultation and written communication Updates to Project websites
	Division of Anti-Human Trafficking, FSM Department of Justice (DoJ)	Referral of occurrences of HT through the GRM	Direct consultation and written communication
Chuuk	Pohnpei State Department of Resources and Development (DRD)	Liaison with regards to implementation of relevant components	Direct consultation and written communication
	Pohnpei State Office of Fisheries and Aquaculture (OFA)	Liaison with regards to implementation of relevant components	Direct consultation and written communication
	Pohnpei State Department of Fish and Wildlife (F&W)	Liaison with regards to implementation of relevant components	Direct consultation and written communication
	Pohnpei State Environmental Protection Agency (EPA)	Liaison with regards to implementation of relevant components and Environmental Permitting for infrastructure works	Direct consultation and written communication
	Department of Transport Works and Infrastructure (DTWI)	Liaison with regards to implementation of relevant components and any permitting for infrastructure works	Direct consultation and written communication
Yap	Chuuk State Environmental Protection Agency (EPA)	Liaison with regards to implementation of relevant components and Environmental Permitting for infrastructure works	Direct consultation and written communication
	Chuuk State Department of Marine Resources (DMR)	Liaison with regards to implementation of relevant components	Direct consultation and written communication
Yap	Yap State Marine Resources and Management Division (MRMD)	Liaison with regards to implementation of relevant components	Direct consultation and written communication

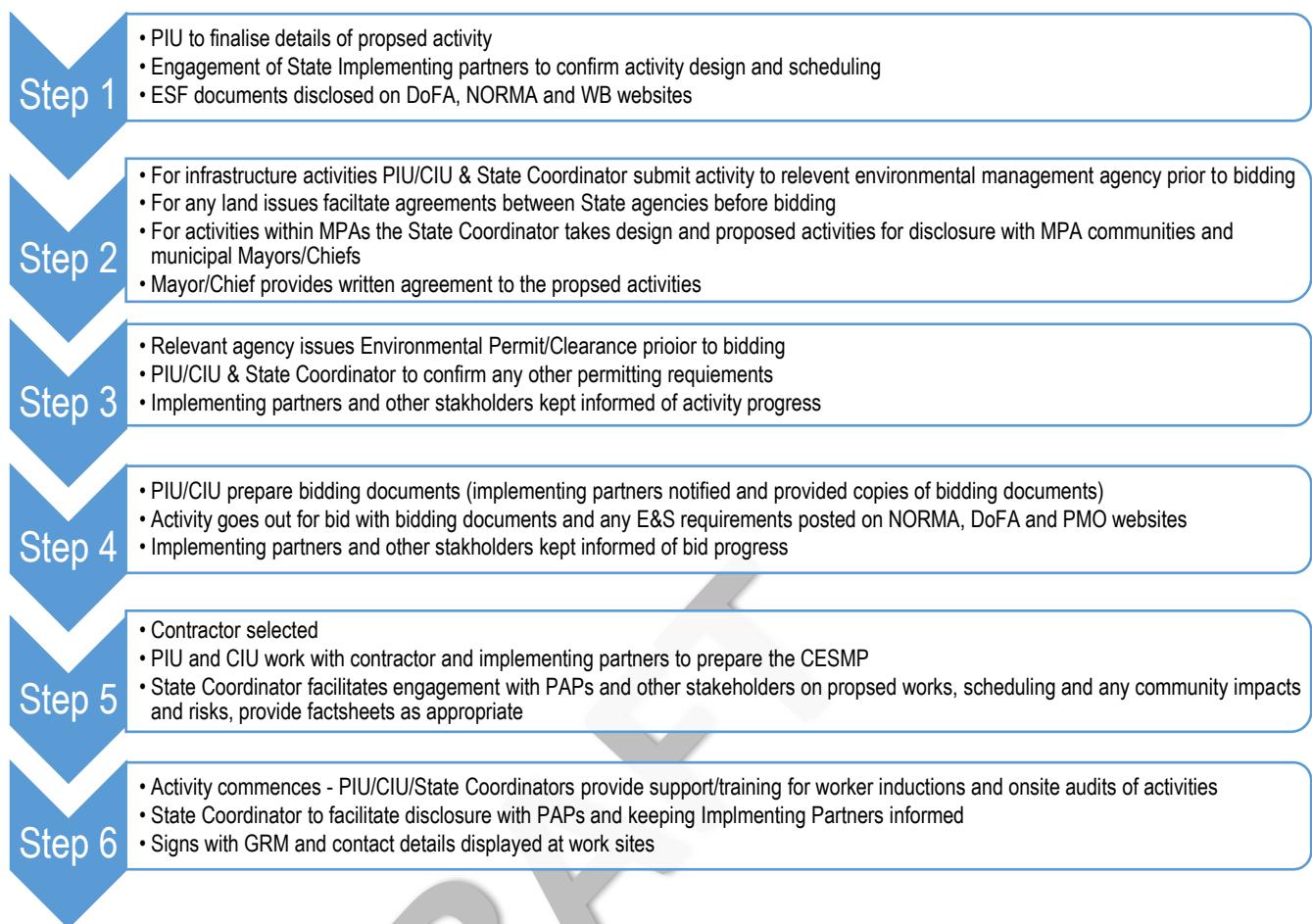
GROUPS	ORGANIZATION	TYPE OF CONSULTATION/ENGAGEMENT	CHANNEL
	Yap Fishing Authority (YFA)	Liaison with regards to implementation of relevant components	Direct consultation and written communication
	Yap State Environmental Protection Agency (EPA)	Liaison with regards to implementation of relevant components and any requirements for environmental permitting for infrastructure works	Direct consultation and written communication
Kosrae	Kosrae State Department of Resources and Economic Affairs (DREA)	Liaison with regards to implementation of relevant components	Direct consultation and written communication
	Kosrae Island Resource Management Authority (KIRMA)	Liaison with regards to implementation of relevant components and Environmental Clearance for infrastructure works	Direct consultation and written communication
	Department of Transport and Infrastructure (DTI)	Liaison with regards to implementation of relevant components and any permitting for infrastructure works	Direct consultation and written communication
	Kosrae Port Authority (KPA)	Liaison and consultation around the proposed port dock works and water improvements	Direct consultation and written communication
	Department of Health Services (DHS)	Liaison and consultation around the proposed port water improvements and water monitoring	Direct consultation and written communication
	Municipal Mayors	Liaison and information disclosure around marina works within MPAs	Direct consultation and written communication
	Marine Protected Areas (MPAs) Resource Management Committees (RMCs)	Liaison and information disclosure around marina works within MPAs	Direct consultation and written communication Factsheets and close consultation prior to initiating works
Other development partners	EU	Informational and coordination with similar projects	Updates to Project websites
	USA Compact Agreement	Informational and coordination with similar projects, identification of any overlapping activities	Direct consultation where required Updates to Project websites
	JICA	Informational and coordination	Direct consultation where required Updates to Project websites
	DFAT	Informational and coordination	Direct consultation where required

GROUPS	ORGANIZATION	TYPE OF CONSULTATION/ENGAGEMENT	CHANNEL
	China AID	Informational and coordination	Updates to Project websites Direct consultation where required Updates to Project websites
	ADB	Informational and coordination	Direct consultation where required Updates to Project websites
	Other PROPER Managers	Virtual consultation with PROPER national Program Coordinators	Direct consultation where required Updates to Program websites
	Consultants	Virtual consultations	Direct consultation where required Updates to Project websites
<b>PROJECT AFFECTED PEOPLE (PAP)</b>			
Local residents/ local communities	Adjacent small-scale civil works Fishers that may be affected by policy or management changes Others as identified during activity assessments	Disclosure and consultation using appropriate language Early engagement prior to civil works and to allow fishers to temporarily relocate	Updates to Project websites Direct consultation if any PAPs identified during Project implementation Factsheets
Disadvantaged & vulnerable groups	Local communities or fishers who are identified as culturally different during activity assessments	Disclosure and consultation using appropriate language	Direct consultation if any PAPs identified during Project implementation Factsheets
<b>NON-GOVERNMENT ORGANIZATIONS (NGOs)</b>			
Women	Chuuk Women's Council	Disclosure and consultation using appropriate language	Updates to Project websites Direct consultation if any additional risks of GBV/SEA/SH and VAC identified during Project implementation Factsheet detailing GRM for GBV/SEA/SH and VAC
	Kosrae Women's Association		
	Yap Women's Association		
Others	YAP CAP	Disclosure and consultation for any MPA involvement	Direct consultation on MPAs Factsheets

#### 4.5 State engagement for approvals

Approval processes are a vital component of engagement with implementing partners. State Governments have different Acts regulations, agencies and processes for environmental approvals. The following sections summaries the process for each State where activities involve site works. **Figure 4.1** summarizes the general process for engagement across the States.

**Figure 4.1 Engagement and approval process for activities involving civil works**



## 5 Grievance Redress Mechanism

All WB projects require a Grievance Redress Mechanism (GRM) that allows affected people/beneficiaries, project staff/volunteers and other stakeholders to provide feedback or to seek satisfactory resolution to grievances they may have in relation to implementation of the Project and its activities. The GRM helps to ensure that the rights and interests of affected people/beneficiaries are protected, and concerns are adequately addressed. The grievance process is based upon the premise that it imposes no cost to those raising the grievances (i.e., complainants); that concerns arising from project implementation are adequately addressed in a timely manner; and that participation in the grievance process does not preclude pursuit of legal remedies under national law. It acknowledges the World Bank's commitment to "do no harm".

During the implementation of the FSM PROPER the PIU will respond to grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. Social grievances that may arise can be related to issues such as disruption of services, community health and safety, temporary or permanent loss of livelihoods, child

labor, gender Based Violence, Sexual Exploitation and Abuse, Sexual Harassment and Violence Against Children (GBV/SEA/SH/VAC) and Human Trafficking (HT) and other social and cultural issues.

Environmental grievances that may arise can include issues such as excessive dust or noise generation, damage to infrastructure due to construction related vibrations or transportation of raw material, noise, traffic congestions, changes to land and port access and associated issues.

Should grievance arise, there must be a mechanism through which affected parties can resolve such issues in reasonable manner with the FSM PROPER personnel in an efficient, unbiased, transparent, confidential, timely and cost-effective manner.

Managing grievance of GBV/SEA/SH/VAC and HT requires different approaches than other types of grievances due to:

- sensitivity of issue
- possible involvement of violence
- the potential for survivors to experience stigma, rejection, or harm
- the reluctance of many survivors to come forward.

Additional mechanisms are needed that create safe, enabling spaces for survivors to report GBV/SEA/SH/VAC and HT that offer a safe, ethical, survivor-centered response. Thus, survivor safety, choice, confidentiality and consent must be systematically applied to all grievances of GBV and HT. For this reason, the FSM PROPER GRM includes a specific pathway to receive and resolve grievances of GBV/SEA/SH/VAC and HT related issues.

### **5.1 FSM Judiciary Level Grievance**

The project level process 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 where an alleged crime had occurred such as illegal drug trafficking, prostitution, child labor, GBV/SEA/SH/VAC and HT. FSM PROPER will not interfere will any formal legal process relating to a grievance.

### **5.2 GRM Objectives**

The GRM is to be used as part of the FSM PROPER and will provide an accessible, rapid, fair and effective response to concerned stakeholders, especially any vulnerable individual and/or group who often lack access to formal legal systems.

While recognizing that many grievances may be resolved informally, the Grievances Register (GR) and GRM set out below encourages mutually acceptable resolution of issues as they arise. The GR and GRM 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 GRM 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 GRM process, and provide 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.
- e) Provide a transparent and confidential approach, by keeping any aggrieved individual/group informed of the progress of their grievance, the information that was used when assessing their grievance and information about the mechanisms that will be used to address it.
- f) Facilitate continuous learning and subsequent improvements to the GRM. Through a process of continuous assessment, the lessons learned may ultimately reduce potential grievances.

### **5.3 GRM Eligibility Criteria**

Project affected parties, local communities and other interested stakeholders may raise a grievance at any time to the PIU, CIU, State Coordinators, contractor's site supervisor's, traditional and government elected officials. Affected local communities should be informed about the FSM PROPER E&S requirements, including its GRM and how to make a grievance. Specific awareness should be conducted with women (and any other identified vulnerable groups within the SEP) in local communities associated with the FSM PROPER on the process of lodging a grievance and specifically the separate pathway for GBV/SEA/SH/VAC or HT, and on how to access other services providers; such as justice, health, counselling and safe accommodation. This will ensure that the FSM PROPER provides a safe, confidential and enabling environment for women to access information and report on any GBV/SEA/SH/VAC and HT issues. Eligibility criteria for the GRM include:

- a) Perceived negative economic, social or environmental impacts on an individual and/or group, or concern about the potential to cause an impact.
- b) Clearly specified types of impact that have occurred or has the potential to occur and explanation of how the project caused or may cause such impact.
- c) Individual and/or group filing of a grievance is impacted, or at risk of being impacted; or the individual and/or group filing a 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.

#### **5.4 Grievance Mechanism Pathways and Processes**

The GRM has been designed to be a problem-solving mechanism with voluntary good-faith efforts. The GRM is not a substitute for the legal process. The GRM will as far as practicable, try to resolve grievances on terms that are mutually acceptable to all parties, while recognizing that for some issues, such as GBV/SEA/SH/VAC and HT, a mutual resolution is less likely. When making a grievance, all parties must act, at all times, in good faith and should not attempt to delay and/or hinder any mutually acceptable resolution. However, the GRM also recognizes that for some grievances, such as those of GBV or HT, the survivor will likely face multiple barriers to making a grievance and accessing required support. Where such barriers exist, this should not be construed as deliberate attempts to delay or hinder the resolution process.

The GRM process includes two distinct grievance pathways which include a project general GRM and a GBV/SEA/SH/VAC and HT specific GRM. The processes for the two pathways are detailed below.

#### **5.5 General GRM**

The process for the GRM is as follows:

- a) The aggrieved party can present their grievance to the FSM PROPER PIU, State Coordinators, relevant State Authority or Contractor, verbally (by phone or in person) by email or written format.
- b) The initial recipient of the grievance should endeavor to resolve any grievance immediately through informal discussion and/or provision of additional information.
- c) Where the aggrieved person has not submitted the grievance directly to the PIU and he/she/they, are not satisfied, the receiver of the grievance will refer the aggrieved person to the FSM PROPER PIU Project Manager who will (with support from the CIU) attempt to resolve the issue through further informal discussion. For grievances that were satisfactorily resolved informally the incident and resultant resolution will be logged and reported to the FSM Project Manager, and then copied to the CIU (Program Manager and Safeguard Team) to be entered into the Grievance Register (GR). Response to general enquires and low-level grievances should be responded to within 3 days.
- d) Where the grievance has not been resolved, the PIU Project Manager will coordinate with the relevant contractor, authority manager and Secretary of DoFA to develop a response and any actions that are required to resolve the grievance. A response from the PIU with proposed strategies to resolve the issue or with the required information will be sent to the person within 10 days of receipt.

- e) If the matter remains unresolved, or the aggrieved person is not satisfied with the outcome, the PIU Project Manager refers the matter to the Project Steering Committee for a resolution. The PIU Project Manager will take the proposed resolution back to the aggrieved person and log details of issue and resultant resolution status (copy CIU Project Manager and safeguard team). Discussions and resolution to be undertaken within 14 days of receipt.
- f) If it remains unresolved or the complainant is dissatisfied with the outcome proposed by the Project Steering Committee, the aggrieved person may refer the matter to the appropriate legal or judicial authority. A decision of the Court will be final.

Each record is to be allocated a unique number, reflecting year and sequence of received grievance (for example 2020-01, 2020-02 etc.). Grievance records (letter, email, record of conversation) should be stored together, electronically or in hard copy.

Any grievance related to corruption or another criminal offence, with the exception of grievances relating to GBV and HT (which should follow the GBV and HT specific GRM outlined below), needs to be managed confidentially through the following process.

### **5.6 Grievances related to corruption**

- a) The aggrieved party/ies take their grievance to the relevant State Authority whom will immediately notify and refer the grievance to the Municipal, State and/or National Police.
- b) The Authority notifies the PIU Project Manager whom notifies the NORMA/DoFA and CIU (Program Manager and Safeguard team).
- c) If the grievance includes an alleged crime, with exception of GBV/SEA/SH/VAC and HT, the Project Manager will notify the state and national legal offices (e.g., police or Department of Justice) and report the incidence.
- d) Resolution of these grievances will be the responsibility of the legal systems within each state and/or national agencies as dictated by state and national law. In these cases, the projects grievance mechanism will ensure the above due diligence is enacted and due process is documented with the grievance given a grievance number and recorded. Confidentiality associated with all criminal cases must be compliant and follow State and national laws.

### **5.7 GBV/SEA/SH/VAC and HT Specific GRM**

Survivor-centered guiding principles will be systematically applied through all steps and actions. These guiding principles are as follows:

- The safety of the survivor shall be ensured at all times. Potential risks to the survivor will be identified and action taken to ensure the survivor's safety and to prevent further harm including ensuring that the alleged perpetrator does not have contact with the

survivor. If the survivor is an employee, reasonable adjustments may be made to the survivor's work schedule and work environment to ensure their safety.

- All actions should reflect the choices of the survivor.
- All information related to the case must be kept confidential and identities must be protected. Only those who have a role in the response to an allegation should receive case-level information, and then only for a clearly stated purpose and with the survivor's consent.
- The survivor must provide informed consent to progress with each stage of the grievances process. Survivors may withdraw their consent during the process at any time.

Any grievance related to GBV/SEA/SH/VAC, or HT needs to be managed confidentially through the following process:

#### **Step 1: Receive the Grievances of GBV/SEA/SH/VAC and HT**

a) Grievances of GBV/SEA/SH/VAC and HT can be received by:

- The existing channels of the GRM.
- The GBV service providers, trainers, women's rights advocates who are women and experienced in responding to GBV/SEA/SH/VAC and HT.
- Division of Anti-Human Trafficking Services (DAHT), Department of Justice (DoJ).

The person who received the grievance will:

- Tell the survivor about the closest GBV/SEA/SH/VAC service providers including justice, health, safe accommodation and/or counseling (Appendix 6). In cases with suspected HT, the survivor will also be given information about the Division of Anti-Human Trafficking Services within the DoJ.
- Document and register the allegation using Form A in Appendix 7.
- Explain the GBV/SEA/SH/VAC grievances and reporting process to the survivor including:
  - The process.
  - That they (the survivor) can choose whether they want to make a formal grievance to the project.
  - That if they choose to make a formal grievance to the project:
    - They control whether and how information about the case is shared with other agencies or individuals.
    - All information will be kept confidential. Only those who will respond to the case will be told about their grievance.

- If they agree, another person will contact them to talk with them more about their grievance and explain that they can choose whether this is a man or a woman. It should also be identified who these people are in case there are concerns about speaking to a specific person (for example, if they are related to / close to the alleged perpetrator).
- They can change their mind and withdraw their consent at any time and the process will stop.

- Information about the grievance will be kept confidential. Information captured on Form A in Appendix 7, should not identify the survivor, perpetrator or include any other information that will identify the survivor or specific situation.
- If the survivor chooses to make a formal grievance to the GRM, communicate the allegation to PIU Project Manager using Form B and providing a copy of Form A in Appendix 6.
- If the survivor chooses not to make a formal grievance to the GRM, they should be reminded about the closest GBV service providers and told that if they change their mind, or if something else happens, they can always make a grievance in the future.

b) If the survivor of the alleged violence is a child, under the age of 18 years of age, while mandatory reporting does not apply to FSM PROPER, it is considered good practice for any suspected or known harm to children to be reported to the police or a welfare officer for further investigation. Where the alleged abuse is criminal, such as physical or sexual violence or neglect by parents or caregivers it should be reported to the police with the consent of the child and / or their guardian.

c) If the person making the grievance is the survivor (the person who the alleged violence was directed towards) and the grievance relates to other forms of GBV, the person who received the grievance will:

- Tell the survivor about the closest GBV service providers (Appendix 6).
- Document and register the allegation using Form A in Appendix 7.

d) If the person making the grievance is a third party (not the person who the alleged violence was directed towards such as a family member, community member, colleague, friend), the person who received the grievance will:

- In cases of **GBV/SEA/SH/VAC**:
  - Document and register the allegation using Form A in Appendix 7.
  - Explain that the project cannot receive third-party grievances because we need to make sure the survivor is safe and that we are acting in their best interests.

- Ask them to tell the survivor about the available options for reporting or accessing support services.
- In cases of HT:
  - Tell the person that they can also talk with the Division of Anti-Human Trafficking Services within the DoJ and provide the contact details.

### **Step 2: Communicate with the Survivor – Ongoing**

- a) PIU Project Manager should be the only person to communicate with the survivor. Where the survivor has chosen to speak to a woman, a woman (who has been trained in handling grievances of GBV and HT) will be delegate this role by the PIU Project Manager.
- b) This communication should include:
  - Responding to any questions or concerns from the survivor.
  - Ensuring that the survivor has received appropriate support.
  - Asking for the survivor's consent (Appendix 7) at each stage in the process.
  - Gathering any further information that may be required from the survivor.
  - Explaining that where the allegation involved a criminal offence the survivor should consider going to the police.
- c) The survivor will be provided ongoing feedback on the development and outcome of their case but especially when:
  - The grievance is received.
  - The case is referred to the PIU Project Manager.
  - The verification process commences or when a determination is made that there is an insufficient basis to proceed.
  - The outcome of the verification process and any disciplinary action.
  - When disciplinary action has been.

### **Step 3: Assess if the Allegation is likely linked to the project**

- a) The PIU Project Manager will determine the likelihood of the allegation being linked to a project.
- b) If the allegation is determined to be likely linked to a project, the PIU Project Manager will:
  - Inform DoFA within 48 hours of the determination being made sharing only the following information:

- The nature of the allegation
- If the alleged perpetrator is, to the survivor's best knowledge, associated with the project (yes/no)
- The survivor's age and/or sex (if available)
- If the survivor was referred to services.
- FSM PROPER PIU must notify the World Bank Task Team immediately sharing only the same information. No further information, including name and contact details of the survivor or alleged perpetrator should be shared with the World Bank Task Team (or anyone else, except in the context of referral for services or verification, with the consent of the survivor).

#### **Step 4: Verify and Act**

- a) If an allegation is determined to be likely to be linked to a project, the PIU Project Manager will convene the ad hoc GBV/SEA/SH/VAC and HT Grievance Committee who will:
  - Convene a meeting to review the grievance and decide on the verification process within 48 hours of the determining that the allegation is likely linked to the project. The goal of the verification is to:
    - Determine the likelihood that the incident occurred.
    - Recommend disciplinary measures towards the alleged perpetrator.
  - Interview all the people involved to gather as much information as possible about what happened. This will usually include interviewing:
    - The survivor.
    - Any witness(es).
    - If there are people that the survivor has told about the incident.
    - Review any other evidence, if available, like text messages or social media posts.
    - The alleged perpetrator.
    - Sometimes there will only be limited information<sup>3</sup>. Building trust with the survivor is very important because the more that they trust the project, the

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<sup>3</sup> In most SEA and SH cases:

- Often there are no witnesses to the alleged incident. Often the alleged perpetrator makes sure that no one sees or knows about the incident but this did not mean that the incident did not happen. Someone making a complaint of SEA or SH does not need to provide a witness or 'evidence' to prove their claim. Survivors face multiple barriers to reporting SEA and SH. When people overcome so many barriers to report SEA and SH, it is unlikely that they are lying. When people come forward we need to make sure that these people are supported even if there is not clear evidence one way or another.

more that they might share about what happened which will help with the verification.

- After gathering the available information, the GBV and HT Grievance Committee should determine whether it is likely that the incident did or did not occur within and completed within 14 days of starting the verification process. It is not the role of the ad hoc GBV and HT Grievance Committee or the project to investigate an allegation and determine if it did or did not happen. This is the role of the police and courts. The role of the ad hoc GBV and HT Grievance Committee is to determine the likelihood that the incident occurred given the information available.
- If it is determined that it was likely to occur, disciplinary action should then be agreed.
- All verification steps and meetings must be documented with information kept confidentially.

The survivor can report the allegation to the police at any time and does not need to inform the PIU Project Manager or GBV/SEA/SH/VAC and HT Grievance Committee that they are doing or have done this. If the survivor chooses to make a grievance to the police this process is separate to the GRM verification.

The GBV/SEA/SH/VAC and HT Grievance Committee may decide to suspend the alleged perpetrator from their employment while the police are investigating / court is hearing the case. However, in FSM the average time to resolve a sexual offences case is 2 years so this will likely not be practical in most situations.

b) If the ad hoc GBV/SEA/SH/VAC and HT Grievance Committee decides that it is likely that the allegation occurred, the employer of the perpetrator implements the recommended disciplinary action, which is proportional to the nature and severity of the incident; in accordance with local legislation, the employment contract and the code of conduct.

- Sanctions applied by the perpetrator's employer may include:
  - Informal warning.
  - Formal warning.
  - Additional training.
  - Loss of salary for a period of time.

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- The person alleged of the violence will often deny that they did what was/is alleged or might they will say it was consensual. Just because the person denied the allegation does not mean it did not happen.
- The survivor may not tell the whole story straight away. They might leave out parts of the story of what happened because they are afraid that they might not be believed or that they will be blamed for what happened. This does not mean the incident did not occur.

- Suspension of employment (without payment of salary), for a period of time.
- Termination of employment.
- Referral to the police or other authorities as warranted, with the consent of the survivor.

c) Once it is confirmed that disciplinary action has been taken by the employer of the perpetrator the case is resolved.

d) In cases of GBV/SEA/SH/VAC and HT related to the project, compensation will not be paid to the survivor or anyone else (i.e., their relatives or community) as such processes are most often not administered using a survivor-centered approach.

e) In cases of GBV/SEA/SH/VAC and HT related to the project, community leaders and customary methods of conflict resolution will not be used as such processes are most often not administered using a survivor-centered approach.

**Step 5: Document and Monitor Grievances of GBV/SEA/SH/VAC and HT**

- a) Each individual grievance of GBV or HT will be documented and registered using Form A.
- b) Informed consent will be captured using Form C.
- c) Each record is to be allocated a unique number, reflecting year and sequence of received grievance (for example 2020-01, 2020-02 etc.).
- d) The PIU Project Manager will compile quarterly reports to DoFA and DoJ with:
  - The number of grievances related to GBV and HT disaggregated by the number of grievances where:
    - That the survivor was referred to GBV / human trafficking services.
    - The case was referred to authorities (with the participation and consent of the survivor).
    - The survivor chooses not to make / withdraw a formal grievance.
    - The project investigated and:
      - It was not linked to the project (but the survivor was referred to GBV / human trafficking services).
      - Did not determine that there was a breach of the Code of Conduct.
      - Took disciplinary action against the alleged perpetrator.
      - These reports should be numerical only and not contain any information with the potential of being identifying, including names and contact details of survivors, their families, or of alleged perpetrators.
- e) All grievance records (letter, email, record of conversation) should be stored together, electronically or in hard copy in a confidential and secure location.

## 5.8 How to Get in Touch with the Project

Anyone can ask for information on the project, express a concern, make a grievance (grievance) or get in touch with the project for any reason. Grievances/concerns can be anonymous, treated confidentially and the various ways to get in touch with the project are provided in the Table 8.1 below.

**Table 8.1** GRM contacts

FSM PROPER NATIONAL CONTACTS	
Program GRM	<p>Okean Ehmes          FSM PROPER Project Manager          FSM NORMA          FSM National Government          691-320-2700   M: 920-7814          okean.ehmes@norma.fm</p> <p>Address: Ambrose Building 2nd Floor          PO Box PS-122          Pohnpei, FM 96941          Website: <a href="http://www.norma.fm">www.norma.fm</a></p>
GBV/SEA/SH/VAC & HT GRM	<p>Mr. Stuart Penias          Acting Chief of Social Affairs          FSM Department of Health &amp; Social Affairs (DHSA)          By Phone: (691) 320-4682          By Email: <a href="mailto:SPenias@fsmhealth.fm">SPenias@fsmhealth.fm</a></p> <p>In Person: C/o Department of Health &amp; Social Affairs, Room 5, Capital Suite, FSM National Government, Palikir, Pohnpei.</p> <p>OR</p> <p>Ms. Lori Williams          Assistant Attorney General          FSM Department of Justice (DoJ)          By Phone: (691) 320-2644          By Email: <a href="mailto:ljw.fsm@gmail.com">ljw.fsm@gmail.com</a></p> <p>In Person: C/o Department of Justice, FSM National Government, Palikir, Pohnpei.</p> <p>OR</p> <p>Mr. Kwame Shiroya          Program Officer, Central Implementation Unit (CIU)          FSM Department of Finance and Administration (DOFA)          By Phone: (691) 320-2639          By Email: <a href="mailto:shiroya.k.s@gmail.com">shiroya.k.s@gmail.com</a></p> <p>In Person: C/o Department of Department of Finance and Administration, FSM National Government, Palikir, Pohnpei.</p>
FSM PROPER STATE CONTACTS	
POHNPEI	
Program GRM	State Coordinator to be confirmed (TBC)
GBV/SEA/SH/VAC & HT GRM	Ms. Canita R Nakamura GBV Counsellor

	<p>By Phone: (691) 320-2112  By Email: <a href="mailto:rilometoc@prel.org">rilometoc@prel.org</a>  In Person: C/o PREL Office, Dolonier, Nett.</p>
<b>CHUUK</b>	
<b>Program GRM</b>	State Coordinator (TBC)
<b>GBV/SEA/SH/VAC &amp; HT GRM</b>	<p>Ms. Christina "Kiki" Stinnet  President – Chuuk Women Council  By Phone: (691) 330-8397  By Email: <a href="mailto:kikistinnetcwc@gmail.com">kikistinnetcwc@gmail.com</a>  In Person: CWC, Tongen Inepwinepw Counseling Center</p> <p>OR</p> <p>Ms. Jasyuri Fritz  Assistant Coordinator/ ANT Focal Point-Chuuk  FSM Department of Justice DoJ  By Phone: (691) 330-5977  By Email: <a href="mailto:j.fritz.fsm@gmail.com">j.fritz.fsm@gmail.com</a>  In Person: FSM National Police Office, Weno</p>
<b>KOSRAE</b>	
<b>Program GRM</b>	State Coordinator (TBC)
<b>GBV/SEA/SH/VAC &amp; HT GRM</b>	<p>Ms. Beverly Wabol  Council Member  Kosrae Women's Association  By Phone: (691) 370-3008/3208  By Email: <a href="mailto:beverlywabol@gmail.com">beverlywabol@gmail.com</a>  In Person: Department of Education, Kosrae State Government, Tofol.</p> <p>OR</p> <p>Ms. Lelean Kephas  Assistant Coordinator/AHT Focal Point - Kosrae  FSM Department of Justice  By Phone: (691) 370-3008/3208  By Email: <a href="mailto:lelean.kephas@doi.gov.fm">lelean.kephas@doi.gov.fm</a>  In Person: Kosrae Anti-Human Trafficking Office, Tofol.</p>
<b>YAP</b>	
<b>Program GRM</b>	State Coordinator (TBC)
<b>GBV/SEA/SH/VAC &amp; HT GRM</b>	<p>Ms. Linda Teteth  Women Interest officer  Women Interest Office  By Phone: (691) 350-5973  By Email: <a href="mailto:lmteteth@gmail.com">lmteteth@gmail.com</a>  In Person: Women Interest Office, Yap State Government.</p>

## 6 Monitoring and Reporting

Monitoring and evaluation is essential to ensure successful implementation of the consultation program as outlined in this SEP and allow the Program to respond to issues and schedule and nature of engagement activities to make them effective.

The PIU, with support from the CIU Safeguards Team and M&E specialist, will be responsible for establishing a monitoring program that will monitor, measure, and assess the implementation and overall effectiveness of stakeholder consultation and participation activities. Issues and activities related to the SEP will be reported in the E&S Section of the Programs six monthly reports.

The PIU will maintain a stakeholder engagement register (Appendix 4) including public consultation, disclosure and grievances (a separate Grievance Register has already been established by the CIU) throughout the Program which is to be made available for public review on request. The following will be used to monitoring the implementation of the SEP:

- Stakeholder register (Appendix 4)
- Issues and management responses linked to minutes of meetings (feedback)
- Program reports
- Informal feedback to State Coordinators from stakeholder groups
- CIU Grievance Register.

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## Appendix 1 Proposed List of Project Activities

TA – Technical Assistance IN – Infrastructure Works/Equipment

ID	Activity	Type
1	Strengthening the institutional capacity, governance, and sustainable management of oceanic fisheries in the FSM	
1.1	<b>Establishment of a Competent Authority</b>	
1.1.1	<i>Institutional strengthening, including capacity and competency development of Competent Authority staff</i>	
1.1.1.1	Staff development: GHP, GMP, HACCP, vessel and facility inspection trainings and audits	TA
1.1.1.2	Hiring of additional Competent Authority staff	TA
1.1.1.3	Purchase of vehicles and boats for use by Competent Authority in Pohnpei, Yap and Kosrae States	IN
1.1.2	<b>Competent Authority system strengthening and implementation</b>	
1.1.2.1	Implementation of the Competent Authority regulation, national control plan (NCP), & industry standards	TA
1.1.2.2	Consolidation of European Union (EU) process ready for Competent Authority	TA
1.1.3	<i>Improvement of Kosrae landing site, including installation of water purification system(s)</i>	
1.1.3.1	Improvement of the Kosrae fish landing site - concreting dock	IN
1.1.3.2	Water quality improvement at landing sites Kosrae	TA/IN
1.2	<b>Establishment of a Reference Laboratory</b>	
1.2.1	<b>Establishment of a Reference Laboratory</b>	
1.2.1.1	Feasibility study of establishing a Reference Laboratory	TA
1.2.1.2	Establishment of sampling and analysis procedures; lab capacity and procedure development including training of food analysts	TA
1.2.1.3	Design and construction of a new multi-purpose Reference Laboratory building	IN
1.3	<b>Oceanic Fisheries Management: Data</b>	
1.3.1	<i>Development and application of an effective information management system (IMS) to inform decision-making for oceanic fisheries</i>	
1.3.1.1	Continued development of an IMS that collects and houses fisheries and related data from industry and various databases	TA
1.3.1.2	Purchase and installation of data center equipment for IMS (e.g. data servers and cooling system)	IN
1.3.1.3	Software registrations for and operationalization of IMS modules	TA
1.3.2	<i>Implementation of the Electronic Monitoring program</i>	
1.3.2.1	Procurement of software and/or subscriptions (Satlink) for the EM program	TA
1.3.2.2	Procurement of hardware (e.g. cameras, antenna, cables, computer, battery back-up) for the EM program	IN
1.3.2.3	Procurement of desktop computer for the EM program Data Review Center	IN
1.3.2.4	Review of EM Data Reviews and program cost recovery	TA
1.3.3	<i>Institutional strengthening of NORMA through improved facilities to enable expansion and remit to be carried out more effectively</i>	
1.3.3.1	Design consultancy for NORMA office building that includes a wet space (to be located on land at Pohnpei port)	TA
1.3.3.2	Construction of the new NORMA office building	IN
1.3.3.3	Creation of new satellite offices for NORMA in the States	IN
1.4	<b>Maximize the value of oceanic resources to the FSM through the Implementation of the Fisheries Investment Policy and additional reviews</b>	
1.4.1	<i>Institutional strengthening of NORMA through improved facilities to enable expansion and remit to be carried out more effectively</i>	
1.4.1.1	Creation of an Implementation Plan for the FSM National Oceanic Fisheries Investment Policy	TA
1.4.1.2	Review of how to enhance oceanic fisheries value through management using measures such as MCS, as well as how to leverage VDS days and value-adding	TA
1.4.1.3	Review of the legal framework for authorization of fishing vessels requesting to enter FSM ports	TA

ID	Activity	Type
1.4.1.4	Development of service provision at Weno Port: Feasibility study to assess potential for increased service provision at Weno Port	TA
<b>2</b>	<b>Strengthening the sustainable management of and socio-economic benefits from coastal fisheries in the FSM</b>	
<b>2.1</b>	<b>Marina Developments</b>	
<b>2.1.1</b>	<b>Re-development of Chuuk marina (Weno) services and facilities</b>	
2.1.1.1	Design consultancy to assess infrastructure needs at current Weno marina, Chuuk site and provide development plans	TA
2.1.1.2	Extension of dock at Weno marina, Chuuk to provide a suitable mooring area	IN
2.1.1.3	Re-development of landside facilities at Weno marina, Chuuk, including rehabilitation of existing market building and new public facilities unit	IN
2.1.1.4	Build of new piers at Weno marina, Chuuk, to provide additional safe moorings	IN
<b>2.1.2</b>	<b>Development of a new marina and fisheries hub at Dehiktik, Pohnpei</b>	
2.1.2.1	Design consultancy to develop detailed plans for the new marina and offices/training center at Dehiktik, Pohnpei	TA
2.1.2.2	Build of new marina at Dehiktik, Pohnpei, including: land preparation and fill, marina facilities (floating pontoons), landing area, and office building	IN
<b>2.1.3</b>	<b>Bottom-up fisheries development and local capacity building</b>	
2.1.3.1	Assessment of marinas in Pohnpei - infrastructural needs and environmental impact, with the involvement of local associations	TA
2.1.3.2	Re-initiation of Pohnpei Menin Katengensed (Pohnpei Marine Council)	TA
2.1.3.3	Training of fishers on Quality Control and the cold chain carried out by a local NGO in all states	TA
<b>2.1.4</b>	<b>Upgrades and improvements to marinas in Kosrae</b>	
2.1.4.1	Consultancy to assess the feasibility of fish processing units and infrastructural needs (including boat ramps) at Lelu, Okat, and Utwe marinas, Kosrae	TA
2.1.4.2	Installation of boat ramp and floating pontoons/jetties at Okat marina, Kosrae	IN
2.1.4.3	Installation/improvement of boat ramp and floating pontoons/jetties at Lelu marina, Kosrae	IN
2.1.4.4	Installation of boat ramp and floating pontoons/jetties at Utwe marina, Kosrae	IN
<b>2.1.5</b>	<b>Improve enforcement of fisheries regulations and environmental laws through institutional capacity enhancement</b>	
2.1.5.1	Procure supplies and equipment to facilitate enforcement, and implement activities highlighted in management plans, in Chuuk	IN
2.1.5.2	Procure supplies and equipment to facilitate enforcement in Kosrae	IN
2.1.5.3	Procure supplies and equipment to facilitate enforcement in Pohnpei	IN
2.1.5.4	Procure supplies and equipment to facilitate enforcement in Yap	IN
2.1.5.5	Planning and building of new guard houses at MPA sites in Pohnpei	IN
<b>2.2</b>	<b>Safety at Sea</b>	
<b>2.2.1</b>	<b>Improve safety and reduce losses at sea: training and awareness</b>	
2.2.1.1	Sea safety training and awareness program in Chuuk for licensed fishing boat crews in communities	TA
2.2.1.2	Sea safety training and awareness program in Kosrae for licensed fishing boat crews in communities	TA
2.2.1.3	Sea safety training and awareness program in Pohnpei for licensed fishing boat crews in communities	TA
2.2.1.4	Sea safety training and awareness program in Yap for licensed fishing boat crews in communities	TA
<b>2.2.2</b>	<b>Improve safety and reduce losses at sea: safety equipment for small powered fishing vessels, in exchange for vessel registration and/or data</b>	
2.2.2.1	Safety packs (e.g., life jackets, EPIRBs, VHF radios, flashlights) for coastal fishers in Chuuk	TA/IN
2.2.2.2	Safety packs (e.g., life jackets, EPIRBs, VHF radios, flashlights) for coastal fishers in Kosrae	TA/IN
2.2.2.3	Safety packs (e.g., life jackets, EPIRBs, VHF radios, flashlights) for coastal fishers in Pohnpei	TA/IN
2.2.2.4	Safety packs (e.g., life jackets, EPIRBs, VHF radios, flashlights) for coastal fishers in Yap	TA/IN
<b>2.2.4</b>	<b>Enhance Chuuk state NavAids (beacon markers for channels)</b>	
2.2.4.1	Firm to assess NavAids needs, and procure and install NavAids in high traffic/danger areas in Chuuk state	TA

ID	Activity	Type
2.3	<b>Coastal Fisheries Management: Data</b>	
2.3.1	<b>Assessment of existing data and development of new/revised protocols for fisheries and ecological data collection and storage</b>	
2.3.1.1	Assessment of availability of fisheries data/research and identification of priority sites for marine ecological assessments in all states	TA
2.3.1.2	Development of appropriate data collection protocols (market and landing sites) for fisheries in FSM for use in all states	TA
2.3.1.3	Validation of new data collection protocols through a series of stakeholder workshops in all states	TA
2.3.2	<b>Equipment for collection and storage of fisheries and environmental data</b>	
2.3.2.1	Procurement and installation of hardware for data collection and storage in Chuuk	IN
2.3.2.2	Procurement and installation of hardware for data collection and storage in Kosrae	IN
2.3.2.3	Procurement and installation of hardware for data collection and storage in Pohnpei	IN
2.3.2.4	Procurement and installation of hardware for data collection and storage in Yap	IN
2.3.2.5	Vehicle for Chuuk DMR to enable data collection from fish markets in Weno	IN
2.3.3	<b>Training for agencies and communities in new data collection (protocols, hardware and software)</b>	
2.3.3.1	Training of staff of fisheries departments and divisions, communities, community-based organizations and non-governmental organizations in the use of the new protocols	TA
2.3.3.2	Training of staff of fisheries departments and divisions, EPAs, and NGOs, in the use of new hardware and software for data management	TA
2.3.4	<b>Renovations of the DREA fisheries office in Kosrae</b>	
2.3.4.1	Contractor to carry out renovations of the current fisheries office	IN
2.3.4.2	Re-furnishing of the renovated fisheries office including storage for radio communications equipment and servers	IN
2.4	<b>Coastal Fisheries Management: Legislation and Policy</b>	
2.4.1	<b>Consultations to produce revised and updated fisheries, aquaculture, and environmental legislation, including deputization of Community Conservation Officers (CCOs)</b>	
2.4.1.1	Consultations in Chuuk state to produce revised and updated policies and development plans (e.g., Chuuk State Constitution Title 25)	TA
2.4.1.2	Consultations in Kosrae state to produce revised and updated policies and development plans (e.g., Kosrae State Code Title 19)	TA
2.4.1.3	Consultations in Pohnpei state to produce revised and updated policies and development plans (e.g., Pohnpei State Code Titles 26, 28, and 29)	TA
2.4.1.4	Consultations in Yap state to produce revised and updated policies and development plans (e.g., Yap State Constitution Titles 18, 26, and 29, and MPA-specific legislation)	TA
2.4.1.5	Consultancy to assist with the finalization of the boat registration bills in all states and development of the marina MOUs (e.g., safety equipment in return for vessel registration and/or data provision)	TA
2.4.1.6	Nationally-led validation workshop to discuss proposed legislative, regulatory and policy updates with stakeholders	TA
2.4.1.7	Consultancy to review results of ecological assessments and provide regulatory recommendations to governments	TA
2.4.2	<b>Dissemination of new inshore fisheries laws, regulations, policies and development plans</b>	
2.4.2.1	Community and government/organization workshops in Chuuk state	TA
2.4.2.2	Community and government/organization workshops in Kosrae state	TA
2.4.2.3	Community and government/organization workshops in Pohnpei state	TA
2.4.2.4	Community and government/organization workshops in Yap state	TA
2.4.3	<b>Facilitate enforcement and enhance safety through mandatory vessel registration and training</b>	
2.4.3.1	Materials (e.g., high-visibility paint and stickers) to registered boats in Chuuk	IN
2.4.3.2	Materials (e.g., high-visibility paint and stickers) to registered boats in Kosrae	IN
2.4.3.3	Materials (e.g., high-visibility paint and stickers) to registered boats in Pohnpei	IN
2.4.3.4	Materials (e.g., high-visibility paint and stickers) to registered boats in Yap	IN

ID	Activity	Type
2.4.3.5	Enforcement/deputization training to government agencies, NGOs, and CCOs in all states, based on new legislation	IN
<b>2.5</b>	<b>Fish Aggregation Devices</b>	
<b>2.5.1</b>	<b><i>Development of fish aggregation device (FAD) management plans</i></b>	
2.5.1.1	Development of FAD management plans for all states including identification of appropriate locations for deployment	TA
<b>2.5.2</b>	<b><i>Support the installation of FADs for use by coastal communities to allow for more production from non-reef sources</i></b>	
2.5.2.1	Procurement of FADs with various technologies for Yap state large-scale FAD pilot project	IN
2.5.2.2	Training in FAD operation and monitoring technologies in all states	TA
2.5.2.3	FAD deployment in Yap state with assistance and training from experts	IN
2.5.2.4	FAD public awareness campaign across Yap state	TA
<b>2.6</b>	<b>Aquaculture Developments</b>	
<b>2.6.4</b>	<b><i>Feasibility assessments for community-focused aquaculture development</i></b>	
2.6.4.1	Feasibility assessment for development of infrastructure needs (landsides and farms) for community-led commercial sea cucumber aquaculture in Pohnpei	TA
2.6.4.2	Feasibility assessment for a collaboratively-led commercial aquaculture production and community training center in Kosrae state	TA
<b>3</b>	<b>Strengthening the sustainable management, protection, and resilience of marine habitats in the FSM</b>	
<b>3.1</b>	<b>Environmental Protection</b>	
<b>3.1.1</b>	<b><i>Community capacity building in waste management and coastal pollution</i></b>	
3.1.1.1	Awareness campaigns in lagoon and outer island communities including schools in Chuuk state to inform about the new waste management system	TA
3.1.1.2	Capacity building program for Chuuk Women's Council to enable expanded outreach efforts	TA
3.1.1.3	Awareness campaigns in Yap state to minimize waste generation and increase proper disposal	TA
<b>3.1.2</b>	<b><i>Improve protection and conservation of the coastal ecosystem</i></b>	
3.1.2.1	Pilot restoration of existing dredging sites in Chuuk state	TA
3.1.2.2	Pilot restoration of existing dredging sites in Yap state	TA
3.1.2.3	Assess condition of the environmental mooring buoy system in Kosrae state, replace missing and upgrade damaged parts	TA
<b>3.2</b>	<b>Waste Infrastructure</b>	
<b>3.2.1</b>	<b><i>Phase one (concurrent with phase two): Preparation of new landfill site at Nepukos village, Chuuk</i></b>	
3.2.1.1	Vegetation strip, taking down to composting site (initial preparation)	IN
3.2.1.2	Build of new access road to Nepukos village site	IN
3.2.1.3	Preparation of new landfill site for public use (e.g., bays, parking, etc.)	IN
3.2.1.4	Liner and leachate installation at new landfill site	IN
<b>3.2.2</b>	<b><i>Phase two (concurrent with phase one): Sorting and clearance of interim marina waste site in Weno, Chuuk</i></b>	
3.2.2.1	Sorting and clearance of interim marina site, transport of pure landfill to new site	IN
<b>3.2.3</b>	<b><i>Phase three: Build of new solid waste management facility at existing site (Neuou), Chuuk</i></b>	
3.2.3.1	Renewal/upgrade of road to old landfill site (Neuou)	IN
3.2.3.2	Design of detailed plans for build of the new waste management facility	TA
3.2.3.3	Land preparation and preparation of sub-structure and fencing	IN
3.2.3.4	Installation of basic utilities (electricity and water) at site	IN
3.2.3.5	Build of steel framed, high-specification solid waste management building	IN
3.2.3.6	Climate-proofing of new building	IN
3.2.3.7	Purchase of the required machinery for the new building	IN
3.2.3.8	Technician and operational training for use of the new machinery	TA
<b>3.2.4</b>	<b><i>Improve land and marine based collection and disposal of waste</i></b>	
3.2.4.1	Install community bins/collection points including for lagoon and outer islands in Chuuk	

ID	Activity	Type
3.2.4.2	Procure equipment and advanced technologies for collection and disposal of marine waste in Kosrae	IN
3.2.4.3	Increase diversity of equipment to deal with marine oil and waste at landing sites in Pohnpei	IN
3.2.4.4	Improve collection and proper disposal of all waste streams (including e-wastes, hazardous waste) in Yap	IN
3.2.4.5	Shipping chemicals that are currently stored in Yap	IN
3.2.4.6	Support public landfill site maintenance and operations in Yap	IN
<b>3.3</b>	<b>Marine Habitats Management: Data</b>	
<b>3.3.1</b>	<b>Prepare teams to conduct assessments for marine ecological health and monitoring</b>	
3.3.1.1	Dive certifications and equipment to facilitate new and ongoing ecological surveys in Chuuk	TA
3.3.1.2	Dive certifications and equipment to facilitate new and ongoing ecological surveys in Kosrae	TA
3.3.1.3	Dive certifications and equipment to facilitate new and ongoing ecological surveys in Pohnpei	TA
3.3.1.4	Dive certifications and equipment to facilitate new and ongoing ecological surveys in Yap	TA
3.3.1.5	Procure equipment for monitoring of dredging in Chuuk	IN
<b>3.4</b>	<b>Marine Habitats Management: Legislation and Policy</b>	
<b>3.4.1</b>	<b>Improve emergency response protocols, pollution laws, and waste management strategies in all states</b>	
<b>4</b>	<b>Project management</b>	
<b>4.1</b>	<b>Personnel for Project Management Unit (PIU)</b>	
<b>4.1.1</b>	<b>PIU staff salaries</b>	
4.1.1.1	Project Manager (5 years full-time)	TA
4.1.1.2	Project Officer	TA
4.1.1.3	Project Assistant	TA
4.1.1.4	Marine Coastal Engineer	TA
4.1.1.5	Technical Expert: Waste	TA
4.1.1.6	Staff equipment / Furniture	TA
4.1.1.7	Chuuk State Coordinator	TA
4.1.1.8	Pohnpei State Coordinator	TA
4.1.1.9	Yap State Coordinator	TA
4.1.1.10	Kosrae State Coordinator	TA
4.1.1.11	Communications Officer	TA
4.1.1.12	M&E Officer	TA
4.1.1.13	National Consultation Meetings and facilitation	TA
4.1.1.14	Miscellaneous office costs	TA
4.1.1.15	CIU costs	TA
<b>5.1.1</b>	<b>Project development consultancies</b>	
5.1.1.1	Design Preparation Consultant - Design preparation work in collaboration with DOFA, DRD, NORMA, DECEM and other stakeholders	TA
5.1.1.2	Environment and Social Safeguards Consultant – development of an environmental and social management plan; training staff and stakeholders	TA
5.1.1.3	POM Consultant – development of the Project Operations Manual (POM) and training the PIU staff on the POM	TA
5.1.1.4	Gender Specialist Consultant – gender analysis of the fisheries sector and recommendations based on local context and what works on ground	TA
5.1.1.5	Legal Consultant – conduct legal assessment on UNCLOS Article 73 compliance COMPLETED	TA

## Appendix 2 Consultation Undertaken by MarFishEco (extract from Project Document 24/08/2023)

A full description of the consultations can be found in the Project Document (August 2023)

WORKSHOP	DATES	NUMBERS OF ATTENDEES
Kosrae State Project Design Workshop	11 <sup>th</sup> and 12 <sup>th</sup> of April 2023	18
Pohnpei State Project Design Workshop	17 <sup>th</sup> and 18 <sup>th</sup> of April 2023	26
National Project Design Workshop	19 <sup>th</sup> of April 2023	13
Chuuk State Project Design Workshop	21 <sup>st</sup> and 24 <sup>th</sup> of April 2023	18
Yap State Project Design Workshop	27 <sup>th</sup> and 28 <sup>th</sup> of April 2023	20
Pre-Validation Workshop	8 <sup>th</sup> and 9 <sup>th</sup> of May 2023	36
Final Validation Workshop	3 <sup>rd</sup> and 4 <sup>th</sup> of August 2023	34

### Attendees

NAME	ORGANIZATION	WORKSHOP(S) ATTENDED
Okean Ehmes	NORMA	All
Dave Mathias	National R&D	All
Bruno Ned	DREA	Kosrae, Pre-validation
D. J. Mongkeya	DREA	Kosrae
Presley Abraham	LTEI	Kosrae
Ronney Tilfas	Okat Marina	Kosrae
Martin Selch	MMME	Kosrae
Suesin George	DREA	Kosrae
Rick Jonathan	TRMC	Kosrae
Jacob George	Tafunsak Municipal Govt.	Kosrae
Bond Segal	KIRMA	Kosrae, Pre-validation
Andy George	KCSO	Kosrae, Pre-validation
Kenye Sagrah-Timothy	DREA	Kosrae
Kenya Zackilyn George	DFMR	Kosrae
Nena William	Kosrae Governor's Office	Kosrae
Gennevieve V. Masao	DREA	Kosrae
Hubert Yamada	Pohnpei R&D	Pohnpei, Pre-validation
Kastor Naich	DHSA	Pohnpei
Manoj Nair	COM Land Grant	Pohnpei
Ryan Ladone	OFA	Pohnpei
Scotty Malakai	Pohnpei R&D	Pohnpei
Clay Hedson	OFA	Pohnpei, Pre-validation
Douglus Kusto	Pohnpei PAN	Pohnpei
Cindy Ehmes	DECEM	Pohnpei
Michaela Saimon	Pohnpei R&D	Pohnpei
Kiyoshi Phillip	COM-FSM	Pohnpei
Dahker Abraham	OFA	Pohnpei, Pre-validation
Benneth Edmund	Pohnpei ODA	Pohnpei
Eugene Joseph	CSP	Pohnpei
Francisco Celestine	Pohnpei EPA	Pohnpei, Pre-validation
Eugene Eperians	Pohnpei R&D	Pohnpei
Smithy Clark	Pinglap Municipal Govt.	Pohnpei
Donald David	OFA	Pohnpei, Pre-validation
Mason Albert	U Municipal Govt.	Pohnpei
Donna Scheuring	Pohnpei EPA	Pohnpei, Pre-validation

NAME	ORGANIZATION	WORKSHOP(S) ATTENDED
Makio James	Pinglap Municipal Govt.	Pohnpei
Tony Santos	OFA	Pohnpei
I. Fred	OFA	Pohnpei
Ben Jackson Amor	DHSA	National, Pre-validation
Moses Pretrick	DHSA	National, Pre-validation
Kastor Naich	DHSA	National, Pre-validation
Joseph Victor	DHSA	National, Pre-validation
Mathew Chigiyal	NORMA	National, Pre-validation
Naiten Bradley Phillip Jr.	NORMA	National, Pre-validation
Youky Susaia Jr.	NORMA	National, Pre-validation
Limanman Helgenberger	NORMA	National, Pre-validation
Valerie Hawley	NORMA	National, Pre-validation
Binasto Ruben	DMR	Chuuk
Brad Mori	Chuuk EPA	Chuuk, Pre-validation
Kirisos Victus	DMR	Chuuk, Pre-validation
Roger Arnold	Chuuk Governor's Office	Chuuk
Christine G. Robert	Chuuk Women's Council	Chuuk
Lidy Jane Serious	Chuuk Women's Council	Chuuk
Bia A. Nanoto	Chuuk DPS	Chuuk
Joyce Sewell	Chuuk EPA	Chuuk
Renados K. Kiyoshi	Salient Inc.	Chuuk
Kezriu Ezra	Chuuk PMU	Chuuk
Ramil Tandrigan	PMO	Chuuk
Carlo Mangadap	PMO	Chuuk
Tos Nakayama	DT&PW	Chuuk
Leelkan Southwick	Yap R&D	Yap, Pre-validation
Constantine Yowbalaw	YFA	Yap, Pre-validation
Debra Laan	PAF WICC	Yap, Pre-validation
Tazmin P. Falan	YapCAP/PAN	Yap
James G. Lukan	WTC	Yap
Manuel Maleichog	Yap Public Works	Yap
Sabino Sauchomal	Yap CAP	Yap
Elijah Tarofalonal	GEF-6 IAS	Yap
Anthony Yalon	MRMD	Yap
Catherine Wes Gjamon	Yap R&D-MRMD	Yap
Christina Fillmed	Yap EPA	Yap
Jordan Mautaman	Yap EPA	Yap
Julian F. Tharngan	DSI	Yap
Jesse Forun	Yap R&D	Yap
Donnalynn D. Techur	Yap R&D-MRMD	Yap
Jon Wk. Fillmed	DYCA	Yap
Roger Mori	Chuuk Governor's Office	Pre-validation
Correy Abraham	DECEM	Pre-validation
Kwame Shiroya	DOFA	Pre-validation
Crawford Nimea	NORMA	Pre-validation
Vanessa Fread	National R&D	Pre-validation
Camille Movick-Inatio	National R&D	Pre-validation
Angelina Tretnoff	NORMA	Pre-validation
Wilmer Kilmete	DOFA & WB CIU	Pre-validation

## Appendix 3 Consultation undertaken during ESF document preparation 7 September to 22 September

DATE	ACTIVITY	STAKEHOLDERS	DISCUSSIONS
<b>KOSRAE</b>			
08/09/2023	1.3.3.3 Creation of new satellite offices for NORMA in the States	Okean Ehmes – PIU Project Manager Shiva Dhakal – CIU Social Safeguards Freddy Nena – Fisheries Extension Officer (DFMR) Delwin Likiak - DREA DFMR	Potential E&S impacts and risks of civil works related to the proposed new satellite Office
	2.1.4.2 Installation of boat floating pontoons/jetties at Okat marina, Kosrae	Okean Ehmes – PIU Project Manager Shiva Dhakal – CIU Social Safeguards Freddy Nena – Fisheries Extension Officer (DFMR) Delwin Likiak – DREA DFMR	Potential E&S impacts and risks of civil works related to the replacement of pontoons and location of temporary moorings for fishers during works
09/09/2023	2.1.4.4 Installation of boat ramp and floating pontoons/jetties at Utwe marina, Kosrae	Okean Ehmes – PIU Project Manager Shiva Dhakal – CIU Social Safeguards Freddy Nena – Fisheries Extension Officer (DFMR)	Potential E&S impacts and risks of civil works related to the replacement of pontoons and location of temporary moorings for fishers during works
	3.1.2.3 Assess condition of the environmental mooring buoy system in Kosrae state, replace missing and upgrade damaged parts	Okean Ehmes – PIU Project Manager Shiva Dhakal – CIU Social Safeguards	Potential E&S impacts and risks associated with assessment and replacement of moorings
11/09/2023	General inspection of landfill site for suitability of any disposal required from civil works activities on Kosrae	Okean Ehmes – PIU Project Manager Shiva Dhakal – CIU Social Safeguards	Potential E&S impacts and risks associated with solid waste disposal from Program activities
	2.1.4.3 Installation floating pontoons/jetties at Lelu marina, Kosrae	Okean Ehmes – PIU Project Manager Shiva Dhakal – CIU Social Safeguards Freddy Nena – Fisheries Extension Officer (DFMR)	Potential E&S impacts and risks of civil works related to the replacement of pontoons and location of temporary moorings for fishers during works
11/09/2023	2.3.4.1 Contractor to carry out renovations of the current fisheries office	Okean Ehmes – PIU Project Manager Shiva Dhakal – CIU Social Safeguards Freddy Nene – Fisheries Extension Officer (DFMR)	Potential E&S impacts and risks of civil works related to renovating the DREA Office at Lelu. Possible position of storage shed to avoid impacts on nearby estuary
	2.3.4.2 Re-furnishing of the renovated fisheries office including storage for radio communications equipment and servers	Okean Ehmes – PIU Project Manager Shiva Dhakal – CIU Social Safeguards Freddy Nene – Fisheries Extension Officer (DFMR)	Potential E&S impacts and risks of civil works related to the renovation of the fisheries office at Lelu.
	1.1.3.1 Improvement of the Kosrae fish landing site - concreting dock	Okean Ehmes – PIU Project Manager	Potential E&S impacts and risks of civil works related to the improvement of the fish landing site at Lelu.

DATE	ACTIVITY	STAKEHOLDERS	DISCUSSIONS
	1.1.3.2 Water quality improvement at landing sites Kosrae	Shiva Dhakal – CIU Social Safeguards Freddy Nena – DREA William Tosie – KPA General Manager Jason Selo – KPA Port Manager Jessie Tulenru – KPA Airport manager Osanny Nedfie – DTI Director Likiak Melander – DTI Administrative Officer	concreting and water quality improvements and lack of detail in current activity description. Discussions with DTI on responsible agency
12/09/2023	General discussion on all issues related to Kosrae activities with particular focus on approval required	Okean Ehmes – PIU Project Manager Shiva Dhakal – CIU Social Safeguards Freddy Nena – DREA Steven Palik – Director KIRMA	Identified need for Environmental Clearance form KIRMA and process for consultation with MPA Resource management Committee and mayor
<b>YAP</b>			
13/09/2023	Kick off meeting on proposed activities for Yap	Okean Ehmes – PIU Project Manager Leelkan Southwick – Director R&D Anthony Yalon – MRMD Tazman Falan – Yap Cap Protected Areas Network Debra Laan – PAF Women in Climate Change Project Joe Gittug – PWT Jordan Mautaman – Acting Director EPA	Proposed activities, approval processes, planning for site visits
14/09/2023	3.2.4.5 Shipping chemicals that are currently stored in Yap	Okean Ehmes – PIU Jordan Mautaman – EPA – Acting Director John Paul Malefahoy - Manager Yap Solid Waste Management Program, DPWT	Strategies for design parameters for the activity and possible solutions
	3.2.4.4 Improve collection and proper disposal of all waste streams (including e-wastes, hazardous waste) in Yap	Okean Ehmes – PIU Project Manager Jordan Mautaman – EPA – Acting Director John Paul Malefahoy - Manager Yap Solid Waste Management Program, DPWT	Landfill site management, general management of waste streams, possible solutions, possibility of grouping activities into one contract
	3.2.4.6 Support public landfill site maintenance and operations in Yap	Okean Ehmes – PIU Project Manager Anthony Yalon – Director MRMD Jonathan Sathal - Gachpar MPA Management Coordinator Thomas Tamangided Marine Specialist MRMD Jordan Mautaman – Acting Director EPA	
15/10/2023	3.1.2.2 Pilot restoration of existing dredging sites in Yap state	Okean Ehmes – PIU Project Manager Anthony Yalon – Director MRMD Jonathan Sathal - Gachpar MPA Management Coordinator Thomas Tamangided Marine Specialist MRMD Jordan Mautaman – Acting Director EPA	Current site status, community expectations, possible actions

DATE	ACTIVITY	STAKEHOLDERS	DISCUSSIONS
<b>CHUUK</b>			
18/09/2023	<p>3.2.3 Phase three: Build of new solid waste management facility at existing site (Neou), Chuuk</p> <p>3.2.3.1 Renewal/upgrade of road to old landfill site (Neou)</p> <p>3.2.3.2 Design of detailed plans for build of the new waste management facility</p> <p>3.2.3.3 Land preparation and preparation of sub-structure and fencing</p> <p>3.2.3.4 Installation of basic utilities (electricity and water) at site</p> <p>3.2.3.5 Build of steel framed, high-specification solid waste management building</p> <p>3.2.3.6 Climate-proofing of new building</p> <p>3.2.3.7 Purchase of the required machinery for the new building</p>	Okean Ehmes – PIU Project Manager Brad Mori – Executive Director EPS	Site assessment, review of proposed activities, discussion on impact to squatters and other E&S potential impacts and risks and mitigation strategies. Issues with the road, capping of remaining area of waste
	<p>3.2.1 Phase one (concurrent with phase two): Preparation of new landfill site at Nepukos village, Chuuk</p> <p>3.2.1.1 Vegetation strip, taking down to composting site (initial preparation)</p> <p>3.2.1.3 Preparation of new landfill site for public use (e.g., bays, parking, etc.)</p> <p>3.2.1.4 Liner and leachate installation at new landfill site</p>	Okean Ehmes – PIU Project Manager Brad Mori – Executive Director EPS	Site assessment of new landfill area. Current EIA and stakeholder engagement, community support. Construction sequence
	<p>3.2.2 Phase two (concurrent with phase one): Sorting and clearance of interim marina waste site in Weno, Chuuk</p> <p>3.2.2.1 Sorting and clearance of interim marina site, transport of pure landfill to new site</p>	Okean Ehmes – PIU Project Manager Brad Mori – Executive Director EPS	Current issue on site, management of removal of waste and remediation of site
	<p>2.1.1 Re-development of Chuuk marina (Weno) services and facilities</p> <p>2.1.1.1 Design consultancy to assess infrastructure needs at current Weno marina, Chuuk site and provide development plans</p> <p>2.1.1.2 Extension of dock at Weno marina, Chuuk to provide a suitable mooring area</p> <p>2.1.1.3 Re-development of landside facilities at Weno marina, Chuuk, including rehabilitation of existing market building and new public facilities unit</p>	Okean Ehmes – PIU Project Manager Brad Mori Executive Director EPA Dinesto Reuben – Deputy Director DMR Enjoy Rain - Chief DMR	Recent report from WB on possible activities and cost. Probable outcome for current funding. Likely requirement for further work if breakwater and basin dredging required

DATE	ACTIVITY	STAKEHOLDERS	DISCUSSIONS
	2.1.1.4 Build of new piers at Weno marina, Chuuk, to provide additional safe moorings		
19/09/2023	World Bank debrief	Okean Ehmes – PIU Project Manager Suzanne Dray – WB Environmental Safeguards Craig Clark – WB Senior Social Safeguards Specialist	Update World Bank on progress
<b>POHNPEI</b>			
20/09/2023	1.2.1.4 Design and construction of a new multi-purpose Reference Laboratory building	Okean Ehmes – PIU Project Manager Wilmer Kilmete – CIU Safeguards Coordinator Shiva Dhakal – CIU Social Safeguards Ben Jackson Amor Jr – Department of Health and Social Affairs Phillip Dianan – Civil Engineer DTCI	Discussion on site aspect and other building proposal for the site, issue around E&S site risks and potential mitigation strategies
21/09/2023	Meeting with NORMA Executive Director	Okean Ehmes – PIU Project Manager Eugene Pangelinan – Executive Director NORMA	General catch up with NORMA to discuss progress. Informed by the Executive Director of move to switch of CA to NORMA, consolidate Reference Lab into NORMA building and possible change of site for NORMA building for better exposure
	1.3.3.1 Design consultancy for NORMA office building that includes a wet space (to be located on land at Pohnpei port).	Okean Ehmes – PIU Project Manager Wilmer Kilmete – CIU Safeguards Coordinator	Site assessment NORMA building site, good location, next to clients, land secured
	2.1.2 Development of a new marina and fisheries hub at Dehektik, Pohnpei	Okean Ehmes – PIU Project Manager Wilmer Kilmete – CIU Safeguards Coordinator	Site assessment of proposed marina development and discussion regarding activities and Environmental Permit for works
	2.1.2.1 Design consultancy to develop detailed plans for the new marina and offices/training center at Dehektik, Pohnpei	Hon. Hubert Yamada – Director Pohnpei Dept. of Resources & Development	
	1.3.3.2 Build of new marina at Dehektik, Pohnpei, including: land preparation and fill, marina facilities (floating pontoons), landing area, and office building	Mr. Francisco Celestine - Executive Director Pohnpei Environment Protection Agency Mr. Dahker Abraham – Administrator Pohnpei Office of Fisheries & Aquaculture Mr. Clay Hedson - Marine Specialist FSM National Government, Dept. of Resources & Development Mr. Dave Mathias - Marine Specialist FSM National Government, Dept. of Resources & Develop	

DATE	ACTIVITY	STAKEHOLDERS	DISCUSSIONS
	CIU debriefing	Okean Ehmes – PIU Project Manager Kwame Wilmer Kilmete – CIU Safeguards Coordinator Shiva Dhakal – CIU Social Safeguards Steve Lindsay – Environmental Safeguards CIU Kwame Shiroya – Program Manager CIU	Discussions on progress of ESF documents to date, summary of site assessment visits, feedback from CIU and proposed timeframe for completion of drafts and reviews

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## Federated States of Micronesia: Pacific Islands Regional Oceanscape Program – Second Phase for Economic Resilience



### Funding

World Bank

### Objective

To strengthen regional collaboration and national capacity for the management and the sustainable development of the oceanic and coastal fisheries sector in FSM and the critical habitats on which they depend

### Schedule

Currently preparing Environmental and Social (E&S) documents for appraisal and approval by the World Bank. The FSM Pacific Islands Regional Oceanscape Program – Second Phase for Economic Resilience (FSM PROPER) is expected to start in early 2024

The preparation phase of FSM PROPER is currently being progressed by the National Oceanic Resource Management Authority (NORMA) in conjunction with the national and state agencies within the FSM with a Project Preparation Advance (PPA) from the World Bank. The Program has 3 components under which activities will be undertaken within the States:

1. Strengthening the institutional capacity, governance, and sustainable management of oceanic fisheries in the FSM
2. Strengthening the sustainable management of and socio-economic benefits from coastal fisheries in the FSM
3. Coastal Fisheries Management: Data

FSM PROPER will be prepared under the World Banks Environmental and Social Framework (ESF). For approval of the FSM PROPER the bank requires 4 documents:

1. Environmental and Social Commitment Plan (ESCP)
2. Environmental and Social Management Plan (ESMP)
3. Labor Management Procedures
4. Stakeholder Engagement Plan (SEP)

These documents are currently being prepared by a Consultant working with the FSM PROPER Project Implementation Unit (PIU). These documents are expected to be completed and approved by the end of the year. Following the approval of these documents the World Bank will enter into a Financial Agreement with the FSM Department of Finance and Administration (DoFA). All documents and information will be available on the DoFA and NORMA websites.

**For further information contact: OKEAN EHMES, FSM NORMA, AMBROSE BUILDING 2ND FLOOR, PO BOX PS-122, POHNPEI, FM 96941**  
**Email: [okean.ehmes@norma.fm](mailto:okean.ehmes@norma.fm)**  
**Website: [www.norma.fm](http://www.norma.fm)**



## Appendix 4 Stakeholder Consultation Registration

No.	Date	Time	Location/ venue	Organizer	Stakeholders	Contact details	Topics Discussed	Feedback to stakeholders	Report Y/N	File Name
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										

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## Appendix 5 Communication Plan Template

The purpose of the Communications Plan template is to guide strategic thinking through the communications planning process. Specifically, prior to implementing communications, we should understand the purpose and desired outcomes and actions we want to see, who our target audience(s) is/are, the different channels we want to use to reach our audiences, and to understand what could go wrong. The tool helps us to plan our activities step by step and provides a shareable document for coordination.

The tool can be filled out in bullet form for simple communications activities and can be expanded for larger communications campaigns with multiple audiences, messages, and materials. The tool can help guide engagement activities.

### INTRODUCTION

- Provide a brief introduction/overview on the Component and activity this Plan is addressing.

### PURPOSE

- Describe the purpose of the communications activity. Why we are doing this communication.

### OBJECTIVES

- What are we trying to achieve?

### RISKS AND MITIGATION

- List any risk(s) involved in this communication.
- Suggest mitigation measure(s) to address the above risk(s).
- Answer the question: What could prevent this communication activity from achieving its desired outcome? Could the communication activity trigger an undesired response?

### Key Stakeholders, Message and Channel

- List your key stakeholders for this engagement,
- List your key messages that you will use in your engagement:
  - Where possible test your messages with a test audience.
- List the means to which the messages will be communicated (channel):
  - Describe the different channels used to achieve the desired outcomes based on analysis of the target audiences; answers the question: How do we communicate with each target audience?

- Describe how each channel will be used.
- Where possible test your communications channel to see if it is effective.

Stakeholder	Key message	Channel

## Frequently asked questions

- List out what you expect to be the FAQs from the audience.
- List out standard responses for your FAQs.

## ROLES and responsibilities

- List out those people and organisations responsible for the implementing this Communications Plan.

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## Appendix 6 GBV/SEA/SH/VAC and HT Survivor Support Services

SERVICE		Chuuk	Kosrae	Pohnpei	Yap
ACCESS TO JUSTICE	Law enforcement and protection	Police	Emergency: 911	National Police: 320 2628	
			Chuuk Police: 330 3612	DV Taskforce: 320 2221	Pohnpei Police: 350 3333 / 2132
	Legal aid	MLSC	Kosrae Police: 370 3333		
			Maritime Police: 320 2700		
MEDICAL	Basic and specialized medical care	State Hospital	330 2597 / 5597	370 3032	320 2404 / 3762
			Cutting Edge Advocacy	320 7400 / 922 3311	350 2193
			330 7936	370 3012	320 2214 / 2215 320 2213 (emergency)
EMERGENCY ASSISTANCE	Direct assistance, repatriation and reintegration support	FSM Anti-Human Trafficking Program Hotline	923 2000		
COUNSELING	Counseling and referrals		CWC, Tongen Inepwinew Counseling Centre (TICC)	Not Identified	Individual Counselors (female, Kolonia): Lululeen: 320 5142 Canita: 320 2112
SAFE HOUSE	Short / medium and long-term accommodation		FSM National Police and Human Trafficking Crisis Centre	Not Identified	Behavioral Health & Wellness, Yap State Hospital: 350 2110
	Emergency accommodation		Police: 330 3612		None Yet Established
			Chuuk State Hospital: 330 7936		None Yet Established

## Appendix 7 Form A - Register the GBV/SEA/SH/VAC, HT Grievance & Consent Form

***There should be no identifying information included anywhere on this form including survivor and alleged perpetrators names and contact details.***

1. Date grievance was received:
2. Person grievance was received by:
3. Was the person who made the grievance the  Yes  No survivor?
4. The nature of the allegation (what a survivor says in their own words):

If it was the survivor who made the grievance answer questions 5 -9 (if a third party made the grievance, only answer questions 1-4).

5. Is, to the best of the survivor's knowledge, the  Yes  No perpetrator is associated with the project?
6. Age of the Survivor (if possible):  
 Female  Male  
 Other  Choose not to answer
7. Sex of the Survivor (if possible):  
 Yes  No
8. What Services was the Survivor Referred to (provide name of service):

	<input type="checkbox"/>	<input type="checkbox"/>	<u>Name of Service</u>
a. Justice	Yes	No	<u>Name of Service</u>
b. Medical	Yes	No	<u>Name of Service</u>
c. Safe House	Yes	No	<u>Name of Service</u>
d. Counseling	Yes	No	<u>Name of Service</u>
e. Other	Yes	No	<u>Name of Service</u>
9. Does the Survivor consent to communicate the allegation to the  Yes  No FSM PROPER Project Manager?
  - a. If yes, complete Form B and give to the FSM PROPER Project Manager along with a copy of this completed form.

## Consent Form

DID THE SURVIVOR CONSENT TO:

SIGNATURE/THUMBPRINT  
OF SURVIVOR OR GUARDIAN  
(FOR CHILDREN UNDER 18)

DATE

### Step 1. Receive the Grievance

1. Have their grievance documented and registered?    
Yes No

2. Communicate their grievance to FSM PROPER Project Manager?    
Yes No

### Step 2. Assess if the allegation is likely linked to the project

3. Share information about the grievance with the contractor / alleged perpetrators employer?    
Yes No

4. Share grievance information with NORMA and DoJ?    
Yes No

5. Share information about the grievance with the World Bank?    
Yes No

### Step 3. Verify and Act

6. Be interviewed by the FSM PROPER Project Manager about the grievance?    
Yes No

7. Share information about the grievance with the alleged perpetrator?    
Yes No

8. Share information about the grievance with the witnesses?    
Yes No

9. Share information gathered by the FSM PROPER Project Manager with other members of the *ad hoc* committee?    
Yes No

### Step 4. Monitor, track, and provide regular reports of the allegation

10. Share which services they were    
referred to with NORMA & DoJ? Yes No

11. Share what action was taken to    
resolve the grievance with the Yes No  
NORMA & DoJ?

**Step 5. Communicate with the Survivor**

12. Ongoing communication from    
the FSM PROPER Project Yes No  
Manager about the grievance?

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