

FEDERATED STATES OF MICRONESIA
PACIFIC REGIONAL CONNECTIVITY
PROGRAM (ICT) Kosrae Component

Environmental and Social Management Plan

Grievance Redress Mechanism
(Projects Complaint Process)

June 2020

1. Principles of the Complaints Process (GRM)

- The Complaints process is for people seeking satisfactory resolution of their concerns and/or complaints on the environmental and social performance of the East Micronesian Cable Project based at the Department of Transport, Communications and Infrastructure (DTC&I) at the FSM national government in the Federated States of Micronesia (FSM) in conjunction with the FSM Telecom Cable Corporation.
- This Process is consistent with the Project's Environmental and Social Management Framework (ESMF), Environmental Management Plan (EMP) and projects Grievance Redress Mechanism (GRM) and is directly related Kosrae ICT State project.
- The mechanism will ensure the following:
 - Basic rights and interests of every person affected by the projects environmental performance or social management of the project are protected; and
 - Their individual concerns arising from the performance of the projects environmental and social performance during the project phases of design, construction and operation activities are effectively and timely addressed.

2. How to get in Touch with the Project

Anyone can ask for information on the project, express a concern, make a complaint (grievance) or get in touch with the project for any reason. Complaints/concerns can be anonymous and the various ways to get in touch with the project include:

National Contacts:

Department of Transport, Communications & Infrastructure (DTC&I)

All correspondence to: Assistant Secretary, Mr. Mark DeOrio.

1. By Phone: (691) 320- 2865
2. By email: mark.deorio@gmail.com copy to beulah.FSM@gmail.com and wkilmete@yahoo.com
3. By mail: Post Office Box PS-2, Palikir, Pohnpei, FSM 96941
4. In person: DTC&I Office National Government, Palikir, Pohnpei, Federated States of Micronesia. Given to the Departments Office Secretary.
5. Website: www.ict.fm/contact

FSM Telecom Cable Corporation

All correspondence to: Mr Pieter Bakker, Chief Executive Officer and Mr. Gordon Segal Manager Operations and Chairman Management Committee (EMCS).

1. By Phone: (691) 320- 2602
2. By email: pieter.bakker@fsmcable.com, gsegal@fsmcable.com or info@fsmcable.com copy to beulah.FSM@gmail.com and wkilmete@yahoo.com
3. By mail: Post Office Box 2202, Kolonia, Pohnpei, FSM 96941
4. In person: Ocean View Plaza (East Wing) Suite 15, Kolonia, Pohnpei, Federated States of Micronesia. Give to the Office Secretary.
5. Website: www.fsmcable.com

Kosrae State Project Sites:

All correspondence to: Mr. Gordon Segal Manager Operations and Chairman Management Committee (EMCS). Mr Segal will manager the project until a Kosrae project manager is appointed. This will be undertaken before the commencement of works.

1. By Phone: (691) 320-2602
2. By email: gsegal@fsmcable.com and copy to beulah.FSM@gmail.com and wkilmete@yahoo.com
3. By mail: Post Office Box 2202, Kolonia, Pohnpei, FSM 96941
4. In person: C/O Ocean View Plaza (East Wing) Suite 15, Kolonia, Pohnpei, Federated States of Micronesia. Give to the Office Secretary.
5. Website: www.fsmcable.com

This information, and a brief summary of the process for answering queries and managing grievances, will be published on the DCT&I, FSM cable and Department of Finance and Administration (DoFA).

3. Roles and Responsibilities:

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

- Focal Point for managing the FSM ICT projects Complaints Process: Mr. Gordon Segal, Manager of Operations for the ICT cable Project (gsegal@fsmcable.com).
- Person who will manage the database and record keeping: Mr. Wilmer Kilmete in coordination with Mr. Steve Lindsay and Ms. Beulah Daunakamakama at the Central Implementation Unit (CIU) of the FSM Government Department of Finance & Administration.
- Person who will answer simple queries and manage simple complaints: Mr. Gordon Segal, Manager of Operations for the ICT cable Project (gsegal@fsmcable.com).
- Person who will manage difficult complaints or grievances: Mr. Gordon Segal, and/or Mr. Pieter Bakker for the ICT cable project and Mr. Mark DeOrio, Acting Secretary DCT&I with support from CIU.
- Person/organization who will prepare report/s for World Bank reporting: CIU safeguard team.
- Grievance Committee will be formed on an ad hoc basis for complex or significant grievance management. This will be made up of appropriate senior officials (Assistant Secretary level or above) from the following:
 - Department of Finance & Administration (DoFA) with support from CIU Safeguards Specialist; and
 - Department or Office managing the project at which the complaint is aimed (FSM Telecom Cable Corporation).

4. The Complaints Process:

- All complaints or grievances will be entered into an assigned database that tracks progress of each complaint/grievance. Complaints records (letter, email, record of conversation etc.) are stored both electronically and in hard copy. Each record has a unique number reflecting year and sequence of received complaint (i.e. 2019-01, 2019-02 etc.).
- Each complaint/grievance is assigned a specific person responsible for its management and close out.
- Each complaint or grievance will have a plan for addressing and closing out:
 - If the complaint/grievance relates to a contractor activity, the project will ensure the Contractor remedies any damage, pays compensation for damage or loss, etc.
 - Use of community leaders and customary methods of conflict resolution is encouraged and utilized if and when appropriate – on a case-by-case basis.

- If an issue/complaint cannot be resolved on site, it is elevated to the Project Manager for resolution (with support from the Safeguards Specialist in the CIU). If the Project Manager and Safeguards Specialist cannot resolve the issue, it is referred to the ad hoc Grievance Committee.
- If a resolution cannot be found through the Grievance Committee, the next course of action is the courts of FSM or an independent mediator.
- All simple complaints and grievances must aim to be closed out within 1 month.
- Complex complaints should aim to be closed out within 3 months or deferred to the Grievance Committee.
- All complainants have the right to use the courts of FSM at any time to seek resolution, if and when required.
- The ICT Project Manager will make adjustments to consultations, the GRM, community engagement, project implementation and other aspects as necessary to avoid future complaints and grievances if and when required.

5. Reporting and Evaluation:

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