



# FEDERATED STATES OF MICRONESIA

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June 22, 2012

His Excellency Manny Mori, President  
Honorable Members of the FSM Congress  
Federated States of Micronesia

RE: Performance Audit on Management of Tuna Fisheries in the FSM

We have completed a *Performance Audit on the Management of Tuna Fisheries in the FSM for Fiscal Year 2009, 2010 and 2011*. The audit on Management of Tuna Fisheries was undertaken by the Office of the National Public Auditor of the Federated States of Micronesia (FSM) as part of an initiative developed by the Pacific Association of Supreme Audit Institutions (PASAI) with the support of the Asian Development Bank (ADB) and the INTOSAI Development Initiative (IDI).

The objective of the audit was to assess the effectiveness of the management of off-shore tuna fisheries by National Oceanic Resources Management Authority (NORMA) in accordance with policies and frameworks, by examining whether: (1) Key aspects of management of off-shore fisheries are planned; (2) Economic returns from off-shore fishery licenses and access agreements are appropriate; (3) Decision-making concerning off-shore fisheries are informed by accurate assessments of the fishery; and changes in the status of the fishery are monitored and reported. We conducted this audit in accordance with Generally Accepted Government Auditing Standards.

NORMA is the government's regulatory and management arm within FSM's 200 mile Exclusive Economic Zone. The authority is governed by a Board of Directors. The authority is responsible to: (1) Ensure that resources are used in a sustainable way; (2) Obtain the maximum sustainable economic benefits from the resources; and (3) Promote economic security for through the nation through their use.

The audit revealed that the Board of Directors do not provide adequate oversight over the operational duties in carrying out their key activities of enhancing and enforcing the main fishery legislation. Consequently, the following weaknesses existed:

- Outdated Tuna Management Plan (TMP) left NORMA with no clear guidelines in managing tuna resources;

- There are no official by-laws to govern the actions including the duties and responsibilities of NORMA's Board members. In addition, NORMA has not developed internal policy framework to provide the necessary direction and guidance to manage their daily operation;
- Inactive *Fisheries Management and Surveillance Working Group*;
- No Assurance that Fishing Right Fees from Japan is Collected and Deposited in the Bank; and
- Unreliable data caused by inaccurate and untimely reporting

Ultimately, the key aspects of management fisheries are inadequately planned. Secondly, the economic returns from the tuna fishery licenses and access agreements may be appropriate, however, the current processes of collecting and issuing fishing licenses do not ensure proceeds are properly collected and recorded. Lastly, the decision-making concerning off-shore fisheries may be affected by the untimely reporting of data from fishing activities.

We recommended the following:

- The Board of Directors should ensure that an updated TMP is developed by Management and presented it for review and approval to meet the current trends in the fishery industry. For instance, Management should consider performance measures to be incorporated in the TMP to meet regional and international requirements like the VDS.
- The Board of Directors should create and adopt its by-law. In addition, NORMA Executive Management should develop appropriate policies and procedures for the operational level. For example: Develop an Operating Manual and submit it to the Board of Directors for review and adoption in order to guide the staff in executing their required duties and responsibilities.
- The Board of Directors should require quarterly reports from the Working Group to ensure that their recommendations are considered when formulating policies and in implementing appropriate monitoring and control of fisheries surveillance activities.
- NORMA and the Department of Finance & Administration should reconcile the bank accounts involved to ensure the accuracy of the collection and recordation of all foreign fishing rights fees especially those involving the account in Japan.
- Adequate monitoring of staff's operational duties and responsibilities.

Respectfully yours,



Haser Hainrick  
National Public Auditor

XC: Vice President  
All Members, Board of Directors  
NORMA Executive Director  
Acting Secretary, Department of Finance & Administration  
Acting Secretary, Department of Justice

**Office of the National Public Auditor**  
**Audit on Management of Tuna Fisheries in the FSM**  
**Report No. 2012-03**

**TABLE OF CONTENTS**

<b>INTRODUCTION</b> .....	1
Background.....	1
Objective, Scope, and Methodology.....	2
Prior Audit Coverage.....	3
Conclusion.....	3
<b>FINDING AND RECOMMENDATIONS</b> .....	5
1. Outdated Tuna Management Plan (TMP) left NORMA with no clear guidelines in managing tuna resources.....	5
2. NORMA has not Developed Internal Policy Framework to provide the Necessary Direction and Guidance to manage their Day-to-Day Operation.....	6
3. Inactive Fisheries Management and Surveillance Working Group .....	7
4. No Assurance that all Fishing Right Fees from Japan are collected and Deposited in the Bank.....	8
5. Unreliable data caused by inaccurate and untimely reporting.....	9
<b>APPENDICES</b> .....	12
<b>MANAGEMENT RESPONSE</b> .....	19
<b>NATIONAL PUBLIC AUDITOR’S COMMENT</b> .....	22
<b>ONPA CONTACT AND STAFF ACKNOWLEDGEMENT</b> .....	23

**Office of the National Public Auditor**  
**Audit on Management of Tuna Fisheries in the FSM**  
**Report No. 2012-03**

**INTRODUCTION**

**Background**

The audit on managing sustainable fisheries was conducted by the Office of the National Public Auditor, FSM as part of an initiative developed by the Pacific Association of Supreme Audit Institutions (PASAI) with the support of the Asian Development Bank (ADB) and INTOSAI Development Initiative (IDI). The audit was designed to assess the effectiveness of the actions taken by key agency/agencies in ensuring sustainable fisheries in the countries Exclusive Economic Zone (EEZ) of the participating Audit Offices.

When the FSM Congress created Title 24 of the FSM Code in 1979, it also established the Micronesia Maritime Authority (MMA). In later years, recommendations were made to bring the Title 24 of the FSM Code up to date and to take into account the most recent trends and developments in the field of fisheries management. In 2002, the Authority officially became the National Oceanic Resource Management Authority (NORMA). The mission of the Authority is to be an effective guardian and manager of the marine resources in the FSM EEZ for people living today and for generations of citizens to come. The Authority works to: (a) Ensure that these resources are used in a sustainable way; (b) Obtain the maximum sustainable economic benefits from the resources; and (c) Promote economic security for the nation through their use. However, the formulation and implementation of the management process is the responsibility of NORMA board members<sup>1</sup>.

In addition, NORMA plays a significant role in international relations. It contributed to FSM's position in international and regional treaty negotiations regarding fisheries by ensuring compliance with international and regional obligations that may arise from certain arrangements. The following are some of the international and regional treaties and agreements that the FSM is a signatory: The United Nations Convention on the Law of the Sea, Forum Fisheries Agency Convention, the 1995 United Nations Fish Stocks Agreement, Niue Treaty, Nauru Agreement, Palau Arrangement, and the FSM Arrangement<sup>2</sup>.



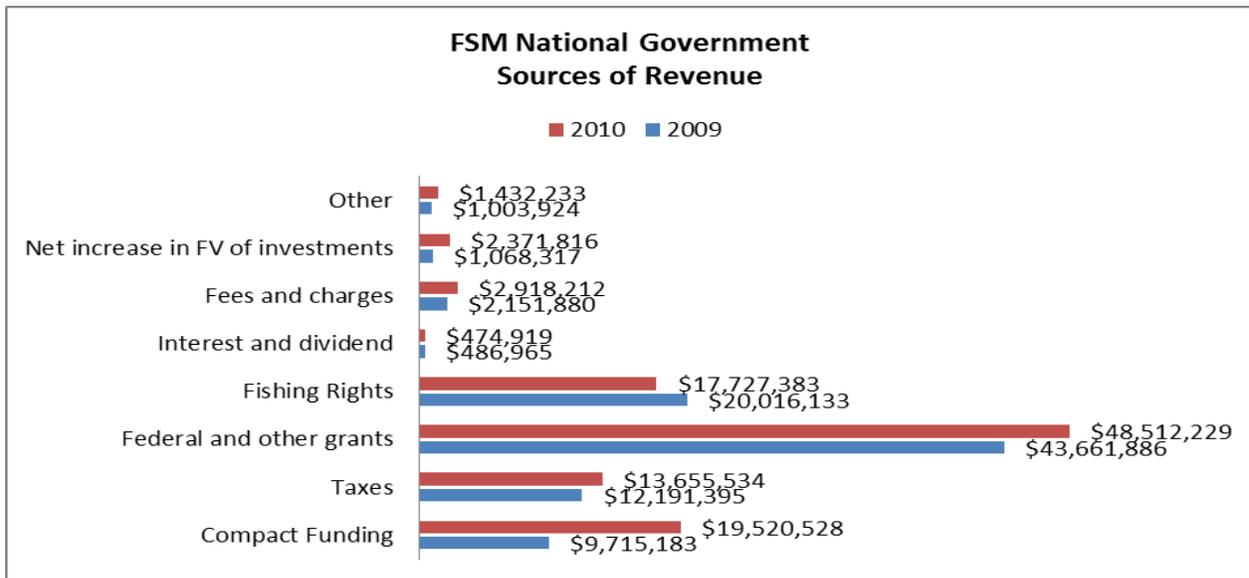
FSM's EEZ is 200 miles from the coast lines which covers a sea area of more than 2.6 million square kilometers and it shares borders with the following countries: Guam, Palau, Marshall Islands, and Papua New Guinea. FSM is considered having the third largest EEZ and a highly productive fishery.

<sup>1</sup> It consists of five members/Directors, appointed by the President and subject to the advice and consent of Congress. Four of the five are appointed after consultations with the Four States and one appointed at-large (in accordance with Section 301 of the Title 24).

<sup>2</sup> Refer to Appendix A

**Office of the National Public Auditor  
Audit on Management of Tuna Fisheries in the FSM  
Report No. 2012-03**

The tuna fishery in the FSM is also the number two revenue generator for FSM’s economy. As indicated in the graph below, in Fiscal Year 2009, revenue collected from fishing rights was approximately \$20 million. Offshore fishing contribution to the FSM GDP alone was estimated at \$23 million in 2010. The major financial benefits from the extensive tuna resources come in the form of access fees paid by foreign fishing vessels that fish for tuna in the FSM EEZs. For the past three years, the revenue generated from fishing rights was approximately \$20 million in 2009, \$17.7 million in 2010 and \$ 18.8 million in 2011. Another crucial benefit of tuna industry to the FSM economy is the employment it provides.



Source: Single Audit Report for the FSM National Government FY ‘10

**Objective, Scope and Methodology**

**Objective:** The audit objective was to assess the effectiveness of the management of off-shore fisheries (in particular the tuna fishery) by NORMA in accordance with policies and frameworks, by examining:

- Key aspects of management of off-shore fisheries are planned;
- Economic returns from off-shore fishery licenses and access agreements are appropriate;
- Decision-making concerning off-shore fisheries are informed by accurate assessments of the fishery; and changes in the status of the fishery are monitored and reported.

**Scope:** The audit focused on the management of fisheries within the FSM’s EEZ and the actions taken by NORMA to manage the resources within the legal/policy framework that applies to the FSM during fiscal years 2009 to 2011. We conducted this audit pursuant to Title 55, FSMC Chapter 5, which states in part:

*“.....the Public Auditor shall inspect and audit transactions, accounts, books, and other financial records of every branch, department, office, and agency, board of*

**Office of the National Public Auditor**  
**Audit on Management of Tuna Fisheries in the FSM**  
**Report No. 2012-03**

*the National Government and of other public legal entities, including, but not limited to, States, subdivisions thereof, and nonprofit organizations receiving public funds from the National Government...”*

Methodology: The audit fieldwork was conducted at the NORMA office in Kolonia, Pohnpei.

- To determine whether key aspects of management of off-shore fisheries are planned, we obtained and reviewed relevant international, regional and sub-regional agreements along with the enabling legislations that govern NORMA. We also interviewed key officials of NORMA and other relevant agencies that play significant roles in monitoring and surveillance of off-shore fisheries activities.
- To determine whether economic returns from off-shore fishery licenses and access agreements are appropriate, we documented the licensing process, obtained, reviewed, and analyzed licensing processing, revenue reports, policies, and fishing agreements. We also conducted interview with key officials and a board member of NORMA.
- To determine whether decision-making concerning off-shore fisheries are informed by accurate assessments of the fishery; and changes in the status of the fishery are monitored and reported, we conducted a site visit with port samplers, obtained and reviewed log sheets, observed on site debriefing of observers and interviewed key officials of NORMA.

We conducted this performance audit in accordance with *Generally Accepted Government Auditing Standards* issued by the Comptroller General of the United States, the July 2007 revision. These standards require that we plan and perform the audit to obtain sufficient and appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our objective.

### **Prior Audit Coverage**

There has been no prior audit of managing sustainable fisheries in the FSM by ONPA. And although NORMA is part of the FSM National Government and is therefore subject to the annual financial audits by our external CPA auditors, there was no specific audit comment that has any relevance to the audit objectives of our current audit.

### **Conclusion**

Based on our audit, we concluded that the NORMA Board of Directors have not provided adequate oversight over the operational duties in carrying out their key activities of enhancing and enforcing the main fishery legislation. Consequently, the following weaknesses existed.

- Outdated Tuna Management Plan (TMP) left NORMA with no clear guidelines in managing tuna resources;

**Office of the National Public Auditor**  
**Audit on Management of Tuna Fisheries in the FSM**  
**Report No. 2012-03**

- NORMA has not developed internal policy framework to provide the necessary direction and guidance to manage their day-to-day operation;
- Inactive fisheries management and surveillance working group;
- No assurance that all fishing right fees from Japan are collected and deposited in the bank; and
- Unreliable data caused by inaccurate and untimely reporting.

Ultimately, the key aspects of fisheries management are inadequately planned. Secondly, the economic returns from the tuna fishery licenses and access agreements may be appropriate, however, the current processes of collecting and issuing fishing licenses do not ensure proceeds are properly collected and recorded. Lastly, the decision-making concerning off-shore fisheries may be affected by the untimely reporting of data from fishing activities.

The findings and recommendations are discussed in details in the following pages.

**Office of the National Public Auditor**  
**Audit on Management of Tuna Fisheries in the FSM**  
**Report No. 2012-03**

**FINDINGS AND RECOMMENDATIONS**

**Finding No. 1 - Outdated Tuna Management Plan (TMP) left NORMA with no clear guidelines in managing tuna resources**

FSM has obligations to the various international and regional fisheries management regimes and treaties. According to the Regional Tuna Management and Development Strategy (2009-2014) endorsed by the FFA country members, FSM should implement a Tuna Management Plan to ensure the sustainability of tuna fisheries in the FSM EEZ.

During our audit, we found that NORMA's TMP was outdated. Since the adoption of the TMP in November 2000, NORMA has been operating under an outdated TMP that lacks the proper guidelines to ensure that it is achieving its operational goals and objectives. For example, one of NORMA's goals is to *ensure that the nation's tuna resources are used in a sustainable way*. Although the objective is clearly stated and is aligned with its strategic goals, the TMP did not include any specific outcomes or activities, and it also lacks any performance measures to evaluate and monitor the success of its implementation.

As a result, there is no assurance that the NORMA's operational goals are achieved. The absence of a TMP could potentially affect its ability to effectively prevent the over-exploitation of offshore fisheries, which could further diminish revenue generation from fishing right fees and licenses.

Furthermore, having an outdated TMP overlooks certain international and regional requirements like the Vessel Day Scheme<sup>3</sup>. The purpose of the VDS is to constrain and reduce catches of target tuna species, and increase the rate of return from fishing activities through access fees paid by Distant Water Fishing Nations (DWFNs). By setting limits on the number of days purse seine vessels fish, the VDS is a management tool to limit fishing within sustainable levels.

The management of NORMA, past and present, does not consider the keeping of the TMP current and updated as a top priority activity. In addition, the Board of Directors' oversight in this crucial area is lacking. However, we would like to acknowledge that NORMA has recently initiated the process of revising the current TMP. According to the Management, the updated TMP should be completed by the end of this year 2012.

**Recommendations**

We recommend the Board of Directors should ensure that an updated TMP is developed by Management and presented it for review and approval to meet the current trends in the fishery industry. For instance, Management should consider performance measures to be incorporated in the TMP to meet regional and international requirements like the VDS.

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<sup>3</sup> Refer to Appendix B

**Office of the National Public Auditor**  
**Audit on Management of Tuna Fisheries in the FSM**  
**Report No. 2012-03**

**Finding No. 2 - NORMA has not Developed Internal Policy Framework to provide the Necessary Direction and Guidance to manage their Day-to-Day Operation**

Chapter 2, sub-section 201 (5) of Title 24 of the FSM Code states that:

*“The Authority shall adopt its own bylaws governing the conduct of its business and performance of the powers and duties granted to or imposed upon by law.”*

Internal policies and procedures serve as guidance to the individuals charged with performing tasks and provide a framework for key activities and processes. Additionally, they establish accountability for essential responsibilities.

The Board of Directors is responsible to design and formulate an effective management system, policies and processes for NORMA in order to guide the implementation of its operational activities and programs, by Management, and under its direct oversight (of the Board). Based on our observation of NORMA’s daily operational activities and our interviews with staff and the Chairman of the Board, we found that the Board members, management, and staff did not have the benefit of a clear guidance regarding their operational duties and responsibilities. Specifically,

There were no official by-laws

We found that no official by-laws for NORMA have been adopted as required by Title 24 of the FSM Code. A set of by-laws would provide the framework on how the Board members, Management and staff are to conduct their official duties and responsibilities as well as provide the rules and guidelines for them to observe. According to the Chairman, the board members have been conducting their duties under a set of by-laws that have yet to be adopted by the Board of Directors since the creation of NORMA. Meaning, there are no official by-laws to govern the actions including the duties and responsibilities of NORMA’s Board members.

An Operating Policies and Procedures Manual was lacking

There are no written internal policies and procedures in place to guide NORMA staff charged with performing their required tasks. For example, during interview, the VMS Manager confirmed the absence of written policies and procedures in carrying out his day to day operation. The newly hired Chief Researcher is currently coordinating with observers as his day to day task. Upon being hired, the Chief Researcher was only oriented verbally on essential responsibilities.

As a result, the decisions and actions of the Board could be brought to doubt in the absence of an approved set of by-laws as required by legislation. Furthermore, the Board members, Management and staff may not have the proper guidance in order to efficiently and effectively carry out their duties and responsibilities due to the lack of an approved Operating Manual. These weaknesses could potentially affect NORMA’s ability to effectively and efficiently manage the tuna fishery resources.

**Office of the National Public Auditor**  
**Audit on Management of Tuna Fisheries in the FSM**  
**Report No. 2012-03**

The Board of Directors is being relaxed in requiring Management to develop a set of by-laws and to prepare an Operating Manual for its review and adoption.

**Recommendations**

We recommend the Board of Directors should create and adopt their own by-laws that will provide clear guidance on their duties and responsibilities imposed by Title 24 of the FSM code.

We further recommend that NORMA Management should develop an appropriate set of operational policies and procedures to provide clear guidance to carry out their duties and responsibilities efficiently and effectively.

**Finding No. 3 – Inactive Fisheries Management and Surveillance Working Group**

Section 207 of Title 24 of the FSM Code states:

*The Authority shall establish a Fisheries Management and Surveillance Working Group to formulate and implement a national fisheries management surveillance strategy. The working group shall consist of appropriate representatives of the Authority and the Department of Justice...The recommendations of the working group regarding surveillance planning and strategy shall be consistent with the objectives and general principles of conservation, management, and sustainable use of fishery resources.”*

We were told that a Working Group existed. However it was largely inactive during the period covered under the scope of this audit, i.e. FY-2009 to FY-2011. We found no Minutes of any meetings or reports to verify that the supposed Working Group was actively carrying out its duties and responsibilities.

In addition, our audit has found that the Division of Marine Surveillance<sup>4</sup> has continued to operate at a low level and was not meeting the target surveillance trips annually. For example, the Division of Marine Surveillance targets between 10 to 12 trips for law enforcement patrol in a calendar year. We found that during the years 2009 and 2010 there were 6 and 7 surveillance trips occurred respectively. Thus, settlement cases were high due to minimal effort of deterring and preventing illegal, unregulated and unreported (IUU) fishing activities. However, the trend in surveillance activities increased in 2011 resulting into a significant reduction of settlement charges from IUU.<sup>5</sup> According to the Department of Justice (DOJ), the vessels are more aware of the presence of surveillance activities, thereby fewer violations were committed.

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<sup>4</sup> Division of Marine Surveillance is responsible for overseeing fishing activity to ensure that participants follow legislations and conditions of access.

<sup>5</sup> See Appendix C

**Office of the National Public Auditor**  
**Audit on Management of Tuna Fisheries in the FSM**  
**Report No. 2012-03**

The following factors contributed to the above conditions:

- Absence of oversight by the Board of Directors to ensure that the provisions of Section 207 of Title 24 of the FSM Code regarding the Management and Surveillance Working Group was fully implemented.
- Insufficient resources in terms of funding to acquire needed fuel to support the operations of the patrol boats in order to achieve the targeted number of surveillance annually.

**Recommendations**

We recommend that NORMA and the Department of Justice should:

- Ensure that the Fisheries Management and Surveillance Working Group is actively performing its required duties and responsibilities.
- Require quarterly reports from the Working Group to ensure that their recommendations are considered when formulating policies and in implementing appropriate monitoring and control of fisheries surveillance activities.

**Finding No. 4 – No Assurance that all Fishing Right Fees from Japan are collected and Deposited in the Bank**

Prudent accounting practices require that all transactions be properly recorded in the books of accounts and reported to the public by means of financial statements.

As indicated in the table below, 96% on average of total fishing rights for the past three fiscal years (2009 to 2011) was contributed by the distant water fishing nations (DWFNs) such as Japan, Taiwan and Korea etc.

	<b>Total Fishing Rights Fees</b>	<b>DWFNs</b>	<b>Fee From Japan</b>
<b>FY 2009</b>	\$ 20,016,132.60	\$ 20,010,765.80	\$5,460,732
<b>FY 2010</b>	\$ 17,727,383.00	\$ 17,187,991.05	\$5,572,524
<b>FY 2011</b>	\$ 18,811,198.33	\$ 17,374,973.33	\$6,310,815

Source: Dept. of Finance and Administration

During the review of the processes involving fishing licenses and collection of license fees, we found the following:

*Un-reconciled Bank Balances*

The bilateral fisheries access arrangement with the Japanese fleets is the longest running access arrangement (since 1979) under NORMA portfolio for authorized foreign fishing fleets. It remains the largest source of revenue compared to other distance water fishing Nations (DWFNs) such as Taiwan and Korea. In Fiscal Year 2011, 34% or \$6.3 out of the \$18.8 million of the total fishing rights fees collected was paid by Japanese fishing fleets. However, we discovered during our audit that no monthly bank reconciliations have been done involving the bank account in Japan despite the fact that more than \$10 million were flowing through the Japan

**Office of the National Public Auditor**  
**Audit on Management of Tuna Fisheries in the FSM**  
**Report No. 2012-03**

account during the two years under review (FY '09 & FY '10). Reconciling items and errors may not be detected or corrected promptly.

Uncollected fishing rights

Wire transfer fees from some foreign fishing companies receipted at the FSM National Treasury were consistently less than the amounts per the NORMA's records. We were told that the difference may be associated with bank charges deducted from the required fees. As of date, NORMA has never followed-up on the discrepancies with the fishing companies.

As a result, there is no assurance that all revenue from fishing licensing fees were properly collected and recorded.

The absence of the bank account reconciliation contributed to the above conditions.

**Recommendation**

We recommend that the responsible official at NORMA and at the Department of Finance & Administration should reconcile the bank accounts involved to ensure the accuracy of the collection and recordation of all foreign fishing rights fees especially those involving the account in Japan.

**Finding No. 5 – Unreliable data caused by inaccurate and untimely reporting**

Section 115, Title 24 of the FSM Code states,

*“The operator of each domestic and foreign fishing vessel issued a permit or which is permitted to fish pursuant to an access agreement ... shall provide information required like (a) the gear type used, (b) noon position of the vessel, (c) the species of fish taken and the size and quantity of each species by weight or number, etc... to the Authority by registered airmail within fourteen (14) days following the date of completion of the off-loading operation...”*

Collected catch data from different programs or sources may be compared with data collected by fishing vessel operator in order to ascertain the accuracy of the latter. The collection and analysis of relevant fisheries data is crucial to monitor the fish stocks under NORMA guardianship. Data collection is primarily undertaken through three programs: the on board Observer Program, the Port Sampling Program, and the Catch Report Program provided by the vessel operators.

Under the Observer Program, observers are placed on foreign fishing vessels such as US, Japanese, Korean and Taiwanese fishing vessels. Their role is to be objective and independent observers of what is happening on the fishing vessels. For example: They report on how much fish is caught, what type of fish is caught and whether there are any observed breaches to laws and regulations. This information is then fed back into a central database so that NORMA can keep track of what fishing vessels are doing and whether fishing laws and regulations are being implemented.

**Office of the National Public Auditor**  
**Audit on Management of Tuna Fisheries in the FSM**  
**Report No. 2012-03**

The Port Sampling Program collects information on catches, particularly length-frequency data, from vessels fishing in or landing their catches in FSM. The program also records and compiles transshipment information from long line and purse seine vessels that may be used in economic analysis, and to identify fishing or marketing patterns.

The Catch Report Programs requires all fishing vessels operators to provide to NORMA their fishing method, the species of fish taken and size and quantity of each species by weight and the position of the vessel with in the FSM EEZ.

All the data collected by the different sources identified above are being forwarded to SPC for assessment of Tuna stock. While there is an existing database to manage information collected on fishing activities by fishing vessels in the FSM EEZ, however, we found a wide room for improvement in terms of assimilating some key controls for data collection and analysis to aid in fishery management in the FSM. The following issues regarding timeliness, consistency, and reliability were noted during audit:

*Untimely submission of log-sheets by vessel operators*

Vessel operators continued to submit log sheets beyond and after the required timeframe without being fined. For example, 64% of catch reports for fiscal year 2009 were submitted late. Additionally, no effort has been made by NORMA to ensure that the required log sheets are received on time.

*Lack of cross-checking the data received*

Data collected from the Onboard Observer Program, Port Sampling Program, and Vessel Monitoring System were never cross-checked to ascertain the accuracy of the data. We noted that there are common data that needs to be cross-check between the different forms like the port sampling form and the catch report form. This includes the following: Vessel name, FFA vessel registration number, Date and Time of departure and arrival and the Positioning of the vessel while fishing in the FSM EEZ etc. According to the NORMA staff, there is no procedure in place to cross-check the common information shared between the two forms.

On the other hand, weekly reports as required by NORMA relating to the position of, and catch on board at the following times while in the exclusive economic zone were likewise never cross-checked during the scope of the audit. According to the Manager of VMS and Compliance, being the sole operator of the VMS, numerous incoming weekly reports are always a challenge to verify by the VMS. Vessels operators continued to submit reports every Wednesday without any meaningful use and analysis.

*Back-log*

Based on observation of data entry of log sheets at NORMA in September of 2011, the data entry staffs were just inputting 2008 log sheets into the Tufman database while keeping up to date on their 2011 data.

Untimely and inconsistent data means that such data would be incomplete, inaccurate and unreliable and hence the stock assessment would not be as accurate as it should be. Therefore,

**Office of the National Public Auditor**  
**Audit on Management of Tuna Fisheries in the FSM**  
**Report No. 2012-03**

management's ability to make informed decisions was affected to the extent of the poor quality of information received and provided.

The following factors contributed to the above conditions:

- There is inadequate monitoring by NORMA management on the operational duties.
- Documented operational procedures were not in place to guide the staff in performing their duties and responsibilities and in executing the requirement of the law.

**Recommendations**

We recommend that NORMA's Management should;

- Monitor staff's operational duties and responsibilities; and,
- Develop an Operating Manual and submit it to the Board of Directors for review and adoption in order to guide the staff in executing their required duties and responsibilities.

**Office of the National Public Auditor**  
**Audit on Management of Tuna Fisheries in the FSM**  
**Report No. 2012-03**

**APPENDICES**

**Appendix A: International and Regional Fisheries Arrangements and Agreements that apply to FSM.**

*United Nations Convention on the Law of the Sea (UNCLOS) 1982*

UNCLOS defines the rights and responsibilities of nations in their use of the world's oceans and establishes guidelines for the management of natural marine resources. It also created an Exclusive Economic Zone (EEZ) which extends 200 nautical miles from the land. Countries have sole exploitation rights over all natural resources within their EEZs. Where a country does not have the capability to fish the resources within their EEZ, they can enter into an agreement with other nations to harvest the surplus fish stocks.

*United Nations Fish Stocks Agreement (UNFA)*

There are many important fish stocks that either live straddling EEZs or that migrates through zones. The 1995 UNFA provides a framework for managing straddling and highly migratory fish stocks in the high seas. These fish stocks are regulated by Regional Fisheries Management Organizations (RFMOs). The Agreement requires countries to control fishing activities of their vessels on the high seas. It also provides for the right of countries party to the UNFA to monitor and inspect vessels of the other parties, to verify compliance with internationally agreed fishing rules of RFMOs. These organizations play an important role in contributing to sustainable fisheries management and, in many instances, provide an effective means to govern fish stocks that migrate across national jurisdictions or are found in the high seas.

*Western and Central Pacific Fisheries Commission (WCPFC)*

The WCPFC was established by the *Convention for the Conservation and Management of Highly Migratory Fish Stocks* (i.e. tuna species, billfish, marlin and swordfish) in the Western and Central Pacific Ocean (WCPF Convention). This Convention came into force in June 2004. Membership includes the following PASAI member countries: Cook Islands, Federated States of Micronesia, Fiji, Kiribati, Republic of the Marshall Islands, Nauru, Palau, Papua New Guinea, Samoa, Solomon Islands, Tonga, Tuvalu, Vanuatu and participating Territories—American Samoa, Commonwealth of the Northern Mariana Islands, French Polynesia, Guam, New Caledonia and Tokelau. Developed countries, such as Japan, Korea, Chinese Taipei and the United States have commercial fleets of vessels fishing for these stocks in the Western and Central Pacific Ocean. These countries are also members of the Commission. Commercial fishing for migratory fish species represents an annual multi-billion dollar industry.

The WCPFC Convention seeks to address problems in the management of high seas fisheries resulting from unregulated fishing, over-capitalization, excessive fleet capacity, vessel re-flagging to escape controls, insufficiently selective fishing gear, unreliable databases and

**Office of the National Public Auditor**  
**Audit on Management of Tuna Fisheries in the FSM**  
**Report No. 2012-03**

insufficient multilateral cooperation in respect to conservation and management of highly migratory fish stocks.

The WCPFC is a Regional Fisheries Management Organization. One particularly important relationship for the WCPFC is with the regional fisheries body known as the Pacific Islands Forum Fisheries Agency (FFA). The FFA is an organization comprised of independent Pacific Island Countries who share a common fisheries interest in the Pacific Ocean region. The WCPFC coordinates very closely with the FFA, whose members are also members of the WCPFC. The Secretariat of the Pacific Community (SPC) is another important relationship for the WCPFC. The SPC's Oceanic Fisheries Program serves as the Commission's Science Services Provider and Data Manager to ensure that there is no duplication of effort in the area of collection and processing of scientific data on fishing activities in the region.

***Forum Fisheries Agency (FFA)***

The FFA was established by the South Pacific Forum Fisheries Agency Convention, signed in Honiara, Solomon Islands, on July 10, 1979. The Convention entered into force on August 9, 1979. Member countries of the FFA include: Australia, Cook Islands, Republic of Fiji, Kiribati, Marshall Islands, Federated States of Micronesia, Nauru, New Zealand, Niue, Palau, Papua New Guinea, Samoa, Solomon Islands, Tokelau, Tonga, Tuvalu, and Vanuatu.

The FFA is a regional fisheries body and its principal objective is "to enable Member Countries to manage, conserve and use the tuna resources in their Exclusive Economic Zones and beyond, through enhancing national capacity and strengthening regional solidarity".

The main functions of the FFA are to:

- collect, analyze, evaluate and disseminate to parties relevant statistical and biological information with respect to the living marine resources of the region and in particular the highly migratory species;
- collect and disseminate to parties relevant information on prices, shipping, processing and marketing of fish and fish products;
- provide, on request, to any party technical advice and information, assistance in the development of fisheries policies and negotiations, and assistance in the issue of licenses, the collection of fees or in matters pertaining to surveillance and enforcement;
- seek to establish working arrangements with relevant regional and international organizations, particularly the South Pacific Commission

***Nauru Agreement Concerning Cooperation in the Management of Fisheries of Common Interest***

The Nauru Agreement is a sub-regional agreement on terms and conditions for tuna purse seine fishing licenses in the region. The Parties to the Nauru Agreement (PNA) are Federated States of Micronesia, Kiribati, Marshall Islands, Nauru, Palau, Papua New Guinea, Solomon Islands and

**Office of the National Public Auditor**  
**Audit on Management of Tuna Fisheries in the FSM**  
**Report No. 2012-03**

Tuvalu. The agreement is dated February 11, 1982. This Agreement has 3 Implementing Arrangements which set out specific rules for fishing in these countries.

***The Federated States of Micronesia (FSM) Agreement for Regional Fisheries Access***

The FSM Arrangement was developed as a mechanism for domestic vessels of the PNA to access the fishing resources of other parties. It was signed on November 30, 1994 and came into force on September 23, 1995. Signatories are Federated States of Micronesia, Marshall Islands, Nauru, Palau, Papua New Guinea and Solomon Islands.

The FSM Arrangement aims to: Provide access for Domestic Vessels to parties' waters on terms no less favorable than those granted to distant water fishing nations; secure maximum sustainable economic benefits from tuna resources; promote greater participation by nationals of Parties in fisheries and assist in development of national fisheries industries; and allow access to vessels on terms consistent with the Palau Arrangement.

Fishing vessels are eligible, based on the following criteria: Good standing on FFA Vessel Register, details of a vessel, Home-Party bilateral license for 1 year, sponsored by Home-Party and vessels must meet FSMA Eligibility Criteria with a minimum of 25 points.

***Palau Arrangement for the Management of the Western Pacific Purse Seine Fishery***

The Palau Arrangement for the Management of the Purse Seine Fishery in the Western and Central Pacific was developed by the Parties to the Nauru Agreement and entered into force in November 1995. The Arrangement sets a limit on the number of purse seine vessels that could be licensed by the Parties and allocated these licenses by fleet. Signatories to the Palau Arrangement are Federated States of Micronesia, Kiribati, Marshall Islands, Nauru, Papua New Guinea, Palau, Solomon Islands, and Tuvalu.

***Niue Agreement on Cooperation in Fisheries Surveillance and Law Enforcement in the South Pacific Region***

The Niue Treaty is an agreement on cooperation between FFA members about monitoring, control and surveillance of fishing - it includes provisions on exchange of information (about where the position and speed of vessels at sea, which vessels are without licenses) plus procedures for cooperation in monitoring, prosecuting and penalizing illegal fishing vessels. It was signed on July 9, 1992.

***US Multilateral Treaty***

This is the US Multilateral Treaty on Fisheries between certain Governments of the Pacific Island States and the Government of the United States of America (commonly referred to as the "US Treaty"). The US Treaty first started in 1987 and it has been renewed on two occasions, with the last renewal in 2003 and to run for 10 years until 2013. The US Treaty enables US purse seine fishing vessels to fish in the waters of the 16 Pacific Island Parties which are: Australia, Cook Islands, Federated States of Micronesia, Fiji, Kiribati, Marshall Islands, Nauru, New

**Office of the National Public Auditor**  
**Audit on Management of Tuna Fisheries in the FSM**  
**Report No. 2012-03**

Zealand, Niue, Palau, Papua New Guinea, Samoa, Solomon Islands, Tonga, Tuvalu, and Vanuatu.

**Appendix B: PNA Vessel Day Scheme (VDS)**

*What is the Vessel Day Scheme (VDS)?*

The VDS establishes a system of tradable fishing days allocated to the Parties as Party Allowable Effort (PAE). The Arrangement was established to regulate the number of purse seine vessels to be licensed by the Parties at any one time, in response to scientific advice of overfishing of yellow-fin tuna and the rapid influx of foreign purse seine vessels into the WCPO.<sup>6</sup>

Prior to the Palau Arrangement, the Parties to the Nauru Agreement (PNA) had already set in 1990 a provisional limit of 164 purse seine vessels to be licensed by the Parties. The license allocation limit under the Palau Arrangement in 1995 was for 205 purse seine vessels until the license allocation management scheme was replaced by the VDS in December 2007. The introduction of the VDS was the result of an external review commissioned by the Parties in 2000 to assess the effectiveness of the license allocation management scheme in achieving its objectives under the Palau Arrangement. The review Report recommended the adoption of the VDS to regulate the number of fishing days by purse seine vessels as a long term approach to the management of the purse seine fishery. The Parties adopted the VDS in 2006 and a trial operation of the VDS was conducted from 1 December 2006 to 30 November 2007 with the VDS becoming fully operational from 1 December 2007.

*Key features of the VDS:*

- a) Parties set the Total Allowable Effort in fishing days for each Management Year, Management years are now calendar years;
- b) A fishing day is defined as any day or part of a day in the waters of a Party outside archipelagic waters unless prior notice is given of a vessel not fishing, e.g. for transit;
- c) Allowances for the FSM Arrangement<sup>7</sup> fleet effort and the US Treaty<sup>8</sup> effort are deducted from the TAE;
- d) The adjusted TAE after accounting for the FSMA and US effort is allocated amongst the Parties as their Party Allowable Effort (PAE) for each Management Year based on the distribution of estimated biomass and historical effort;
- e) there are three Management years in a Management Period;
- f) Parties may transfer days freely between themselves (at a price) and between years within a Management Period, but transfers between Management Periods are limited;

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<sup>6</sup> During the period from the mid-1980s to 2003, the regional purse seine fleet expanded and the national composition of the fleet became more diverse to include other Asian fishing nations such as Taiwan, Korea, Philippines, followed by China and New Zealand. A more recent group of entrants to the fishery include the Latin fleets of Spain, El Salvador and Ecuador.

<sup>7</sup> The FSM Arrangement aims to provide access for Domestic Vessels to the waters of PNA partners on terms no less favorable than those granted to distant water fishing nations.

<sup>8</sup> Although a nominal allocation of days is determined for the US Treaty for each Management Year for the purpose of setting the Adjusted TAE [i.e. the TAE less the deduction of the UST seven (7) year average historical effort and FSMA (outside home Party waters) days], the US Treaty vessels days are exempted under the VDS and do not count against the PAEs of the Parties.

**Office of the National Public Auditor**  
**Audit on Management of Tuna Fisheries in the FSM**  
**Report No. 2012-03**

- g) Each Party is required to take all necessary measures to ensure that the number of fishing days by purse seine vessels in its EEZ does not exceed that Party's PAE or Adjusted PAE in any Management Year; and
- h) as a capacity adjustment, a fishing day of a small vessel (<50 metres length overall (LOA)) is counted as half of a fishing day, and large vessels (>80 metres LOA) one and a half fishing days.

The VDS is overseen and reviewed by an Inter-Party VDS Committee, and reports on its operation are provided to the annual meeting of the Parties to the Palau Arrangement. The role of the VDSC is to have oversight on the operational aspects of the VDS and provide recommendations as appropriate to the plenary meetings of the Parties to the Palau Arrangement, unless mandated to decide on certain operational aspects of the VDS. The Committee has met 10 times since the VDS was adopted by the annual meeting of the Parties in May 2006.

A recent assessment, carried out by Moody Marine for the PNA-licensed Western and Central Pacific purse seine sets against the Marine Stewardship Council Principles and Criteria for sustainable fishing, concluded that the VDS had the following core strengths:

- binding agreement on allocations of fishing effort;
- mechanisms to account for effort creep;
- high-level political support in the PNA Leadership;
- a long history of cooperative PNA management efforts;
- an extensive consultative process with stakeholders directly involved;
- acceptance of the VDS by the WCPFC;
- centralized monitoring of effort by VMS;
- support from the FFA VMS and the Regional Observer Program; and
- monitoring (log-sheet) and scientific support from SPC.

The Moody assessment also identified the following weaknesses apparent in the VDS:

- the lack of a clear link between the PAE and scientific advice on stock status;
- PAE allocation has been unsettled, and difficulties have been addressed in part through increasing the TAE and individual PAEs through ad hoc adjustments;
- trading has been slow to develop;
- the ad hoc adjustments, lack of trading and high provisions for transfers between years resulted in high adjusted PAEs for 2010 and increased effort in 2010, including allowing the transfer, instead of removal, of effort from the closed high seas areas;
- some Parties have overrun their PAEs, and it is not clear that the sanctions in the Scheme for over-runs are being applied;
- limits have only been partially applied at national level;
- there are inconsistencies in the treatment of non-fishing days, with apparently high provisions for non-fishing days for one Party, while no provisions are made for other Parties;
- the Scheme does not apply to archipelagic waters, and effort has increased substantially in archipelagic waters of the Parties since 2004;

**Office of the National Public Auditor**  
**Audit on Management of Tuna Fisheries in the FSM**  
**Report No. 2012-03**

- the FSMA effort is capped at 3,907 days but this looks likely to have been exceeded in 2010;
- the need to bring US effort under the VDS.

In response to the early experience with the VDS, including any shortfalls in performance, PNA has reported amending the VDS Management Scheme to improve the Scheme including:

- eliminating the rollover three year Management Periods in order to prevent the automatic carry-over of days between Management Periods;
- disallowing the transfer of days between Management Years and between Management Periods;
- disallowing the allocation of temporary allocations for special circumstances for Parties, effective Management Year 3; and
- requiring FSMA vessels to cease fishing once the cap for days outside home Party waters is exceeded in a Management Year;
- applying a hard limit of 28,469 days for 2011;
- improving VMS reporting; and
- upgrading administrative systems supporting the VDS.

In addition, PNA has advised that additional enhancements under consideration include:

- the Parties have initiated discussions with the US for the US Treaty vessels to operate and have their days limited under the VDS, if not in the current Treaty period which ends 14 June 2013, then in the Treaty extension after 14 June 2013, should there be an extension.

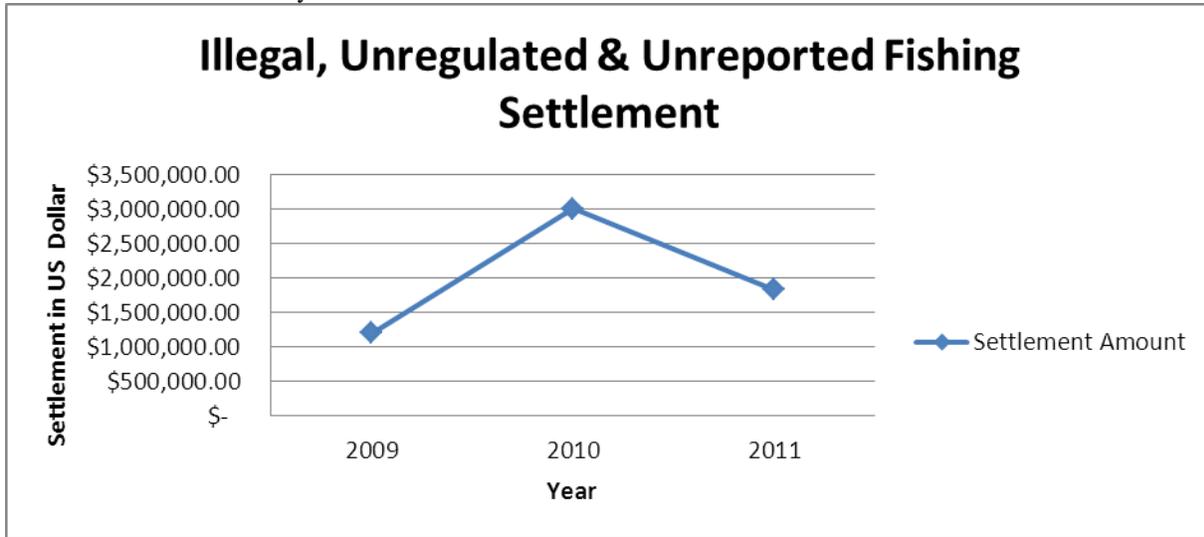
The VDS is providing an important means of accommodating the effects of El Niño-Southern Oscillation (ENSO) events on redistribution of tuna, both now and in the future. The VDS holds total fishing effort for PNA members constant, but allows them to trade fishing days when the fish are concentrated either in the west or east due to ENSO events. The VDS is designed to operate in a similar way to 'cap and trade' systems and ensures that all PNA members continue to receive some level of benefits, regardless of where tuna are concentrated. Allocation of effort among members will also need to be adjusted periodically, as provided for under the VDS, as tuna stocks move progressively east under the projected effects of climate change (Bell et al. 2011). Periodic adjustment will still allow the transfer of effort during ENSO events well into the future, but avoid the need for PNA members further to the east to continually purchase vessel days from those in the west, based on present-day catches.

**Office of the National Public Auditor  
 Audit on Management of Tuna Fisheries in the FSM  
 Report No. 2012-03**

**Appendix C: Total Settlements from IUU and Number of Patrol Trips by Year**

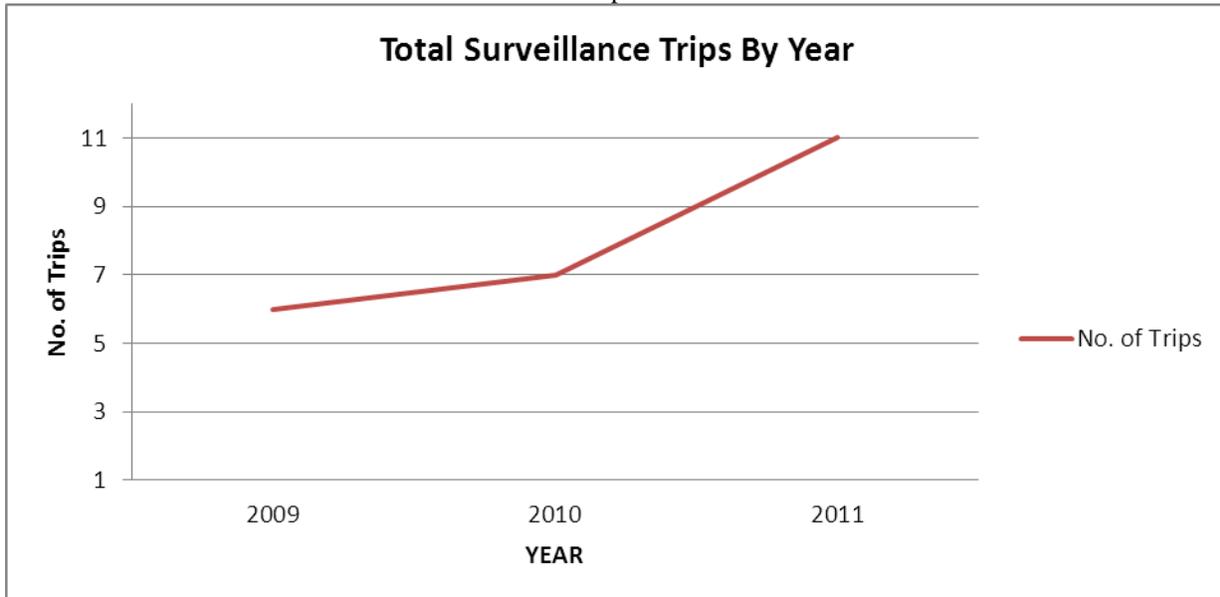
As indicated in Table 1, settlement charges in 2009 was at \$1.2 million, it increased in 2010 at \$3 million and decreased in 2011 at \$1.8 million. One of the obstacles that Maritime Surveillance face is the lack of funding for fuel, which deters them from pursuing Illegal, Unregulated & Unreported vessels fishing in the FSM EEZ.

Table 1: IUU Settlements by Year



Source: FSM Marine Surveillance records

Table 2: FSM Marine Surveillance Law Enforcement Trips



Source: FSM Marine Surveillance Records

**Office of the National Public Auditor  
Audit on Management of Tuna Fisheries in the FSM  
Report No. 2012-03**

**MANAGEMENT RESPONSE**

1. Response from NORMA



*National Oceanic Resource Management Authority*

FSM NATIONAL GOVERNMENT  
P.O. BOX PS122

PALIKIR, POHNPEI, FEDERATED STATES OF MICRONESIA 96941



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June 6, 2012

Mr. Haser Hainrick  
National Public Auditor  
FSM Government  
Palikir Pohnpei FM 96941

Re: 2011 NORMA Audit Responses to Recommendations

Dear Mr. Hainrick:

On behalf of the Board and Management of the Authority I would like to thank you and your good staff for meeting with us on May 24 to discuss the subject draft audit and your recommendations. I must admit that after walking away from that meeting we had a different outlook on the audit. Weeks before our meeting I had assigned appropriate staff to prepare responses to each of the findings and recommendations. We now realize the benefit of a sit down meeting to discuss across the table our views and misunderstandings on some of the issues raised. Many of our questions were answered during the exit conference. As a way forward we do however have a few comments to offer. Generally, we agreed with the recommendations and the comments that follow will only clarify or assure you that we intent to comply and carry out whatever is necessary to move the Authority in the right directions. Our comments as follow:

Finding No. 1- 'Outdated Tuna Management Plan left NORMA with no clear guidelines in managing tuna resources'. The FSM Tuna Management Plan is a living document that should be regularly reviewed to ensure it is consistent with the current state of tuna fisheries management, development and changing policies and objectives of the nation. The TMP was meant to be a policy document of the Authority, implementing principles such as sustainability and economic returns. We acknowledge there is no performance indicators attached to implementation of the TMP, the success of the TMP lies in the national income generated and the joint effort to ensure sustainability of resource, implementation of national, regional and international measures. NORMA is currently in the process of finalizing the revised draft tuna management plan. The current draft took on elements of the Ecosystem Approach to Fisheries Management (EAFM). EAFM is a holistic fisheries management tool that embraced aspects of oceanic ecosystem and environment on fishing and vice versa, the dependence of fishing operators etc. This was to be concluded about two years ago but the passing of the Executive Director Thoulag has delayed the process and is now being progressed with the aim of finalizing it at the end of 2012. The Executive Director will visit the FSM states to present the draft final TMP for consideration and wide acceptance before submitting it to the TMP Steering Committee and NORMA Board for final review and adoption.

Finding No. 2- "NORMA has not Developed Internal Policy Framework to provide the Necessary Direction and Guidance to manage their Day-to-Day Operation." We appreciate

**Office of the National Public Auditor**  
**Audit on Management of Tuna Fisheries in the FSM**  
**Report No. 2012-03**

flagging of the lack of or limited procedures in place to guide management and staff. When I came on board February 2011 I found there are draft guidelines in file but need to be updated and approved by Board. We fully support the recommendation that management develop a set of operational policies and procedures to provide clear guidance to carry out duties and responsibilities efficiently and effectively. We have initiated the process and hope to complete the first draft for Board review and approval by end of this calendar year. Despite the lack of adequate staff dedicated to perform this task we offer no excuses and commit to getting this done sooner than later.

Finding No. 3-**“Inactive Fisheries Management and Surveillance Working Group.”** The audit’s findings are correct we have no disagreement. To our recollection, only one FMSWG meeting for 2010 and 2011 was held. It should be noted that the passing of the late Chief of Police, Mr. Pius Chotailug, resulted in some delay in getting this working group active, again. It also needs to be noted that despite the absence of a formal FMSWG, NORMA Compliance staff met regularly with Maritime Surveillance staff on an informal basis and that communication and coordination between the two Divisions has improved. Nevertheless, Title 24 is clear about the establishment of a FMSWG, hence NORMA has initiated meetings beginning in January 2012. The next meeting is currently being scheduled for July or August 2012. We commit to carry out the recommendations as noted in report before end of 2012.

Finding No. 4-**“No Assurance that all Fishing Right Fees from Japan are collected and Deposited in the Bank”.** We agree with the finding and are currently working on solutions to remedy this anomaly. Regarding the comment on bank reconciliation in the past we were unable to obtain records of the bank account from the finance department because we were informed the account is not under the control of NORMA. More recently, we have developed cooperation so that the Executive Director is permitted to confirm receipt of wire transfers with Bank of FSM from the various fishing agreements without having to make specific request each time. The arrangement has been working fine and a great benefit for both parties.

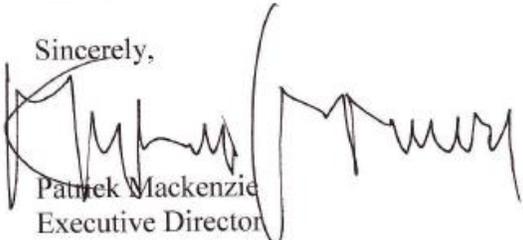
On the amount discrepancies between NORMA and finance department we acknowledge it is due to the bank charges that we should not be responsible for. Although amounts are insignificant compared to the access fee we receive they nevertheless can add up to a few thousand dollars. During our next annual consultations with respective fishing associations we will bring these to their attention and I am sure we will come to some agreement.

Finding No. 5-**“Unreliable data caused by inaccurate and untimely reporting.”** We agree and support the recommendations fully. Data management has been identified as a top priority for NORMA beginning in 2012 and development of an internal Information Management System is underway. It is envisioned that an IMS for NORMA will help address the problems highlighted in the auditor’s report with respect to collection, handling and verification of data. Also, in the recent budget submissions the Budget Review Committee accepted our request to add two full time data entry and analysis staff in FY 2013. This hopefully will address some of the issue regarding short staff to perform the tasks.

**Office of the National Public Auditor  
Audit on Management of Tuna Fisheries in the FSM  
Report No. 2012-03**

The above are our comments to audit findings and I would like again to express our appreciation especially to the two young ladies who performed the field audit for bringing these matters to our attention.

Sincerely,



Patrick Mackenzie  
Executive Director

Cc: Chairman and Board Directors, NORMA

**Office of the National Public Auditor  
Audit on Management of Tuna Fisheries in the FSM  
Report No. 2012-03**

**NATIONAL PUBLIC AUDITOR'S COMMENT**

We would like to thank management and staff at the National Oceanic Resources Management Authority (NORMA) for their assistance and cooperation during the course of the audit.

The ONPA may perform a follow-up review within the next 9-12 months to ensure that the NORMA have taken corrective measures to address all the findings and recommendation provided in this report.

In conformity with general practice, we presented our draft findings and recommendations to the Director of NORMA, Chairman and Board of Directors of NORMA for comment.

We have provided copies of the final report to the President and Members of the Congress for their use and information. Other recipients include the FSM Vice President, all members of NORMA Board of Directors, Acting Secretary of the Department of Finance & Administration and Acting Secretary of the FSM Department of Justice. We will make copies available to other interested parties upon request.

If there are any questions or concerns regarding this report, please do not hesitate in contacting our Office. Contact information for the Office is listed on the last page of this report, along with the ONPA and staff who made major contribution to this report.



Haser Hainrick  
National Public Auditor

June 22, 2012

**Office of the National Public Auditor  
Audit on Management of Tuna Fisheries in the FSM  
Report No. 2012-03**

**ONPA CONTACT AND STAFF ACKNOWLEDGEMENT**

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**ONPA CONTACT:** Haser H. Hainrick, National Public Auditor  
Email: [hhainrick@fsmopa.fm](mailto:hhainrick@fsmopa.fm)

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**ACKNOWLEDGEMENTS** In addition to the contact named above, the following staff made key contributions to this report:

Haser Hainrick, Public Auditor  
Julinida Weital, Auditor-In-Charge  
Elina Paul, Staff Auditor

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