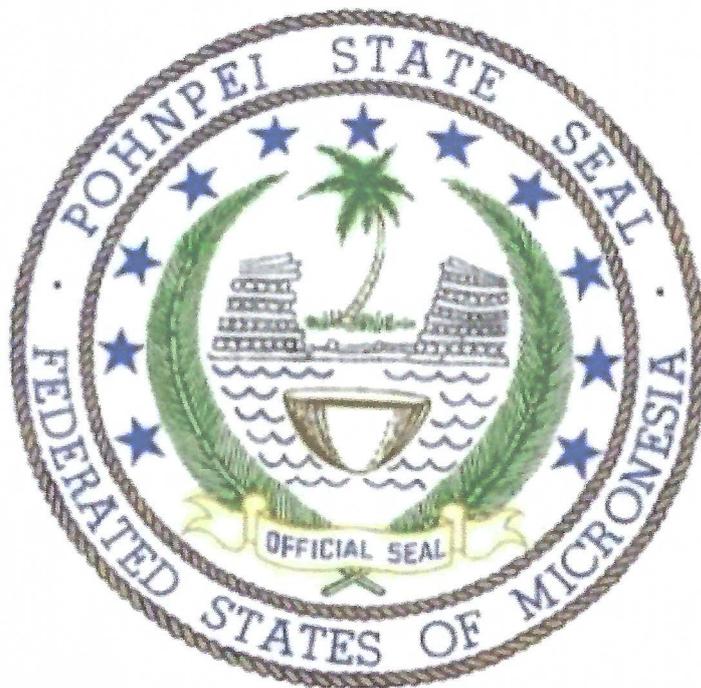


OFFICE OF THE PUBLIC AUDITOR
POHNPEI STATE GOVERNMENT
COMPLIANCE AUDIT OF EPA SOLID WASTE
MANAGEMENT

FISCAL YEAR 2024

AUDIT REPORT NO. 003-25



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**ENVIRONMENTAL PROTECTION AGENCY (EPA)
COMPLIANCE AUDIT OF SOLID WASTE MANAGEMENT
FISCAL YEAR 2024**

AUDIT REPORT NO. 003-25

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June 05, 2025

The Honorable Stevenson A. Joseph, Governor, State of Pohnpei
The Honorable Marvin T. Yamaguchi, Speaker, 11th Pohnpei Legislature
Honorable Members of 11th Pohnpei Legislature
Board of Directors, EPA
Mr. Francisco Celestine, Executive Director

RE: Compliance Audit Report No. 003-25 Solid Waste Management

EXECUTIVE SUMMARY

We are pleased to submit our compliance audit report of the Solid Waste Management for fiscal year 2024. Solid waste are garbage, refuse, and other discarded solid materials including solid waste materials resulting from industrial and commercial operations, and from community activities. The audit was performed in pursuant to Pohnpei State Law No. 1L-10-79, as amended.

Objective, Scope and Methodologies

The objectives of the audit were: (1) To review the legal and policy framework governing solid waste management practices; (2) To assess the implementation of the legal and policy framework; and, (3) To ensure that all parties are implementing and complying with policy framework. Our audit covered management of solid waste for FY-2024. As part of our audit, we followed up on prior year audit findings. To achieve our audit objectives, we reviewed applicable laws, regulations, established policies, procedures and practices, inspected certain sites and observed operation, interviewed relevant personnel, analyzed documents, reviewed prior audit findings, examined relevant documents, and performed other procedures as necessary to achieve the audit objectives.

Our audit was conducted in accordance with the generally accepted government auditing standards contained in the Government Auditing Standards issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate and relevant evidence to provide reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides reasonable basis for our findings and conclusions based on our audit objectives.

Results of Our Audit

The results of our audit: 1) Noncompliance with the FSM Public Law No. 21-73; 2) Noncompliance with certain State Laws and Solid Waste Regulations; 3) Management action plan for managing the

dumpsite is not effective, and 4) Repeated findings of prior year audit. We also observed that EPA is continuously improving the recycling of aluminum cans and removing of end-of-life vehicles from primary roads. However, the audit team noted that prior findings remain unresolved which will be discussed in detail in this report on pages 5 to 10.

Our Conclusion and Recommendation

The Environmental Protection Agency (EPA) established policy and legal frameworks as recommended in the previous audit, but these measures were not adequate to resolve prior year issues. Weak implementation has led to continued illegal landfilling and inadequate enforcement of waste management regulations. The dumpsite facility in Dekehtik lacks proper design, safety, and compliance with Solid Waste Management Regulations. We recommend that EPA collaborate with FSM National Government to enhance enforcement, implement legal waste management policies, and work with T&I to develop a public landfill that will be in line with the solid waste regulations. Strengthening cooperation and accountability is essential to ensuring sustainable solid waste management. We recommend management to take action to resolve prior year findings.

Other Significant Matters

We commend EPA management for providing opportunities in capacity building for its solid waste management staff. The staff provided several certificates that showed their participation and dedication to enhance their learning in their duties and responsibilities. We also commend EPA management for engaging with stakeholders that are willing to provide great ideas to help Pohnpei State improve in solid waste management.

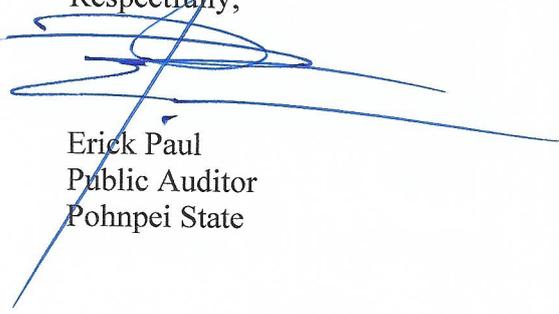
As is customary, we have discussed the draft audit report with EPA management and EPA Board of Directors and have requested for their response to our findings and recommendations. The response is included as an Appendix on pages 11 to 14 of this report. Additionally, our reply to the auditee's response is incorporated on pages 8 and 10 of this report.

The Pohnpei State Law No. 5L-08-00 as amended, requires the auditee to prepare and submit monthly report to the Public Auditor indicating corrective measures already taken or will be shortly implemented to clear the deficiencies cited in the report until the findings are satisfactorily resolved, which period shall not exceed one year. Accordingly, the first progress report from the EPA should be due around July 6, 2025.

In closing, we extend our sincere appreciation to the management and Board of Directors of EPA.

With warm regards, I remain.

Respectfully,



Erick Paul
Public Auditor
Pohnpei State

**POHNPEI ENVIRONMENTAL PROTECTION AGENCY
COMPLIANCE AUDIT ON SOLID WASTE MANAGEMENT
FISCAL YEAR 2024**

Introduction

We have completed an audit of the solid waste management activities of the Pohnpei Environmental Protection Agency (EPA). This audit also serves as a follow-up to the previous engagement conducted in 2010, addressing solid waste management practices.

The engagement was initiated by the Pohnpei Office of the Public Auditor (POPA) as part of its commitment to audit priorities identified in the Annual Audit Plan. Given the growing concern that solid waste management has become a pressing issue in various areas within Pohnpei, this audit aims to evaluate the current state of practices, compliance with regulations, and effectiveness of waste management strategies.

Background

Pohnpei Code Title 27 established the Pohnpei Environmental Protection Agency (EPA) with “power to protect the environment, human health, welfare and safety and to abate, control and prohibit pollution or contamination of air, land and water” among others. To fulfill its power and duty, EPA is directed by the law to establish related regulations, rules and policies over its activities, including solid waste management.

Solid waste management regulations are established for the purpose of setting minimum standards governing the design, construction, installation, operation, and maintenance of solid waste storage, collection and disposal systems. Such standards are intended to:

- Prevent pollution of the drinking water or waters of the State of Pohnpei;
- Prevent air and land pollution;
- Prevent the spread of disease and the creation of nuisances;
- Protect the public health and safety;
- Conserve natural resources; and,
- Preserve and enhance the beauty and quality of the environment.

The law also empowers EPA to collaborate with pertinent agencies for the protection of the environment. In line with the law, EPA entered into an understanding with Pohnpei Transportation and Infrastructure (T&I) in contracting a company or agency to manage the dumpsite in Dekehtik. EPA is required to conduct inspections at the Dumpsite Waste Facility in Dekehtik to determine if the agency or contractor operates in accordance to solid waste regulations. Then the Office of

Transportation and Infrastructure will conduct an oversight of the agency’s performance at the dumpsite to determine whether they are in line with the contract agreement. It is stated in EPA that bylaws that “the EPA is required to maintain accurate and complete financial records at its office. In practice, however, EPA’s finances are centralized and accounted at the Pohnpei Department of Treasury and Administration. Furthermore, funding for the operation of the Dumpsite Waste Facility is appropriated by Pohnpei State Legislature to the Office of Transportation and

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Infrastructure (T&I) under line item, solid waste management. T&I as Contractee, has the authority to request payment to the contractor selected to operate the dumpsite waste facility. The Division of Pollution Control within the Environmental Protection Agency is responsible for managing solid waste in Pohnpei.

Administration of Solid Waste

This division consists of two staff members, who not only oversee solid waste management but also handle earthmoving activities throughout Pohnpei. They conduct inspections and monitor solid waste management at the Dumpsite Facility, as well as in residential and commercial areas. For reporting, EPA submits their inspection reports of the Dumpsite Facility to the Office of Transportation and Infrastructure (T&I). The commercial and residential inspections are reported to EPA management and Board of Directors orally and not documented.

Audit Objectives

As part of this audit, we followed-up the status of the prior year audit findings. The result of our follow up is reported and the audit objectives were:

1. To review the legal and policy framework governing solid waste management practices;
2. To assess the implementation of the legal and policy framework; and,
3. To ensure that all parties are implementing and complying with policy framework.

We conducted our audit in accordance with the Government Auditing Standards issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate and relevant evidence to provide reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides reasonable basis for our findings and conclusions based on our audit objectives.

Audit Scope and Methodology

To accomplish the audit objectives, we performed the following audit techniques:

- Reviewed applicable laws, regulations, established policies, procedures and practices
- Inspected certain sites and observed operation to ensure they are being performed as specified and to assess compliance;
- Interviewed relevant personnel and other individuals, as appropriate;
- Analyzed, compared and tested records, data and documents
- Reviewed prior year audit findings;
- Examine relevant documents, such as policies, and compliance records to assess accuracy and adherence to regulations.
- Performed other procedures as necessary to achieve the audit objectives; and,

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The engagement included a review and assessment of related internal controls and compliance with laws and regulations over solid waste management activities for the fiscal year 2024.

Due to the unavailability of several relevant records and source documents, our audit follow-up procedures were limited and our judgments were only on observation and available records.

Prior Audit Coverage

The most recent audit of Solid Waste Management was conducted in year 2010. The audit was jointly undertaken by FSM Office of the National Public Auditor (FSM ONPA) and Pohnpei Office of the Public Auditor 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 audit showed that no singular agency has taken the lead in ensuring that progress continues in a timely manner. Furthermore, involvement of agencies at both the national and state levels create confusion over jurisdictional authority and project responsibility, and the fact that waste management involves both environmental and land use policy have hindered progress.

The conclusion of the 2010 audit cited that: (1) Unclear to determine whether the national Project Management Unit (PMU) for amended compact projects or Pohnpei State EPA is responsible for ensuring that landfill architectural and engineering design studies are completed; (2) Issues relating to jurisdiction, lack of expertise on the matter, competing priorities, and no specific projects have been implemented; and that, (3) no effective enforcement efforts are made to ensure storage of garbage at residential and commercial sites, that proper methods of transportation are used, or even that the treatment of hazardous medical waste is done in compliance with Pohnpei State Environment Protection Agency (EPA) regulations.

Our audit follow-up revealed the same problems concerning solid waste management remain unresolved. This is due to lack of corrective action plan in place to show the actions that they have taken to resolve the prior audit findings.

Audit Conclusion

The Environmental Protection Agency (EPA) has established policy and legal frameworks as recommended in the previous audit; however, there is more room for improvement as not all prior audit findings were resolved. Weak implementation of audit recommendations has led to continued illegal landfilling and inadequate enforcement of waste management laws and regulations and/or good practices. Also, the dumpsite facility in Dekehtik is not compliant with Solid Waste Management Regulations as to its design and safety matters.

We recommend that EPA collaborate with relevant agencies to enhance enforcement, implement solid waste management policies; and, identify and develop a public landfill that is in line with

**POHNPEI ENVIRONMENTAL PROTECTION AGENCY
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environmental laws and solid waste regulations. Strengthening cooperation and accountability is essential to ensuring sustainable solid waste management.

Management should prepare an effective corrective action plan to fully resolve our audit findings, including the prior year outstanding issues.

**POHNPEI ENVIRONMENTAL PROTECTION AGENCY
SCHEDULE OF FINDINGS AND RECOMMENDATIONS
FISCAL YEAR 2024**

FINDING NO 1: NONCOMPLIANCE WITH THE FSM PUBLIC LAW NO. 21-73

Criteria

FSM Congressional Act No. 21-73 prohibits the importation of one-time-use disposable Styrofoam and plastic food service items, and plastic shopping bags.

Condition

The audit team assessed five (5) businesses and discovered that four (4) of them were selling one-time-use disposable Styrofoam and plastic food service items. EPA has not implemented measures to ensure the FSM Act is complied with. Management claims that the law does not authorize EPA to enforce the provision. Management explained that the DECEM is drafting a Memorandum of Understanding between the four states of FSM and FSM Attorney General in order for all the states to enforce the law.



Cause

EPA is not ensuring that environmental laws applicable and beneficial to Pohnpei State are adopted and implemented. The management control is not effective to ensure that FSM laws are timely implemented.

Effect

The problem of non-biodegradable solid waste will persist. Conflicts between state and FSM laws will only impede the resolution process. The noncompliance with this law could lead to negative environmental impacts, including increased waste in landfills and waterways. It also poses potential legal and financial risks for the entities involved, including penalties or fines.

Recommendation

We recommend that Environmental Protection Agency (EPA) management take an active role in supporting, adopting and/or enforcing applicable environmental laws of the Federated States of

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Micronesia and Pohnpei State. Effective implementation or enforcement of the laws by the EPA will ensure compliance with the environmental regulations, good practices, and improve the environment of Pohnpei. The EPA can help facilitate public education campaigns to inform Pohnpei's residents about the public law, its requirements, and the importance of compliance for community health and environment.

Auditee Response: Please refer to Appendix pages 11 – 14.

FINDING NO. 2: NONCOMPLIANCE WITH CERTAIN STATE LAWS AND SOLID WASTE REGULATIONS.

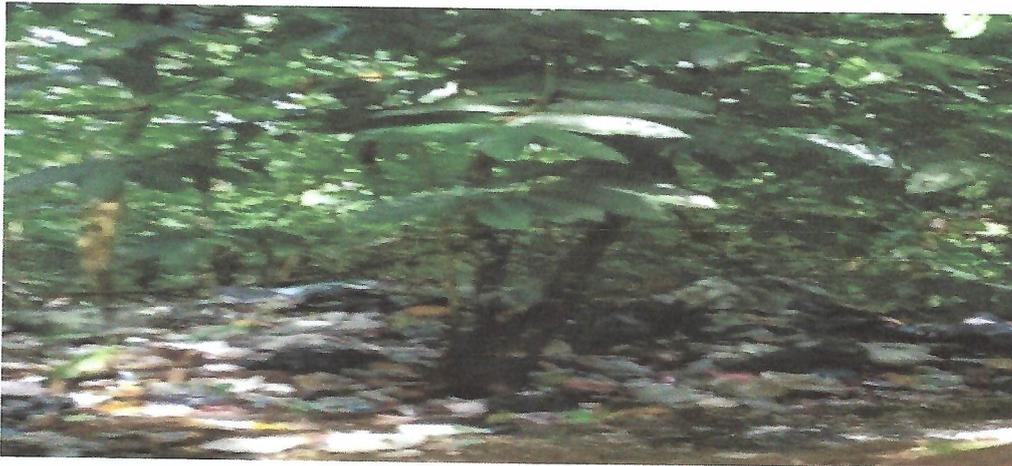
Criteria

- a) Chapter 1 Title 27 Section 112 of the Pohnpei Code states “Any person who violates or threatens any provision of this chapter, or of any permit, regulation, standard or order issued or promulgated hereunder, shall be subject to enforcement action by the Agency. Such enforcement action may include, but is not limited to issuance of an order to cease and desist from such violation, or to comply within a specific time period.
- b) Title 27 of the Pohnpei Code requires EPA to collect information, establish record-keeping, monitoring and reporting requirements. Regular inspections of commercial and residential properties are essential for ensuring compliance with local regulations, environmental standards, and public health requirements. Proper documentation of these inspections is crucial for accountability, transparency, and effective enforcement.
- c) Pohnpei State Law No. 3L-26-92 Part 5 Section on Collection: “Scavenging is prohibited at all times to avoid injury and to prevent interference with collection operations.”

Condition

- a) EPA management and Division of Pollution Control on solid waste management have not been issuing order to cease and desist to violators of Pohnpei environmental laws and ensure they comply within a specific period. EPA management however, had asked the Attorney General to make amendments to the regulation that will clearly state EPA having the authority to issue citations. EPA reports the violations to the Board of Directors and recommends the amount of fine for the violators.
- b) There was no documentation of the inspections conducted at commercial and residential areas. EPA solid waste management staff conducts inspections but only reports orally to EPA management. They did not make it a practice to document the inspections. Illegal landfill has become an issue all around Pohnpei and the solid waste management staff could not manage to stop it for some time now. The image on the next page shows a sample of illegal landfill.

**POHNPEI ENVIRONMENTAL PROTECTION AGENCY
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- c) EPA allows scavenging for certain items such as parts for equipment, machinery, etc., that particular individuals need or want. Solid Waste Management staff claimed that they logged the items that were scavenged but could not locate the logbook for fiscal year 2024.

Cause

- a) EPA management has not taken appropriate remedial action to ensure the provisions of laws and regulations are enforced and/or implemented.
- b) EPA has not established and implement suitable guidelines that would ensure documentation are done on residential and commercial inspections.
- c) EPA is not strictly enforcing its regulations on scavenging activities.

Effect

- a) By not taking appropriate action, the conditions will continue to hinder EPA from properly managing solid waste programs and related administrative activities.
- b) Ultimately, the number of violators including scavengers may continue to increase over time and without appropriate documentation, EPA would not have a critical tool for evaluating the effectiveness of its programs and for identifying areas for improvement.
- c) Furthermore, continuing noncompliance with laws and regulations can lead to significant environmental degradation and health risks for the community.

Recommendation

- a) We recommend management should revisit the Pohnpei Code Title 27 Part 1, Section 112 on enforcement and take necessary action to ensure implementation of the public law.

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SCHEDULE OF FINDINGS AND RECOMMENDATIONS
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- b) We recommend EPA management should establish guidelines and implement the provision to ensure that proper records are in place for all duties and responsibilities. We also recommend management should maintain comprehensive and accurate records of all inspections performed, including adequate details to support finding and facilitate actions to be taken, and follow-up measures.
- c) We recommend EPA management should strictly enforce the solid waste regulations on scavenging activities.

Auditee Response: Please refer to Appendix pages 11 – 14.

Auditor's Reply: Pohnpei State Law No. 3L-26-92 Part 5 Section on Collection states that “Scavenging is prohibited at all times to avoid injury and to prevent interference with collection operations”.

FINDING NO 3: MANAGEMENT ACTION PLAN FOR MANAGING THE DUMPSITE IS NOT EFFECTIVE

Criteria

According to Part 2 of the Solid Waste Regulations: “The purpose of these regulations is to establish minimum standards governing the design, construction, installation, operation, and maintenance of solid

waste storage, collection and disposal systems”. Therefore, management should have an effective action plan in place to guide operation and management of the dumpsite to ensure protection of public health and the environment. The action plan should also include proper training for personnel involved in waste management to ensure that they understand safety protocols, applicable regulations, and best practices for handling different types of waste.

Condition

Pohnpei Waste Management Services Incorporation encountered constant problems in managing the dumpsite facility in Dekehtik. There were repeat findings from EPA’s inspection reports on PWMS submitted to T&I, as follows:

- Second cell is always nearly full;
- Stockpile of junk cars and scrap metals are increasing and taking up space;
- Hazardous fire occurred at the dump site facility; and,
- Smoke still emits from the fire.

In addition, management of the dumpsite was not effective as a huge fire occurred on January 12, 2024, which until now, there is still odor and smoke emitting from the site. Many departments and offices of Pohnpei State Government collaborated to mitigate the fire.

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The images below show the hazardous fire on January 12, 2024 (left) and at the end of fieldwork on January 24, 2025 (right).



Cause

EPA management does not have an effective action plan in place to ensure engagement and operation of the dumpsite provide assurance in protecting human health and environment, including finding suitable contractor to manage the dumpsite facility in Dekehtik.

Effect

The dumpsite will continue to have issues and other hazardous activities harmful to the environment and may happen again without a comprehensive action plan (including corrective or remedial plan) in place.

Recommendation

We recommend EPA management should establish an effective action plan and collaborate with appropriate agencies to enable implementation of the plan. The action plan should be comprehensive to include measures and guidelines in operating and managing the dumpsite as well as monitoring and remedial actions.

Auditee Response: Please refer to Appendix pages 11 – 14.

FINDING NO 4: REPEATED FINDINGS OF PRIOR YEAR AUDIT

Criteria

The FSM Infrastructure Development Plan (IDP) serves as a comprehensive strategic plan to guide infrastructure in the FSM. The IDP identified a Minimization Study and Landfill Plan as two major planning activities that must occur to guide future actions aimed at replacing the existing dump with a landfill.

**POHNPEI ENVIRONMENTAL PROTECTION AGENCY
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Condition

EPA does not possess a Landfill Plan in writing. Pohnpei State Legislature proposed landfill areas in Madolenihmw and Palikir have not materialized due to land issues. The Dumpsite Facility in Dekehtik can no longer accommodate the storage of solid waste. In addition, Municipal Offices are not all collecting and disposing of solid wastes. In addition, coordination with the Municipal Governments is going slow hence, not all of them are collecting and disposing solid wastes properly.

Cause

The goals are yet to be achieved because there is no plan in place to guide management in dealing with issues hindering relocation of dumpsite (whether it is land issues or alternative areas for landfill).

Effect

The current dumpsite may spill and harm the environment of Pohnpei. The recurrence of these findings suggests that the Pohnpei Environmental Protection Agency have not fully addressed the recommendations from the prior audit. Inaction can hinder effective waste management efforts and diminish the agency's credibility in upholding regulations.

Recommendation

We recommend management should prepare an action plan and work with appropriate agencies in resolving the issues surrounding the current dumpsite.

Auditee Response: Please refer to Appendix pages 11 – 14.

Auditor's Reply: We accept your response and therefore, the statement is accurately reflected in this report.

Appendix

Management Response



Pohnpei Environmental Protection Agency

POHNPEI, FM 96941

FEDERATED STATES OF MICRONESIA

Tel: (691) 320-1780/1210

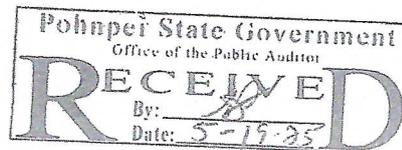
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Subj: Audit report response

Executive Officer
Francisco Celestine

Kaselehlie maing Mr. Paul. Ai tungoal wahu. I hope this letter finds you in good health.

The Pohnpei Environmental Protection Agency (EPA) appreciates the thorough audit conducted by the Pohnpei State Public Auditors' Office. We acknowledge the findings and recommendations provided in the audit report and would like to respond to each finding as follows:

Finding #1: Noncompliance with FSM Public Law # 21-73

Issue: The audit highlighted noncompliance regarding the prohibition of one-time use disposable styrofoam and plastic food service items, as well as plastic shopping bags.

Response:

To address this issue, we recognize that a Memorandum of Understanding (MOU) is essential to empower the Pohnpei EPA to collaborate with the Department of Environment, Climate Change & Emergency Management (DECCEM). This partnership will facilitate the enforcement and confiscation of prohibited items, as well as ensure their proper storage and destruction. Attached is the national auditor's report for your reference.

Finding #2: Noncompliance with State Laws and Solid Waste Regulations

Issue: The audit pointed out the Pohnpei EPA has not been issuing citations to violators.

Response:

Management is actively working with the Attorney General's Office and the State Legislature to amend existing laws. This amendment will enable the Pohnpei EPA and other relevant departments to issue citations effectively. Enforcement of litter regulations is a collaborative effort, as outlined in Title 16, Chapter 2 of the Pohnpei Code, and is not solely the responsibility of the EPA.

Regarding scavenging, we permit specific individuals to collect parts for vehicles, washing machines, and fishing nets for farming and road maintenance, under the supervision of the EPA. We recommend that these individuals return items when no longer needed for proper disposal. Records of authorized individuals collecting these items are now maintained, and we are compiling files for illegal landfill inspections. Once inspections and follow-ups are completed, hearings will be conducted by the EPA Board of Directors for penalties or warnings.

Finding #3: Lack of Corrective Action Plan

Issue: The audit noted that management does not have a corrective action plan.

Response:

The solid waste regulation serves as a comprehensive guideline for individuals, groups, businesses, and entities involved in solid waste management. Part 4 outlines the requirements, while Part 5 details collection procedures and safety measures. Our regulations provide the necessary framework.

Furthermore, the Pohnpei EPA is collaborating with the Department of Transportation and Infrastructure (T&I) and other offices to develop a new landfill design and rehabilitate the Dekehtik landfill.

Finding #4: Repeat Findings from Prior Year Audit

Issue: The audit reiterated previous findings regarding proposed landfill areas.

Response:

We would like to clarify that the proposed landfill areas in Madolenihmw and Sokehs were not proposed by the EPA; rather, they were designated by law through

the Legislature. We request that this distinction be accurately reflected in the audit report.

Conclusion

We thank you for your findings and recommendations. The Pohnpei EPA is committed to working collaboratively with all entities to enhance our duties and responsibilities. We appreciate your support in our efforts to improve environmental protection and compliance within Pohnpei.

Sincerely,


Francisco Celestine

