



The Independent Accountability Mechanism for IFC & MIGA

CAO ASSESSMENT REPORT

**Regarding Concerns in Relation to
IFC's Investment in Eleme Fertilizer-03/Port Harcourt
in the Federal Republic of Nigeria
(IFC 47723, 40420, 30967)**

December 2024

Office of the Compliance Advisor Ombudsman
for
the International Finance Corporation and the
Multilateral Investment Guarantee Agency
www.cao-ombudsman.org

About the Compliance Advisor Ombudsman (CAO)

The Office of the Compliance Advisor Ombudsman (CAO) is the independent accountability mechanism of the International Finance Corporation (IFC) and Multilateral Investment Guarantee Agency (MIGA), members of the World Bank Group. We work to facilitate the resolution of complaints from people affected by IFC and MIGA projects in a fair, objective, and constructive manner, enhance environmental and social project outcomes, and foster public accountability and learning at IFC and MIGA.

CAO reports directly to the IFC and MIGA Boards of Executive Directors. For more information, see www.cao-ombudsman.org

About CAO Assessments

Any person who believes they may be harmed by an IFC or MIGA project can lodge a complaint to CAO. We apply three simple eligibility criteria to accept a complaint. For eligible complaints, we assess the concerns with the complainant(s), project sponsor, and other relevant stakeholders.

Once a complaint is determined to be eligible, we review the concerns raised in it. This assessment is conducted in consultation with the complainant, IFC and MIGA client and project teams, and other relevant stakeholders.

Purpose

The objective of the CAO assessment process is to develop a thorough understanding of the issues the complaint raises, work to understand all perspectives, engage with all key stakeholders to the complaint, consult with them to determine the process they choose to address the complaint, and consider the status of other grievance resolution efforts made to resolve the issues raised. The CAO assessment process does not entail a judgment on the merits of the complaint; rather, it seeks to understand the facts and empower those involved to make informed decisions on how to address the issues raised.

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ACRONYMS

BIC	Bank Information Center
BOD	Biological Oxygen Demand
CAO	Office of the Compliance Advisor Ombudsman
CIA	Cumulative Impact Assessment
COD	Chemical Oxygen Demand
CSO	Civil Society Organization
E&S	Environment and Social
EHS	Environment, Health, and Safety
EIA Act	Environmental Impact Assessment Act of Nigeria
EPCL	Eleme Petrochemicals Limited
ERM	Environmental Resources Management International Group Limited
ESIA	Environmental and Social Impact Assessment
ESMPP	Environmental and Social Management and Monitoring Plan
ESMS	Environmental and Social Management System
ETP	Effluent Treatment Plant
FME _{env}	Federal Ministry of Environment
GBVH	Gender-Based Violence and Harassment
GMP	Grievance Management Procedure
HIA	Health Impact Assessment
IFC	International Finance Corporation
MIGA	Multilateral Investment Guarantee Agency
NNPC	Nigerian National Petroleum Corporation
SEGR	Stakeholder Grievance Response
SEP	Stakeholder Engagement Plan
TMP	Transportation Management Plan
WBG	World Bank Group

OVERVIEW

On May 30, 2024, a complaint was lodged with CAO by two Nigerian civil society organizations (CSOs), Greenleaf Advocacy and Empowerment Center and O-E'la Obor Eleme Organization (the General Assembly of Eleme People Worldwide), supported and advised by the Bank Information Center (BIC), on behalf of project-affected community members (collectively referred to as “the Complainants”). The complaint pertained to the environmental and social (E&S) impacts of the operations, and planned expansion, of Indorama Eleme Fertilizer and Chemicals Ltd. (Indorama).

Indorama Corporation has been a longstanding IFC client in several countries, with a global business presence in 35 countries in Asia, Africa, Europe, and the Americas. Indorama has two urea fertilizer facilities in Port Harcourt, Nigeria. In November 2023, the IFC approved a Category B loan to support the expansion of the production and transportation of chemical fertilizers. The most recent project is the focus of the complaint.

The Complainants alleged a number of E&S issues regarding inadequate community engagement and lack of information disclosure; adverse environmental impacts, particularly related to air pollution and water pollution; negative health effects resulting from the negative environmental impacts; labor-related gender discrimination; and other concerns.

CAO found the complaint eligible on July 30, 2024, and began its assessment process on July 31, 2024. During the assessment, both parties decided to proceed with a compliance process to address the issues raised in the complaint. As a result, the case is being transferred to CAO’s Compliance function for appraisal of IFC’s environmental and social performance related to the project.

CAO’s compliance appraisal will determine whether further investigation of IFC is warranted or whether CAO closes the case.

BACKGROUND

2.1 The Project

The Indorama Corporation, a holding company based in Singapore, is 26% owned by Indorama Eleme Petrochemicals Limited and 74% owned by Indorama Corporation. Over the last three decades, IFC has supported Indorama Corporation’s entry into high-risk markets, helping it grow from a mid-sized, domestically focused business into one of the world’s fastest growing petrochemical and fiber companies.¹

The Projects consist of two nitrogenous fertilizer complexes and the ongoing construction of a third complex in Port-Harcourt, Nigeria. In June 2016, Indorama completed a 1.4 million metric ton per annum (MMTPA) urea fertilizer facility, referred to as “Line 1” (IFC #30967).² In 2021, Indorama constructed a second urea fertilizer line located at the same site, referred to as “Line 2” (IFC #40420),³ which increased capacity from 1.4 MMTPA to 2.8 MMTPA. Indorama is currently constructing a third urea fertilizer line, referred to as “Line 3,” within the same complex as Lines 1 and 2, which will increase current capacity from 2.8 MMTPA to 4.2 MMTPA (IFC #47723).⁴ The cost of Line 3 is estimated at US\$1.25 billion. IFC is leading the debt financing package, which is comprised of (i) a US\$215.5 million IFC A loan; (ii) up to US\$940 million in

¹ <https://disclosures.ifc.org/project-detail/SII/47723/indorama-eleme-fertilizer-iii>

² <https://disclosures.ifc.org/project-detail/SPI/30967/eleme-fertilizer>

³ <https://disclosures.ifc.org/project-detail/SII/40420/eleme-fertilizer-ii>

⁴ Id, 2.

mobilization of B/parallel loans from commercial banks/development finance institutions, including available Trust Loans; and (iii) IFC B2 loans provided under IFC’s Managed Co-Lending Portfolio Program (MCP) of up to US\$94.5 million.⁵

The Projects are classified as Category B according to IFC’s Policy on Environmental and Social Sustainability.

2.2 The Complaint

The complaint was lodged with CAO on May 30, 2024, with the support of BIC, by the Greenleaf Advocacy and Empowerment Center and O-E’la Obor Eleme Organization (the General Assembly of Eleme People Worldwide), on behalf of members of the Eleme community who claim to be affected by the E&S impacts of the Projects.

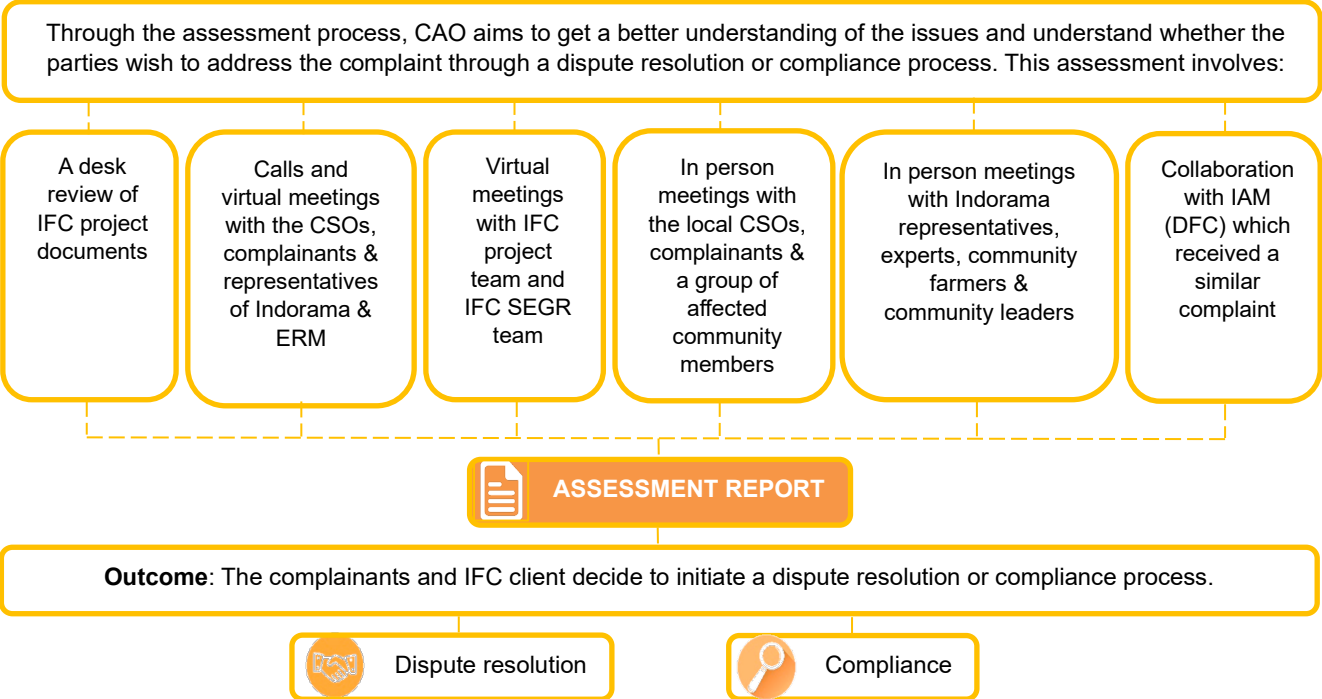
The Complainants raised several E&S issues related to the operations of the Projects. These issues include: (i) air pollution, (ii) water pollution, (iii) adverse health effects, (iv) inadequate stakeholder engagement, (v) employment discrimination against women, and (vi) additional concerns.

ASSESSMENT SUMMARY

3.1 Methodology

Figure 1 shows the approach and methodology to be applied in CAO’s assessment process.

Figure 1. CAO Assessment Process



The Complainants also submitted a similar complaint to the Independent Accountability Mechanism (IAM) of the International Development Finance Corporation (DFC). With permission from the parties, the CAO and IAM collaborated on a joint assessment process.

⁵ Idem.

The CAO assessment process does not entail a judgment on the merits of the complaint; rather, it seeks to understand the facts and empower those involved to make informed decisions on how to address the issues raised. The issues raised in the complaint and during assessment by the Complainants and IFC's client are described below.

3.2 Summary of Views

Complainants' perspective

The issues raised by the Complainants through their complaint and shared in-person with the CAO assessment team are explained below.

Air pollution

The Complainants alleged that there has been a significant increase in air pollution linked to the operations of the Projects. They attributed this to emissions from gas flares and other production-related activities, particularly from urea production, which they claimed releases strong, offensive odors across the area. They argued that the air quality has deteriorated noticeably since the Line 1 and 2 projects began and is going to worsen with the addition of Line 3.

The Complainants shared that community members have experienced a rise in respiratory irritation and discomfort. They attributed this to the air pollution from Indorama's projects, which they claimed negatively impacts their health, comfort, and ability to conduct daily activities in an environment they describe as increasingly uninhabitable.

Water pollution

The Complainants alleged that the Okulu River has been contaminated by toxic effluent waste discharged from the Projects. They expressed concern that this pollution has rendered the river unusable for drinking water, fishing, and irrigation, which is affecting livelihoods and threatening food security. The Complainants claimed that they have observed a stark decline in marine biodiversity and that fish and other aquatic life have nearly disappeared.

The Complainants further stated that the pollution of the Okulu River had also impacted the community's health. They added that the loss of this vital water source has disrupted traditional agricultural practices, leading to reduced crop yields and increased costs, as they are forced to seek alternative water sources, further diminishing their economic stability.

Adverse health effects

The Complainants alleged that pollution from the project had caused serious health problems within the Eleme community and had contributed to the decline of life expectancy in the community to less than 50 years. They alleged a rise in cases of dermatitis and other skin infections, chronic asthma, bronchitis, respiratory infections, hypertension, and impotency. They claimed that these conditions are directly tied to the polluted air and water sources. They further shared that woman reported an increase in miscarriages, premature deliveries, stillbirths, delayed pregnancies, and pelvic inflammatory disease, while malaria had reportedly become endemic. The Complainants claim that these health issues have been caused by the

increased population density near the project site and environmental pollution resulting from the Projects.

Inadequate stakeholder engagement

The Complainants expressed concern that Indorama has not adequately involved the community in preparing its Environmental and Social Impact Assessment (ESIA) documents, which they believe limits transparency and community input. The Complainants shared that they were neither consulted nor given meaningful opportunities to contribute to the ESIA process, which they view as critical for voicing local concerns and perspectives. Additionally, the Complainants alleged that Indorama did not provide avenues for community feedback on the ESIA, and that discussions and decision making took place behind closed doors, without sufficient community involvement.

The Complainants also raised concerns about the company's lack of data sharing regarding environmental impacts, particularly air pollution and effluent discharge data, which they say are withheld from the public despite repeated requests. They asserted that this data is essential for understanding potential health and environmental risks associated with the Projects. Furthermore, the Complainants noted that Indorama has either not conducted or not shared its Cumulative Impact Assessment (CIA) with the community, which they feel would promote greater transparency regarding the Project's broader environmental and social impacts on the region.

Employment discrimination against women

According to the Complainants, Indorama has failed to provide equitable employment opportunities for women. They claimed that, despite community interest, there is a significant gender disparity in hiring, with a small percentage of female hires in comparison to men. Those women who did secure employment described facing discriminatory practices, including disproportionate layoffs without pay, particularly during the COVID-19 pandemic. The Complainants asserted that these impacts had left women in the community without the means to support their families, leading to heightened rates of hunger and malnutrition, and an increase in children who could not attend school due to financial hardships.

Additional concerns

The Complainants raised several additional concerns, including the loss of livelihoods due to environmental degradation, increased traffic congestion and safety hazards from heavy equipment transportation, and allegations of reprisals against those who voiced opposition to the project. They asserted that community members had faced arrests, beatings, and even kidnappings, with women and youth being particularly vulnerable to such actions. The Complainants claimed that these acts of retaliation created a climate of fear, deterring individuals from expressing concerns about the Project's impacts on their community.

Company's perspective

Indorama's views on the issues raised in the complaint are expressed below.

Air pollution

Indorama stated they adhere strictly to air quality standards to minimize environmental impacts. According to Indorama, the ESIA demonstrated that emissions from the Projects fell

within ambient air quality standards set by both Nigerian and international guidelines, including specific thresholds outlined by the World Bank Group (WBG) and IFC Environmental, Health, and Safety (EHS) guidelines.

Indorama stated that they have put in place robust air quality management and monitoring systems. These include regular monitoring of stack emissions, on-site air quality stations, routine equipment maintenance to control fugitive emissions and limited gas flaring during startup, shutdown, and emergency. According to Indorama, these measures have helped reduced emissions from urea production. Indorama also explained that emissions of nitrogen oxides (NO_x) and particulate matter (PM) from the stack are closely monitored to stay within regulatory limits. Additionally, Indorama indicated that monthly air quality monitoring by accredited third-party consultants shows that average pollutant levels are below regulatory thresholds, with no expected health risks for residents in the surrounding area of the Project.

Furthermore, Indorama noted that detailed dispersion modeling confirmed that emissions from the Projects would not exceed health-protective thresholds or result in adverse air quality conditions for surrounding communities. They disagreed with the assertion that communities have suffered respiratory irritation and discomfort as a result of their operations.

Water pollution

Indorama expressed their compliance with national and international water quality standards for effluent discharges. They explained that they had invested in a state-of-the-art effluent treatment plant (ETP) designed to remove contaminants from wastewater before release. According to Indorama, this complies with, Nigerian, WBG, and IFC standards. Indorama shared that the ETP operated with a multi-stage treatment process, including chemical coagulation, biological treatment, and filtration, which effectively removed contaminants. They reported that monitoring results consistently demonstrated that treated effluent discharged into the Okulu River met regulatory limits, with chemical oxygen demand (COD) and biological oxygen demand (BOD) levels kept below regulatory thresholds, thus minimizing potential adverse impacts on aquatic life and human health. Indorama disagreed with the claim that their operations have made the Okulu River unusable for drinking water, fishing, and irrigation.

Indorama further explained that they used high-quality containment systems to prevent accidental discharges and conducted routine inspections and maintenance of wastewater storage facilities. According to their ESIA findings, Indorama noted, the Projects' impact on local water bodies was minimal. They further shared that they actively collaborate with the Federal Ministry of Environment (FMEnv), Rivers State Ministry of Environment (RSMEEnv), and other regulatory authorities and local environmental stakeholders by submitting quarterly water sampling results to verify water quality and ecological balance in the Okulu River.

In addition, Indorama reported that several studies were conducted to assess the Okulu River ecosystem. The company indicated that they hired local accredited environmental consultants and experts to collect and analyze samples of treated effluent and river water from various locations, which were then evaluated by independent accredited laboratories. According to Indorama, the findings show that the Okulu River has historically been unsuitable for drinking water and fishing, and it has never been a primary source of livelihood for local residents. The company stated that monitoring data indicated that the treated effluent is of higher quality than the river water and that its discharge does not harm the river's ecosystem. Instead, Indorama shared that extensive sand mining is identified as the main factor negatively affecting the river's environment. Furthermore, Indorama indicated that it is installing a Wastewater Recovery Plant (WWRP) to process treated effluents currently being discharged into the Okulu River. According to Indorama, the plant is expected to produce high-quality water that will be recycled back into the production process. Once the WWRP is commissioned, the discharge of effluents into the Okulu River is expected to decrease significantly.

Indorama also explained that farming in the region has historically relied primarily on rainwater rather than irrigation from the Okulu River, and hence, they disagree with the claim that their operations have caused communities to lose a vital water source for agriculture.

Adverse health effects

In response to health-related concerns, Indorama stated that they are in full compliance with stringent health and safety guidelines, including WBG and IFC EHS guidelines, to protect both workers and local communities. Indorama explained that their Health Impact Assessment (HIA) evaluated potential health impacts and found no significant health risks in the Projects' impact regions, as its operations have been managed under prescribed standards. Indorama y shared that they regularly engage with local healthcare providers to support health monitoring within the community. Preventive health screenings were reportedly offered to address potential health concerns.

Furthermore, Indorama stated that there has been an improvement in life expectancy in River State from 52.5 years in 2015 to 55.2 years in 2022, per the Demographic Statistical Bulletin 2022, NBS – National Bureau of Statistics, published in December 2023. They also shared that there has been a decline in the prevalence of diseases such as asthma, malaria, pelvic inflammatory disease, dermatitis, hypertension, and respiratory infections in the vicinity of its facility. They claim that health bulletins and hospital records indicate consistent decreases in these conditions over recent years and assert that there is no evidence linking increased industrial activity to adverse health outcomes. They noted that independent studies conducted by epidemiologists from the University of Port Harcourt corroborate these findings and, hence, disagree with the assertion that their operations have resulted in adverse health effects on the surrounding communities.

Additionally, Indorama shared that they have implemented a Grievance Management Procedure (GMP) as part of their Environmental and Social Management System (ESMS), offering a structured platform for residents to report health or environmental issues.

Inadequate stakeholder engagement

Indorama noted that they had developed a robust Stakeholder Engagement Plan (SEP) for the Line 3 project, as they did for Line 1 and 2, ensuring full compliance with both Nigerian regulations and IFC standards on inclusive, transparent engagement.

Indorama indicated that they started stakeholder engagement for the Environmental and Social Impact Assessment (ESIA) of the Line 3 Project in 2021, involving community leaders, youth, and women's groups in scoping workshops, public forums, and technical panel reviews to discuss impacts and gather feedback. The ESIA document was made publicly accessible at local government and environmental ministry offices with a 21-day comment period, supported by local media and radio announcements to ensure transparency and participation. The company said that the baseline data on air pollution, effluent discharge, and noise levels, conducted by accredited consultants, were shared during consultations, as per EIA Act requirements. Indorama further stated that it has completed the requirement of a Cumulative Impact Assessment and that this Assessment was shared, as per the ESIA process, with stakeholders, including project-impacted communities.

Indorama further shared that, since inception, they have established MOUs with six local communities, focusing on initiatives like preferential recruitment, skill acquisition for youth, microcredit for women, scholarships, contractor opportunities, and funding for projects such as schools, healthcare centers, solar water facilities, and streetlights. Engagement is managed through the Project Advisory Committee (PAC), which includes representatives from each host

community, local government, and state officials, ensuring constant communication through quarterly meetings and specialized subcommittees for employment, development, grievance handling, and scholarships. They stated that engagement efforts would continue throughout the project phases to ensure ongoing dialogue and responsiveness to community needs.

Regarding data on air emissions and effluent discharges, Indorama noted that they conducted continuous monitoring and submitted quarterly reports to the FMEEnv, which made this information accessible to the public. The company's Environmental and Social Management and Monitoring Plan (ESMMP) outlined these procedures, ensuring transparency in environmental performance and, in Indorama's view, demonstrating their commitment to compliance and community health.

Employment discrimination against women

Indorama disagreed with the claim that they have discriminatory practices against hiring of women. Indorama stated their commitment to fair and equitable employment practices, as outlined in their 2021 Non-Discriminatory Policy and Gender-Based Violence and Harassment (GBVH) Policy and Equal Employment Opportunity Policy, in line with Nigerian labor laws and IFC Performance Standards on non-discrimination.

Indorama indicated that they are promoting gender diversity in the workplace, aligning with objectives set in collaboration with the IFC to achieve a 12% target for women's representation. Indorama said that currently women make up 23% of its workforce. Indorama also refuted allegations of layoffs during the COVID-19 pandemic, asserting that no employees were laid off during that period. Indorama instead asserted that it actively recruited numerous employees for the Line 2 project and operations during the pandemic.

Indorama further disagreed with claims that its operations have negatively impacted women's ability to support their families or have prevented children from attending school. They asserted that there is no connection between its projects and these issues. Indorama stated that to support the well-being of women and children in the area, they have undertaken several Corporate Social Responsibility (CSR) initiatives to enhance education, including building schools and a state-of-the-art technical college, which is currently under construction.

Indorama also indicated that they launched an initiative promoting women's employment, which included technical skills training, career mentorship, and outreach to local communities to inform them of available opportunities. Indorama further shared that they provide annual support to women-led businesses through micro-grants to help them grow their businesses and thrive.

Additional concerns

Indorama disagreed with the allegations of loss of livelihood due to environmental degradation, traffic congestion, and reprisals, as claimed by the Complainants.

Indorama shared that they had taken measures to address potential traffic congestion, which includes the implementation of a comprehensive Transportation Management Plan (TMP). According to Indorama, the TMP included scheduling equipment transportation outside peak hours to avoid high-traffic times, using designated routes to reduce traffic on local roads, and coordinating with the Rivers State Ministry of Works to conduct repairs on any roads impacted by project-related vehicles. A Road Safety Impact Assessment reportedly identified high-risk areas, and Indorama collaborated with local authorities to install signage and improve traffic safety controls. As part of TMP, Indorama further stated that a new 10.5 km dual carriage road has been constructed, bypassing communities located close to East-West Expressway, thereby helping to address potential traffic issues.

Indorama rejected allegations of reprisals related to the Projects, stating that they are unaware of any objections from individuals within the project impact area, making the issue of reprisals unfounded. The company indicated that they comply with the Public Forums and Technical Panel Review requirements outlined in the EIA Act of the Federal Republic of Nigeria. They explained that their grievance mechanism allowed community members to voice issues anonymously if needed, and all concerns were reviewed by an independent committee. Indorama shared that they maintain open communication with local leaders through regular community meetings to address concerns and promote trust. Indorama also asserted that no arrests or assaults have occurred at its direction or by anyone acting on its behalf before, during, or since the project phase.

ASSESSMENT CONCLUSION

During the assessment, both parties decided to proceed with a compliance process to address the issues raised in the complaint. As a result, the case is being transferred to CAO's Compliance function for appraisal of IFC's environmental and social performance related to the project.

CAO's compliance appraisal will determine whether further investigation of IFC is warranted or whether CAO closes the case.

APPENDIX A. CAO COMPLAINT-HANDLING PROCESS

Once CAO declares a complaint eligible, an initial assessment is carried out by CAO Dispute Resolution specialists. The purpose of CAO's assessment is to: (1) clarify the issues and concerns raised by the complainant(s); (2) gather information on how other stakeholders see the situation; (3) help stakeholders understand the recourse options available to them and determine whether they would like to pursue a collaborative solution through CAO's Dispute Resolution function or whether the case should be reviewed by CAO's Compliance function.

As per the IFC/MIGA Independent Accountability Mechanism (CAO) Policy,⁶ the following steps are typically followed in response to a complaint that is received:

Step 1: **Acknowledgment** of receipt of the complaint.

Step 2: **Eligibility**: Determination of the complaint's eligibility for assessment under the mandate of CAO (no more than 15 business days).

Step 3: **Assessment**: Assessing the issues and providing support to stakeholders in understanding and determining whether they would like to pursue a consensual solution through a collaborative process convened by CAO's Dispute Resolution function or whether the case should be handled by CAO's Compliance function to review IFC's/MIGA's environmental and social due diligence. The assessment time can take up to a maximum of 90 business days, with the possibility of extension for a maximum of 30 additional business days if after the 90-business day period (1) the parties confirm that resolution of the complaint is likely; or (2) either party expresses interest in dispute resolution, and there is potential that the other party will agree.

Step 4: **Facilitating settlement**: If the parties choose to pursue a collaborative process, CAO's Dispute Resolution function is initiated. The dispute resolution process is typically based on or initiated by a Memorandum of Understanding and/or mutually agreed-upon ground rules between the parties. It may involve facilitation/mediation, joint fact finding, or other agreed resolution approaches leading to a settlement agreement or other mutually agreed and appropriate goals. The major objective of these types of problem-solving approaches will be to address the issues raised in the complaint, and any other significant issues relevant to the complaint that were identified during the assessment or the dispute resolution process, in a way that is acceptable to the parties affected.⁷

OR

Compliance Appraisal/Investigation: If the parties opt for an investigative process, the complaint is transferred to CAO's Compliance function. The complaint is also transferred to the Compliance function when a dispute resolution process results in partial or no agreement. At least one complainant must provide explicit consent for the transfer unless CAO is aware of concerns about threats and reprisals. CAO's Compliance function reviews IFC/MIGA's compliance with environmental and social policies, assesses related harm, and recommends remedial actions where appropriate following a three-step process. First, a compliance appraisal determines whether further investigation is warranted. The appraisal can take up to 45 business days, with the possibility of extending by 20 business days in exceptional

⁶ For more details on the role and work of CAO, please refer to the IFC/MIGA Independent Accountability Mechanism (CAO) Policy: <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/889191625065397617/ifc-miga-independent-accountability-mechanism-cao-policy>

⁷ Where stakeholders are unable to resolve the issues through a collaborative process within an agreed time frame, CAO Dispute Resolution will first seek to assist the stakeholders in breaking through impasse(s). If this is not possible, the Dispute Resolution team will inform the stakeholders, including IFC/MIGA staff, the President and Board of the World Bank Group, and the public, that CAO Dispute Resolution has concluded the dispute resolution process and transferred it to CAO Compliance for appraisal.

circumstances. Second, if an investigation is warranted, the appraisal is followed by an in-depth compliance investigation of IFC/MIGA's performance. An investigation report will be made public, along with IFC/MIGA's response and an action plan to remediate findings of noncompliance and related harm. Third, in cases where noncompliance and related harm are found, CAO will monitor the effective implementation of the action plan.

Step 5: **Monitoring and Follow-up**

Step 6: **Conclusion/Case Closure**

Figure 2. Compliance Process Flowchart

