



STANDING COMMITTEE ON PUBLIC ACCOUNTS

Review of the Performance Audit on the Licensing and Monitoring of River Gravel and Sand Extractions



PARLIAMENT OF THE REPUBLIC OF FIJI
Parliamentary Paper No. 87 of 2022

August 2022

Published and printed by the Department of Legislature, Parliament House, Government Buildings, Suva

TABLE OF CONTENTS

CHAIRPERSON'S FOREWORD	3
COMMITTEE MEMBERS.....	4
INTRODUCTION	5
GENERAL RECOMMENDATIONS.....	7
KEY FINDINGS.....	8
1. ASSESSMENT OF POTENTIAL RIVER GRAVEL AND SAND EXTRACTION SITES.....	8
2. LICENSING SYSTEM FOR EXTRACTING RIVER GRAVEL AND SAND.	9
3. MONITORING OF EXTRACTION OPERATIONS.....	22
SUSTAINABLE DEVELOPMENT GOALS	29
CONCLUSION	30
APPENDICES.....	32
APPENDIX 1	33
APPENDIX 2	34

CHAIRPERSON'S FOREWORD

This report follows the Report of the Auditor General of the Republic of Fiji – the Performance Audit on the Licensing and Monitoring of River Gravel and Sand Extractions. The report summarises the Committee review findings, highlights the audit issues that were raised with responses from the Ministry of Lands and Mineral Resources and the Committee recommendations.



The primary objective of the audit that was carried out by the Office of the Auditor General was to determine whether the Ministry of Lands and Mineral Resources (MLMR) effectively regulates the river gravel and sand extractions through a proper system of contracting/licensing and monitoring in order to ensure good governance and sustainable development in the sector. River gravel and sand extractions fall under the extractive industries

sector in Fiji, in addition to mining, petroleum, hard rock quarrying and ground water resource extractions. Extractive industries consists of any operations that remove oil, gas, metals, minerals and aggregates from the earth and or sea. The seven (7) steps of extractive industries value chain includes, Legal Framework, Resource Exploration, Awarding of Contracts & Licenses, Monitoring of Operations, Collection of Revenue, Resource Management and the Implementation of Sustainable Policies.

Development minerals play a major role in Fiji's domestic development, especially in the areas of infrastructure, construction of buildings, road construction, agriculture and disaster reconstruction, as well as supporting a large number of Fijian small and medium-sized domestic enterprises.

The mining and quarrying of development minerals in Fiji are dominated by crushed aggregate, gravel and sand, used for construction materials, and to lesser extent limestone, used for agricultural purposes.

It was noted that poorly regulated development minerals industry can contribute heavily to over-exploitation of river gravel and sand, increased unregulated/illegal extraction resulting in the under-estimation of the industry's output and its contribution to Fiji's economy. Furthermore, increased unregulated/illegal extractions could also lead to significant environment degradation due to operations not being monitored and even threatening future sustainability of the industry.

Most importantly, more consultations and collaboration is needed between MLMR with other relevant stakeholders to address ongoing issues that were raised. Overall, we commend the work done by the Ministry of Lands and Mineral Resources in addressing majority of the issues that were highlighted in the audit.

I also wish to extend my appreciation to all the Honourable Members of the Committee who were part of the successful compilation of this bipartisan report namely Hon. Joseph Nand (Deputy Chairperson), Hon. Ro Teimumu Kepa, Hon. Virendra Lal and Hon. Aseri Radrodro. I also extend my appreciation to Hon. Mikaele Leawere who stands in as an alternate member as pursuant to Standing Order 115 (5).

A handwritten signature in blue ink, appearing to be 'Alvick Avhikrit Maharaj', written in a cursive style.

Hon. Alvick Avhikrit Maharaj
Chairperson

COMMITTEE MEMBERS



**Hon. Alvick Avhikrit Maharaj
(Chairperson, Government MP)**



**Hon. Joseph Nitya Nand
(Deputy Chairperson MP)**



**Hon. Aseri Masivou Radrodro
(Opposition MP)**



**Hon. Ro Teimumu Kepa
(Opposition MP)**



**Hon. Virendra Lal
(Government MP)**

INTRODUCTION

The Performance Audit on the Licensing and Monitoring of River Gravel and Sand Extractions was tabled in Parliament on 2nd December, 2021 and referred to the Standing Committee on Public Accounts, for its scrutiny.

Standing Order 109 (2) (d) allows Standing Committee on Public Accounts to examine the accounts of the Government of the Republic of Fiji in respect of each financial year and reports of the Auditor-General, and for any other matter relating to the expenditures of the Government of the Republic of Fiji or any related body or activity (whether directly or indirectly) that the committee sees fit to review.

Standing Order 110(1)(c) authorises the Standing Committee to *scrutinise the government departments with responsibility within the committee's subject area, including by investigating, inquiring into, and making recommendations relating to any aspect of such a department's administration, legislation or proposed legislative program, budget, rationalisation, restructuring, functioning, organisation, structure and policy formulation.*

COMMITTEE PROCEDURE

The Novel Coronavirus Disease renamed as COVID-19 was declared by the World Health Organisation as a global pandemic on 11 March 2020. The Parliament of the Republic of Fiji therefore undertook necessary health precautionary measures to control the spread of the new virus strand outbreak.

In view of the above, Standing Order 112 (1) (b) provides powers to the Standing Committee on Public Accounts to compel the production of documents or other materials or information as required for its proceedings and deliberations.

In this regard, the Committee requested for written responses from the Ministry of Lands and Mineral Resources on the audit issues that were raised and after reviewed the responses received it was agreed that the Ministry to have a face to face public hearing session with the Committee. Therefore, on 8th June 2022, the MLMR appeared before the Committee and presented it responses on the questions that were posed to them in relation to the performance audits that were undertaken on the Licensing and Monitoring of River Gravel and Sand Extractions.

BACKGROUND

The Committee noted that Fiji's 5 year & 20 year National Development Plan (NDP) expresses the need to revise and update the monitoring and evaluation of mining and quarrying operations for better oversight, in areas such as environment safeguards.

River gravel and sand extractions are forms of mining, yet gravel and sand are absent from the definition of minerals under Fii's Mining Act 1965, for it to be considered a mining activity. With this restriction, the extraction of gravel and sand from rivers is regulated through the States Lands Act 1945 and the Rivers and Streams Act 1880 and its subsequent regulations. Gravel and sand have often been termed as development minerals.

(Franks, Pakoun, Ngonze, 2016) provides a general definition of development minerals which has been adopted in the UNDP 2018 baseline assessment report of Fiji's development minerals. Development

minerals are minerals and materials that are mined, processed, manufactured and used domestically in industries such as construction, manufacturing and agriculture.

The UNDP 2018 baseline assessment report is the product of Fiji's first ever comprehensive assessment of development minerals in Fiji. The study has identified, amongst other issues, significant and acute negative social impacts associated with river gravel and sand extraction operations.

Despite these negative impacts, which have been supported by sufficient anecdotal evidences, there is still an increase of river gravel and sand extractions. These include regulated and unregulated extractions. These include regulated and unregulated extractions. These surges in river extractions have been impelled by the demand for sand and gravel for both domestic and international markets. International trade of gravel and sand resources are mostly done with neighbouring island nations.

GENERAL RECOMMENDATIONS

- 1. The Committee notes the gender parity in the Senior Management of the Ministry of Lands and Mineral Resources ('MLMR') and commends the Ministry for fulfilling Sustainable Development Goal (SDG) 5 – Gender Equality.**
- 2. The Ministry to transform manual record keeping to electronic centralised database system for all rivers/streams and resources.**
- 3. The current fees levied by MLMR need to be reviewed and brought on par to what is being paid by the extractors of river gravel on iTaukei land.**
- 4. The MLMR should consider digital technologies for monitoring purposes such as Drones.**
- 5. The MLMR in conjunction with Itaukei Lands and Fisheries Commission ('ITLFC') should conduct regular trainings and workshops on financial literacy and resource management for resource owners.**
- 6. The MLMR should carry out awareness programmes with landowners on the impact of river gravel and sand extractions to the environment targeting SDG 15 – Life on Land.**
- 7. The MLMR should expedite the finalisation of the two Manuals, namely the River Gravel Extraction Guideline and the National Development Mineral Policy Guideline that are yet to be finalised.**

KEY FINDINGS

1. ASSESSMENT OF POTENTIAL RIVER GRAVEL AND SAND EXTRACTION SITES

This section deals with the assessment process of potential river gravel and sand extractions with respect to database maintenance which is done prior to receiving applications for extractions.

Theme 1: Database for Potential river gravel and sand extraction sites.

Audit Opinion

The audit report noted that though there is a centralized information system in place for the MLMR, however, there is no centralized database for potential river gravel and sand extraction sites.

Governance issue:

The audit report highlighted that all rivers are assumed to have gravel, thus all rivers are potential extraction sites. Therefore, there are currently no processes in place to pre-determine whether gravel from a particular river is viable for potential extraction. Decisions for extractions are entirely based on whether to approve or decline an application for license to extract which is received by the MLMR through Department of Lands. Pre-requisites for approval are based on provisions of inter alia, approved EIA Reports, Rock Resource Assessments, and Volumetric Assessments.

Root cause:

The audit also noted that there is no database because there is currently no data available with the MLMR for all current and potential river gravel extraction sites.

Response from the Entity: the audit noted that there are discussions on conducting a baseline survey for the river systems in Fiji. The survey would involve collection of information on individual river systems and the resources available in the river. Further, MLMR responded to the findings and agrees to the recommendation made but stated that carrying out a mineral investigation project or baseline survey for river gravel and sand will require funds and human resources.

Audit Recommendation:

1. *The MLMR should consider collating information for all rivers gravel and sand extraction sites including potential sites and also keeping database detailing this information which is linked to a National Land Use Plan.*

2. LICENSING SYSTEM FOR EXTRACTING RIVER GRAVEL AND SAND

This chapter looks at the effect of the huge demand for river gravel and sand, with the likelihood of consequential rise of over- exploitation and illegal extractions. This chapter also examines whether the Ministry of Lands and Minerals Resources (MLMR) manages and administers the licensing process in an effective and efficient manner in compliance with applicable procedural guidance's.

Theme 1: Demand Pull for River Gravel and Sand

Audit Opinion

The considerable number of river gravel and sand extractions is impelled by the excessive demand for gravel and sand materials. Consequently, there is sufficient evidence to confirm the significant negative environmental and social impacts of these extractions. The planned and systematic transition from the river gravel and sand extractions to a network of hard rock quarries would, therefore, be more environmental undertaking, considering the impacts of river extractions.

The Audit highlighted strong evidence to indicate the significant negative impacts of river extractions at the social and environmental levels. Further, noting the implications of river gravel and sand extractions, and the increased number of extractions being carried out. These include regulated and unregulated extractions.

Regulated extractions are those companies/individuals operating with valid licenses while unregulated extractions are those companies/ individuals who are extracting blatantly without a license. Unregulated extractions also include companies/individuals who are extracting with expired licenses. Unregulated extractions are deemed illegal.

Governance issues:

According to the UNDP 2018 baseline assessment report of Fiji's development minerals, it noted 30 unregulated extraction sites (Figure 4.20). From the 30 unregulated extraction sites, 27 (or 90%) were river gravel extractions which 2 were unregulated soft rock quarries and 1 was unregulated hard rock quarry.

The audit noted that there are companies, though operating under a valid license, extract beyond the approved volume (as per EIA). Furthermore, the audit noted that over extractions under valid license requires a penalty which is still being considered for discussions with SG's Office. The MLMR further clarified that what is being sought from SG's office is advice on whether the MLMR can charge an additional penalty for the volume of gravel which is over extracted because current practice by the MLMR can be seen as too lenient.

The audit highlighted that addressing unregulated extractions is a challenge, as they do not have any policy in place to penalize offenders. Further it is noted that while proposals have been discussed, they have been advised by the SG's Office that they can only penalize offenders under the penal code or refer them to DoE under the Environment Management Act (EMA) 2005.

Further, the legal engagement is established with a license holder through the approved license conditions, yet it is a setback for the MLMR when dealing with those extracting without valid licenses because legal

engagement does not exist due to absence of a valid licences. Therefore, the MLMR advised, that current practice have compelled them to report matters of illegal extractions to other agencies who have powers to penalise such as the DoE if they breach an environmental condition or to the Police under the penal code.

The audit report clarified that the limitation of imposing penalties for illegal extractors who do not hold valid licenses, emerges from restrictions in the legislation surrounding river gravel and sand extractions. The MLMR noted that legislation does not have a prosecution clause which can be used to penalized offenders. On the other hand, the MLMR elaborated that, if river gravel and sand were regarded as minerals under the Mining Act, the MLMR through the DMR would have the legal backing to legalize offenders.

Root Causes:

The former Minister of Lands and Mineral Resources in August 2019 noted *that “illegal extraction of sand and gravel from all divisions in the country is mainly because of the increasing demand by the construction industry for roads and infrastructure.”*

The UNDP 2018 baseline assessment report of development minerals in Fiji identifies the following activities as composing of Fiji's demand profile:

- Transport infrastructure development;
- Concrete manufacturing; and
- Export of aggregates;

The Audit noted that Fiji's transport infrastructure development and concrete manufacturing constitutes the internal demand pull for development minerals (namely aggregates such as gravel and sand sourced from rivers as well as aggregates sourced from hard rock). On the other hand, exports of aggregates make up the external demand pull for aggregates.

The audit highlighted that the demand for river gravel and sand are further attributed to two main reasons:

1. It is the cheaper option compared to set up costs for hard rock quarries; and
2. Delayed commitments on the development of a detailed implementation plan and programme of works to support the development and transition to a network of hard rock quarries in strategic locations.

Response from the Entity: The MLMR does recognize that illegal extractions is a growing concern and they have proposed addressing this through many forums including:

- Bringing awareness to the local and remote communities through consultations with the various Provisional Roko's and Administration. This will include public awareness on the legality and processes of river gravel and sand extractions, as in some instances, the community have entered into illegal arrangements by allowing extractions without the Director of lands (DL's) approval.

- Commencing discussions with the Fiji Police Force in securing assistance to monitor these illegal extractions. The MLMR hopes to enter into an Agreement with the Fiji Police Force once the borders open with Police resuming normal operations due to the current COVID 19 pandemic.
- Sending data of valid licenses to the above mentioned parties with the consensus that any activity these licenses are deemed illegal and should be stopped.

Audit Recommendation:

The MLMR should strongly consider the recommendation presented in the UNDP 2018 baseline assessment report of Fiji's development minerals. The report recommended that:

- 1. The MLMR should undertake a programme of works to support the development of a network of hard rock quarries in strategic locations, considering the holistic demand for development minerals in Fiji. This programme should consider, as proposed in the baseline assessment report, government incentives and improving access to finance.*
- 2. The Government of Fiji should develop a detailed implementation plan for the phasing out of river gravel extraction, with the exception of certain areas where it is beneficial to Fijian communities (supported by thorough scientific studies) or is small scale and the transition to a network of hard rock quarries in strategic locations.*

Theme 2: Well defined and maintained procedural guidance

Almost most of the procedural guidance for approving extraction license application are clear and relevant, exceptions were noted, with significant one being, the absence of key procedures in the standard operating procedures. Hence, a structured review process is warranted, clearly indicating when and who to review, approve and maintain the standard procedures.

Extraction license approvals are carried out in accordance with established procedural guidelines set out in the standard operating procedures (SOPs). Apart from consistency with governing legislations and regulations (discussed in detail in theme 3 below), procedures should be adequate to guide the work of staff in a logical manner. It should also be well maintained.

The Auditors were provided with the following SOPs relating to the extraction of river gravel and sand:

- Extraction licenses for sand, lime and common-stone
- Receiving of river sand and gravel extraction files; and
- Receiving of illegal river sand and gravel extraction complaints.

Further the Audit examined whether the standard operating procedures were adequate and appropriately maintained.

Governance issues:

Are standard procedures adequate?

Procedures should be well defined, covering all decision points and clearly defining roles and responsibilities. The audit assessed whether SOPs were sufficient to guide the processing of new and renewal applications. The audit specifically examined (Table 4.2) whether the standard procedures were clear; complete' and relevant.

The audit found that all the SOP's to be relevant, however noted that the SOP for "*extraction licenses for sand, lime and common-stone*" is incomplete. The SOP lacked procedural guidance for:

- Renewal of license given the need for annual renewals required under *Regulation 29 of the state Land (leases and licenses) regulation 1980*;
- Joint inspection (when applicable) with i-Taukei Land Trust Board(i-TLTB) to ensure that the correct license issuer is identified(i.e., i-TLTB issuer for gravel and sand extracted on dry pit and MLMR's Department of Lands issuer for gravel and sand extracted directly from the river); and
- Consent by the Land Owing Unit (LOU) for road access to the extraction site.

Are standard procedure appropriately maintained?

To ensure that procedures remain appropriate over time, structured arrangement for its review should be maintained. These arrangements would include determination of when the procedures are to be reviewed and who is responsible for their approval and maintenance.

While acknowledging the need to review the SOP, the audit noted that the MLMR lacks a structured approach to the review process.

Root cause:

The MLMR have generally agreed with the audit observations, though, noting that they have preferred the use of checklists. The checklist have allowed them to make changes, by simply inserting and excluding documents where necessary. The Audit noted that not having certain processes in the SOP must not be taken as it not being done. They usually came in the form of official instructions through verbal or other means. This is made the use of checklists more appealing because review of standard procedures is done over time.

The audit noted that there is a general understanding that checklists simply list the documents to be submitted with an application, whereas SOPs capture the departmental operations as well. For example, the endorsing and approving officers etc. Nonetheless, MLMR is committed to amending the SOP's as much as they can in the review process.

Response from the Entity: The MLMR in their response, stated that the SOP's are open to review but are usually standardized once adopted. The MLMR further noted that the recent reviews to the SOP were being carried out in 2020, hence, the SOP currently being used, is the reviewed version.

The MLMR stated that checklists are to be strictly followed and any deviation will need the approval of the Honourable Minister.

Audit Recommendation:

The MLMR should:

- *Expedite the amendments and review of its SOPs so that processes have more clarity and procedures that are lacking, are incorporated ; and*
- *Consider developing a structured review process for its procedural guidance.*

Theme 3: Requirement of legal infrastructure supported by standard procedures

Consistency in regulatory decision-making depends on procedural guidance which are consistent with requirements of governing legislations and regulations. However, it was noted that procedures for servicing extraction of river gravel and sand do not fully represent the requirements of the governing legislations.

The legal architecture governing the licensing process (as indicated in Figure 4.34) is provided for in legislation, regulations, procedural guidance, and license contracts, consistent with the legal hierarchy suggested by the Natural Resources Governance Institute.

The Audit noted that while the main legislation governing river gravel and sand extraction are the *State Act 1945, Environment Management Act 2005 and Rivers and Streams Act 1880*, regulations for the same are provided for in the *State Land (Leases and Licenses) Regulations 1980*. The audit report added that procedure should be consistent with relevant legislative and regulatory requirements.

The Audit assessed whether the provisions of the governing legislation and regulation relevant to the extraction of river gravel and sand were captured in the procedural guidance for DoL.

Governance issue:

The audit noted that 47% of the relevant provisions were included in the SOPs of MLMR, and 17 (or 45%) provisions were not found or not fully captured in the standard procedures. The audit determined that seven of the 17 provisions are critical procedures that need to be laid out in the standard procedures. These include:

- DoL as the approving authority to determine whether the extraction needs an EIA;
- Extraction license renewal process given that licenses are to be renewed annually, if proponents require extensions;
- Fees in arrears in respect of license (pertains to two sub-sections), i.e. Section 15 of the State Lands Act 1945 and Regulation 34 of the State Lands (Leases and Licenses) Regulations 1980.
- Proceedings to be brought in the name of the Attorney General; and
- Dealings with a licensee who has sold, transferred, sub-licensed or in any other manner, without the consent of the Director of lands as licensor, i.e. Section 16 of the State Lands Act 1945 and Regulation 33 of the State Lands (Leases and Licenses) Regulations 1980.

The Audit also noted that procedure in the SOPs as not being consistent with the State Lands Act 1945. In addition the standard procedures stated that *'license to be revoked if returns are not submitted within three (3) consecutive months.'* While the governing legislation (that is State Lands Act 1945) noted that

the license to a person can be rescinded if the person fails to execute that license within six (6) months of the service of notice that such lease or license is ready for execution.

Root causes:

The Audit noted that discussion with MLMR noted that since the coming to effect of the SOPs for license processing, it has not been holistically reviewed. There was also indication that under theme 2 above, the MLMR have preferred the use of checklists when receiving applications for extractions as it is easier to include documents for proponents to submit, depending on the situations to each applications.

Response from the Entity: The MLMR, noted that DoL issues licenses to licensees who may enter into agreements with contractors where arrangement are captured under sublicenses.

These arrangements, the MLMR noted needs the consent of the Director of Lands in which contractors are required to pay a performance bond.

Audit Recommendation:

The MLMR should expedite the review of the SOPs ensuring that they are consistent with the governing legislation and its regulations.

Theme 4: Business and Information Systems

In the absence of a centralized place/site which captures all regulatory processes, information is scatters across a range of agency/divisional silos. Although talks have surfaced on a “One Stop Shop” concept, it has remained on the discussion table without any definite plan of becoming a reality.

The most of relevant and primary source of procedural guidance for the administration and management of the licensing process is the *MLMR’s Department of Lands (DoL) SOP for Extraction licenses for sand, lime and common-stone.*

The procedural guidelines identified key agencies whose endorsements and approvals were pre-requisites to the approval of extraction license applications. The agencies have different responsibilities and lines of accountability. As such, best practice suggested by the Natural Resource Governance Institute (NRGI) propose the presenting of system information in a joined-up manner.

Governance Issue:

The NRGI acknowledges that government agencies will continue to exist and function as separate entities with their own legislation, resources and lines of responsibility. However, this should not preclude all concerned agencies from coordinating to present information in a way that supports a coherent and orderly flow of information about the administrative processes of river gravel and sand extractions.

The Audit noted that there is no publicly available and centralized place/site where key information on regulatory agencies with responsibilities for administering extraction projects can be accessed.

In addition, multiple divisions within MLMR have some role to play in the awarding of licenses. These include:

- The Environment Division's environmental assessment and analysis of resource based development facilitated by the MLMR;
- Geological Survey Division for geoscience information to support and regulate the development of mineral resources, such as Rock Resource Assessments (RRA); and
- Geospatial Information Management Division for development /maintenance & distribution of Geospatial Information.

Root Cause:

The audit noted that agencies whose endorsements and approvals are pre-requisites to the approvals of the extraction license, work according to their SOPs which are not shared with other approving agencies.

The audit was informed that a request was made in 2018 by the Permanent Secretary Lands and Mineral Resources (PSLMR) to develop a database which was to be used as a monitoring tool for gravel extraction. However, the form and copy of the request was not provided to audit. The database was known as the Resource Management Database. Conversely, it was not used as there was no decision from managers at that time on who was to populate the database resulting in the development of other database.

Response from the Entity: The MLMR confirms that the draft guideline for river gravel and sand extraction which is currently being developed also includes the process of licensing,

The MLMR noted that they anticipate the guidelines to address many of the issues raised through this audit engagement as well as others discovered along the way.

The MLMR agreed to the audit findings and recommendations.

Audit Recommendations:

The MLMR should:

- *Consider leading collaboration work with relevant agencies to develop a centralized place/site where all regulatory processes and information surrounding licensing can be accessed. The site should incorporate information from multiple agencies as necessary and presenting it in a joined-manner; and*
- *Ensure that information maintenance by responsible divisions within MLMR who are part of the licensing process, is stored in a co-ordinated and holistic manner. One such approach could be the reactivation of the Resource Management Database with broadened scope of operations.*

Theme 5: License Application Processing.

Applications are not processed and accessed in full accordance with procedural guidelines.

The MLMR's SOP define the processes and parameters employed for assessing river gravel and sand extraction applications. On receipt of applications and approvals from relevant agencies (i.e. endorsed waiver of fishing rights and approved EIA report), applications for extraction are assessed using the DoL's

Extraction license for sand, lime and common-stone SOP and the Environment Divisions SOP on Receiving of river sand and gravel extraction.

Procedures noted are fundamental precursor to the approval of licenses.

To determine whether the MLMR was compliant with procedures, files for 12 companies (32%) with active license and 18 companies (25%) with expired license were randomly sampled and reviewed during our audit. Refer Table 4.4 for details.

Table 4.4: Assessment of MLMR’s compliance with procedures for administering river gravel and sand extraction license applications, assessments and approvals

		Application	Assessment	Approval
1	Checklist for extraction application met	<p>69%</p>	<p>92%</p>	<p>43%</p>
2	Acknowledgement letter sent to applicant			
3	Approved EIA Report			
4	Waiver of Fishing Rights			
5	Inspection by Environment Division			
6	CEO endorsement on inspection report			
7	ADL endorsement on application			
8	Director Lands Approval			
9	License updated in Manual Register			
10	Licensee informs DL before commencing			

Source: OAG analysis based on assessment of files reviewed.

Assessment on receipt of applications cover procedures 1-4, assessments of applications covers procedures 5 and 6, while approval of applications covers procedures 7 to 10.

Governance issue:

From the Audit it was found that the MLMR was generally in compliant with processes and procedures. However, we noted the following:

- None of the files were in full compliance to the procedural guidance.
- Although most of the files complied with the submission of TIN letters, Company Registration Certificates and Photo ID of the Director(s), most of the submissions were not certified given that they were copied documents.
- Partial compliance to Procedure 1 were dues to submissions of uncertified TIN Letters, Company Registration Certificates and photo ID of directors as well as submission of unendorsed Locality Maps by registered surveyors.
- 24 (or 80%) of the files we sighted did not contain acknowledgement letters sent to the applicant as indicated in the SOPs.
- Licenses issued were maintained in a typical database and not in manual register as required by the SOPs.
- The audit could sight notification from the proponents prior to commencement of extraction operations.

The Audit also noted that the department's procedural guidance is primarily concerned with administrative requirements. Therefore, our analysis provides assurance over these administrative requirements and not the overall quality of decisions.

Root Causes:

The audit noted that while the high degree of non-compliance to Procedure 1, and 9 might be viewed as less risky, it reflects the level of conformity of staff responsible for ensuring procedures are followed. Moreover, explanation for high level of non-compliance to procedure 10 were not provided by MLMR at the time of finalizing this report.

Response from the Entity: The MLMR agreed to the audit findings and recommendations.

Audit Recommendations:

The MLMR should ensure that its procedural guidance is implemented consistently.

Theme 6: Significant Environmental Baseline Data.

The Audit could sight significant environmental baseline data in some reviewed files. This may imply that proponents are not held accountable for significant impacts as data are not benchmarked and monitored against the state of the environment pre and post extractions.

Kubo, Were and Wetang'ula (2009), suggest that the study scope should cover, but not limited to issues such as climatic conditions, drainage and water resources, soils, flora, fauna, air quality, noise, land use, land tenure and socio economic aspects. Thus, based on current work practices for the processing of extraction applications, the audit have identified the following components as requiring baseline information;

- Volumetric Aggregate Assessments;
- Rock Resource Assessments; and
- Baseline Water Quality tests

The collection and analysis of the above baseline data are usually covered in the EIA process by an independent accredited consultant. Since the environmental consultant are contracted by proponents/companies, we tried to determine whether the MLMR through DoL/DMR carried out independent assessments to assist with decision-making.

Governance issues:

Are volumetric assessment carried out?

The Audit noted that they were not able to sight volumetric assessment results in 11 (or 37%) of the files that we reviewed. For those that carried our volumetric assessments (19 or 63% of company files reviewed) the audit noted instances where results significantly varied from approved volumes by DoE.

The variances indicate differences of average of 65,275m³ between MLMR volumetric assessments with that of the approved extraction volume as per EIA report. The audit noted that there are significant

disparities which should be investigated further before licenses are approved. Despite this, the MLMR through DoE proceeded with license approvals.

It was further noted that except for one instance, the MLMR's Environment Division did not provide comments on the EIA reports regarding the differences in volume estimations. This was the following the divisions independent inspections at the extraction site. This was due to inspections being carried out much after the EIA approval. Application files for proposed river gravel extractions received by Director of Lands would already contain the EIA approvals, clearly stating the volume to be extracted based on the EIA report submitted to DoE by the consultant.

The UNDP 2018 baseline assessment report of Fiji's development minerals reported that only one out of the 58 EIA's observed during the study attempted to quantify the sustainable rate at which gravel could be extracted from the system.

Are Rock Resource Assessments carried out?

The purpose of the RRA is to determine the engineering properties of the rive gravel aggregates to ensure that the properties are compliant with its intended purpose (.i.e. for construction or road developments etc).

The Audit sighted RRA results in 18 (or 60%) company applications files reviewed, while RRA's were deemed not applicable for 6 (or 20%) of the 30 application files, as they pertained to sand extractions. The Audit could no sight RRA results for the remaining 6 (or 10%) companies.

The Audit noted that majority (.i.e. 83%) of the proponents /companies collected the rock samples themselves and provided it for testing. This raises concerns on the reliability of the samples. There is a risk of proponents/companies providing rock samples that would favour their application for extraction license.

Are water analysis carried out?

Baseline water quality analysis are to be used for monitoring purposes during and after extractions.

The audit could not sight water analysis results in 21 (or 70%) of the files reviewed. Carrying out water quality analysis was applicable for two (or 7%) application files as they related to extraction of sand readily stockpiled.

Thus, for the reaming seven companies, we found that the MLMR's Environment Division mostly carried out physical, oxygen demand and solid tests for the applications. There were no chemicals or heavy metal testing's carried out to determine chemical composition of water prior to any extractions.

Root Causes:

Volumetric Assessments:

The MLMR noted that volumetric assessments for EIA is done by the EIA consultants as per the TOR issued by DoE. The MLMR further noted that they can only comments on the volumetric assessment when the EIA is received through DoL/DMR for review as part of the EIA process.

Rock Resource Assessments:

The requirement for Rock Resource Assessment was a recent requirement under the revised checklist.

Water Analysis:

The MLMR noted that the EIA report would include all the required baseline analysis issued by the Department of Environment including baseline water quality. However, upon verification, the audit found that some EIA reports did not have water quality analysis carried out. Therefore, if the MLMR as the licensing authority, places sole reliance on the EIA report for baseline information, in instances where the EIA is lacking water quality test results, monitoring exercise by the MLMR through the environment division would be futile as subsequent results would not have baseline data to benchmark against.

Audit Recommendations:

The MLMR should ensure the adequate baseline information such as volumetric assessments, rock resource assessments and water analysis is obtained prior to recommending the approval of license issued to proponents.

Theme 7: Land Owning Unit (LOC) Consultations and Consents.

LOU consultations and their consent through the waiver of fishing rights are essential components of the EIA and the license approval process, respectively. The absence of community representations (usually the LOU members for extraction on rivers adjacent to i-Taukei Land) at the EIA consultation meeting is a concern that needs to be addressed by the responsible authorities.

One of the major components of the EIA process is community consultations. Central to the purpose of community consultations is to provide the opportunity for community members to voice opinions regarding the proposed development, thus establish the foundation from which mitigation measures are formulated to manage concerns.

Governance issue:

The audit noted that 9 out of 12 of community participation process have more members signing the waiver of fishing rights form compared to number of members attending the EIA consultations.

The audit further noted the lack of community representations at the EIA consultation meeting is a concern. Most meeting minutes sighted by the audit has less than 10 community members present at the EIA meeting.

The Audit also revealed that lack of representation at the EIA meetings, it raises concerns on the validity and authenticity of the signatories in the waiver of fishing rights.

Root Causes:

Lack of community representation at the EIA Consultation meeting:

According to the 2018 UNDP baseline assessment report of Fiji's development minerals revealed that the community members were concerned regarding the advertisements of consultations. Because consultations were advertised on either one of the two main newspapers, the community members argued that many Fijians do not buy newspaper. Even when they do so, they do not read through the newspaper, in particular searching for notifications of EIA consultations.

Risk of forgery:

The waiver of fishing rights form requires signatories to be witnessed by the Roko Tui for Provincial Council in whose jurisdiction lies the extraction. The signatories would be obtained at the fishing rights owners meeting. There is a clear indication that the witnessing protocols are not adequate and may pose risk of forgery incident.

Response from the Entity:

- The MLMR noted that as the licensing authority they should carry out consultations with the community likely to be impacted by the proposed river gravel and sand extraction activity.
- The MLMR revealed that the EIA consultations largely addressed environment issues whereas the consultations carried out by them would take into account other concerns including environmental issues.

Audit Recommendation:

The MLMR should appropriately action proposals to carry out community consultations through their community development team when applications for extractions are received.

The MLMR should liaise with the i-Taukei affairs board responsible for the provincial councils in ensuring that the signatures of fishing rights owners are appropriately witnessed at the fishing rights owners meeting.

Theme 8: Environment Impact Assessment.

Though the audit found EIA reports in most of the applications files that we reviewed, its quality is questionable due to inconsistencies noted in the report. Therefore, these inconsistencies should be addressed through a proper review process.

The MLMR commented that their Environment Division was established as an Environment Management Unit (EMU) under Section 15 of the Environment Management Act (EMA) 2005.

Governance issues:

The audit reviewed 30 applications files with its accompanying EIA reports. From our review, we noted the following:

- Inconsistencies in reports prepared for two set periods;
- Volume of extraction not disclosed not disclosed in report;
- Incomplete presentation of water sampling results;
- Sources of pictures and photographs not adequately acknowledged in report;
- Inadequate representation of flora and fauna.
- Inappropriate Cost Benefit Analysis; and
- Same information on environmental impacts noted across various EIA reports prepared by the same consultant.

Root causes:

The audit noted that according to the UNDP 2018 baseline assessment report of Fiji's development mineral noted discussions with the environmental consultants indicating the current quality of EIA reports and depth of scientific studies is dictated by the market (the extraction companies), as the Department of Environment's approval process does not subject reports to a comprehensive review process. Therefore, EIA consultants are offered insufficient budgets to conduct thorough scientific studies, thus the quality of EIA's, as supporting the assessment, is substandard.

Response from the Entity:

The MLMR noted that the EIA approval is a requirement under the licensing process where the approved EIA report and approval is conditions submitted to DoL. The MLMR further noted that the review process for EIA is prescribed under the EMA which is the jurisdiction of DoE. They only provide their comments on the EIA report with the final decision resting with the Department of Environment.

Audit Recommendations:

The MLMR, through the Environment Division, should thoroughly scrutinize EIA reports as an EMU established under Section 15 of the EMA, providing relevant comments and recommendations in order to remedy any issues noted in the EIA report.

3. MONITORING OF EXTRACTION OPERATIONS

This chapter examines the monitoring and reporting processes and procedures of the DoL with regard to extraction of river gravel and sand. Firstly, the chapter assess the actions taken against non-compliance of companies to laws, terms and conditions governing river gravel and sand extractions. It further evaluates the processes in place by the DoL to verify information provided by extraction companies. The chapter also tries to determine the extent on use of technologies to assist with the monitoring exercise. Finally the chapter evaluates the effectiveness and regularity of monitoring work carried out DoL.

Theme 1: Dealing with non-compliance to the terms and conditions of a contract/license agreement or illegal Operators.

The audit found that while there are actions being taken against illegal extraction of river, gravel and sand, there is a need for relevant stakeholders to coordinate in order to impose harsher penalties on offenders to send clear messages on the consequences of not abiding to laws, terms and conditions.

The Audit noted the following:

- Section 2 of the States Lands Act 1945 states that included as part of state land is the foreshore and the soil under the waters of Fiji. Foreshore refers to the beachfronts. They are different from rivers and streams. The legislation does make references to the soil under the waters of Fiji, but it does not mention rivers and streams.
- The Rivers and Streams Act 1880 through sections 2, 3, 5 and 6 specifically states that the rivers and streams all belong to the state.
- Any person that wants to use the State Land (which included the foreshore, soil under the waters of Fiji, rivers and streams) they would have to get a license. Hence the provisions for the issue gravel and sand extraction licenses is in the State Lands Act 1945.
- As per the subsidiary legislation- State Lands (Leases & Licenses) Regulations 1980 – for the removal of sand, lime and common stone, the director of lands issues the licenses. These licenses are valid for a year. The regulation focuses on condition for those operating with a license. The regulations does not mention of any penalty for illegal operators who operate without the extraction license. However, there are provisions in place for licensee’s who breach conditions of the license.
- Under the State Lands Act 1945, the MLMR may forfeit a license based on its terms and conditions.
- Moreover, for every offence under the state lands act 1945 for which no penalty is specially provided an offender shall be liable to a fine of \$100 or to imprisonment for six months or to both such fine and imprisonment. Also, the provision for penalties against offenders is rather broad. There is no prescribed penalty that is precisely for illegal gravel and sand extractions (that is, operators extracting without license or with a license but extracting more than they are required to or extracting out their boundaries or extracting in an unsustainable manner causing harm to the environment).
- The Rivers and Streams Act 1880- mostly focused on public rights for accessing rivers and streams. It does not make any references to river grave and sand extractions.

According to the audit, MLMR had highlighted that there is no clause in the Rivers and Streams Act 1880 to penalize operators on the illegal activity (in terms of the dollar value) or for the Director of Lands to take them to court or to arrest them. However, the MLMR refers all these matters to the police.

The Audit selected and tested a sample 17 monitoring reports to ascertain if there were instances of:

- Non-compliance and actions taken against the non-compliance' and
- Any inconsistencies were non-compliance issues posing severe social and environmental impacts were given lesser penalties or none at all.

After review of the 17 monitoring reports, it was established that only one report did not have any non-compliance issue while the other 16 reports had non-compliance issues. Refer Appendix 6 for details.

The audit also added the following, based on their examination:

- That for any environmental impacts (sediments flowing in the river, unsustainable method of extracting, un-stabilizing the river banks etc., no penalty was imposed on the operators.
- There were instances whereby despite being given the instructions, the company continued to do what they are not supposed to and yet, for these repeated acts, no fines had been charged.
- There were also no evidence of follow ups undertaken to ensure that the recommendation in the reports were implemented or actioned.
- There were inconsistencies in the calculations of the penalties.

Root causes:

The audit noted that findings is attributed to the lack of co-ordination between the Ministry of Lands and Mineral Resources and the ministry of Water Waterways and Environment. Both Ministries could explore ways in which illegal operations could be referred to the ministry of waterways and environment on the possibility of imposing penalties under the environment management act 2005 for damages and pollution to the natural environment.

Response from the Entity:

The MLMR has stated that the reason for the inconsistency in the calculation was that:

- If market value was being used in the formula, then maybe it meant that the inspectors were referring to the extraction that were made some years back and current market price was being used to bring it back to the monetary value as of today.
- The various land officers had a different understanding on carrying out the assessment, hence, applying the two different formulas.

MLMR also mentioned that the standardized of the formula is currently being discussed between the Director Lands and Director Minerals. Moreover, it was highlighted that companies are required to pay the environment bond to the Ministry of Waterways and Environment for any environmental damages caused.

Audit Recommendations:

- *The MLMR to collaborate with the ministry of waterways and environment and establish a MOU whereby the MLMR will be able to notify ministry of waterways and environment of the illegal and unsustainable sand and gravel operations for them to take actions under the EMA 2005 to prosecute and penalize offenders.*
- *The MLMR should consider engaging environmental experts to quantify environment damage into monetary terms to penalize illegal operators who have breaches license or EIA conditions and brought severe harm to the environment.*
- *The MLMR should collaborate more and follow up with the Fiji Police to penalize offenders through their penal code.*
- *The MLMR should ensure that follow ups are done to monitor that their recommendations are implemented and actioned.*

Theme 2: Verification process on Licensee's Self-Reported Information

The MLMR has not been collecting and verifying self-reported information of extraction activities by the Licensee such as tally records from river gravel and sand extraction companies. The MLMR has also acknowledged that this is something that needs to be improved on as it is a part of the license conditions which needs to be compiled with.

Governance issues:

The audit noted that the MLMR is not undertaking proper verification of self-reported information of the gravel extraction companies as necessary evidence were not provided during the audit.

The submission of monthly returns to the MLMR is left to the discretion of the operators. The MLMR does not follow up with operators.

Root causes:

The main reason for not carrying out stringent monitoring of the monthly returns is because the MLMR does not have the capacity in terms of staffing and other resources, to be monitoring full time. They also do not have access to the operator's registers.

Response from the Entity:

- The MLMR in its response stated that gravel licenses are not confined to companies but also include individuals and land owning units. As such applicants must meet the requirements of the checklists.
- The MLMR acknowledged the audit findings and informed audit that the verification of monthly returns is a very critical component of monitoring that is not really enforced.
- The MLMR acknowledged the audit findings and noted that it would be taken into consideration when improving their monitoring process.

Audit Recommendations:

The MLMR must ensure that vital information is well kept to enable the management is making informed decisions with respect to river gravel and sand activities and helps in fulfilling the roles and responsibilities of the government.

Theme 3: Use of Technology to Detect Unregulated/Illegal River Gravel and Sand Extractions.

The audit noted that the monitoring mechanism of the ministry of lands and mineral resources included physical checking together with the use of certain technologies by site inspectors. These technologies are used to confirm illegal operation after any unregulated river gravel and sand extractions has been detected by site inspectors during their routine monitoring or after complaints have been received by the MLMR through communities or bystanders. The use of technology for effective monitoring can assist the MLMR detect unregulated/ illegal river gravel and sand extractions.

Governance issues:

The MLMR has confirmed that they make use of technologies to identify unregulated/ illegal river gravel and sand extractions. These technologies include GPS, Google Earth and the GIS Software.

The audit noted that more can still be done to take full advantage of the benefits of available technology, especially for those requiring the most minimal manual application. Further, from the review, the audit identified parameters that have been assessed as going beyond the conventional use Google Earth Imagery. This can be useful if it is ingrained into the monitoring process of the MLMR.

Figure 5.3: Parameters for using Google Earth Pro Imagery as part of monitoring

	Rational	Challenges
Verification of variations in topography, size, pattern and associations etc.	To determine if variations have taken place at unapproved river extraction sites. These include changes in size, pattern, and topography etc. of the area and if noticeable elements can be identified such as equipment's, vehicles and trucks on the unapproved extraction sites. These could be a way of identifying illegal extractions (i.e. companies without licenses to extract and companies with expired licenses).	<ul style="list-style-type: none"> • Limitation of temporal satellite data availability; and • Limitation of ground truth due to high dynamic nature of the River morphology.
Verification of timing of extraction activity	To determine if extraction work is being carried out at unapproved times of the day that are in violation of specified times in approval conditions, thus a breach which should warrant stop work notices.	Companies would extract during odd hours of the day, for example, early hours of the morning, and late hours at night. This would be difficult to track because these are beyond official working hours of monitoring officers.
Assessment of temporal changes of extraction area over a period of time	To determine how the extraction site has changed over time, in terms of environmental impacts and if extraction work has gone into boundaries beyond the approved sites for extraction. This can be done using the available historical imagery feature.	Limitation of temporal satellite data availability.

Source: OAG analysis based on assessment of published work relating to use of Google Earth Pro Imagery

Root causes:

The MLMR may not have had to consider the usage of new technologies due to the lack of funds and resources.

Response from the Entity:

the MLMR stated that the company were marketing themselves as such were providing free services for the use of their drone in the western division and the MLMR had used their services for the complaint in Yavuna to help gather information for their investigation and to justify their recommendation for the use of drones in the monitoring exercise.

Audit Recommendations:

- *The MLMR should consider the use of drones as part of their monitoring operations or request assistance from the Fiji Police force.*
- *The MLMR may be consider using any other technology that seems feasible to assist them in monitoring such as investing in more sophisticated remote sensing satellite products that guarantee high resolution and world class images.*

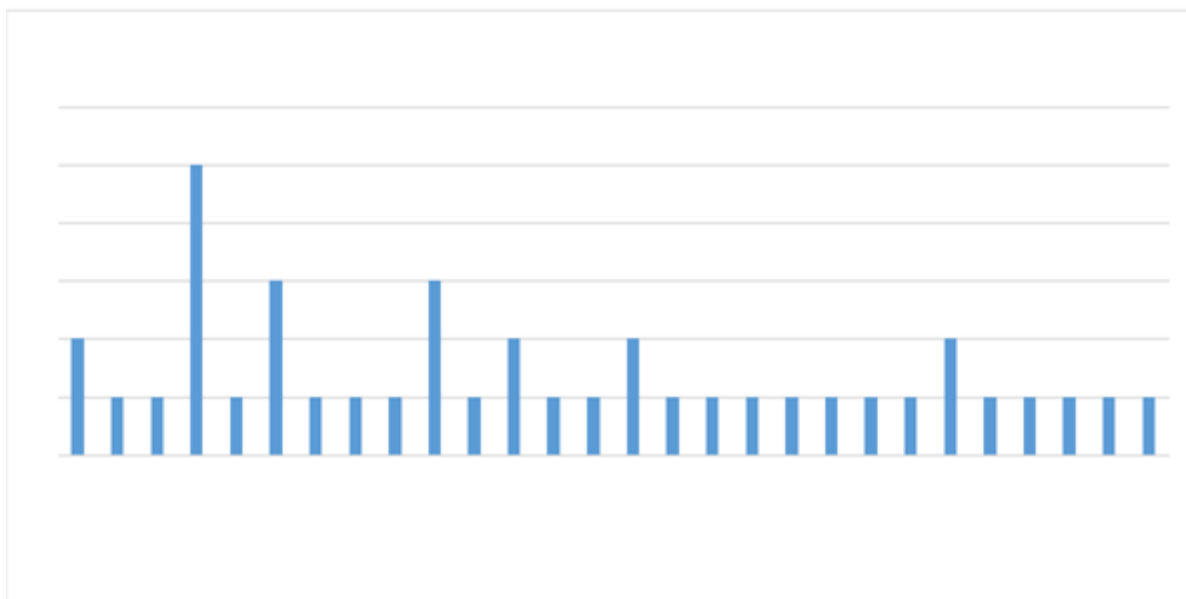
Theme 4: Regular and Effective Monitoring of River Gravel and Sand Extraction Sites.

It was found that regular and consistent inspection of the sites are not being carried out for effective monitoring.

Governance issues:

The audit carried out a review of monitoring reports to analyse the frequency at which the monitoring exercises are carried out for a number of companies/extractors. While we requested for monitoring reports from the year 2015 till 2021 for the selected companies/extractors, the graph below shows the number of monitoring reports that was provided for review.

Figure 5.10: Number of monitoring reports received for each extraction company



The audit noted that the monitoring is not being carried out frequently and consistently. It was also noted that the tallyman is appointed from the qoliqoli owners or the landowners to record loads of gravel or sand extracted to carry out real-time monitoring to ensure that stockpiles are valued and quantified correctly.

The audit noted and enquired whether MLMR carries out real-time monitoring when stockpiles are being valued and quantified by the companies and if independent officers from the MLMR are present during the exercise. Listed below is what was gathered:

- River gravel and sand extraction is under the responsibility of the director of lands. The companies who were granted licenses have a pre-determined estimated volume of gravel and sand in their license area. As per the conditions of the license, all companies with river gravel and sand license need to record loads of gravel and sand extracted and also have the tallyman from the qoliqoli owners or landowners to record loads of gravel or sand extracted from the river to the quarries for processing or for direct use. This is then verified during inspections and also against the volume estimated prior to issuance of license.
- During the entry meeting with the MLMR on 02/03/21, the MLMR had also mentioned and confirmed the above statement that the rivers gravel and sand extractions are monitored by the resource offices based in the Division. Also, the report on the volume of extractions is submitted by the companies on the 5th of every month along with the payment of due royalties. The tallyman is hired by the company. A person from the community/village should also be present when the tally is being taken.
- The above statement is confirmed through the Lands Division SOP 2015-MLMR (Appendix 4F-Special Condition number 5):

The license shall submit a return to the licensor by the 5th day of every month, showing the amount of material extracted during the previous month and at that time shall pay the royalty due thereon.
- As per the reports receive from the TA/NRDO's, only stockpiles from legal operations are quantified by the MLMR officials to confirm volume of extracted gravel and sand. In cases of illegal operations, stockpiles are quantified by the MLMR staff for royalty payment payable by the illegal contractor to the MLMR for illegal resources extracted.

Root causes:

Irregular and inconsistent monitoring by MLMR

There are 107 rivers in the Central, Eastern, Western and Northern Division. Out of these 107 rivers, only 13 rivers are active for extracting gravel and sand. To monitor these rivers, two TA/NRDO's from the Lands Divisional Offices have been allocated for the Western Division (Lautoka), two for the Northern Division (Labasa) and only one for the Central/Eastern Division (DMR-Suva).

Awareness of extraction companies of scheduled inspections

The audit queried the MLMR that when carrying out their monitoring, if they informed the extraction companies beforehand that the MLMR will be coming for their monitoring, to which the below response was gathered:

- For river gravel extraction, it will be just phone calls to advise them that officers will be inspecting site and requesting for a company representative to be at site during inspection.
- Also, under EIA approval condition they can come in any time to carry out inspection. However, the MLMR still calls them as some companies cannot be reached through email in a timely manner.

Response from the Entity: MLMR highlighted that for every approved licenses, the usual requirement is to have one tallyman that represents the Land Owning Units (LOU) and one for the company.

The MLMR also noted that the monitoring of extraction sites would depend on the risks involved. The higher the risk sites are monitored frequently and lower risk site less frequently although teams try to see that visits are conducted every month to ensure that the license approval conditions are not breached.

Audit Recommendations:

The Ministry of Lands and Mineral Resources should consider:

- *Hiring more TA/NRDO's for carrying out site inspections based on the number of rivers that needs to be monitored.*
- *Carrying out spot checks on the activity that is being carried out by the companies at the extraction sites.*
- *Notifying the ministry of waterways and environment on instances where they cannot penalise as they have not caught the company in action but the observation of the after math clearly depicts that the activity has taken place. Ministry of Waterways and Environment through the Environment Management Act 2005 has powers to penalize and prosecute any breach of license conditions or illegal activities.*
- *Establishing a MOU to work in conjunction with the Fiji Police so that the divisional police officers or community police officers can be engaged with the tallyman every month for real-time monitoring of the volume of gravel and sand extracted.*
- *Making it compulsory for the TA/NRDO's to physically inspect the volume of extraction twice a month and then compare this with the tally records that the companies and the tallyman provide for the next 11 months. Comparisons can be made with the initial record with the next 11 months on whether there are huge discrepancies in the tallies provided.*
- *Consider using a combination of well-coordinated monitoring technologies with physical manpower to conduct surprise checks to deter illegal extraction of gravels.*

SUSTAINABLE DEVELOPMENT GOALS (SDGs)

The Committee notes that the Fiji Parliament with its six (6) Standing Committees which includes the Public Accounts Standing Committee are now extending and expanding its roles and initiated activities to strengthen its support towards promotion, implementation and monitoring of the SDGs. In this regard, the Committee raised questions to the MLMR related to the relevant SDGs targets and in this compliance audits. The Committee asked questions on the Ministry roles on SDG 14 – Life below Water and SDG 15 – Life on Land.

GENDER ANALYSIS

The Committee noted the importance of Gender Equality while scrutinising the Auditor General's Reports and commended the work done by the Ministry in considering the importance of gender equality in its workforce and further to the annual activities/programmes.

CONCLUSION

The Committee was informed that the information on potential river gravel and sand extraction sites can be further improved through the development of a centralized database. However, while the MLMR's compliance with the licensing system for river gravel and sand extractions is fair, the Committee is looking forward to the MLMR in improving the anomalies that were highlighted during the audit.

In conclusion, the Committee looks forward to the Ministry finalising the **River Gravel Extraction Guideline and the National Development Mineral Policy Guideline.**

We, the undersigned Members of the Standing Committee on Public Accounts agree with the contents of this report:



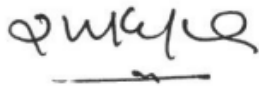
.....
Hon. Alvick Maharaj
(Chairperson)



.....
Hon. Joseph Nand
(Deputy Chairperson)



.....
Hon. Virendra Lal
(Member)



.....
Hon. Ro Teimumu Kepa
(Member)



.....
Hon. Aseri Masivou Radrodoro
(Member)

APPENDICES

APPENDIX 1:
PUBLIC ACCOUNTS COMMITTEE QUESTIONS

APPENDIX 2:

PUBLISHED WRITTEN EVIDENCE

The following copies of the written responses from the Ministry of Lands and Mineral Resources in relation to the issues covered in this performance audit. This responses can be accessed on the Parliament Website using the following link: <http://www.parliament.gov.fj/committees/standing-committee-on-public-accounts/>

APPENDIX 3:

Report of the Auditor General

Performance Audit on the Licensing and Monitoring of River Gravel and Sand Extractions (PP No. 106 of 2021) can be accessed on the Parliament Website using the following link:

<https://www.parliament.gov.fj/wp-content/uploads/2021/12/Performance-Audit-on-the-Licensing-and-Monitoring-of-River-Gravel-and-Sand-Extractions-2.pdf>