



**The Government's Approach to Disposal of ICT Assets**  
A cross-cutting information technology audit



January 2026



**INFORMATION TECHNOLOGY AUDIT:  
THE GOVERNMENT'S APPROACH TO  
DISPOSAL OF INFORMATION &  
COMMUNICATION TECHNOLOGY  
ASSETS**

This is a report of an Information Technology Audit conducted by the Montserrat National Audit Office.

Auditor-General  
Montserrat National Audit Office  
January 2026



## PREAMBLE

### Vision Statement

“To be a proactive Supreme Audit Institution that helps the nation makes good use of its resources”.

### Mission Statement

“The N.A.O. is the national authority on public sector auditing issues and is focused on assessing performance and promoting accountability, transparency and improved stewardship in managing public resources by conducting independent and objective reviews of the accounts and operations of central government and statutory agencies; providing advice; and submitting timely Reports to Accounting Officers and the Legislative Assembly”.

### The Goal

“To promote staff development, enhance productivity, and maintain a high standard of auditing and accounting in the public sector, thereby contributing to the general efficiency and effectiveness of public finance management”.

## ABBREVIATIONS

<b>BoC</b>	Board of Condemnation
<b>BUILTE</b>	Building, Utilities, Infrastructure, Labour, Transport & Ecclesiastical Affairs
<b>CAP</b>	Chapter
<b>CO</b>	Clerical Officer
<b>DITES</b>	Department of Information Technology & E-Gov Services
<b>EO</b>	Executive Officer
<b>E-Waste</b>	Electronic and electrical waste
<b>GoM</b>	Government of Montserrat
<b>IAU</b>	Internal Audit Unit
<b>ICT</b>	Information & Communication Technology
<b>ITAD</b>	Information Technology Asset Disposition
<b>MCWL</b>	Ministry of Communication, Works, Labour
<b>MoFEM</b>	Ministry of Finance & Economic Management
<b>MHSS</b>	Ministry of Health & Social Services
<b>MNAO</b>	Montserrat National Audit Office
<b>PPU</b>	Physical Planning Unit
<b>SCO</b>	Senior Clerical Officer

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## EXECUTIVE SUMMARY

Information Technology Asset Disposition (ITAD), is an environmentally responsible IT disposal solution, involving the proper disposal or repurposing of IT hardware, software, data, and other technologies and equipment, once it reaches its end-of-life stage. “Disposition” means that the life of ICT devices can be extended by sanitising, refurbishing, and re-marketed to secondary users, or the actual disposal of obsolete and unserviceable ICT assets, to include: desktop computers, laptops, servers, networking equipment, external hard drives, cellular phones and tablets, and software (i.e. corporate applications and software asset management tools; and corporate data especially any sensitive data).

The Government of Montserrat (GoM) owns several categories of non-current assets (stores and inventories). Each government Ministry or Department, is responsible for the purchase and safe custody of these items, maintenance, and disposal. In the *CAP 17.07 Montserrat Public Finance (Management and Accountability) Act, (PFMAA)* there are provisions for the condemnation and disposal of obsolete and unserviceable stores and inventories. ICT devices are stores or inventories that fall under the category of office equipment.

## FINDINGS & RECOMMENDATIONS

### Ministry of Finance & Economic Management

- **Board of Condemnation and Boards of Survey are being used interchangeably.** As per the revised CAP 17.07 Public Financial (Management Accountability) Regulations, there are five types of BoS, in contrast to only one type of BoC. However, the BoS for the condemnation of obsolete and unserviceable inventories and the BoC, are being regarded as one and the same.
- **Unauthorised disposal certificate in circulation.** The authorised Disposal Certificate for unwanted or condemned items in the CAP 17.07 PFMA Regulations 2019, differs greatly from the current revised version being distributed by MoFEM. However, the modified Disposal Certificate has not been amended in the PFMA Act
- **Systemic non-removal of condemned stores from the Asset Register.** It was noted that the majority of the ministries/departments have not been removing condemned assets that were already disposed of from the WASP Mobile Asset Register, as there are no designated trained persons to remove asset. When persons leave, replacements are not readily being identified by the departments to be trained by the Treasury Department.

- **Majority of entities ensure that condemned ICT assets are stored away securely.** From inspections conducted at select entities, it was observed that the majority of them have adequate and secure storage areas to retain and safeguard condemned ICT devices against interference or theft by unauthorised persons, before disposal.
- **Revision and endorsement of the circulated disposal certificate.** We recommend that MoFEM adopt the current version of the disposal certificate being disseminated, but must first amend it by itemising and clearly distinguishing the: disposal options; the method of destruction or disposal; and the reason for condemning the asset. Once these changes are made, the necessary measures should be taken to adopt and modify the disposal certificate displayed in the PFMA Act.

## FINDINGS & RECOMMENDATIONS

### Department of Information Technology & E-Government Services

- **Unofficial responsibility for the processing of obsolete and condemned ICT assets.** The processing of old, and unserviceable government-owned ICT devices by DITES before disposal as prescribed by the F.S., is an informal practice that is not stipulated in the PFMA Act, nor specified in an ICT Policy. Processing involves the removal of hard drives and the harvesting of reusable parts from the condemned computers and laptops that stores the GoM's sensitive information before being destroyed and dumped; sold by public auction or tender; executing a factory reset to erase all of the GoM-related information, before re-installing the required software for re-use by the accounting Ministry/Department, or by a different government entity (transfer).
- **Unauthorised dumping of condemned ICT assets.** DITES indicated that atleast one department has bypassed the customary practice of turning over condemned ICT devices to DITES to process, and dumped them at the New Windward Landfill. Fortunately, the I.T. Department was alerted by a concerned citizen who observed several (unprocessed) government-owned computers and laptops at the dump site. Consequently, DITES was able to salvage quite a number of these ICT devices to remove the hard drives.
- **Formalization of current disposal procedures.** It is strongly recommended that the current unofficial role that DITES's plays in the GoM's ITAD operations, be formalised as provisos in the *CAP 17.07 PFMA Act and Regulations* by MoFEM, to guarantee that the Public Service will be fully acquainted with the mandatory disposal protocols. In addition, to ensure that all understand the serious importance of relinquishing all condemned ICT devices to DITES for the removal of GoM's sensitive information, before disposal. DITES should also

institute and disseminate within the Civil Service, an internal ITAD policy that defines the tasks the department is responsible to perform on condemned ICT items, that will either be re-used, transferred, sold, donated or dumped.

## FINDINGS & RECOMMENDATIONS

### Montserrat E-Waste Management Policy and E-Waste Legislation

- **No national e-waste management policy or regulatory e-waste legislation.** An initial effort to develop and implement an e-waste management policy and e-waste legislation by the MCWLE's ICT Unit, commenced in 2015; however, it was never accomplished. A second attempt was launched with the *Montserrat National Information & Communication Technology Plan 2017 – 2021*, the focus area being 'Environment' which *"...encapsulates both Montserrat's natural environment and the legal/regulatory environment for ICTs and ICT-related activity..."* In the NICT Plan, the Environmental Health Department, the Attorney General Chambers, and the Ministry of Communications, Works, Labour, and Energy's ICT Unit, were assigned to be responsible for the drafting and implementation of the e-waste management policy and e-waste legislation. However, it has been confirmed that these two e-waste endeavours were never started.
- **Unacceptable e-waste disposal practices and activities.** The EHD indicated that the unsafe practices for the disposal of e-waste, have been observed around Montserrat, such as: (i) dumping e-waste items along with regular solid waste at the New Windward Landfill site in Jack Boy Hill; (ii) dumping e-waste items on sides of the roads, empty lots of land, and/or in ghauts; (iii) locals scavenging e-waste items from the landfill; and (iv) burning of e-waste in the open. These unsafe activities are hazardous to both the environment and human health, as they can release toxic pollutants that will contaminate the air, soil, dust, and water.
- **Draft and implement a national e-waste policy and legal framework.** It is of great importance that the drafting and implementation of an e-waste management policy, and a robust national e-waste legislation for Montserrat, be undertaken as originally planned, as more and more electronic and electrical items that contain many different toxic substances are being brought to the island. Moreover, when these items have reached the end of their useful life, they are not being disposed of in safe and eco-friendly ways. Consequently, these national e-waste documents are essential for the protection of Montserrat's environment and communities, from the possible long-term negative impacts that can stem from the improper disposal of e-waste.

- **Proposed solution to managing and reducing e-waste.** One solution that can be taken into consideration, is implementing the best practice of a Circular Economy aimed at reducing waste to a minimum; that is, materials are kept within the economy wherever possible by reusing, repairing, refurbishing and recycling. Therefore, the product is effectively reused several times, thus creating further value.

# CHAPTER 1 INTRODUCTION

## BACKGROUND

1.1 <sup>1,2,3,4</sup>Information Communication Technology (ICT) devices are typically designed with a short service life, which enables equipment manufacturers and software vendors to constantly manufacture and market new and improved hardware and systems, at relatively short intervals. This business practice is designed to prompt consumers to replace the older versions of their devices, and upgrade to the latest ones on the market. In addition, with a short service life these ICT devices grow older much faster, and their value and/or usefulness decreases very quickly.

Table 1 – Examples of ICT devices and their average lifespan<sup>5</sup>

Device	Avg. lifetime in years
Desktop	5
Laptop	4
Television	10
Mobile phones	6
Printer	4

1.2 Information Technology Asset Disposition (ITAD), is an environmentally responsible IT disposal solution, involving the proper disposal or repurposing of IT hardware, software, data, and other technologies and equipment, once it reaches its end-of-life stage. “Disposition” can take various forms, where the life of ICT devices is extended by sanitising, refurbishing, and re-marketed to secondary users; or the actual disposal of obsolete and unserviceable ICT assets. ITAD covers a wide range of hardware, software, and data, to include but not limited to computers and other IT hardware, other physical and virtual infrastructure, mobile devices, and software applications and tools.

1.3 The Government of Montserrat owns several types of non-current assets. Each government Ministry or Department, is responsible for the purchase, safe custody of the items under their control, maintenance, and also the disposal of all inventories issued to them. In the *Montserrat Public Finance (Management and Accountability) Regulations 2009*, there are provisions for the condemnation and disposal of unserviceable stores and inventories, and also

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<sup>1</sup><https://thectoclub.com/news/it-asset-disposition/>  
<sup>2</sup><https://techreset.com/itad-guides/what-is-it-equipment-disposal/>  
<sup>3</sup><https://techreset.com/itad-guides/it-asset-disposition-itad/>  
<sup>4</sup><https://ictreverse.com/4-benefits-of-using-an-itad-service/>  
<sup>5</sup>*An Approach to En Route Environmentally Sustainable Future Through Green Computing (SCOPUS, WEB OF SCIENCE)*

for obsolete and unwanted usable items. ICT devices are stores, or inventories, that fall under the category of office equipment.

1.4 The Ministry of Finance & Economic Management (MoFEM) is responsible for the appointment of Boards of Condemnation (BoC) that survey all government-owned assets, reported to be unwanted or unserviceable, and make recommendations for their disposal; i.e. either donated, dumped, or sold. The F.S. (F.S.) after considering the BoC's recommendations, issue directions on how the condemned items are to be disposed of; that is, either reused, donated, sold, or dumped.

## AUDIT MANDATE

1.5 The Montserrat National Audit Office is mandated through the Montserrat Constitution Order 2010 to perform various audits. This mandate is supported by International Standards of Supreme Audit Institutions (ISSAI) 1, 200, 300, 400 and strengthened by the *Public Finance (Management and Accountability) Act (PFMAA), 2008* and the *Public Finance (Management and Accountability) Regulations (PFMAR), 2009*.

## AUDIT STANDARDS AND GUIDELINES

1.6 This Information Technology audit work was conducted in accordance with the *International Standards of Supreme Audit Institutions (ISSAI) GUID 5100 - Guidance on Audit of Information Systems*, and the *WGITA-IDI IT Audit Handbook for SAIs*. We were also guided by the *Compliance Audit ISSAI Implementation Handbook 2022*.

## AUDIT OBJECTIVE

1.7 This Information Technology Asset Disposition (ITAD) audit aimed to establish whether the current practices of the MoFEM, as well as the controlling Ministries/Departments, are fulfilling the objectives of the related laws, regulations, and policies, for the disposal of condemned and/or unwanted government-owned IT and ICT assets. It also sought to assess whether ICT waste generated by the GoM was appropriately managed and disposed of through safe and environmentally sound methods to protect human health, the environment and the communities in which we operate.

1.8 The audit reviewed the controls, procedures, and practices in place for the condemnation of obsolete, unwanted and unserviceable inventories. For this purpose, the following sub-

objectives have also been formulated to ensure that an overall conclusion on the condemnation and disposal practices and procedures, can be made:

- **Sub Objective 1** - To determine the existence of legislation, policy, or regulations, dedicated to the proper disposal of IT and ICT devices (*e-Waste*).
- **Sub Objective 2** - To determine the extent to which government-owned IT and ICT assets are being disposed of by the controlling Entities, in the manner prescribed by the regulatory authority, and/or as directed by MoFEM.
- **Sub Objective 3** - To determine whether government-owned IT and ICT assets are properly stored and secured by the controlling Entities, before the items are destroyed or disposed.
- **Sub Objective 4** - To assess the extent to which sensitive information stored on condemned or unwanted government-owned IT and ICT assets, are removed before the items are destroyed or disposed.
- **Sub Objective 5** - To determine whether unwanted government-owned IT and ICT assets that were gifted, sold, or auctioned were written-off and/or removed from the asset register.

## AUDIT CRITERIA

1.9 We derived our criteria from the following act, regulations, and the national level ICT strategic plan, which respectively govern the operations and undertakings of the Boards of Condemnation; and the formulation of the national e-Waste strategies and regulations:

- CAP 17.07 Public Finance (Management and Accountability) Act, Revised Edition 2019.
- CAP 17.07 Public finance (Management and Accountability) Regulations, Revised Edition 2019.
- Montserrat's National Information & Communication Technology Policy, Strategy & Implementation Plan 2017 - 2021.

## AUDIT SCOPE

1.10 The audit scope focused on the controls for the disposal of government-owned IT and ICT assets, as prescribed in the *CAP 17.07 Public Finance (Management and Accountability) Act Revised Edition 2019* and the *CAP 17.07 Public Finance (Management and Accountability) Regulations, Revised Edition 2019*; other informal internal operations; in addition to the

strategies for the formulation of a national e-Waste management policy and legislation as per the *Montserrat's National Information & Communication Technology Policy, Strategy & Implementation Plan 2017 - 2021*; as described in the audit objectives for the period 2018 to 2023.

1.11 The findings of this report were discussed with key stakeholders and their views were taken into consideration when finalising the report.

## CHAPTER 2      MINISTRY OF FINANCE AND ECONOMIC MANAGEMENT

2.1 <sup>6</sup>The Ministry of Finance & Economic Management is responsible for managing the financial resources of Government and to ensure that a proper legal framework and supporting systems are in place for that purpose.

2.2 One of the responsibilities of the Ministry of Finance and Economic Management, is the administration of the convening of Boards of Condemnation (BoC). As per the *CAP 17.07 PFMA Regulations 2019*, the F.S. appoints Boards of Condemnation to inspect government-owned stores, which have been reported as obsolete, unwanted, or unserviceable, and to make recommendations for their disposal. Consequently, any Government ministry/department that wants to dispose of these stores and inventories, must write to the F.S. requesting the assessment of the operational status of the items that have been identified for disposal. As per the PFMA Regulations, items to be disposed of have to be retained until a sufficient quantity has been accumulated before the ministry/department can send a BoC request in writing to the MoF, with a list of the stores or inventories to be disposed of. The F.S. approves the BoC request and the MoFEM's administrative staff are responsible for actioning the BoC request.

2.3 Each BoC consists of only two (2) people, that is, a Chairman and a member. Only permanent and pensionable civil servants can be elected to a BoC; the Chairman who has to be the more senior civil servant, and the other member the least senior. Another selection consideration is dependent on the nature of the items to be condemned. For example, for ICT office equipment, or vehicles, plant or heavy equipment; an I.T. Technician from DITES or a mechanic from the MCWEL's garage who are qualified and knowledgeable in their field, will normally be selected to examine the stores or inventories; and to express a technical opinion on the condition and manner of disposal of the items.

2.4 The elected individuals are notified via an appointment letter from the F.S., sent under the flying seal (ufs) of their respective Heads of Department. The letter notifies the individuals of their election to conduct Board of Condemnation duties, and what their individual designation in the team is; the location(s) where the BoC will be carried out; and the timeframe in which the BoC is to be completed. Two weeks is the maximum time given for a BoC to complete the condemnation exercise. If the assignment cannot be completed within the stipulated time period, an extension of 1 to 2 weeks is usually given. The listing of the stores and inventories to be inspected is included in the notification letter and usually details:

- the items to be destroyed and written-off;
- the quantities;

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<sup>6</sup> <https://www.gov.ms/government/ministries/ministry-of-finance-economic-management/>

- where the items are being stored; and
- the condition of the items.

2.5 An Assessment Form, which is technically a BoC report, is issued to the Chairman of the BoC to be completed by him/her when the survey exercise is concluded and signed-off by both persons in the BoC team before submitting it to MoFEM. This form or BoC report includes the number of items provided by the requesting Ministry/Department; the actual number of items that were counted and inspected by the BoC; the Chairman's remarks regarding the condition of the assessed items; and the recommended method of disposal for each item. The F.S.'s directives for the disposal of the condemned items is included at the bottom of the report, which can be either in agreement with, or different from, the recommendations made by the BoC.

2.6 The BoC report is then enclosed in a memo and sent back to the requesting ministry/department, along with a blank *Disposal Certificate* to be completed. The assessed department actions the recommendations, returns the completed *Disposal Certificate* signed by the Accounting Officer and a Witness, to MoFEM. The memo and the BoC report are also copied to the Treasury Department, Internal Audit Unit, and also to the Montserrat National Audit Office.

## FINDINGS

2.7 **Undocumented internal request.** It is the standard prerequisite that all government departments must write to the F.S., to request a BoC to convene. However, from the sample BoC documents reviewed in the closed 2018 - 2023 *Board of Survey - General* files, it was noted that MoFEM is non-compliant to this rule. There are no internal request letters, memos, or emails from MoFEM's admin staff to the F.S. on file, for a BoC to be set up.

2.8 **Undocumented reasons for inability to serve on Boards of Condemnation.** The PFMA Regulations, *Part 12, Condemnation and Disposal of Stores, Section 66. (7)*, states that where an officer appointed to a BoC is unable to serve, he or she should immediately report this to the F.S., giving a valid reason for their inability to serve. However, there were no paper trails in any of the 2018 - 2023 *Board of Survey - General* files, explaining why the elected public officers declined to serve on the Boards.

2.9 **Unauthorised disposal certificate in circulation.** It was noted that the authorised Disposal Certificate for unwanted or condemned items, in the revised edition of the *CAP 17.07 PFMA Regulations 2019*, differs greatly from the current version that is being distributed by

MoFEM (refer to *Appendix I*). The original wording and format of this version of the Disposal Certificate was modified by MoFEM, but the PFMA Act has not been amended to reflect these changes.

2.10 Another observation, is that the current version being sent out to the ministries/departments, does not provide for all of the prescribed methods of disposal for the old, unwanted, or unrepairable inventories, as per the PFMA Regulations; that is:

- dumped at the New Windward Landfill;
- sold by public auction or by public tender; or
- donated to educational, scientific, cultural, charitable institutions and organisations.

2.11 Notably from the BoC samples reviewed, ninety-eight percent (98%) of the prescribed methods of disposal recommended by the BoC Team, and the directives from the F.S., were that the condemned ICT devices were either to be dumped, or given to *Hightech Electrical*.

#### 2.12 **Systematic non-removal of condemned ICT assets from the Asset Register.**

The Treasury Department is responsible for the administration of the WASP Mobile Asset Register software, and also for the training of the GoM employees to use it to enter, check in, check out, move, transfer, and remove GoM-owned assets and inventories within or from the software. However, it was observed from the report generated by the WASP Mobile Asset Register, and from interviews with the auditees, that the majority of the entities have not been removing condemned ICT assets from the WASP Asset Register that were already dumped or disposed.

2.13 The following were identified as the main reasons why condemned ICT assets are not being removed from the WASP Mobile Asset Register:

- DITES is usually responsible for dumping condemned ICT devices after removing the hard drives that contains the GoM's sensitive information, and also harvesting of any useful parts for recycling. The I.T. Department then stockpiles the processed ICT devices for an unspecified number of years, before actually dumping them. Consequently, majority of the time the accounting ministries/departments are not aware of when DITES finally disposes the processed condemned ICT items.
- In some departments, there are no designated trained person(s) with access permissions (segregation of duties) to add, move, transfer, check in, check out or remove assets in the WASP software. This is mainly due to the high turnover of staff, and those that have exited the civil service, and replacements are not readily identified by the departments, to be trained by the Treasury.

- A large number of government employees are not aware that once there is no trained designee(s) to perform tasks in WASP software, that formal requests can be sent to the Treasury Department to execute these tasks in the Asset Register on behalf of the ministries/departments.

**2.14 Board of Condemnation and Board of Survey are being used interchangeably.** As per the revised PFMA regulations, there are five types of BoS, in contrast to only one type of BoC. However, the BoS for the condemnation of obsolete and unserviceable inventories and the BoC, are being regarded to be one and the same.

2.15 There are four key differences between the six types of assessment boards, as follows:

### **1. Purpose of the Boards**

2.16 BoS are convened to inspect and assess (i) cash and bank balances; (ii) stores<sup>7</sup>; (iii) inventories<sup>8</sup>; (iv) assets<sup>9</sup>; and to (v) condemn unserviceable inventories that have reached the end of their useful life, and are beyond economical repair, or unserviceable, or obsolete (refer to *Appendix II* for PFMAA definitions of stores, inventories, and assets).

2.17 As per Part 12, Section 66. (1), BoC are assembled to inspect stores reported to be unserviceable or obsolete, and to make recommendations for their disposal.

### **2. Appointment of the Boards team members**

2.18 Depending on the type of BoS, the teams can be appointed by either the (i) Financial Secretary; (ii) Accountant General; or (iii) at the discretion of Accounting Officers; for each Ministry, Department, and Government agencies.

2.19 As per Part 12, Section 66. (1), BoC are appointed only by the FS, on the recommendation of (i) an accounting officer; (ii) a stock verifier; or by (iii) a Board of Survey.

### **3. Method of conducting the different types of Boards**

2.20 The BoS conduct the various surveys as follows:-

- **Stores:** Teams perform complete checks of all stores on hand, or about to be converted (allocated/unallocated); and comparison of quantities against the stock ledger and bin cards.

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<sup>7,8,9</sup> Chapter 17.07 Public Finance (Management and Accountability) Act, Revised Edition 2019

Discrepancies are noted and if there are surpluses in comparison to the stores ledger, the quantity is brought to account on a stores receipt voucher.

- **Cash and bank balances, etc.:** Team(s) “drop in” unannounced at the targeted Ministries, Departments, or agencies, to conduct surprise surveys on all cash, bank balances, stores, and stamp stocks, being held by public officers.
- **Inventories:** Team(s) inspect and assess the stock holdings where inventories have not been fully checked during the financial year by a Stock Verifier; or in stores where exceptionally valuable or attractive items that have been already checked.
- **Assets:** Team(s) check the assets held by the Ministries, departments and agencies.
- **Condemnation of unserviceable inventories:** Team(s) check and document any stores that appear to be unserviceable or obsolete, on the prescribed BoS report form, and the recommended method of condemnation or disposal.

2.21 As per *Part 12, Section 67. (1) - (3)*, a BoC has to identify, inspect, and determine, whether or not each item of stores listed to be condemned are either unserviceable, or obsolete, in the presence of the accounting officer or any officer authorised by them.

#### 4. Reporting

2.22 All BoS, whether appointed by the FS or not, a signed report must be submitted immediately to the FS in the format specified by the Accountant General, and with the terms of reference of the type of Board that was conducted. For example, a BoS Stores report should include:

- Comments or remarks regarding any unexplained surpluses and shortages; and opinions of any listing of stores considered to be unserviceable or obsolete.
- Statement of any difficulties experienced while conducting its duties.
- Opinion on the condition and adequacy of storage and storage facilities; and the effectiveness of security arrangements and safeguards against fire and deterioration.
- A certificate stating that procedures as given in regulation 64, were followed.

2.23 As per *Part 12, Section 68. (1) - (4)*, the Chairman of the BoC immediately submits a report listing the stores identified by the team to be condemned; the recommended manner of disposal; accounts of any misuse, abnormal damage, deterioration, or any other cause the team thinks contributed to the inspected items being unserviceable or obsolete.

2.24 **Omission of some disposal methods in reports.** Notably, from the numerous BoC documentation examined that had listings of ICT devices to be condemned, the majority of the recurrent BoC recommendations and F.S.'s directives were for the items to either be:

- Dumped at the New Windward Solid Waste Disposal Site at Jack Boy Hill.
- Handed over to the GoM's I.T. Department to process before being disposed of as per the recommended, or sanctioned, method.
- Gifted to a local Electrical and I.T. company, Hightech Electrical.

2.25 From the samples reviewed, none of the BoC reports stated the above recommendations; nor instructions given by the F.S., for any of the unwanted ICT devices to be sold by public auction or tender; or given as gifts to local educational, scientific, cultural, and charitable institutions and organisations.

2.26 Furthermore, a qualified electrician who has repeatedly served as the Chairman of BoCs for a number of years, has highlighted the above non-inclusions on some of his BoC reports. He has provided his expert views regarding the current disposal practices, and recommended practical solutions for the disposal of condemned stores and inventories. However, to date, none of his recommendations have been acknowledged, or actioned by MoFEM.

2.27 **Secured condemned ICT assets.** From inspections conducted at select entities, it was observed that the majority have adequate and secure storage areas to retain and safeguard condemned ICT devices against interference or theft by unauthorised persons, before they are disposed as instructed by the F.S. and turned over to DITES.

## RECOMMENDATIONS

2.28 **Adequate recordkeeping is required.** As it is the standard that all government departments must send BoC requests to the Financial Secretary to convene BoCs, MoFEM's admin staff should commence filing the department's internal BoC request correspondences (i.e. whether letters, memos, or emails) on the *Board of Survey - General file* folders for audit trail purposes.

2.29 **Commence documenting the elected public officers' inability to serve.** As per the PFMAA, MoFEM's admin staff needs to commence documenting the reasons given by the

appointed BoC team members for declining to serve, whether it was communicated to MoFEM formally or informally; that is, via letters, emails, telephone calls, or direct verbal exchanges.

2.30 Therefore, we suggest that all reasons given should be noted down on the actual cross-referenced BoC letters of appointment, on file, in the *Board of Survey - General folder*.

2.31 **Revision and endorsement of the circulated disposal certificate.** We recommend that MoFEM adopt the current version of the disposal certificate being disseminated, but must first amend it by itemising and clearly distinguishing the: disposal options; the method of destruction or disposal; and the reason for condemning the asset. Once these changes are made, the necessary measures should be taken to adopt and modify the disposal certificate displayed in the PFMA Act.

*Figure 1 - Recommended amendments to be made to the Certificate of Disposal*

I hereby certify that the list of stores shown below have been disposed of by **auction / donation / dumping**, due to **infestation / item(s) not being fit for human consumption**.

2.32 **Development of an ITAD Handbook.** It is of great importance that government-owned assets that were permanently disposed of (destroyed and dumped, sold via public auction/tender, or donated) are removed from WASP, so that MoFEM can keep an accurate record of what assets they own, and the dollar values. Therefore, we recommend that MoFEM should, in conjunction with Treasury Department and DITES, formulate and define guidelines in an Information Technology Asset Disposition Handbook, for dissemination throughout the Public Service.

2.33 The requisites for the *ITAD Handbook*, should clearly state specifics such as (but not limited to):

- i. The time frame in which it should take for the:
  - Board of Condemnation assessments to be conducted.
  - Condemned ICT assets to be processed by DITES.
  - Processed condemned ICT assets should be stockpiled before eventually being disposed.
  - Carrying out the prescribed disposal method, as directed by FS.

- ii. When condemned ICT items are relinquished to DITES to be processed, the rules should indicate:
  - That the unwanted or condemned ICT items are to be checked in/checked out, moved, or transferred in WASP, as per the directive given by the F.S.
  - By which department.
  - At what phase of the ICT Asset Disposal process this occurs; etcetera.
  
- iii. Whether the accountable ministries/departments, or DITES, will be responsible for ultimately removing the processed condemned ICT assets, from the WASP Mobile Asset Register.

2.34 **More consideration of the prescribed provisos for the disposal of condemned ICT devices.** It was noted that the sale of condemned stores by public auction or public tender are rare, or have never been considered for disposing unwanted ICT devices. The provisos (i) sale of condemned stores, Section 70., is an ideal way of raising added revenue for the GoM; and (ii) gift of condemned stores, Section 71., encourages a Circular Economy.

2.35 A *Circular Economy* can help to reduce e-waste, when electrical and electronic products are maintained, repaired, and refurbished, to keep them whole in order to retain the maximum possible value, and to be reused (*technical cycle*).

## OTHER OBSERVATIONS

2.36 **Insufficient qualified officers to serve on Boards of Condemnation.** It is a hard and fast rule that public officers elected to serve on BoCs, must be permanent and pensionable employees within the GoM. However, qualified officers are re-employed on contractual terms and are selected to serve; some have expressed their reluctance and have declined various requests.

2.37 It has also been indicated that a BoC team can opt not to begin or continue, to conduct a BoC survey exercise for the following reasons:

- unavailability of all the listed items;
- items not listed on the original documents were presented to be examined;

- The BoS team members who are full-time public officers, still have to perform their normal work duties which cannot be neglected during a BoC assignment. Consequently, the Chairman of a BoC can make an executive decision to abort the survey and to disband if the task is too much to accomplish within the two (2) week deadline.

2.38 **Poor conditions in main storage room.** From past reports and from observation, the main storage room used by most of the government departments was very hot, grossly overrun with mould, and windowless with no circulating fresh air. The room was always cluttered with carton boxes, garbage bags, office furniture, computers, and other condemned items that have been placed haphazardly from the front door all the way back into the main storage areas. Consequently, this unhealthy and risky, environment was unfavourable for persons to enter with ease and to remain in the space for any length of time.

2.39 The BoC team that conducted the survey, stated that they were unable to attain a complete and accurate tally of the ICT devices or to perform the required inspection and testing, due to the stifling musty air and the disorganised state of the room. Consequently, under the given circumstances, they were compelled to do an extremely speedy “eyeball estimate” of the stockpiled condemned computers, as the BoC team could not thoroughly survey the computers to verify whether the machines were serviceable or not. It was possible that before the ICT devices were stored under such extreme conditions, that there may have been ICT devices that could have been repaired and/or refurbished for re-use; or sold by public auction to generate additional revenue for the GoM; or donated to the Primary or Secondary schools.

2.40 In addition, the team also indicated that they were unable to establish whether the mandatory Asset Tags generated by the Treasury Department’s asset register software, were affixed on each machine; to document the unique identification numbers on said asset tags; or to record the details of the manufacturer, model series, type of control processing unit (CPU), and the serial number of each computer.

2.41 After the observation exercise, it was indicated by the GoM’s Facilities Manager that the EDH had previously conducted an inspection of the storage room, and issued a report that recommended the immediate closure of the storage area, due to the health hazard risk posed by the mould.

## CHAPTER 3 DEPARTMENT OF INFORMATION TECHNOLOGY & E-GOVERNMENT SERVICES

3.1 The Government of Montserrat's Department of Information Technology & E-Government Services (DITES), falls under the umbrella of the Office of the Premier. The I.T. unit is responsible for the development of ICT strategies and policies; engaging in the delivery and support of first-rate I.T. and e-Government services across the GoM; the enhancement and increased access to Government services, by citizens and local businesses in Montserrat, as well as in the diaspora; and the maintenance and upgrading of the GoM's ICT equipment and network infrastructure.<sup>10</sup>

### FINDINGS

3.2 **Unofficial responsibility for processing of obsolete and condemned ICT assets.** Prior to the disposal of ICT devices that are old and unserviceable, the I.T. Department DITES, has to perform the following tasks on condemned equipment:

- the removal of the hard drives from the computers and laptops that stores GoM's sensitive information before dumping them, or sold by public auction;
- the harvesting of any useful parts for recycling in other ICT devices, before they are dumped;
- the execution a factory reset of the ICT devices to erase all of the GoM-related information, before re-installing the required software for re-use by either the accounting Ministry/Department; or by a different government entity (transfer).

3.3 However, notably, this responsibility is an informal practice that is not stipulated in the PFMA Act, nor specified in an ICT Policy.

3.4 The standard practice is that the ICT devices, along with the extracted hard drives, are stockpiled and stored by DITES for an unspecified period before they are dumped. The hard drives in particular are either manually destroyed by DITES's staff; or smashed to bits by the bulldozer onsite at the Jack Boy Hill dump. The person(s) from the I.T. Department overseeing the disposal and/or destruction activity, remain onsite until the fragments are totally unrecoverable.

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<sup>10</sup><https://www.gov.ms/government/ministries/office-of-the-premier/department-of-information-technology-e-gov-services-dites/3/>

**3.5 Unauthorised dumping of condemned ICT assets.** DITES indicated that at least one government ministry/department has bypassed the customary practice of turning over condemned ICT devices to DITES, to process, before they are disposed of at the New Windward Landfill dump site. Fortunately, in this instance, the I.T. Department was alerted by a concerned citizen who observed several (unprocessed) government-owned computers and laptops at the dump site. Consequently, DITES was able to salvage quite a number of these ICT devices to remove the hard drives, and to harvest spare parts.

3.6 DITES was unable to confirm that all of the discarded ICT devices were retrieved from the Jack Boy Hill dump site and whether this was an isolated incident; or a common practice of unauthorised dumping.

## RECOMMENDATIONS

**3.7 Formalisation of current disposal procedures.** It is strongly recommended that the current unofficial role that DITES's plays in GoM's asset disposal procedures, must be formalised in an Information Communications Technology (ICT) Policy. The government's I.T. Department should create and implement an ICT Policy that defines the tasks that DITES is responsible for carrying out on condemned ICT items, that are to be re-used, transferred/moved, sold, donated, destroyed and dumped, such as:

- data erasure via performing a factory reset of the ICT devices that will be re-used, whether by the accountable ministry/department, or in another government office;
- removal of hard drives that store the GoM's confidential information;
- harvesting of useable parts to be recycled in the repair/refurbishment of other ICT devices;
- physical destruction of condemned ICT assets that are either obsolete or beyond repair.

3.8 In addition, the ICT Policy, should also clearly stipulate that it is mandatory for all ministries/departments to relinquish all condemned ICT devices to DITES for removal of the hard drives, which contains the GoM's sensitive information before they can be disposed of as directed by the F.S. The document is to be disseminated throughout the Civil Service, to ensure that all government employees will be fully acquainted with the above requisite ICT Asset Disposal rule.

## CHAPTER 4 MONTSERRAT E-WASTE MANAGEMENT POLICY AND E-WASTE LEGISLATION

4.1 The Montserrat National ICT Plan (2017 - 2021) identified the Information Communication Technology (ICT) Unit of the Ministry of Communications, Works, Labour, and Energy (now renamed BUILTE - *refer to Abbreviations for full name*), and the Environmental Health Department of the Ministry of Health & Social Services (MoHSS), as being the key agencies responsible for the development of an e-waste management policy by 2018. The ICT Unit was to be the lead entity for the project.

4.2 The second endeavour was the drafting and submission of a national e-waste legislation, which to be enacted by 2020. The project was the responsibility of the above-mentioned departments, along with the Legislative Drafting Unit of the Attorney General Chambers. The Environmental Health Department was the assigned lead in this undertaking.

### FINDINGS

4.3 **No national e-waste management policy or legal framework.** The GoM had started taking the necessary steps to address the potential consequences of improper e-waste disposal at the landfill, which can pose as a serious threat to the Montserrat's present and future public health of generations to come, and to the pollution of the island's ecosystems. Reportedly, the initial attempt took place in 2015 when the former Head of the newly-formed MCWL ICT Unit, selected an I.T. Technician from DITES who had recently received training in India in the subject area. He was tasked with gathering the necessary information for the development of an e-waste management policy, and serve as the basis for an e-waste legal framework for Montserrat. This legislation would have been in alignment with regional and international standards.

4.4 The I.T. Technician was sent on training to the *ITU 5<sup>th</sup> Green Standards Week* in December 2015, after which an obligatory report was submitted upon his return to Montserrat. However, shortly upon his return, the Head of the MCWL ICT Unit was transferred to another Ministry/Department. Consequently, nothing further was done regarding the drafting of the e-waste management policy or legal framework. There was also a significant time-lapse before another Head of the ICT Unit was appointed, and this initial e-waste management initiative in conjunction with the I.T. Technician, was reportedly not continued.

4.5 However, we found that an official endeavour to develop and implement an e-waste management policy and e-waste legislation, was launched with the National ICT Plan 2017 - 2021. The document outlined the five defined focus areas for prioritised action in the application of ICT

towards achieving the National ICT Vision, namely Environment, Learning, Access, Virtual and Adoption (e-lava). The focus area of 'Environment' *"...encapsulates both Montserrat's natural environment and the legal/regulatory environment for ICTs and ICT-related activity..."*

4.6 The NICT Plan also stated that Montserrat *"...requires a supportive legal and regulatory framework, necessary for enabling business, foster enterprise, and engender trust and confidence among the citizenry in using ICTs securely and routinely in their daily lives. ICT legislation will be non-discriminatory and technology neutral..."* (Refer to Appendix III to view the summaries of the policy objective, strategic thrusts and key programme specifically developed for 'Environment', that pertain to e-waste management).

4.7 Three government entities were assigned in the NICT Plan, to be responsible for the drafting and the implementation of these documents. The deadlines given in the NICT Plan for completing the e-waste management policy and the e-waste legislation, were in 2018 and 2020 respectively; however, each responsible stakeholder confirmed that these two e-waste initiatives were never started.

4.8 **Unacceptable e-waste disposal practices and activities.** Electronic and electrical waste (or *e-waste*) includes almost any household or business item containing circuitry or electrical components with either power or battery supply such as toasters and kettles, electrical tools, scales, electric shavers, "white goods" i.e. refrigerators, washing machines and dryers, televisions, computers, laptops, tablets, printers, mobile phones, toys, medical devices, etcetera (*refer to Appendix IV for the full listings of the 6 categories of e-waste*). These items contain several different toxic substances such as lead, americium, mercury, cadmium, sulphur, and chromium; and while users are unlikely to come into contact with any of these substances when using them, when they become waste these toxicants can be released into the environment if the devices are not properly handled and disposed of, using environmentally unsound practices and activities. Health hazards related to these toxicants include: brain damage, cancer, memory loss, muscle weakness, reduced fertility, and damage to the lungs, liver, heart, and kidneys (*refer to Appendix VI for the table of toxicants and associated health hazards*).

4.9 The Environmental Health Department (EHD) indicated that the following unsafe practices for the disposal of e-waste, have been observed around Montserrat. These activities are hazardous to both the environment and human health, as they can release toxic pollutants that will contaminate the air, soil, dust, and water:

- dumping e-waste items along with regular solid waste at the New Windward Landfill site in Jack Boy Hill;
- dumping e-waste items on sides of the roads, empty lots of land, and/or in ghauts;
- locals scavenging e-waste items from the landfill; and

- burning of e-waste in the open poses significant environmental and health risks.

4.10 The EHD has reported that there is an ongoing smouldering fire in the area where the solid waste is burnt and that it cannot be extinguished due to the flammable chemicals in the soil, released from previously burnt items. It was indicated that it is not a requirement for the EHD workers to separate electrical and electronic items from the regular solid waste; consequently, e-waste is often unintentionally burned, thereby releasing toxic pollutants into the environment. As a result, complaints have been lodged with the EDH about the thick pungent smoke emanating from the Jack Boy Hill dump site, whenever wind conditions change. Residents in St. Johns, and other villages in its vicinity, are mainly affected.

#### 4.11 **Strategies considered for the future prevention and reduction of e-waste.**

The Public Health Act 2013, only pertains to the management and disposal of regular solid waste. There is nothing in this legal framework concerned with either the management or disposal of e-waste. In addition, reportedly the present Principal EH Officer had no prior knowledge about the *2017 - 2021 National ICT Plan and its Policy Objective, Strategic Thrusts, and Key Programmes* in relation to Environment; the set responsibilities and timelines assigned to the EHD for the development and implementation of an e-waste management policy; nor the role of the EHD as an active participant in the passing of an e-waste legislation.

4.12 However, the Principal EH Officer indicated that the department had considered undertaking two strategies for the prevention of, or reduction in, the harmful effects that the improper handling and disposal of e-waste can have on humans and the island's environment:

#### **Strategy #1:**

- This option would involve the separation and stockpiling of e-waste items for exportation to another country in the region, that has the appropriate facilities to safely and permanently dispose of e-waste (*transboundary movements of e-waste*). However, it was realised that this course of action would not be feasible nor cost effective for Montserrat as households, and the public and private sectors, are not large enough to generate enough tonnage of e-waste for export. It would also take decades for an ample amount of e-waste to be stockpiled which is not ideal; furthermore, there is also the consideration of high shipping costs, which would not be worth the endeavour.

#### **Strategy #2:**

- The second option involved conversations amongst the *Organisation of Eastern Caribbean States* (OECS) members who are having similar challenges with the management and disposal of hazardous waste. The idea debated was the joint pooling and disposal of hazardous waste.

## RECOMMENDATIONS

**4.13 Draft and implement a national e-waste management policy and legal framework.** It is of great importance that the drafting and implementation of an e-waste management policy and a robust national e-waste legislation for Montserrat, be undertaken as originally planned, as more and more electronic and electrical items that contain many different toxic substances are being brought to the island. Moreover, when these items have reached the end of their useful life, they are not being disposed of in safe and eco-friendly ways. Consequently, these national e-waste documents are essential for the protection of Montserrat's environment and communities, from the possible long-term negative impacts that can stem from the improper disposal of e-waste, as described in the table in *Appendix V*.

**4.14 Proposed solution to managing and reducing e-waste in Montserrat.** One solution that can be taken into consideration, is creating the best practice of a Circular Economy. A *Circular Economy* is aimed at reducing waste to a minimum; that is, when a product reaches the end of its life, its materials are kept within the economy wherever possible by reusing, repairing, refurbishing and recycling. Therefore, the product is effectively reused several times, thus creating further value.

**4.15** Below are a few suggested circular economy best practices, that may be appropriate for Montserrat's context:

- (i)** Harvesting of ICT components from used and/or disposed of ICT equipment that have not reached the end of their useful life, for reuse in refurbishing and repairing other ICT items. For example, central processing units (CPUs), motherboards, graphic cards, hard drives, Random Access Memory (RAM), etcetera.
- (ii)** Donation of harvested, non-toxic, ICT components to schools for science projects. For example, fans, capacitors, magnets, switches, transformers, and the like.
- (iii)** Designate a secured area at the landfill for the dumping of unwanted ICT devices.
- (iv)** Stockpile e-waste inside shipping containers to prevent scavenging, and leaching of toxic substances into the soil, water, and air.
- (v)** Following the manufacturer's usage guidelines to prolong the serviceable life span for electronic and electrical items.
- (vi)** Social awareness is another very important factor in the management and reduction of e-waste. Hence, it would be beneficial to educate and promote to Montserrat's populace, the

of dangers of improperly handled and disposed of e-waste; and the resulting short- and long-term negative impacts that e-waste can have on the island's inhabitants and ecosystem.

- (vii)** Training of individuals to clean, repair, and update electronic and electrical items, in order to extend their useful life; and/or possibly granting them concessions or grants, to establish their own businesses in this field.

## CHAPTER 5 CONCLUSION

### BASIS FOR MODIFIED CONCLUSION

5.1 In the table below, are the areas of non-compliance which resulted in a modified conclusion relating to the condemnation and disposal of obsolete, unwanted, and unserviceable assets, stores and inventories:

ENTITY	AREA OF NON-COMPLIANCE	RELATED SECTION OF REGULATORY AUTHORITY
<p><b>MoFEM</b></p>	<p><b>Appointment of board of condemnation</b></p> <p>“...The Financial Secretary may, on the recommendation of an accounting officer, a stock verifier, or a board of survey, appoint a board of condemnation...”</p>	<p><b>CHAPTER 17.07 Public Financial (Management Accountability) Act 2019</b></p> <p>PROCUREMENT AND STORES REGULATIONS - SECTION 58</p> <p>PART 12, CONDEMNATION AND DISPOSAL OF STORES, 66. (1)</p>
<p><b>Government Ministries/ Departments</b></p>	<p><b>Accounting for stores destroyed or disposed of</b></p> <p>Whenever the destruction, disposal, sale, gift of condemned stores has been authorised by the Financial Secretary of the accounting officer as the case may be, a stores issue voucher shall be prepared by the officer in charge of stores before such stores are remove from stock.</p>	<p><b>CHAPTER 17.07 Public Financial (Management Accountability) Act 2019</b></p> <p>PROCUREMENT AND STORES REGULATIONS - SECTION 58</p> <p>PART 12, CONDEMNATION AND DISPOSAL OF STORES, 73.</p>
<p><b>MHSS MCWL ATTORNEY GENERAL</b></p>	<p><b>Environment Pillar key programmes:</b></p> <p><b>e-Waste Management</b></p> <p>Create policy and legislation to treat with the appropriate disposal of electronic waste (e-Waste).</p> <p><b>Timelines &amp; Key Agencies</b></p> <ul style="list-style-type: none"> <li>• e-Waste policy developed by 2018 – <b>MCWL</b>, MHSS</li> <li>• e-Waste legislation developed by 2020 – <b>MHSS</b>, MCWL, Attorney General</li> </ul>	<p><b>Montserrat’s National Information &amp; Communication Technology Policy, Strategy &amp; Implementation Plan 2017 - 2021</b></p> <p><b>Environment policy objectives:</b></p> <p><b>Strategic Thrust #1</b></p> <p>Utilise ICTs to <u>accelerate</u> the sustainable use and management of the natural environment and resources.</p>

5.2 Based on the audit work performed we found, except for the instances of non-compliance, MoFEM and all the other government Ministries/Departments are in general, in conformity with the material respects of the *Chapter 17.07 PFMA Act and Regulations 2019*.

5.3 We also established that there is no dedicated policy, legislation, or regulations for the appropriate management, treatment, and the disposal of electrical and electronic items (e-waste) on Montserrat, as strategised in the *Montserrat NICT Policy, Strategy & Implementation Plan 2017 - 2021*.

## CHAPTER 6 MANAGEMENT RESPONSES

### Response from the Financial Secretary, Ministry of Finance & Economic Management

8 January 2026

FINDING	RECOMMENDATION	MANAGEMENT RESPONSE
<p>2.7 <b>Undocumented internal request.</b> It is the standard prerequisite that all government departments must write to the F.S., to request a BoC to convene. However, from the sample BoC documents reviewed in the closed 2018 - 2023 <i>Board of Survey - General file</i>, it was noted that MoFEM is non-compliant to this rule. There are no internal request letters, memos, or emails from MoFEM's admin staff to the F.S. on file, for a BoC to be set up.</p>	<p>2.28 <b>Adequate record-keeping is required.</b> As it is the standard that all government departments must send BoC requests to the Financial Secretary to convene BoCs, MoFEM's admin staff should commence filing the department's internal BoC request correspondences (i.e. whether letters, memos, or emails) on the <i>Board of Survey - General file</i> folders for audit trail purposes.</p>	<p><i>Recommendation is noted and accepted. Efforts have been made by the Ministry to ensure that all requests for a BoC are filed along with the recommendation by the BoC with the FS's comments and the disposal certificate. Staff within MoFEM consistently follow up the Ministries and Departments if the disposal certificate is not received in a timely manner. These will be placed on the appropriate files with all related documentation.</i></p>
<p>2.8 <b>Undocumented reasons for inability to serve on Boards of Condemnation.</b> <i>The PFMA Regulations, Part 12, Condemnation and Disposal of Stores, Section 66. (7)</i>, states that where an officer appointed to a BoC is unable to serve, he or she should immediately report this to the F.S., giving a valid reason for their inability to serve. However, there were no paper trails in any of the 2018 - 2023 <i>Board of Survey - General file</i>, explaining why the elected public officers declined to serve on the Boards.</p>	<p>2.29 <b>Commence documenting the elected public officers' inability to serve.</b> As per the PFMAA, MoFEM's admin staff needs to commence documenting the reasons given by the appointed BoC team members for declining to serve, whether it was communicated to MoFEM formally or informally; that is, via letters, emails, telephone calls, or direct verbal exchanges.</p> <p>2.30 Therefore, we suggest that all reasons given should be noted down on the actual cross-referenced BoC letters of appointment, on file, in the Board of Survey - general folder.</p>	<p><i>Findings and recommendations are noted and accepted. The Ministry of Finance has required that all persons communicating that they are unable to serve must submit a correspondence indicating the reason before MoFEM assigns another Officer to the BoC.</i></p>

<p>2.9 <b>Unauthorised disposal certificate in circulation.</b> It was noted that the authorised Disposal Certificate for unwanted or condemned items, in the revised edition of the <b>CAP 17.07 PFMA Regulations 2019</b>, differs greatly from the current version that is being distributed by MoFEM (refer to Appendix I). The original wording and format of this version of the Disposal Certificate was modified by MoFEM, but the PFMA Act has not been amended to reflect these changes.</p> <p>2.10 Another observation, is that the current version being sent out to the ministries/departments, does not provide for all of the prescribed methods of disposal for the old, unwanted, or unrepairable inventories, as per the PFMA Regulations; that is:</p> <ul style="list-style-type: none"> <li>• dumped at the New Windward Landfill;</li> <li>• sold by public auction or by public tender; or</li> <li>• donated to educational, scientific, cultural, charitable institutions and organisations.</li> </ul>	<p>2.31 <b>Revision and endorsement of the disposal certificate currently being circulated.</b> We recommend that MoFEM adopt the current version of the disposal certificate being disseminated, but must first amend it by itemising and clearly distinguishing the: disposal options; the method of destruction or disposal; and the reason for condemning the asset. Once these changes are made, the necessary measures should be taken to adopt and modify the disposal certificate displayed in the PFMA Act.</p>	<p><i>Findings and recommendation are noted. The Ministry of Finance has been made aware that the incorrect certificate has been in circulation. The certificate has been modified to reflect the Legislation.</i></p>
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<p>2.11 Notably from the BoC samples reviewed, ninety-eight percent (98%) of the prescribed methods of disposal recommended by the BoC Team, and the directives from the F.S., were that the condemned ICT devices were either to be dumped, or given to <b>Hightech Electrical</b>.</p>	<p><b>2.31 Revision and endorsement of the disposal certificate currently being circulated.</b> We recommend that MoFEM adopt the current version of the disposal certificate being disseminated, but must first amend it by itemising and clearly distinguishing the: disposal options; the method of destruction or disposal; and the reason for condemning the asset. Once these changes are made, the necessary measures should be taken to adopt and modify the disposal certificate displayed in the PFMA Act.</p>	<p><i>Findings and recommendations are noted.</i></p>
<p><b>2.14 Board of Condemnation and Boards of Survey are being used interchangeably.</b> As per the revised PFMA regulations, there are five types of BoS, in contrast to only one type of BoC. However, the BoS for the condemnation of obsolete and unserviceable inventories and the BoC, are being regarded to be one and the same.</p> <p>2.15 There are four key differences between the six types of assessment boards, as follows:</p> <p><b>1. Purpose of the Boards</b></p> <p>2.16 BoS are convened to inspect and assess (i) cash and bank balances; (ii) stores; (iii) inventories; (iv) assets; and to (v) condemn unserviceable inventories that have reached the end of their useful life, and are beyond economical repair, or unserviceable, or obsolete (<i>refer to Appendix II for PFMAA definitions of stores, inventories, and assets</i>).</p> <p>2.17 As per <i>Part 12, Section 66. (1)</i>, BoC are assembled to inspect</p>	<p><b>(No recommendation given)</b></p>	<p><i>The findings are noted and will be addressed.</i></p>

stores reported to be unserviceable or obsolete, and to make recommendations for their disposal.

## **2. Appointment of the Boards team members**

2.18 Depending on the type of BoS, the teams can be appointed by either the (i) Financial Secretary; (ii) Accountant General; or (iii) at the discretion of Accounting Officers; for each Ministry, Department, and Government agencies.

2.19 As per *Part 12, Section 66. (1)*, BoC are appointed only by the FS, on the recommendation of (i) an accounting officer; (ii) a stock verifier; or by (iii) a Board of Survey.

## **3. Method of conducting the different types of Boards**

2.20 The BoS conduct the various surveys as follows:-

- **Stores:** Teams perform complete checks of all stores on hand, or about to be converted (allocated/unallocated); and comparison of quantities against the stock ledger and bin cards. Discrepancies are noted and if there are surpluses in comparison to the stores ledger, the quantity is brought to account on a stores receipt voucher.
- **Cash and bank balances, etc.:** Team(s) “drop in” unannounced at the targeted Ministries, Departments, or agencies, to conduct surprise surveys on all cash, bank balances, stores, and stamp stocks, being held by public officers.

<ul style="list-style-type: none"> <li>• <b>Inventories:</b> Team(s) inspect and assess the stock holdings where inventories have not been fully checked during the financial year by a Stock Verifier; or in stores where exceptionally valuable or attractive items that have been already checked.</li> <li>• <b>Assets:</b> Team(s) check the assets held by the Ministries, departments and agencies.</li> <li>• <b>Condemnation of unserviceable inventories:</b> Team(s) check and document any stores that appear to be unserviceable or obsolete, on the prescribed BoS report form, and the recommended method of condemnation or disposal.</li> </ul> <p>2.21 As per Part 12, Section 67. (1) - (3), a BoC has to identify, inspect, and determine, whether or not each item of stores listed to be condemned are either unserviceable, or obsolete, in the presence of the accounting officer or any officer authorised by them.</p> <p><b>4. Reporting</b></p> <p>2.22 All BoS, whether appointed by the FS or not, a signed report must be submitted immediately to the FS in the format specified by the Accountant General, and with the terms of reference of the type of Board that was conducted. For example, a BoS Stores report should include:</p> <ul style="list-style-type: none"> <li>• Comments or remarks regarding any unexplained surpluses and shortages; and opinions of any listing of stores considered to be unserviceable or obsolete.</li> </ul>		
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<ul style="list-style-type: none"> <li>• Statement of any difficulties experienced while conducting its duties.</li> <li>• Opinion on the condition and adequacy of storage and storage facilities; and the effectiveness of security arrangements and safeguards against fire and deterioration.</li> <li>• A certificate stating that procedures as given in regulation 64, were followed.</li> </ul> <p>2.23 As per <i>Part 12, Section 68. (1) - (4)</i>, the Chairman of the BoC immediately submits a report listing the stores identified by the team to be condemned; the recommended manner of disposal; accounts of any misuse, abnormal damage, deterioration, or any other cause the team thinks contributed to the inspected items being unserviceable or obsolete.</p>		
<p><b>2.36 Insufficient qualified officers to serve on Boards of Condemnation.</b> It is a hard and fast rule that public officers elected to serve on BoCs, must be permanent and pensionable employees within the GoM. However, qualified officers are re-employed on contractual terms and are selected to serve; others have expressed their reluctance and have declined various requests.</p> <p>2.37 It has also been indicated that a BoC team can opt not to begin or continue, to conduct a BoC survey exercise for the following reasons:</p> <ul style="list-style-type: none"> <li>• unavailability of all the listed items;</li> </ul>	<p><b>(No recommendation given)</b></p>	<p><i>Findings are noted. The Ministry of Finance will consult with the Human Resources Department to ensure that persons selected are Permanent and Pensionable before nominating to serve on the Board of Condemnation.</i></p>

<ul style="list-style-type: none"> <li>• items not listed on the original documents were presented to be examined;</li> <li>• The BoS team members who are full-time public officers, still have to perform their normal work duties which cannot be neglected during a BoC assignment. Consequently, the Chairman of a BoC can make an executive decision to abort the survey and to disband if the task is too much to accomplish within the two (2) week deadline.</li> </ul>		
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**Response from the Accountant General, Treasury Department  
9 January 2026**

Treasury Management acknowledges the audit observation that condemned ICT assets disposed of have not been consistently removed from the WASP Mobile Asset Register. We recognize that this perpetuates the risk of inaccurate asset records and as a result, weak internal controls. Therefore, Treasury Management is committed to implementing corrective measures within some agreed timelines and will ensure that progress is monitored through monthly internal reports, quarterly reconciliations, and departmental audit follow-ups with Ministries/Departments. The objective is for the WASP Mobile Asset Register to reflect the true status of ICT Assets.

It is also our intention to update our forms in the call for Annual Returns to make provision for an acknowledgement by all Ministries/Departments of condemnation/disposals during the reporting year, and create and/or update a register of disposal certificates where required.

We acknowledge the main storage area is not fit for purpose. A fit-for-purpose storage area will ensure that ICT Assets are securely held in suitable storage conditions, properly documented, and easily verifiable. We expect this to strengthen internal controls, support accurate reporting, and help to avoid adverse audit opinions.

**Response from the Chief Environmental Officer, Department of Environmental Health**  
**24 December 2025**

I acknowledge the findings and recommendations contained in this audit.

I note that the Montserrat National Information and Communication Technology (NICT) Policy, Strategy and Implementation Plan 2017 - 2021 assigned responsibilities to the Environmental Health Department for the development and implementation of an e-waste management policy and for leading the drafting of e-waste legislation. However, I was not previously made aware of these assigned roles, timelines, or expectations, and no formal handover, directive, or active programme relating to e-waste policy development existed within the Department prior to this audit. The matter was brought to my attention through the audit process.

I further acknowledge the National Audit Office's observations regarding unacceptable e-waste disposal practices occurring on the island, including the disposal of electronic and electrical waste alongside general solid waste, illegal dumping, scavenging, and open burning as I pointed them out during the audit. These practices present legitimate environmental and public health concerns, particularly given the hazardous substances contained in e-waste.

While the Public Health Act provides for the management of general solid waste, I agree that the absence of specific policy guidance and legislation for e-waste has limited the ability to regulate, enforce, and implement environmentally sound e-waste management practices in Montserrat.

Going forward, the Environmental Health Department commits to working collaboratively with key stakeholders, including the Ministry responsible for ICT, the Department of Information Technology & E-Government Services, the Ministry of Finance, the Attorney General's Chambers, and other relevant agencies, to advance the development and implementation of a national e-waste management policy and supporting legislative framework.

As an initial step, the Department will support inter-agency discussions aimed at clarifying institutional roles and responsibilities, identifying feasible options for the segregation and controlled handling of e-waste at the landfill, and exploring practical, context-appropriate measures aligned with circular economy principles. Public education and stakeholder engagement will also be considered as part of a phased approach to improving e-waste management practices.

The Environmental Health Department welcomes the National Audit Office's recommendations and views them as an opportunity to strengthen governance, environmental protection, and public health outcomes in relation to electronic and electrical waste management in Montserrat.

**Response from the Permanent Secretary, Building, Utilities, Infrastructure, Labour, Transport & Ecclesiastical Affairs**  
**16 November 2025**

The Ministry of Buildings, Utilities, Infrastructure, Labour, Transportation & Ecclesiastical Affairs (BUILTE) acknowledges receipt of the report and offers the following remarks.

The Ministry notes that the National ICT Policy, Strategy and Implementation Plan was formally reviewed in late 2023, and Cabinet received and approved the *NICT Review and Interim Plan* on 4 January 2024, extending the ICT Policy to 2025 and prioritising funding for development of a new comprehensive ICT policy (See Cabinet Decision 10/2024). The Review recognised that several areas remained outstanding at the national level, including the development of an e-waste management policy and supporting legislation.

Shortly thereafter, Cabinet approved the establishment of the Ministry of Communication and Digital Transformation on 22 February 2024, thereby transferring responsibility for ICT policy, ICT governance, and the associated implementation agenda, including matters relating to the disposal of ICT assets and the development of an e-waste policy and legislative framework, from BUILTE to the newly created Ministry.

Accordingly, BUILTE limits its comments to cross-government matters that remain within the scope of the Ministry:

**1. Disposal governance across the public service**

BUILTE supports the principle of establishing a standardised disposal procedure across Government, including clarity on disposal certificates, the removal of condemned assets from asset registers, and alignment with disposal expectations under the Public Finance Management framework.

**2. Storage of condemned physical assets**

BUILTE notes the observations regarding the condition of central storage facilities. Although ICT policy responsibilities no longer fall to the Ministry, BUILTE remains supportive of a coordinated approach where physical storage standards interface with Government's asset management obligations.

**3. Collaboration going forward**

BUILTE stands ready to support any cross-government measures arising from the audit that relate to disposal procedures which apply uniformly across Ministries. For ICT-specific policy action, BUILTE defers to the Ministry of Communication and Digital Transformation as the responsible authority.

BUILTE appreciates the work undertaken through this audit and remains committed to supporting a consistent and accountable Government-wide framework for the disposal of public assets.

**Response from the Chief Information Officer, Ministry of Digital Communication and Technology, (Department Information Technology & E-Services)**

**3 December 2025**

DITES concurs with the findings and recommendations of the report.

DITES confirms that there are several policies that have been approved in principle for implementation, one of which is Hardware and Software Asset Management and Control.

DITES confirms that it has recommended and has subsequently received approval for the establishment of an ICT Policy Review Committee that will take a broader look at ICT policy development and implementation.

DITES states for the record (1) Computer Devices are no longer considered office equipment and computer devices are used almost everywhere (2) the computer equipment should be expanded to include network hardware devices (switches, firewall, etc.), server equipment and surveillance cameras as well as IOT devices. The aforementioned items have a high acquisition cost and should also be safeguarded under the ITAD.

## ACKNOWLEDGEMENT

The Auditor General wishes to express her gratitude for the assistance and courtesies extended to the auditor, during the course of the audit.



**Marsha V. E. Meade**  
**Auditor-General**



## *APPENDIX II - Definitions<sup>11</sup>*

**ASSETS:** *means any item of economic value owned by a Ministry, department or agency of the Government especially that which could be converted to cash.*

**INVENTORIES:** *are assets in the form of materials or supplies to be consumed in the production process; or in the form of materials or supplies to be consumed or distributed in the rendering of services; or held for sale or distribution in the ordinary course of operations; or in the process of production for sale or distribution.*

**STORES:** *means stores including stores of plants, equipment, machinery, tools and vehicles being the property, or in the possession, or under the control, of the Government.*

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<sup>11</sup>Chapter 17.07 Public Finance (Management and Accountability) Act, Revised Edition 2019

APPENDIX III - Summarisation of Environment: Policy Objective, Strategic Thrusts & Key Programmes<sup>12</sup>



STRATEGIC THRUSTS	KEY PROGRAMMES	SDP Goal	KEY PROGRAMME ELEMENTS	TARGETS	TIMELINES	KEY AGENCIES
			Utilise MVO as a key aspect of Montserrat's tourism product. Enhance the richness of the data across MVO's various ICT systems through greater integration	Develop a tourism product which incorporates MVO data and media assets and ICT connectivity - Media promotion of MVO tourism, education hub - Online sales of memorabilia - Volcano Interpretation Centre at MVO - Virtual video tours	2017 and ongoing  2017 and ongoing  2017  2018	<u>Ministry of Tourism</u> , Office of the Premier, MVO, NICTU, Local ICT stakeholders / developers
	<b>e-Waste Management</b>	SG 3	Create policy and legislation to treat with the appropriate disposal of electronic waste (e-Waste).	e-Waste policy developed  e-Waste legislation passed	2018  2020	<u>MCWL</u> , MHSS (Waste Mgmt.)  <u>MHSS</u> , MCWL, Attorney General

<sup>12</sup>Montserrat's National Information & Communication Technology Policy, Strategy & Implementation Plan 2017 – 2021

## APPENDIX IV - Six Categories of E-waste<sup>13</sup>

 <p>Temperature Exchange Equipment</p>	<p><b>Temperature exchange:</b></p> <p>Temperature exchange equipment, more commonly referred to as cooling and freezing equipment: refrigerators, freezers, air conditioners, heat pumps</p>
 <p>Screens</p>	<p><b>Screens, monitors:</b></p> <p>televisions, monitors, laptops, notebooks, and tablets</p>
 <p>Lamps</p>	<p><b>Lamps:</b></p> <p>fluorescent lamps, high intensity discharge lamps, and LED lamps</p>
 <p>Large Equipment</p>	<p><b>Large equipment:</b></p> <p>washing machines, clothes dryers, dish-washing machines, electric stoves, large printing machines, copying equipment, and photovoltaic panels</p>
 <p>Small Equipment</p>	<p><b>Small equipment:</b></p> <p>vacuum cleaners, microwaves, ventilation equipment, toasters, electric kettles, electric shavers, scales, calculators, radio sets, video cameras, electrical and electronic toys, small electrical and electronic tools, small medical devices, small monitoring and control instruments</p>
 <p>Small IT</p>	<p><b>Small IT and telecommunication equipment:</b></p> <p>mobile phones, Global Positioning Systems (GPS), pocket calculators, routers, personal computers, printers, telephones</p>

<sup>13</sup><https://www.step-initiative.org/e-waste-challenge.html>

APPENDIX V - Negative Effects of E-Waste on the Environment<sup>14</sup>

AREAS OF THE ENVIRONMENT THAT CAN BE AFFECTED BY E-WASTE	NEGATIVE EFFECTS OF E-WASTE ON THE ENVIRONMENT
<p style="text-align: center;"><b>Air</b></p>	<p>Contamination in the air occurs when e-waste is informally disposed by dismantling, shredding or melting the materials, releasing dust particles or toxins, such as dioxins, into the environment that cause air pollution and damage respiratory health. Burning e-waste in the open also increases the risk of chronic diseases and cancers to occur, as it releases fine particles which can travel thousands of miles, creating numerous negative health risks to humans and animals.</p> <p>The air pollution caused by e-waste impacts some animal species more than others, which may be endangering these species and the biodiversity of certain regions that are chronically polluted. Over time, air pollution can hurt water quality, soil and plant species, creating irreversible damage in ecosystems.</p>
<p style="text-align: center;"><b>Soil</b></p>	<p>When improper disposal of e-waste in regular landfills or in places where it is dumped illegally, both heavy metals and flame retardants can seep directly from the e-waste into the soil, causing contamination of underlying groundwater or contamination of crops that may be planted nearby or in the area in the future. When the soil is contaminated by heavy metals, the crops become vulnerable to absorbing these toxins, which can cause many illnesses and doesn't allow the farmland to be as productive as possible.</p> <p>When large particles are released from burning, shredding or dismantling e-waste, they quickly re-deposit to the ground and contaminate the soil as well, due to their size and weight. The amount of soil contaminated depends on a range of factors including temperature, soil type, pH levels and soil composition. These pollutants can remain in the soil for a long period of time and can be harmful to microorganisms in the soil and plants. Ultimately, animals and wildlife relying on nature for survival will end up consuming affected plants, causing internal health problems.</p>

<sup>14</sup><https://elytus.com/blog/e-waste-and-its-negative-effects-on-the-environment.html#:~:text=Contamination%20in%20the%20air%20occurs,regions%20that%20are%20chronically%20polluted.>

<p style="text-align: center;"><b>Water</b></p>	<p>After soil has been polluted, heavy metals from e-waste such as mercury, lithium, lead and barium, can leak through the earth even further to reach groundwater. When these heavy metals reach groundwater, they eventually make their way into water sources like ponds, streams and rivers. Through these pathways, acidification and toxification are created in the water, which is unsafe for animals, plants and communities even if they are miles away from the source of soil pollution. To find clean drinking water will become problematic.</p> <p>Acidification can kill marine and freshwater organisms, disturb biodiversity and harm ecosystems. If acidification is present in water supplies, it can damage ecosystems to the point where recovery is questionable, if not impossible.</p>
<p style="text-align: center;"><b>Humans</b></p>	<p>Electronic and electrical waste, contains toxic components that are dangerous to human health, such as mercury, lead, cadmium, polybrominated flame retardants, barium and lithium. The negative health effects of these toxins on humans include brain, heart, liver, kidney and skeletal system damage. It can also considerably affect the nervous and reproductive systems of the human body, leading to disease and birth defects.</p>

APPENDIX VI - Electronic Waste Health Hazards<sup>15</sup>

Metal	Health effects e-waste-related
Lead	Damages brain function, particularly in children
Americium	Can induce cancer
Mercury	Causes memory loss, muscle weakness, reduced fertility, and more
Cadmium	Severe lung damage if breathed in
Sulfur	Damages the liver, heart, kidneys, and eyes
Chromium	A known cause of cancer

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<sup>15</sup> <https://techreset.com/itad-guides/e-waste-and-human-health-hazards/>

*APPENDIX VII - Electronic Waste at New Windward Landfill*

