

Committee on Economic and Foreign

Vanuatu

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**Report on Enquiry into
the Citizenship By
Investment Program**



November 2021

Parliament of the Republic of Vanuatu
Port Vila



ACRONYM LIST

| | |
|-------|---|
| ADB | Asian Development Bank |
| AM | Anti-Money Laundering |
| CBI | Citizenship by Investment |
| CIIP | Capital Investment and Immigration Program |
| COC | Citizenship Office and Commission |
| COM | Council of Ministers |
| DD | Due Diligence |
| DG | Director General |
| DSP | Development Support Program |
| EU | European Union |
| FIU | Financial Intelligence Unit |
| GRT | Government Remuneration Tribunal |
| HCDI | Human Capacity Development International |
| NAB | National Australian Bank |
| NBV | National Bank of Vanuatu |
| NGO | Non-Government organizations |
| REO | Real Estate Option |
| UN | United Nations |
| VAT | Vanuatu Added Tax |
| VCP | Vanuatu Contribution Program |
| VERP | Vanuatu Economic Rehabilitation Program |
| VIPA | Vanuatu Investment Promotion Authority |
| VNSDP | Vanuatu National Sustainable Development Plan |

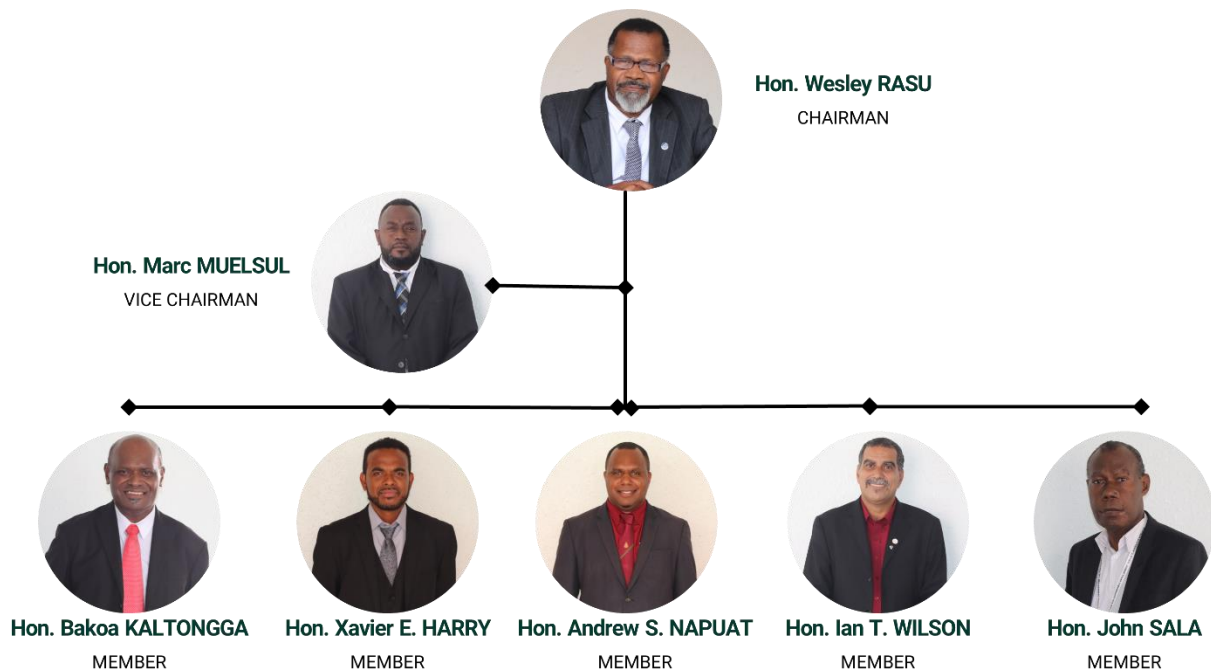
COMMITTEE MANDATE

The Standing Committee on Economic and Foreign Policies is established under Standing Orders 62, a Motion made pursuant to article 23 of the Constitution, and under that Motion and Part 8 of the Standing Orders has the roles and functions, together with the necessary powers to discharge its duties.

Parliament had appointed the Committee members including the Chairman and the Vice-Chairman through same Motion No. 4 of 2021 in the First Extra Ordinary Session of 2021.

COMMITTEE MEMBERSHIP

The current members of the Standing Committee on Economic and Foreign Policies (12th Legislature) are:



* Hon. Wesley RASU is also a Member of the Public Accounts Committee.

** Hon. Xavier Emanuel HARRY is also the Chairman of the Ad-Hoc Committee on the Commercial Government Business Enterprise Bill

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CHAIR'S FORWARD



Hon. Wesley RASU, MP

I am honoured to present the report of the Committee on Economic and Foreign Policies on the *inquiry into the Vanuatu Citizenship Program*.

The intention to inquire into the Citizenship Program was a key economic objective of the Committee to assess the effectiveness of the program and suggest possible recommendation to improve the program.

Given its mandate, Parliament has endorsed the Committee's 2021 work plan to inquire into the Citizenship Program, and table this report in Parliament.

The Recommendations set forth in this report carry the essence of the inquiry and what the government needs to do to improve the program as far as this inquiry is concerned.

However, I wish to thank Parliament, the Office of the Speaker and the Office of the Prime Minister for noting the Committee's intentions for pursuing this inquiry.

I would like to sincerely thank witnesses from various government line ministries and stakeholders who have rendered their participation in this inquiry process.

I would also like to thank the Committee Secretariat for their tireless efforts in ensuring that the administration and secretariat work for the inquiry are accomplished with efficiency.

Finally, may I thank my fellow Committee Members for their commitment and supportive participation in this inquiry.

A handwritten signature in blue ink, appearing to read 'Wesley Rasu', written over a horizontal line.

Hon. Wesley RASU, MP

Chairman

Standing Committee on Economic and Foreign Policies

EXECUTIVE SUMMARY

An inquiry conducted into the Vanuatu Citizenship Program was completed by the Committee on Economics and Foreign Policies in October 2021. The inquiry conducted included the Comprehensive Review Report of the Vanuatu Citizenship by Investment Program submitted to the Vanuatu Citizenship Commission in January 2020, the Chairman and Secretary General of the Citizenship Office and Commission, Director Generals of the Ministry of Prime Minister and Ministry of Finance, the Vanuatu Financial Intelligence Unit, Department of immigration and passport services, Foreign Affairs department, and three agents of the citizenship programs.

The Objective of the enquiry is to assess the effectiveness of the current Citizenship Program, enquire into the risk of issues surrounding the program and consider effectiveness of current policies.

The Committee regrets that it could not sought more views from equally important stakeholders including government officials, other agents and across the country for the purpose of this exercise.

However, upon the completion of its inquiry, the Committee made the following recommendations below.

Summary of Recommendations

Recommendation 1

The Committee recommends that the COC and government must strengthen the program by addressing some key recommendations in the review report of 2020, in particular, the following issues to remove Vanuatu from EU black listing and public information.

Recommendation 2

The Committee recommends that the government engage a consultant to assist with sound policy advice and the development of a long-term policy framework in line with the recommendations of the Review Report

Recommendation 3

The Committee recommend against any decision, if it is to be done, to cancel licences of non-performing agents, as it must be considered in the context of the covid-19 crisis.

Recommendation 4

The Committee recommends that COC needs to take FIU's advices seriously and ensure agents are properly checked by FIU before granting them licenses.

Recommendation 5

The Committee recommends that the government and COC develop and/or install a database System for the Citizenship office to manage its data and recording purposes. The system needs to have an interface with Ministry of Finance and Economic Management.

Recommendation 6

The Committee recommends that the government engage a consultant to assist with sound policy advice and the development of a long-term policy framework in line with the recommendations of the Review Report.

Recommendation 7

The Committee recommends that the Government must be prepared to introduce another Revenue Initiative to carter for the financing gap if the Citizenship Program ends.

Recommendation 8

The Committee recommends that the COC must address the issue of VAT registrations for local agents and ensure VAT registrations are provided before issuing them any licenses.

Recommendation 9

The Committee recommends the government to develop a policy to guide the revenue towards investment to complement the idea of a development budget initiative.

Recommendation 10

The Committee recommends that the government must address the issue of the correspondent banking immediately, as further delaying of a solution might tarnish the reputation of the Vanuatu's CBI programs.

Recommendation 11

The Committee recommends the government allocates financial resources to the office of citizenship to provide more awareness on the use of funds collected from the program of citizenship.

Recommendation 12

The committee recommends that the passports and certificates of citizenship shall be handle by Vanuatu Consulates or embassies. This will redirect the handling fees to the government budget.

Recommendation 13

The Committee recommends a good management of passports booklets and the introduction of e-passport as soon as possible.

Recommendation 14

The Committee recommends that the COC to publish official consolidated editions of the Citizenship Act and Immigration Act including regulations and orders.

Recommendation 15

The Committee recommends that the government must consider harmonizing the framework in line with the idea of operating the CBI program under one stop shop approach.

Recommendation 16

In line with the advice of VFIU, the Committee recommends that the COC terminate the contract that was signed with the agent for the operation of the Stateless program.

Recommendation 17

The Committee recommends that the COC adds an independent Third-Party Agent to work with and monitored by FIU to conduct background and Due Diligence checks on all applicants.

Recommendation 18

The Committee recommends that it is best to suspend the processing of applications (of persons) from the prohibited and sanctioned countries until such time as the government can engage a Third-Party Agent to assist with our due diligence.

1. INTRODUCTION

1.1 Background of inquiry

The Committee on Economic and Foreign Policies had compiled this inquiry report following its work plan as referred by Parliament in the First Ordinary Session of 2021. The Committee had commenced the inquiry into the Vanuatu Citizenship Program from the 20th of September to the 15th of October 2021. The inquiry was formulated around a Comprehensive Review Report of the Vanuatu Citizenship by Investment Program (CBI) that was submitted to the Vanuatu Citizenship Office and Commission (COC) in January 2020.

1.2 Objectives of the inquiry

The objectives of the inquiry are:

- To assess the effectiveness of the current Vanuatu Citizenship by Investment Program;
- To enquire into the risk of issues surrounding the program;
- To consider effectiveness of current policies; and
- To consider any other matters related to the program.

1.3 Brief background of the CBI program

Vanuatu Citizenship is regulated through the Constitution and the Citizenship Act. The Citizenship office comes under the portfolio of the Prime Minister's Office whereas the Citizenship Program had started in 2014 to respond to a budget shortfall, and to recover from the destructions of TC Pam in 2015. There have been 4 different CBI programs in Vanuatu since 2014: Capital Investment Immigration Program (CIIP), Vanuatu Economic Rehabilitation Program (VERP), Vanuatu Contribution Program (VCP) and Development Support Programs (DSP).

Today, citizenship is offered through the VCP and DSP programs, Real Estate Option (REO) program which was passed by Parliament in 2021, and also offered through the Permanent Residency program. Summary descriptions of some of these programs are described in the CBI Review Report in the appendices.

The CBI programs were offered through the honorary citizenship provision in the Constitution, but are now offered as regular citizenship but without political rights.

The current VCP and DSP programs, which started in 2017, including the recent REO program, as passed by Parliament this year 2021, are

administered by the COC, with the support from related government offices, including the Financial Intelligence Unit, the Passport Office, and the Immigration Office. The Permanent Residency Program is administered by the department of immigration and passport services under the portfolio of the Ministry of Internal Affairs.

Like Tourism, the CBI program is very fragile as it is being developed and managed depending on international factors that are occasionally beyond our control.

2. PROCEEDING (METHODOLGY)

2.1 Conduct of the inquiry

The inquiry process includes seeking written submissions and held private briefings and hearings.

All briefings and hearings were held in Port Vila, specifically at the Library Conference Room, at the National Parliament House.

2.2 Call for Submissions

The Committee wrote to line ministries, government department and agencies to provide written submissions. They can be made available by the National Parliament of Vanuatu upon request.

2.3 Briefing/Hearing

The Committee held its briefings/hearings in private. The briefings and hearings were conducted with the Citizenship Office and Commission (COC), the Vanuatu Financial Intelligence Unit (VFIU), the Department of Immigration and Passport Services, the Ministry of Foreign Affairs, and three agents of the CBI program.

2.4 Transcripts

Transcripts of the evidences from briefings and hearings were transcribed by the Committee Secretariat. They can be made available by the National Parliament of Vanuatu upon request.

3. COMMITTEE FINDINGS AND ANALYSIS

3.1 Review Report of January 2020

The Committee has considered the Comprehensive Review Report of the Vanuatu Citizenship by Investment Program that took place between November 2019 – January 2020.

The review was carried out at the request of the Citizenship Commission by a team, assembled by Human Capacity Development (HCDI), a Vanuatu based NGO. The team of organisational, international policy, legal and industry experts was led by Mr. Henry Tamashiro, former Director of Immigration Services and former Vanuatu and Regional Pacific Director of IOMⁱ.

The report listed 12 recommendations for the improvement and strengthening of the program. The Committee has noted through its inquiry that to date, the key recommendations have not been prioritized by the relevant agencies including the citizenship office for implementation therefore progress is diminutive or none at all which has been the reason for lack of response provided regarding the recommendations. This was also confirmed by the Secretary General of the Citizenship Office in the minutes of 6 October 2021.

The Committee is of the view that it has taken too long for the COC through the Prime Minister's Office to implement the recommendations in the report. As requested by the Committee, the responses from the COC to the recommendations shows no serious commitment to the implementation of the key recommendations in review report and that there were no specific time line and actions provided. Responses from the COC and FIU are provided in the appendices.

The Committee had noted through its inquiry that the approach of the Government is to implement the recommendations of the review report in a holistic approach, however, there is lack of coordination besides no specific timeframe provided.

The Committee has also noted that the Council of Ministers (COM) had endorsed to engage a consultant to assist the Government to address the issues identified in the program, uplift its profile, and develop a long-term policy framework moving forward.

Committee's recommendation

- The Committee recommends that the COC and government must strengthen the program by addressing some key recommendations in the review, in particular, the following issues to remove Vanuatu from EU black listing and public information.
- The Committee recommends that the government engage a consultant to assist with sound policy advice and the development of a long-term policy framework in line with the recommendations of the Review Report.

3.2 Agents

The VCP program has an exclusive agent, the DSP program has 113 agents, and an exclusive Advertising Master Agent for the REO Programⁱⁱ. These agents assist in the application process, including finding clients, accompanying them in the document collection and submission, and the processing of funds.

In his briefing, the Secretary General of the Citizenship Office alluded that about half of the DSP agents are not performing. This can lead to the cancelation of their licences as per the regulationⁱⁱⁱ.

The Committee has heard from the Director of VFIU that the list of agents that has gone through proper checks and recommended by FIU is different from the COC's final list. This is because COC has granted licences to some agents without proper checks of the FIU.

The original currency of trade for the program is the US Dollar. At the end of June 2021, the National Australian Bank (NAB) has terminated its USD correspondent banking arrangement with Vanuatu, and the entire South Pacific, including in Fiji, Tonga, Samoa etc. All three CBI agents who had appeared before the Committee have expressed the difficulties in opening USD bank accounts as a result of this issue. Although recent regulation orders permit the use of other banks and currencies^{iv}, the Committee has heard from agents that there is a consistent complain received from clients about the issue of higher rates being offered through other currencies.

According to Agents and confirmed by the Director General of Finance, there has been a decline in revenue, however, it has been affirmed that it has picked up again since the last quarter of 2021. The Committee is of the view that this might have been caused by the delay of funds due to the issue of correspondent bank relationship and covid-19 related issues. Further delaying of a solution to the corresponding bank issue might tarnish the reputation of Vanuatu's CBI programs.

Committee's recommendation

- The Committee recommend against any decision, if it is to be done, to cancel licences of non-performing agents, as it must be considered in the context of the covid-19 crisis.
- The Committee recommends that COC needs to take FIU's advices seriously and ensure agents are properly checked by FIU before granting them licenses.
- The issue of the USD correspondent banks needs the governments intervention as soon as possible.

3.3 Citizenship Office and Commission Administration

The CBI programs are run by the COC, with the support from other government offices. These includes managing agents, the proper running of the program, and citizenship applications.

Apart from the review report, the Committee has heard from its inquiry that most information and results are manually done and can result in human error and time consuming. As such, some of the information requested by the Committee could not be made available in time as it would require time to do manual counting.

The Committee has also noted with regards to stateless people that there was a miscommunication and misunderstanding between FIU and the Citizenship Office about the 300 targeted audience. The FIU had advised for only a selected group of people, whereas, the COC had opened up the program to receive applicants world-wide.

Finally, administrative matters in relation to human resource, remunerations, and space is also a concern raised by the COC during the inquiry. The Committee has noted that for a program that contributes significantly to the revenue of the government, it requires to be equipped with professionals with proper remunerations to drive the program forward.

Committee's comments and recommendation

- The Committee recommends that the government and COC develop and/or install a database System for the Citizenship office to manage its data and recording purposes. The system needs to have an interface with Ministry of Finance and Economic Management.
- The Committee recommends the government to strengthen the COC allocating more resources (financial and human) to address

administrative issues for functioning of the office and proper remunerations.

3.4 Finance, Investment and Public Perception

The program provides a significant source of Revenue for the government. There has been a good and steady increase of the Citizenship Revenue since 2014 – see the revenue graph below. Since then, there has been a surplus in the Citizenship Revenue fund collection as initially budgeted for. However, there have been a slow-down in Revenue collection from VDSP and VCP starting from June 2021. This reduction is due to the pandemic, and could be directly related to Corresponding Banking issue with NBV, that had caused delays in citizenship payments, as well as negative publicity of the program. The presentation of the Director General of Finance confirmed is also attached to this report.

The Committee has noted the challenges of the program also includes meeting the external international pressures around security and due diligence, addressing the internal political pressures around acceptability of the program, and the issue of correspondent banking. A drop in revenue and loss of this program considering Vanuatu status as Developing Country could impact Vanuatu in an adverse manner economically or in cashflow terms.

Unlike Bred Bank, NBV has only one USD Correspondent Bank, the National Australian Bank (NAB). When its relationship was terminated, NBV has no other USD correspondent bank. The Committee has heard that NBV has just secured an arrangement with the global western union to act as its USD correspondent bank based in London. However, the western union bank rules out any transactions relating to international companies, offshore companies and Government Citizenship Program.

The Committee has questioned whether income tax would contribute the same as the CBI program, however, it was confirmed from the DG of Finance that the revenue collected from the CBI program is higher compare to income tax if introduce in Vanuatu.

The Committee has also heard in its inquiry that VAT Registrations for Local Agents is still an issue. Some of the agents are not paying VAT as required.

Regarding the use of the funds, our recurrent budget is very limited to funding salaries and wages and part operations. There is always a reliance on our development partners for developments in infrastructure and other projects.

The Committee has also noted that there was no proper policy in place to guide the program especially the revenue towards a development budget initiative.

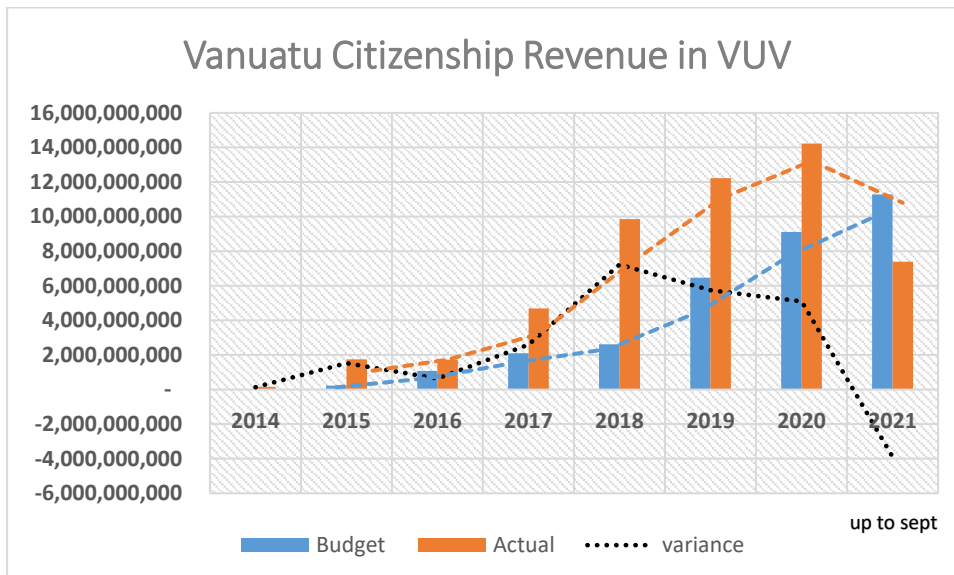
The Committee heard that the CBI revenue has allowed the government to make repayments and advance repayments of external and domestic loans. This included two Air Vanuatu aircraft, e-gov investment loan, ICL interchange Ltd, Luganville wharf, loans from ADB and World Bank. This is in line to achieving Economic Pillar of the VNSDP, in particular ECO 1.3 *“Ensure public debt is sustainably managed and finances are directed towards projects with positive economic returns”*. The CBI have also allowed the government to fund the 2016 elections, pay outstanding severances and Government Remuneration Tribunal (GRT), Government Scholarships, Agriculture, Tourism, Disaster relief efforts, etc.

The use of funds for various developments is a challenge, particularly on political priority versus VNSDP. The Committee has noted in its inquiry that various governments have different priorities and managing a balance decision is a challenge.

The Economic Pillars of the VNSDP talks about how to grow our economy, one of which is to create a conducive environment for investments. The CBI program when first initiated is aimed for additional cash injection to support disaster recovery efforts. Lately, the government REO program recently passed in Parliament is an effort towards investments.

The Committee is of the view that there is need to guide the CBI program to an investment approach, particularly to boost employment and other added benefits. That would complement the idea of a development budget. The REO recently passed in Parliament is an effort towards this.

The Committee has noted from the Review Report that although the CBI-funds are being used to fund development projects, there is still lack of information provided to communities about how these funds are being expended. There is a need for awareness and assimilation of information to the public. It would be useful for the Citizenship Commission and the government to share such information along with information on program rationale and revenue spending with the public, to avoid further confusion and misinformation.



Committee's recommendation

- The Committee recommends that the Government must be prepared to introduce another Revenue Initiative to carter for the financing gap if the Citizenship Program ends.
- The Committee recommends that the COC must address the issue of VAT registrations for local agents and ensure VAT registrations are provided before issuing them any licenses.
- The Committee recommends the government to develop a policy to guide the revenue towards investment to complement the idea of a development budget initiative.
- The Committee recommends that the government must address the issue of the correspondent banking immediately, as further delaying of a solution might tarnish the reputation of the Vanuatu's CBI programs.
- The Committee recommends the government allocates financial resources to the office of citizenship to provide more awareness on the use of funds collected from the program of citizenship.

3.5 Passport

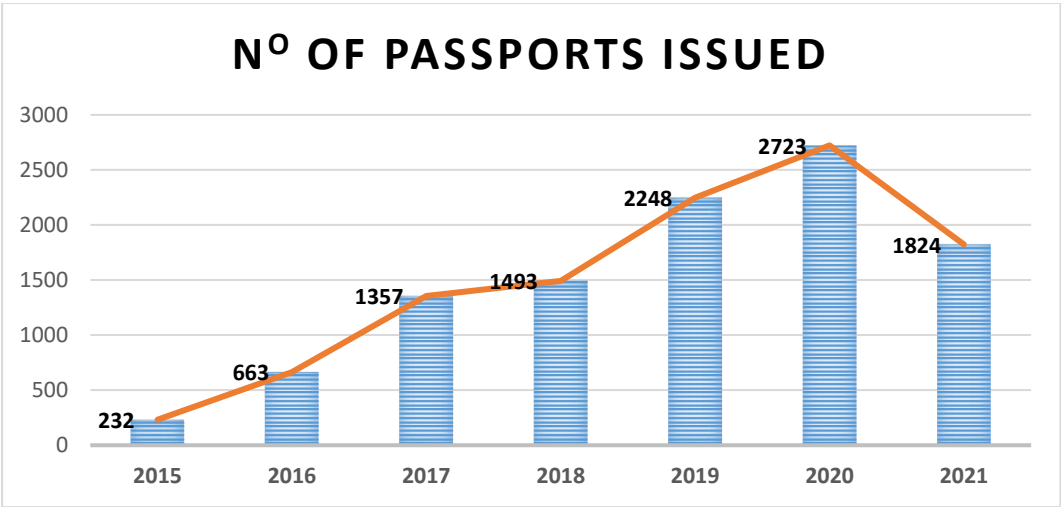
Current passport has concerns over its security features. A move towards e-passports will minimize concerns. The Director of immigration and passport services confirmed in his briefing, the first sample of printing e-passports already happened in Port-Vila and the department is waiting for the stock to arrive at the end of this year.

Currently handling of passports by ordinary people and not an official person or an office of Vanuatu overseas is a concern. The Committee noted

the handling fees of the Passports and certificates citizenship go the subagents in overseas.

Shortage of passport is also an issue. The three agents appeared before the Committee stated they have received lot of complains about the shortage of passport booklets.

The graph below shows the number of passports issued since 2015. Note that, the 2021 figure shows only the data up to August. Total passports issued so far up to August 2021 is 10,540 as far as the Vanuatu Citizenship Program is concerned.



Committee's recommendation

- The committee recommends that the passports and certificates of citizenship shall be handle by Vanuatu Consulates or embassies. This will redirect the handling fees to the government budget.
- The Committee recommends a good management of passports booklets and the introduction of e-passport as soon as possible.

3.6 Legal framework

The Committee has considered also the legal review and recommendation in section 5 of the review report. There are various Acts that gives effect to the CBI programs such as the Constitution of Vanuatu, Citizenship Act/Amendments Regulations and Orders, immigration Act/Regulation and Orders etc.

There has significant changes or amendments relating to citizenship, particularly the CBI. During its inquiry, the committee had also realized that consolidated records of the relevant laws, regulations and orders are not readily accessible online.

The CBI current CBI programs have almost identical legal frameworks, including fees, processes and rights accompanying citizenship. This might be a duplication of programs. The complexity of the framework also makes the different programs and citizenship categories not easily identifiable.

The Committee is of the view that there is need for the frameworks to be harmonized. Harmonization should go in line with the idea of operation the CBI program under one roof or one stop shop approach. In this context, VIPA should also be considered as these activities are aimed at attracting investments.

The Committee was informed that citizenship programs were under various government agencies. The immigration department is responsible for the Permanent Residency and the Citizenship Office is responsible for the other programs. CBI programs are guided by regulations and orders issued by the COC. However, it has come to the Committee's attention that for stateless people, there was an exclusive agreement granted to a person, but to date, no regulation was established to guide the program. This has given concerns to the public and has some risks when considering AML and DD issues. The Director of FIU informed the Committee that FIU had advised against the current agreement, but it was not taken into consideration by the COC.

Committee's recommendation

- The Committee recommends that the COC to publish official consolidated editions of the Citizenship Act and Immigration Act including regulations and orders.
- The Committee recommends that the government must consider harmonizing the framework in line with the idea of operating the CBI program under one stop shop approach.
- The Committee recommends that the COC terminate issuing of citizenship to stateless people.

3.7 Security and Due Diligence

Due Diligence (DD) for Vanuatu CBI applicants is done by the Vanuatu Financial Intelligence Unit (FIU). Currently the stages of DD begin with the agent, to the FIU, an external independent company FACT UK (when adverse information is discovered), and the Citizenship office does the last checks before it is forwarded to the screening committee.

When FIU receives the receipt of 25% payment from the client, it checks for the client's criminal investigations and convictions against the INTERPOL watch list, UN security council resolution sanction lists, terrorism sanction lists, financial sanction lists, entity disqualification lists, politically exposed persons lists, black lists, immigration lists etc. Any adverse information identified (in addition to past convictions) are reported to the Screening Committee for their informed decision making.

The FIU utilises 4 globally reputable servers/databases to conduct its DD checks. According to FIU, these servers are recommended and widely used within the financial world, banking sectors, law enforcement and FIU networks.

The Committee is conscious of the benefits such as the visa-free agreements with the EU, that although FIU feels that it does not need any third-party DD, there is still a need to have a third-party DD. The use of such will add credibility to the program and protection of such benefits. This will also assist to address and meet EU DD requirements.

The committee noted in their findings that despite the circular/regulation/memo from the citizenship office on the United Nations prohibited and sanctioned list of countries, CoC and agents have continued to process applications for citizens of these prohibited and sanctioned countries. These caught the attention of the international media which also

reported that Vanuatu was granting citizenship to alleged fugitives and wanted persons. **The countries that are in the UN prohibited list are Syria, Iraq, Iran, Yemen and North Korea. In 2020 and 2021, Vanuatu granted a total of 334 citizenships to these persons from these countries.** There is a regulation that states that persons from these countries must provide proof of their residency in another country for more than five years in order to be eligible. Given that the due diligence from our side is still under discussion and scrutiny, it is best to suspend the processing of applications (of persons) from these countries until such time as the government can engage a Third-Party Agent to assist with our due diligence processes.

Committee's recommendation

- The Committee recommends that the COC adds an independent Third-Party Agent to work with and monitored by FIU to conduct background and Due Diligence checks on all applicants.
- The Committee recommends that it is best to suspend the processing of applications (of persons) from the prohibited and sanctioned countries until such time as the government can engage a Third-Party Agent to assist with our due diligence.

4. CONCLUSION

The report contains 18 recommendations. The recommendations represent the Committee's views following the conduct of its briefings, hearings and having reviewed the comprehensive review report of the CBI program and written submissions. It fairly represents the sentiments, views, and opinions of the witnesses that appeared before the Committee and reflected the views of those that took the time to appear before the committee.

The committee encourages the executive to consider the recommendations in the report and in the comprehensive review report to further improve the program.

Finally, in accordance with Standing Orders 92, the Committee require a written response from the Government to this report within 90 days after this report is being tabled in Parliament.

5. APPENDICES

Appendix 1: Comprehensive Review Report of the Citizenship by Investment Program.

Appendix 2: Submissions

1. Submission to the Economic and Foreign Policies Committee on the Due Diligence Process for CBI programs, FIU (22/09/2021)
2. Briefing Paper Submission to the Committee on Economic and Foreign Policies, Citizenship Office and Commission (29/09/2021)
3. Briefing Paper presentation on the Citizenship Program, Ministry of Finance and Economic Management (11/10/2021)
4. Written response to the CBI Review Report of 2019, Citizenship Office and Commission (12/10/2021)
5. Written response to the CBI Review Report of 2019, Vanuatu Financial Intelligence Unit (12/10/2021)
6. Written submission to the Committee request regarding Permanent Residency Records, Department of Immigration and Passport Services (13/10/2021)

Appendix 3: Witnesses

BRIEFINGS AND HEARINGS HELD AT THE LIBRARY CONFERENCE ROOM,
VANUATU NATIONAL PARLIAMENT

| DATE & TIME | NAME | POSITION | ORGANISATION |
|----------------------------|---|--|---|
| 30 Sept 9:00 am | Mr. Denny V. Gaua | Secretary General | Citizenship Office |
| 30 Sept 10:30 am | Mr. Floyd R. Mera | Director | Vanuatu Financial Intelligence Unit |
| 30 Sept 2:00 pm | - Mr. Yvon Basil - Mr. Esrom M. Vano | - Director - Chief Protocol Officer | Department of Foreign Affairs |
| 1 Oct 9:00 am | Mr. Jeffery Markson | Director | Department of Immigration and Passport Services |
| 11 Oct 9:15 am | Mr. Gregoire Nibtik | Director General | Prime Minister's Office |
| 11 Oct 10:40 am | Mr. August Letlet | Director General | Ministry of Finance and Economic Management |
| 11 Oct 2:00 pm | Mr. Edmon Toka | VCP & PR program Agent | Vanuatu Glory Ltd |
| 11 Oct 3:15 pm | - Mr. Arthur Knight - Ms. Opheli Stevens | DSP & PR program Agent | Pacific Star Consultancy |
| 12 Oct 9:00 am | - Mr. Ronald Warsal - Mr. Denny V. Gaua | - Chairman - Secretary General | Citizenship Office and Commission (COC) |
| 13 Oct 1:30 pm | Mr. Gregoire Nimbtik | Director General | Prime Minister's Office |
| 13 Oct 2:30 pm | Mr. Samuel Andrew | DSP & PR program Agent | Blue Mirror Ltd |

6. END NOTES

ⁱ Comprehensive Review of the Vanuatu Citizenship by Investment Program Submitted to the Vanuatu Citizenship Commission and Office, January 2020.

ⁱⁱ Available information published in the Vanuatu COC website, <https://vancitizenship.gov.vu/index.php>

ⁱⁱⁱ Citizenship (Development Support Program) (Amendment) Regulations Order No. 39 of 2020. *“A designated agent is to achieve a minimum of 12 investors per annum.”*

^{iv} Citizenship (Development Support Program) (Amendment) Regulations Order No. 124 & 125 of 2021