

# A Study on the Effectiveness of the Review Panels in Addressing Appeals in the Public Procurement of Bangladesh

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## Abstract

*Review Panels (RP) formed within the legal framework of the PPR 2008 are responsible for addressing review appeals in public procurement in Bangladesh. Though the appeals are very few numbers in respect of the total number of tenders in a year, they need to be addressed properly for building public confidence and ensuring transparency, accountability & fair treatment in public procurement. However, with the growing concern about the effectiveness of the Review Panels, this study was conducted to find out the room for improvements. Key Informant Interviews (KII) were conducted, and also data were collected from different stakeholders through a questionnaire survey for the same. The study revealed that the effectiveness of Review Panels is in great question from its formation to the disposal of appeals and come up with several recommendations emphasizing selection of competent members for the panels, formation of RP for a definite period, a regular briefing from CPTU towards RP for updating them with emerging issues and having a closer look on the decisions of RP to guide them for avoiding ultra vires.*

**Key Words:** Appeal, KII, NoA, PPA 2006, PPR 2008, Review Panel.

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## CHAPTER 1: INTRODUCTION

### 1.1 Background

Public Procurement is the main vehicle for operating the development activities of a country by its government. It is defined as the procurement of goods, works, and services with government funds (CPTU, 2008). In Bangladesh, there was no law to administer public procurement since its independence up to 2006. During the British era, General Financial Rules (GFR) were originally issued and slightly revised in 1951 during the Pakistan period. These rules were further revised in 1994 and 1999 after the independence of Bangladesh which had regulated public procurement procedures and practices in Bangladesh till 2003. General and broad principles for public procurement were set down in the GFR (FD, 2021). However, the individual department was responsible to frame detailed rules and procedures for their respective purchases. In this regard, all government organizations had been referring to the Manual of Office Procedure (Purchase) compiled by the then Department of Supply and Inspection as the guide for procurement of goods and the Public Works Department (PWD) code as the guide for procurement of works. Separate Guidelines, modeled on World Bank Procurement Guidelines, were issued in 1992 by the Economic Relations Division (ERD) for the procurement of externally funded projects (WB, 2002).

In the context of escalating concerns from different corners, especially from the development partners, for streamlining the country's public procurement system, the government undertook an array of reforms to strengthen the public procurement regime. The reform process ultimately led to the formulation and issuance of Public Procurement Regulations in 2003, providing a unified procurement processing system. Before then, there was no standardized procurement system usable by all organizations in Bangladesh. However, the legal and more standardized system evolved after the enactment of the Public Procurement Act, 2006 (PPA 2006) (CPTU, 2006), and sub-sequent Public Procurement Rules, 2008 (PPR 2008) which have come into effect on January 31, 2008 (CPTU, 2008). The main objective of enacting PPA 2006 and introducing PPR 2008 was, generally, of achieving value for money, ensuring transparency, accountability, fair treatment in all public procurement throughout the public sector organizations of Bangladesh.

The World Bank in Bangladesh Country Procurement Assessment Report (CPAR) 2002 (WB, 2002) recommended introducing an appeal procedure in public procurement of Bangladesh. Accordingly, both the PPA 2006 and PPR 2008 have some specific provisions under the heading “Complaint and Appeals” (PPA 2006 and PPR 2008) as a measure of ensuring transparency and accountability in public procurement (CPTU, 2008). Any person who claims to have suffered loss or damages due to breach of a responsibility assigned to the Procuring Entity (PE), may complain to the administrative authority. Only when a person has exhausted all his or her options of complaints at the Administrative Level, may submit an appeal to the Review Panel through Central Procurement Technical Unit (CPTU), Implementation Monitoring and Evaluation Division (IMED), Ministry of Planning. The Review Panels (RP), formed by the government, work independently to settle the appeals from the aggrieved tenderers. Five separate Review Panels were formed by CPTU in 2010 initially after enacting the PPR 2008 two of which were reconstructed later on. Since the complaint and appeal mechanism are considered as a test of transparency & credibility building public confidence and trust in government procurement, the service delivery by the Review Panels is always considered as one of the paramount pillars in public procurement.

## **1.2 Problem Statement**

Review Panels are formed by the Government of Bangladesh for appeal management in public procurement. The main objective of the Review Panel is to ensure fair treatment to the tenderers as well as to ensure that the PEs conduct the public procurement with full transparency. Also, the accountability of the PEs is very crucial. As per Rule 60 of PPR 2008, the decision of the Review Panels has legal bindings and both the parties (Tenderer & PE) are bound to comply with the decision. But sometimes it was found the Review Panels give decisions beyond the provision of PPA 2006 and PPR 2008. Also, both the appellant and the PE sometimes do not comply with the decisions of Review Panels and move to the Honorable High Court challenging the decisions of the Review Panels. Thus, the effectiveness of the Review Panels remains questionable and demands an in-depth study.

## **1.3 Rationale/Justification of the Study**

As per Rule 60 of PPR 2008, Review Panels are bound to provide their written decision upon hearing both the appellant (the Tenderer) and the respondent (the PE). They are allowed only 12 (twelve) working days to give settle the appeal (CPTU, 2008). Since they are an independent

body, CPTU has no direct control over the decision-making process of the Review Panels. Every year, almost 70-100 'Appeals' are being settled by the Review Panels. Though they are bound to provide their decisions based on the provisions of PPA 2006 and PPR 2008, the performance of review panels is neither evaluated by CPTU nor else. This study aimed to have an insight into the effectiveness of the Review Panels for ensuring transparency and accountability in public procurement of Bangladesh. This may also help the policymakers for decision-making on the issues of constructing/reconstructing the Review Panels.

### 1.4 Objectives of the Study

Public confidence and trust are often built on fair judgment from the relevant authority. The effectiveness of the Review Panels is thus considered a very crucial element in the area of public procurement. The main objectives of the study are:

- (i) To assess the effectiveness of the Review Panels in the disposal of the Review Appeals;
- (ii) To find out the areas to be addressed by CPTU for making the Review Panels more effective.

### 1.5 Research Question

The main question addressed in the present study is:

*To what extent the Review Panels are effective in addressing the appeals in the public procurement in Bangladesh?*

The subsidiary question addressed in the study is:

*What are the steps CPTU can consider to make the Review Panels more effective?*

### 1.6 Limitations of the Study

The study is very important in the present scenario of public procurement in Bangladesh. However, it was difficult to collect all relevant data in the present COVID-19 period. The research was also bound to be completed within a very short period where only 3 (three) days were allocated for data collection. Also, the study is hindered by financial issues since there was no assistance available for conducting the same.

## **CHAPTER 2: LITERATURE REVIEW**

This study is a very new one. So far, information available from different sources, the effectiveness of Review Panels was never formally evaluated by CPTU or else since the enactment of PPA 2006 and PPR 2008. However, Kangogo & Kiptoo (2013) found that lack of transparency and accountability is one of the major hindrances in Kenyan public procurement which is oversight by the Kenya Public Procurement and Oversight Authority (PPOA). In Procurement Regulations for ADB Borrowers, the emphasis has been given on complaint management objectively and timely manner, with transparency and fairness (ADB, 2017). The scenario is similar to the case of the World Bank's Procurement Regulations for IPF Borrowers (WB, 2020). In both cases, the matter of complaint management in public procurement of Bangladesh is dealt with by the Review Panels. Thus, the matter of assessing the effectiveness of the Review Panels becomes one of the cornerstones for ensuring transparency and accountability in Bangladesh.

## **CHAPTER 3: METHODOLOGY**

To assess the effectiveness of the Review Panels, a thorough study of the PPA 2006 and PPR 2008 along with relevant circulars and available published papers were reviewed to understand the background of the study. Both primary and secondary data were collected and analyzed for the assessment. Primary data were collected through a semi-structured questionnaire from the Appellant and the concerned PEs. The secondary was collected from the CPTU office by exploring the selected orders of Review Panels of different calendar years. Also, a Key Informant Interview (KII) was conducted with the selected senior officials of CPTU and other major PEs namely the Local Government Engineering Department (LGED), Roads and Highways Department (RHD), Bangladesh Water Development Board (BWDB). The data gathered from primary and secondary sources were both quantitative and qualitative in nature. After collecting data, coding and summing of variables were done. Then the content analysis was conducted and interpreted thereon for final recommendations from the study.

## CHAPTER 4: RESULTS AND DISCUSSION

### 4.1 Legal Framework of Review Panel

The study revealed that the provision for complaints and appeals in the public procurement in Bangladesh has been spelled out both in PPA 2006 and PPR 2008. Section 29-30 of PPA 2006 and Rules 56-60 clearly states the grounds for complaints, the procedure for lodging complaints & appeals, formation of Review Panels, settlement of appeals by the Review Panels. As per Rule 58 of PPR 2008, CPTU constitutes the Review Panels by taking one (1) member from each of the following three (3) groups:

- (i) well-reputed specialists in legal matters, experienced in Procurement related legal issues which could also include retired senior officers from, Government and semi-Government, autonomous bodies or corporations;
- (ii) well-reputed specialists having relevant technical expertise and experience in public Procurement;
- (iii) well-reputed experts in Procurement and contract management practices having experience in complaints and dispute settlements whose names can be provided by the Federation of Bangladesh Chamber of Commerce and Industry (FBCCI), provided that no active public servant shall be included in the Review Panel.

At present, there are five (5) Review Panels are in operation which were formed, with the approval of the Honorable Planning Minister, back in 2010. The panels were slightly revised in 2013 and 2015 while some members were unable to continue to work due to personal grounds. For group (i), mainly the ex-Secretaries were nominated by the Ministry of Public Administration (MoPA) and for the group (ii), the retired district judges were nominated by the Law and Justice Division were selected for the Review Panels. And for the third group, members were nominated from the FBCCI.

## **4.2 Complaints/Appeals Handling Mechanism by Administrative Authorities and Review Panels**

There are four (4) tiers in the complaints submission ladder as described in Rule 57 of Public Procurement Rules 2008 (CPTU, 2008). Firstly, the tenderer submits the complaints to the concerned officer of the Procuring Entity (the Project Director (PD), Line Director (LD), Project Manager (PM), Procurement Officer, Officer assigned for Procurement who issued the Tender or Proposal Document). If the tenderer does not receive the response within 5 working days or is not satisfied with the response of the officer, then the complaint can be submitted to the Head of Procuring Entity (HOPE). HOPE should respond in 5 working days. If the tenderer is not satisfied with the response from HOPE, the complaint can be submitted to the Secretary of Ministry/Division. Secretary of Ministry/Division should also give a response within 5 working days. If the tenderer is still not satisfied with the response then the tenderer may wish to consider pursuing the appeal through the Review Panel. An aggrieved tenderer may appeal to the Review Panel only if he has exhausted all his or her options of complaints to the administrative authority (i.e. Secretary) under Rule 57 of PPR-2008. The Review Panel shall issue a written decision within a maximum of 12 working days from the date they receive appeals through CPTU.

The broad guidance for disposal of review appeals has been laid down in Rule 60 of PPR 2008. To ease the same, CPTU has issued a guideline for Review Panels in 2015. Later in 2019, it has issued another circular to ease the complaint and appeal application. Review Panels are bound to work within these legal frameworks of PPR 2008 and guidelines issued by CPTU. It can be noted that both the complaints and appeals are exclusively in the tendering phase, *not in the contract management phase*. Since Notification of Award (NoA) is a part of a contract, there is a limited scope of appeal after the issuance of NoA by the Procuring Entity (PE). However, the appellant (tenderer) still can get compensation for tendering and other legal costs incurred so far if the PE fails to comply with its' responsibilities under the PPR 2008.

## **4.3 Review Appeal Scenario**

Earlier, the function of review panels was on a limited scale. With the escalation of the development budget, government procurement has increased to a large extent. The number of review appeals has also increased with time. However, the total number of review appeals is



still a negligible fraction compared to the total number of tenders in a year. A glimpse of the last 8-years review appeals is given in Table 1 below:

Year	Number of Tenders in e-GP System	Number of overall Appeals	Percentage
2013	4443	33	0.74%
2014	11130	45	0.40%
2015	24007	57	0.24%
2016	36219	65	0.18%
2017	60948	85	0.14%
2018	101044	77	0.08%
2019	106042	81	0.08%
2020	97427	75	0.08%

**Table 1:** Number of Tenders in e-GP and overall Review Appeal submitted in CPTU

*[Source: Data collected from CPTU, IMED]*

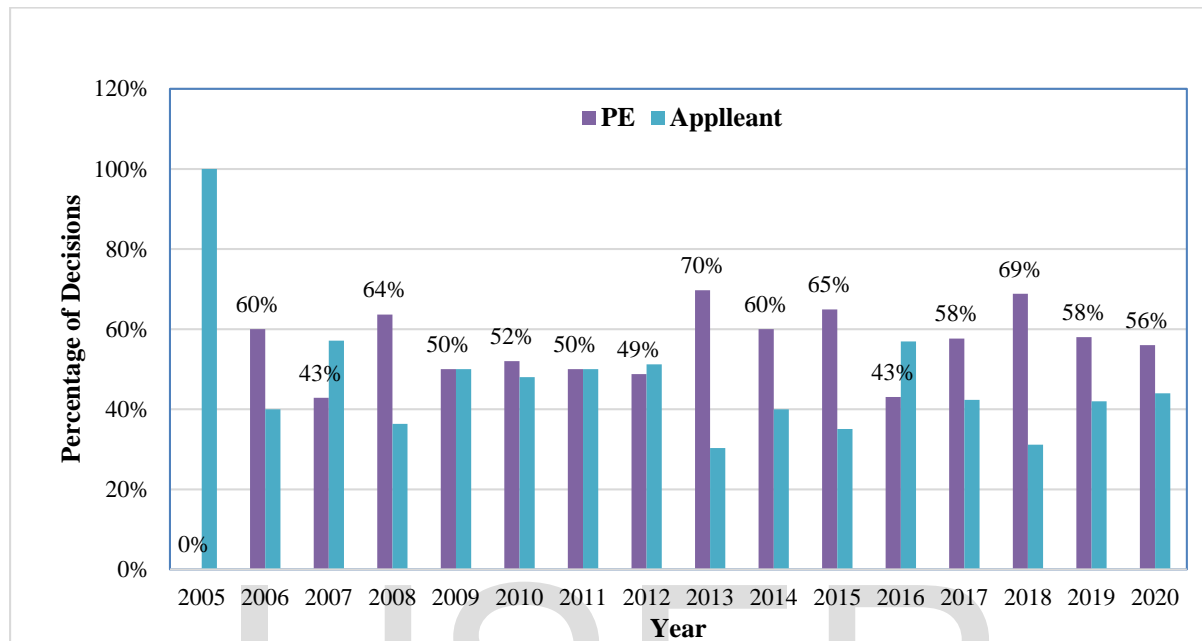
At present, tenders are invited both manually and through electronic Government Procurement (e-GP). Since the figure of the total number of tenders invited manually is not available, the percentage of the appeals has been calculated based on the number of tenders in the e-GP systems only whereas the number of appeals calculated both for manual and e-GP tenders.

From Table 1 above, it can be easily understood that the total number of appeals is very much less than 1% in respect to the tenders invited in e-GP which is nearly 50% of the total tenders invited. If, both the numbers of manual and e-GP tenders could be available, the percentage of appeals would constitute even less than 0.05%. This indicates a positive sign in the sense that the objectives of PPR 2008 for ensuring transparency and fair treatment in public procurement are more or less achieved.

#### 4.4 Disposal of Review Appeals by the Review Panels

The available information showed that the Review Appeals had been disposed of by the Review Panels since 2005. In 2005, there was a single appeal and the decision went towards the appellant meaning that the complaint raised against the PE was found by the Review Panel as a genuine one. However, from the subsequent years, the result shows that more than 50% of decisions were in favor of the PEs meaning the relatively weak complaints by the appellants against PEs. In 2013, the decision in favor of the PEs was the maximum (70%) so far. In the

present time (2017-2020), nearly 60% of decisions are in favor of the PEs. Upon analyzing the decisions of the selective review appeals, it has been found that in many cases, the appellant makes complaint/appeals with trivial issues or issues which are not within the purview of PPR 2008. Year-wise disposal scenario of the appeals by the Review panels is given below:



**Figure 1: Year wise Review Panels Decisions**

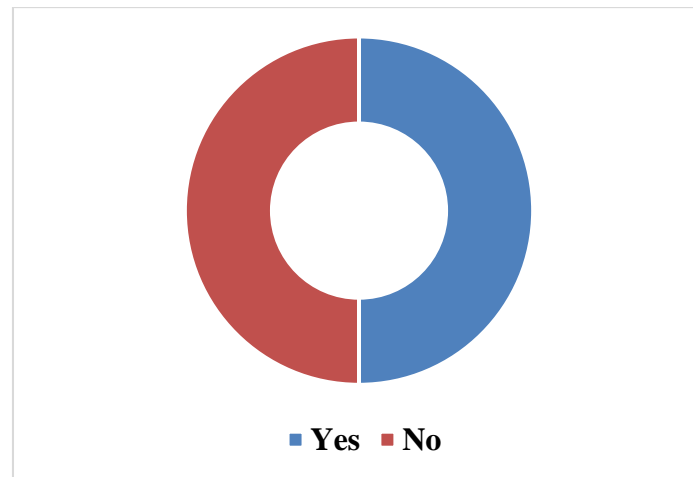
## 4.5 Effectiveness of the Review Panels and its' Decisions

The effectiveness of the Review Panels in addressing the appeals was evaluated in respect of its formation, conducting the hearing, following PPA 2006, PPR 2008, Review Panel Guidelines in its decision making, compliance of the decision by the parties, and challenging its decisions in the higher court. Also, their capabilities and training requirements were evaluated in consideration of the data collected from the Key Informant Interviews (KII) and the survey among the appellants & Procuring Entity (PE). Findings from the study in all of the aspects under consideration are discussed below:

### 4.5.1 Formation of Review Panel

To make something effective, the formation of the same is very much important. There is a clear Rule on the formation of Review Panels (CPTU, 2008). As per Rule 58 of PPR 2008, Review Panels are to be formed with at least 3 (three) persons, one from each group stated in 4.1. Analyzing the composition of the existing Review Panels (RP), it was found complied with

the Rules. But while surveyed the KII, a mixed response was found. The following graphs depict the findings (Figure 2):

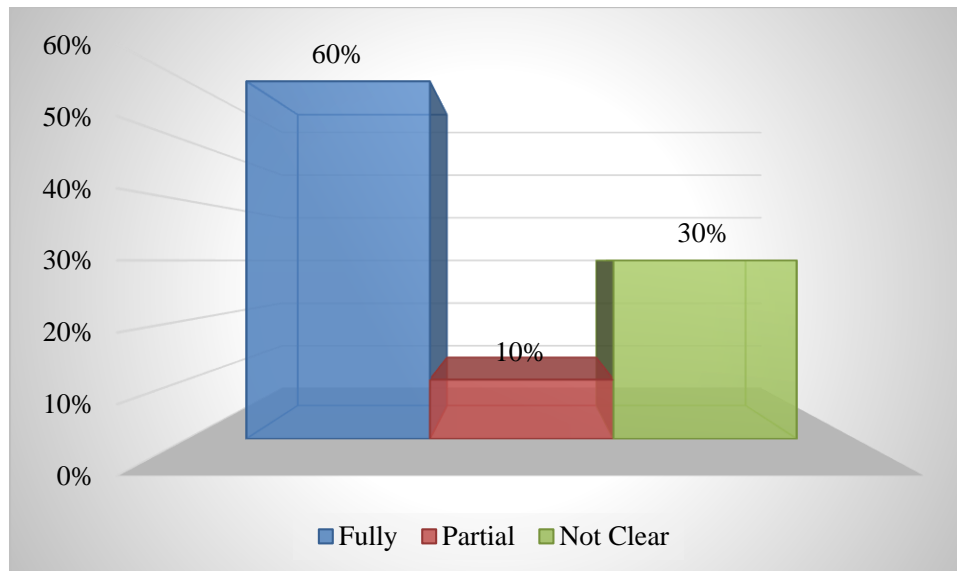


**Figure 2:** Formation of RP as per PPR 2008

From Figure 2, it has been found that the 50% of the respondents were agreed that in the formation of RP, Rule 58 is strictly complied with while the remaining respondents disagree the same. The study found that the main concern behind the disagreement was the quality issues. For disposal of the review appeals, the members of the RP need to be much conversant with the legal issues, especially the procurement-related legal issues. However, they claimed that the issue was not considered properly while the formation of the Review Panels. Also, there is a growing concern that CPTU did not consider the knowledge and expertise of the officials who worked in different procuring entities beyond the administrative ministries.

#### **4.5.2 Clarity of the Review Panel Guidelines**

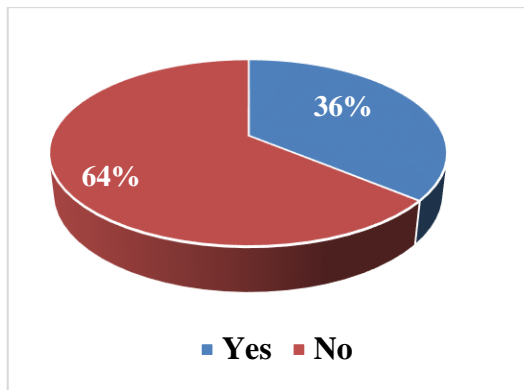
To ease the task of the Review Panels (RP), CPTU has issued a guideline in 2015 (CPTU, 2015). It is considered that the guideline would be helpful to make the RPs more effective in the disposal of the appeals. But, there was a concern about the clarity of the guideline. The study revealed that the guideline is more or less well stated. The same has been illustrated in Figure 3 below. However, upon discussion with the KII, it was found that there is ample scope for improvement of the guidelines with a detailed framework for the RP about areas of judgment.



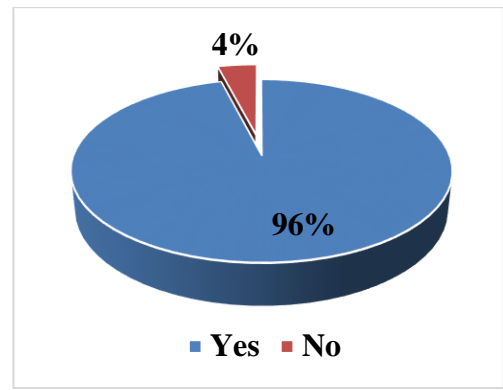
**Figure 3:** Clarity of RP Guidelines\_KII Views

#### 4.5.3 Review Appeals Disposal as per PPR 2008

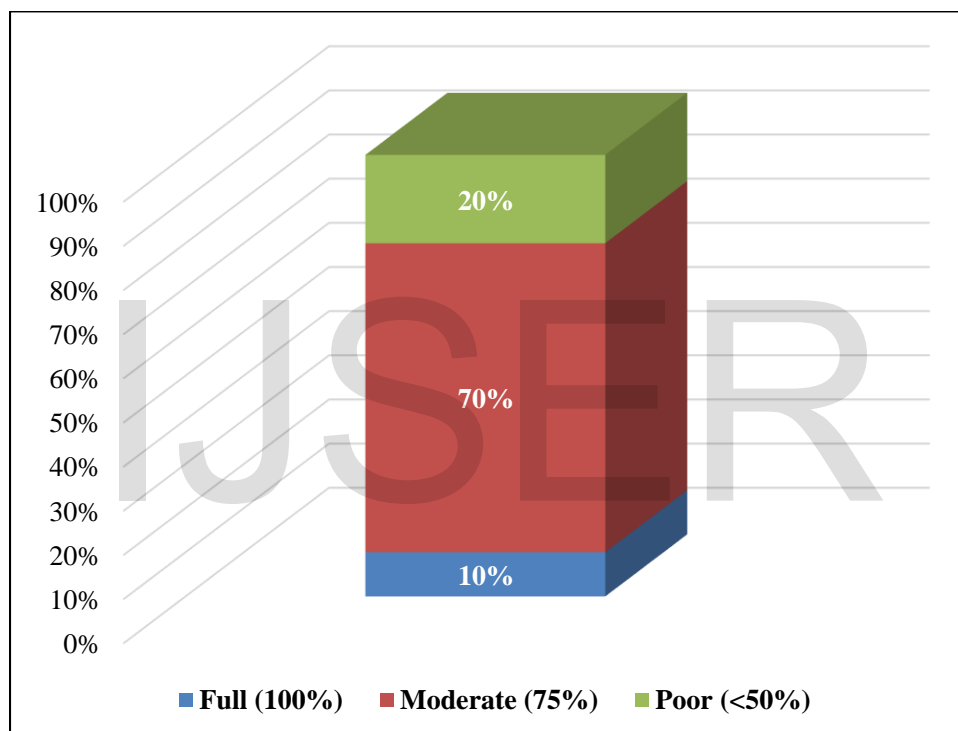
The key area about the effectiveness of the RPs is the disposal of the appeals as per PPA 2006 and PPR 2008. This was evaluated both from the viewpoint of appellant & PEs as well as Key Informant (KI). From the perceptions of the appellant & PEs, it was found that the majority of the PEs were very much disappointed regarding the disposal of appeals by the RPs (Figure 4.1). The scenario is reversed while seen from the appellant's views (Figure 4.2). While asked a similar question to the KIs, it was found that only 10% of the respondents were fully in favour of the opinion. The majority showed moderate views while 20% of respondents were very much sceptic that the RPs often violate PPR 2008 in their decision making (Figure 4.3). Upon analyzing the responses from different stakeholders, it was found that though the majority of decisions taken by RPs go in favor of the PEs, they expressed their concerns regarding the disposal of the appeals. This was endorsed by the majority of Key Informants (KIs).



**Figure 4.1:** Decision as per PPR 2008: *PE View*



**Figure 4.2** Decision as per PPR 2008: *Appeallant View*



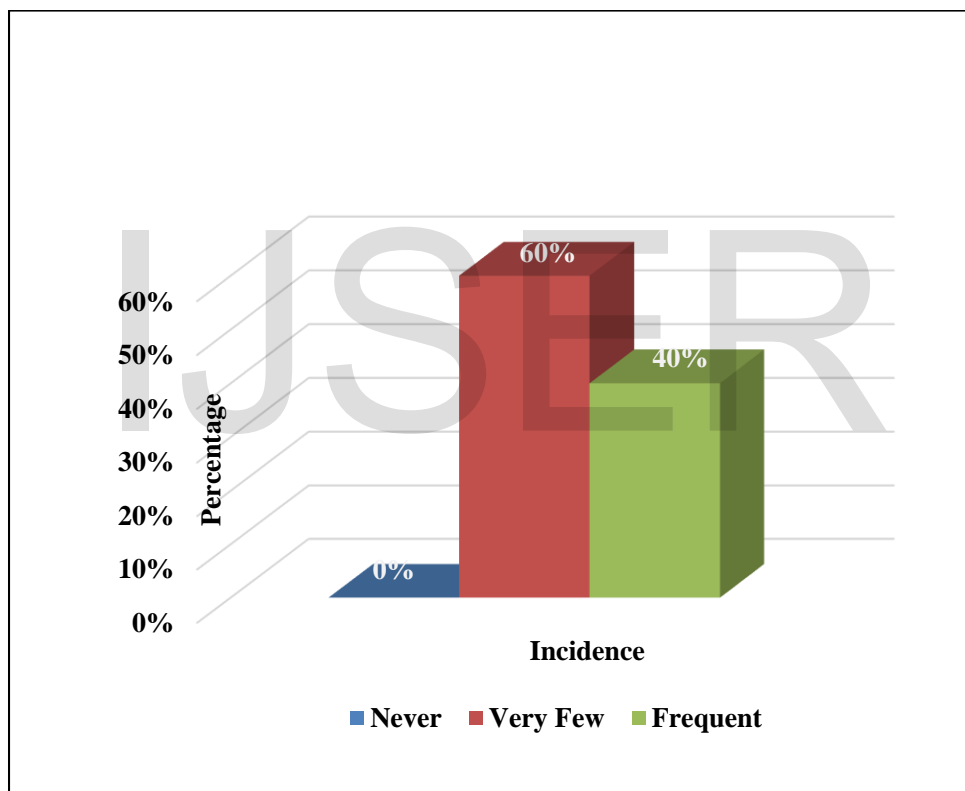
**Figure 4.3:** Appeal Disposal by RP as per PPR 2008: KIs Views

#### 4.5.4 RP Orders for Cancellation of NoA

Notification of Award (NoA) is a part of the contract as per Rule 106(2) of PPR 2008. While issued by the PE, it becomes binding to both the PE and tenderer who becomes awarded the contract. There is no scope to cancel NoA except Corrupt, Fraudulent, Collusive and Coercive (CFCC) grounds stated in Rule 127. In the recent past, it has been revealed that Review Panels sometimes pass an order for cancellation of NoA which is ultra vires of the Review Panel. If any PE is found to fail to comply with the PPR 2008, there is scope for imposing compensation. Side by side, the Review Panel may pass an order to take necessary actions against him as per

Section 64 of PPA 2006. But while a Review Panel orders for cancellation of NoA, it creates multiple complexities for the PE. Also, the winning tenderer approaches before the Honourable High Court (HC), and the whole procurement process becomes delayed.

Considering the importance and implication of the issue, the matter was thoroughly investigated under the current study. Data collected through KII shown that all respondents opined positively about the incidence (Figure 5). However, the majority of them reported the incidence as “very few” cases while the rest of them claimed it as a ‘frequent’ event. Upon analyzing the orders passed by the RPs for the last two years, the result went in favor of the majority of respondents (very few cases). However, even 1% of such events is unacceptable since this is a gross violation of the provisions of PPA 2006 and PPR 2008.

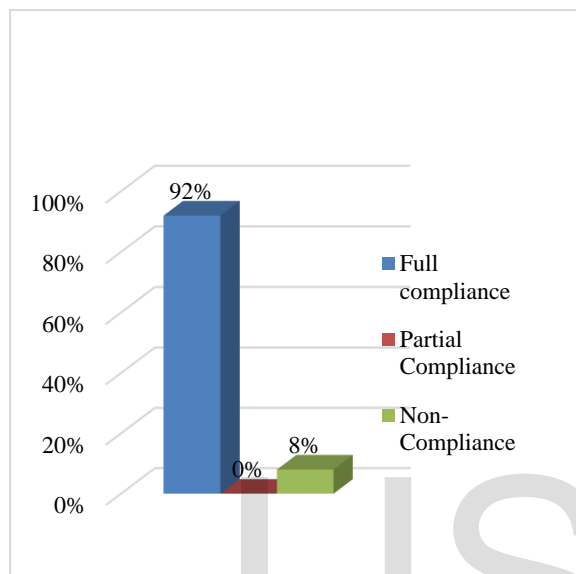


**Figure 5:** Order for Cancellation of NoA

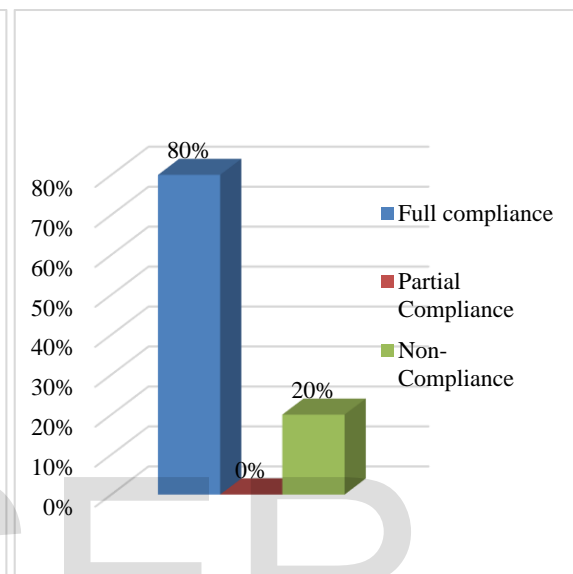
#### 4.5.5 Compliance of Review Panel (RP) Orders

As per Rule 60 of PPR 2008, the order/decision from RP will be treated as final and both the parties (PE and Appellant) will act accordingly. Thus, it is very important to have a look at the compliance issue of the RP Orders. The data collected from the PE and Appellant revealed that

in more than 80% of cases, the decision of the RP is complied with by the PE and the appellant (Figure 6.1 & 6.2). While asked about 'Partial compliance' the result was 'none' from both the parties. Upon further assessing the result of non-compliance of the decision, it was found that the cases were mostly for cancellation of NoA which was beyond the provision of PPR 2008. Also, the winning tenderer pursued the matter to the High Court which ultimately lingered the whole procurement process.



**Figure 6.1:** Compliance of RP Decision by Appellant



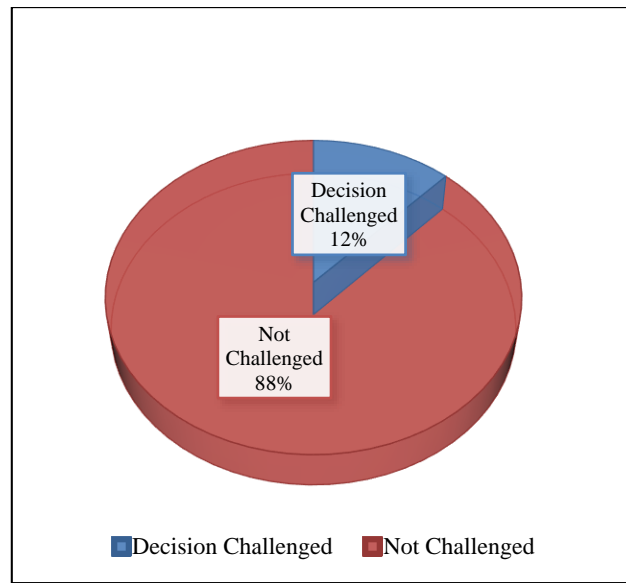
**Figure 6.2:** Compliance of RP Decision by PE

#### 4.5.6 Appearance Before the Honourable High Court by the Parties

While aggrieved by the decision of RP, the party(s) may appear before the High Court (HC) challenging the same. This phenomenon has been assessed in the study which ultimately shows the effectiveness of the decision of RP as well as confidence towards the RP. From the study, it was found that the case referred to HC is not so frequent, especially the PEs shown unwillingness to avoid further complications. Figure 7 below depicts the same.



**Figure 7.1:** RP Decision challenged in HC: *PE*

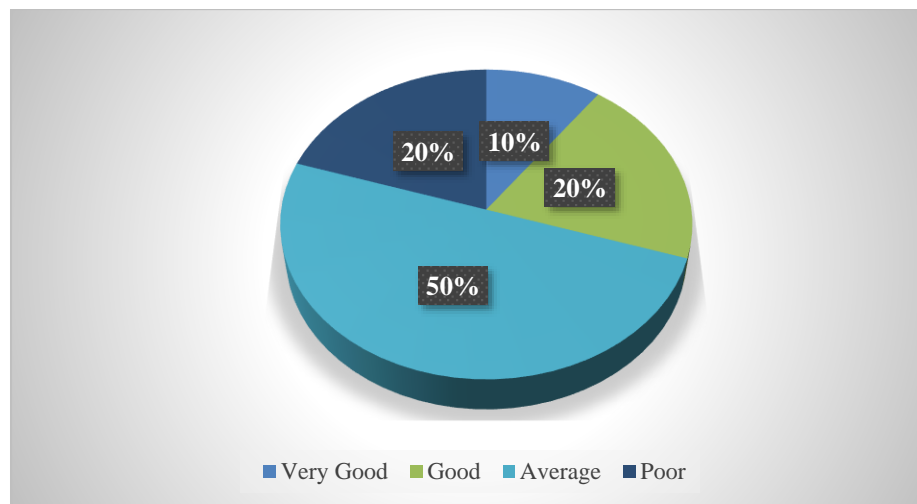


**Figure 7.2:** RP Decision Challenged in HC: *Appellant*

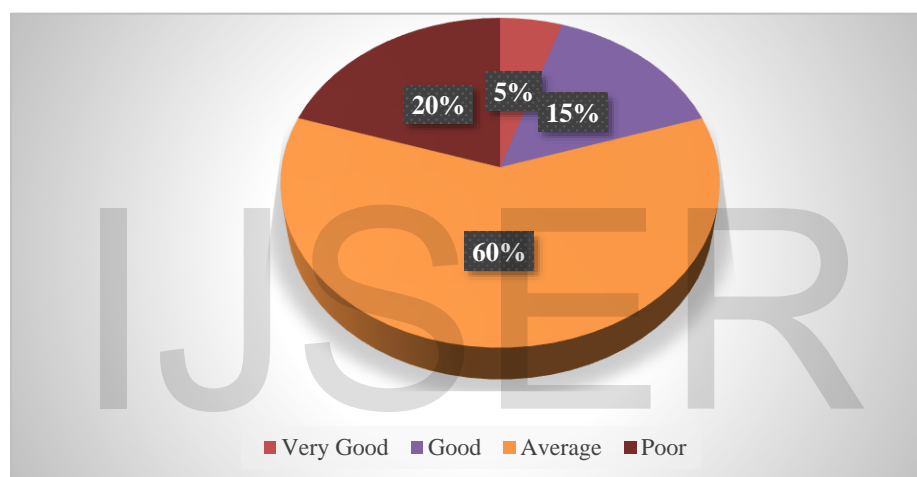
#### 4.5.7 Capability of the Review Panels (RP)

The RP formed as per Rule 58 of PPR 2008 is bound to dispose of the appeal within 12 (twelve) working days from the date of receipt of the appeals. They need to have good knowledge in public procurement as well as experience in the field. Sometimes there raise questions about the capability of the RP members in addressing the appeals prudently. For this, information was collected on the capability issues of the RP. Upon analyzing the data collected from KII, it was found that the majority of the respondents claimed that the RPs are more or less capable on the 'average' level. However, 20% of respondents reported that their quality is not up to the mark, rather poor. The results were found similar upon analyzing the data obtained from PE and appellant ends. For better understanding, graphical representations of the same are stated below.

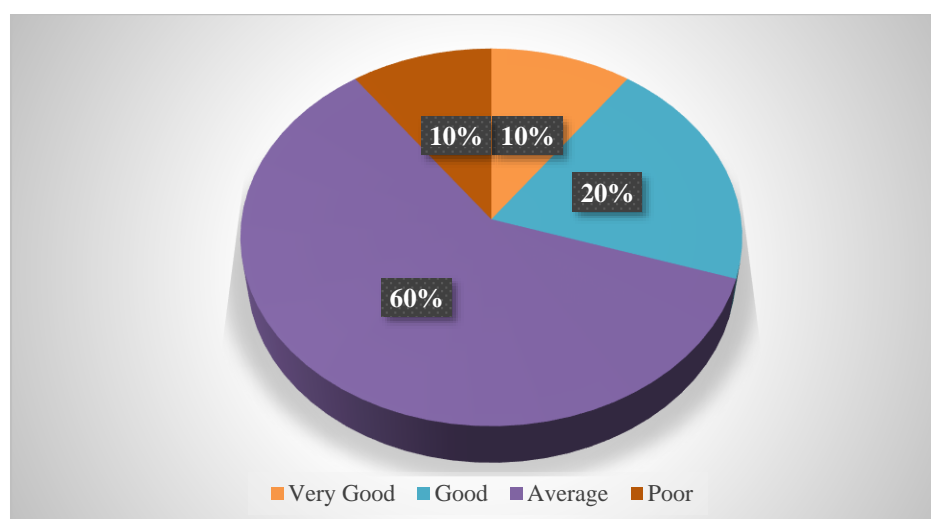




**Figure 8.1:** Capabilities of the RPs in Handling Appeals: Key Informants



**Figure 8.2:** Capabilities of the RPs in Handling Appeals: PE

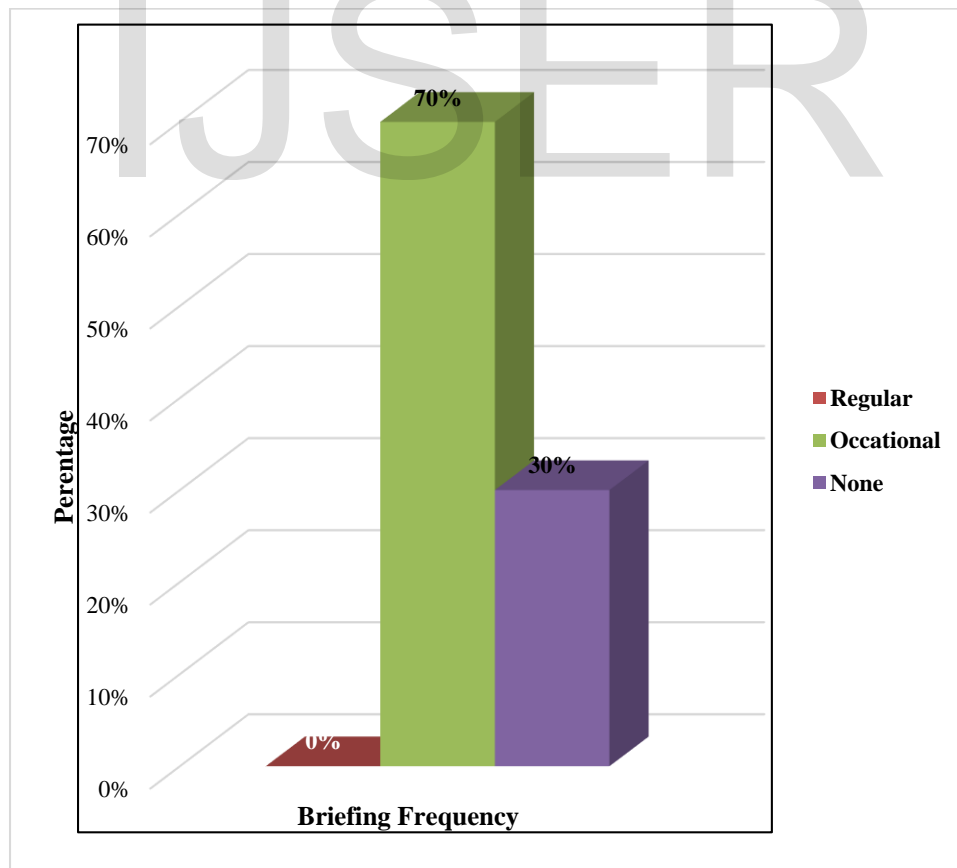


**Figure 8.3:** Capabilities of the RPs in Handling Appeals: Appellant

#### 4.5.8 Regular Briefing towards Review Panels

Public Procurement Act 2006 (PPA 2006) and Public Procurement Rules 2008 (PPR 2008) are living documents. With the approval from the competent authority, these documents are amended to address the changing scenario. Since the members of the RP are retired persons, they don't have the scope to work in the procurement directly. Also, the complexity in Public Procurement has many facets. Since CPTU is the nodal procurement body of the government and providing an opinion on different issues, it becomes essential for CPTU to update the members of the RP on the issue of public procurement. For this, it is essential to sit with the RPs in regular intervals.

From the study, it was found that CPTU occasionally sits with the RPs for any briefing and it was treated as not sufficient to update them (Figure 9). Since the complexities in procurement are increasing day by day, the respondents suggested that CPTU should brief the RPs at regular intervals to update them with challenges and new issues in public procurement. No doubt this will uphold the image of CPTU too.



**Figure 9:** Regular Briefing by CPTU towards RPs

## CHAPTER 5: RECOMMENDATIONS

For ensuring transparency and accountability in public procurement in Bangladesh, strong and effective Review Panels are very much essential. The study revealed different shortcomings of the RPs which are needed to address for ensuring the effectiveness of the RPs. For this, the followings are a set of recommendations derived from the present study:

- While forming Review Panels (RP), the spirit of Rule 58 (2) should be followed strictly. Members should be selected not only from government but also from other semi-government and autonomous bodies having diverse work experience and knowledge in public procurement;
- The panels should be formed for a certain period, a maximum for 5 (five) years to avoid complacency;
- CPTU should update the RP Guidelines emphasizing the areas of the decision by the Review Panel.
- There should have a regular briefing from CPTU towards the RP on the issues of PPR 2008 to update them with concurrent issues and legal provisions.
- In the disposal of appeals with complex issues, RP may seek expert assistance from CPTU.
- In decision making, there should have no *ultra vires* like cancellation of NoA. CPTU should take the necessary steps to prevent this.
- The orders passed by the Review Panels should be further studied carefully by the CPTU on a random basis to ascertain the adherence of PPA 2006 and PPR 2008.
- While found violating the PPR 2008 in providing the decision/verdicts, CPTU should warn them or abolish the panel with prior approval from the concerned authority.
- There should create a scope for interacting with the RP with the Honourable High Court (HC) Division regularly to avoid further complications arising from the disposal of appeals.
- The capacity of the RP should be enhanced through training.
- Decisions beyond the provision of PPR 2008 should be addressed by CPTU. Necessary amendments required for the same should be made by CPTU.
- A mechanism for observing the compliance of decisions taken by the RPs needs to develop by CPTU.

## **CHAPTER 6: CONCLUSIONS**

Review Panel is an institutional arrangement for ensuring fair competition in public procurement. Through appeal management properly as per PPA 2006 and PPR 2008, they help to build the trust of the stakeholders especially the tendering communities in the government's wills to ensure transparency in the procurement system. They play a vital role in settling disputes during the whole procurement processing phase. However, for playing such crucial roles, the Review Panels need to be effective through equipped with technical knowledge on procurement and common laws as well as strong ethical values. Recommendations from the study might be helpful in this regard. The government should take proper steps for ensuring the effectiveness of the Review Panels as well as building its image towards the procurement stakeholders at home and abroad.

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