

Public Procurement Needs Assessment for Public Administrations





Index

04	Introduction
05	Distribution map of the 20 surveyed administrations' locations
06	The study mechanism and the approved criteria
07	Comprehensive analysis of administrations' responses
46	Analysis for Each Administration
46	Ministry of Public Works and Transport- Directorate General of Land and Maritime Transport
52	Ministry of Energy and Water - Directorate General of Water and Electrical Resources
58	Ministry of Energy and Water - Directorate General of Oil
64	Ministry of Agriculture - Directorate General of Agriculture
70	Ministry of Information - Directorate General of Ministry of Information
76	Ministry of Finance - Lebanese National Lottery
82	National Social Security Fund
87	Green Plan Lebanon
93	Litani River Authority
98	South Lebanon Water Establishment
103	Qartaba Governmental Hospital
108	Dahr el Bachek Governmental Hospital
113	Nabatiyeh Governorate
119	Akkar Governorate
125	Jezzine Municipality
131	Batloun Municipality
137	Saadnayel Municipality
142	Batroun Municipal Corporation
147	Al Buhaira Municipal Corporation
152	Chouf Souayjani Municipal Corporation
158	Conclusion



Introduction

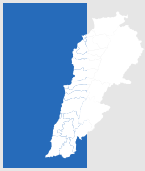


The Methodology for Assessing Procurement Systems (MAPS) has revealed the lack of unified procedures and clear standards for public procurement in Lebanon. The multiplicity of texts and provisions, the lack of complaint and objection mechanisms, the absence of standardized criterion and documents such as standard bidding documents, and the excessive recourse to direct contracting have led to irregular public procurement processes.

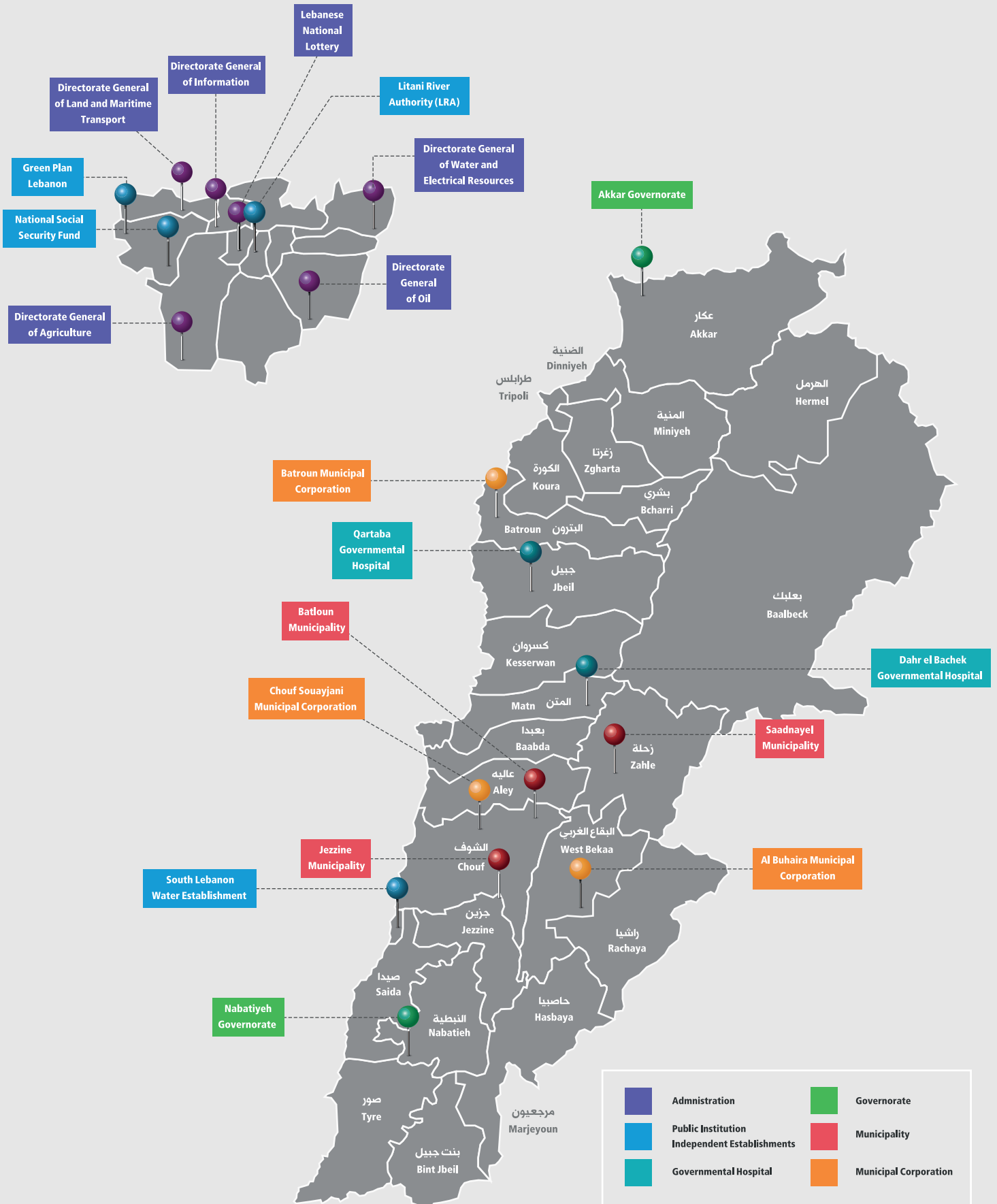
Several defects have been identified in terms of institutional capabilities, technological infrastructure, inefficiency and lack of development of information management systems, which impede access to information, reduce the effectiveness of supervision and control and increase the risks of corruption, which in its turn, result in additional cost over the public finance and the loss of opportunities to attract new investment suppliers.

In 2018, the Lebanese state, at the CEDRE Conference held in Paris, committed to carrying out comprehensive reforms, most notably the fight against corruption and the modernization of public procurement, coinciding with the insistence of the international community and its emphasis on the importance of implementing these reforms in light of the financial and economic challenges the country is going through. An initial draft public procurement law in Lebanon was prepared and presented as a law proposal before the Lebanese Parliament. The proposal of the law, before its approval in the parliament, went through a long journey that lasted a whole year of discussions and consultations with the concerned authorities, until it was enacted and signed by the President of the Lebanese Republic and published in the Official Gazette on July 29, 2021, and entered into force on July 29, 2022.

Therefore, in order to review the procurement procedures previously followed by the Lebanese administrations, assess their future needs in light of the adoption of the New Public Procurement Law No. 244/2021, and monitor the challenges they face that may prevent the implementation of the provisions of this law at all levels, Gherbal Initiative conducted a field visit to 20 Administrations, including General Directorates, Public Institutions, Independent Authorities, governmental hospitals, governorates, municipalities and Municipal Corporations in different Lebanese territories, and a series of questions were asked to the employees entrusted with public procurement tasks.



Distribution map of the 20 surveyed administrations' locations





The study mechanism and the approved criteria

A set of 50 questions divided into seven sections has been prepared :



Section I:

Information about the procuring entity

Section II:

Public Procurement and the basis for its conduct

Section III:

Administrative and Organizational Affairs

Section IV:

Public Procurement Practices

Section V:

Human Resources

Section VI:

Technical and logistical matters and transparency enhancement

Section VII:

Strategic Procurement

Regarding the answer to a question about the number of procurement conducted between 2017 and 2021; the number of operations has been divided into the following ranges: 1-9, 10-49, 50-199, 200-999, 1000 procurement operations and above.

We also asked the administrations to provide us exclusively with their annual budgets for the years 2019 and 2022, for Gherbal has already submitted in 2019 a request for information regarding the administrations budget for 2017, as well as a request submitted in 2020 regarding their cut-off procedures for 2018 and 2019.

Accordingly, we hereby present a comprehensive analysis of the provided answers.



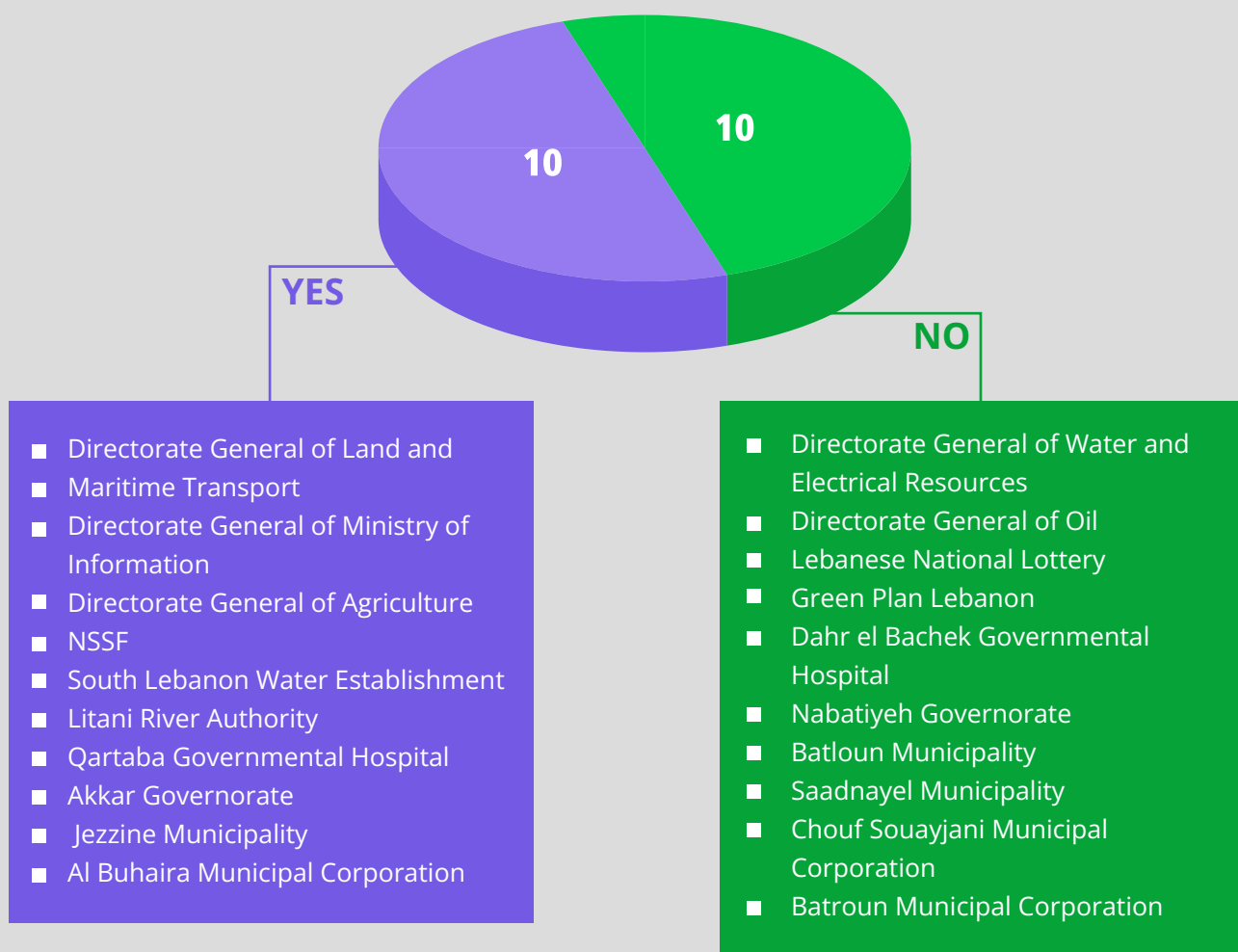


Comprehensive analysis of administrations' responses

The employees knowledge of the new Public Procurement Law No. 244/2021

The study of Gherbal Initiative included 20 administrations, and after collecting and processing information, we learnt that only 10 out of 20 administrations reviewed the provisions of the new Public Procurement Law No. 2021/24, while employees of the remaining ten administrations were unable to review it for several reasons, including lack of time or their lack of knowledge regarding the publication of the law in the Official Gazette.

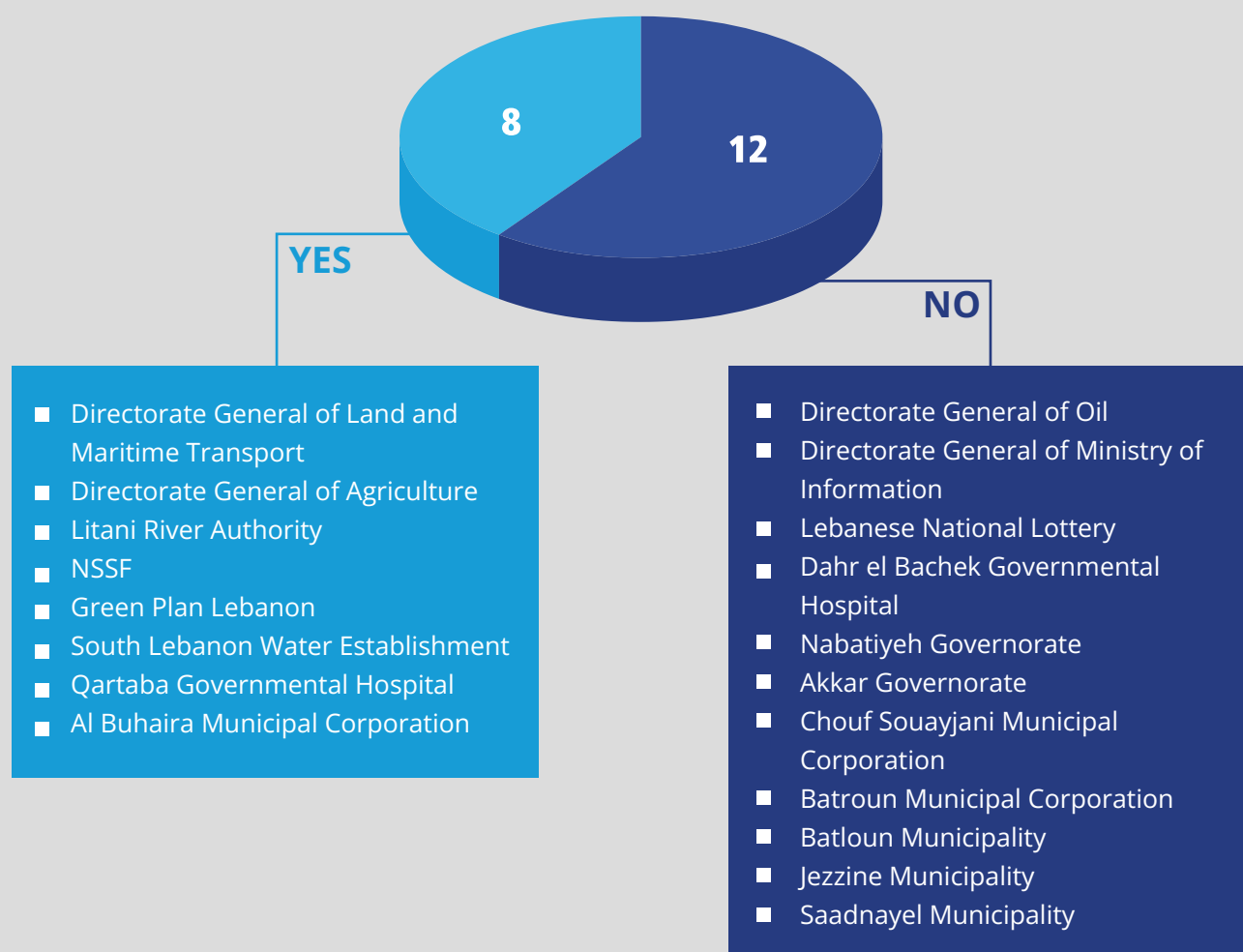
THE EMPLOYEES KNOWLEDGE OF THE NEW PUBLIC PROCUREMENT LAW NO. 244/2021



The administrations staff has underwent the mandatory training

The employees of only 8 out of 20 administrations underwent the mandatory training held by the Institut des Finances Basil Fuleihan. Noting that the employees of the other 12 administrations did not for several reasons, including the difficulty of transport to attend the training at the Institute, the failure of the Institute to contact them as they claim, or the shortage of internet and technology at their workplace. Noting that the said Institute has organized dozens of online workshops during the period between the year following the publication of the law and its entry into force.

THE EMPLOYEES UNDERWENT THE MANDATORY TRAINING



Conducting Public Tenders in cooperation with the Public Procurement Management Administration

After interviewing 20 administrations, it turned out that only 8 conducted Public Tenders in cooperation with the Public Procurement Management Administration, while the other 12 administrations, either did not conduct any public tenders or have formed an internal Tender Committee.

CONDUCTING PUBLIC PROCUREMENT IN COOPERATION WITH THE PUBLIC PROCUREMENT MANAGEMENT ADMINISTRATION



Administrations procurement value between 2017 and 2021

As a result of this survey, it was noticeable that the procurement value has decreased, as the highest value occurred in 2017 and the lowest in 2020.

Year	Procurement value / LBP
2017	60,093,391,669
2018	57,172,462,064
2019	56,182,157,133
2020	24,871,968,042
2021	32,774,334,692

The number and value of Public Tenders conducted between 2017 and 2021

From the 20 interviewed administrations, 16 administrations provided us with the number of tenders conducted between 2019 and 2021. Among these 16 administrations, 5 did not conduct any tender, 2 conducted only one tender each, and 6 conducted less than 20 tenders over the last 5 years, while the remaining 3 administrations conducted between 20 and 50 tenders over the said years.

We were not provided with the value of all tenders; however, the value of those provided ranged between 147 million LBP and 24 billion LBP.

Number of Tenders	Value of Tenders (LBP)	Number of administrations	Administrations
0	0	5	Directorate General of Oil Saadnayel Municipality Chouf Souayjani Municipal Corporation Dahr el Bachek Governmental Hospital Qartaba Governmental Hospital
Less than 20	10,119,932,077	8	Directorate General of Land and Maritime Transport Directorate General of Ministry of Information Lebanese National Lottery Akkar Governorate Batloun Municipality Jezzine Municipality Al Buhaira Municipal Corporation
Between 20 and 50	24,757,032,228	3	Green Plan Lebanon NSSF Directorate General of Agriculture Directorate General of Water and Electrical Resources
No response	-	4	South Lebanon Water Establishment Nabatiyeh Governorate Litani River Authority Batroun Municipal Corporation

Announced Tenders for which no proposals were submitted

Only 2 administrations announced 28 tenders, for which no proposals were submitted, resulting in their reconduction: 18 tenders announced by Litani River Authority and 10 tenders announced by Batroun Municipal Corporation.

Administration	Number of tenders for which no proposals were submitted	Total procurement number
Litani River Authority	18	25
Batroun Municipal Corporation	10	32

The number of tenders in comparison with the total number of procurement operations conducted by each administration between 2017 and 2021:

Administration	Number of Tenders	Number of Procurements	Percentage
Directorate General of Land and Maritime Transport	14	1,750	0.8%
Directorate General of Water and Electrical Resources	No answer	-	-
Directorate General of Oil	No answer	1-9/year	-
Directorate General of Agriculture	No answer	-	-
Directorate General of Ministry of Information	7	2,172	0.3%
Lebanese National Lottery	3	54	5.5%
National Social Security Fund	No answer	-	-
Green Plan Lebanon	No answer	-	-
Litani River Authority	25	10-49/year	-
South Lebanon Water Establishment	32	200-999/year	-
Qartaba Governmental Hospital	0	10-49/year	0%
Dahr el Bachek Governmental Hospital	0	50-199/year	0%

Nabatiyeh Governorate	50	10-49/year	-
Akkar Governorate	5	10-49/year	-
Jezzine Municipality	1	2,500	0.04%
Batloun Municipality	6	775	0.8%
Saadnayel Municipality	0	-	-
Batroun Municipal Corporation	32	200-999/year	-
Al Buhaira Municipal Corporation	1	-	-
Chouf Souayjani Municipal Corporation	0	1,188	0%

The value of tenders conducted by each administration in cooperation with the Public Procurement Management Authority between 2017 and 2021:

Administration	Value of Tenders/LBP	Value of tenders conducted in cooperation with PPMA/LBP	Percentage of tenders conducted in cooperation with PPMA from the total value
Directorate General of Land and Maritime Transport	16,409,824,000	11,037,562,250	67.26%
Directorate General of Water and Electrical Resources	No answer	309,300,611,811	-
Directorate General of Oil	-	-	-
Directorate General of Agriculture	No answer	1,853,785,219	-
Directorate General of Ministry of Information	146,690,000	325,725,075	-
Lebanese National Lottery	8,712,248,077	6,716,754,300	77.1%
National Social Security Fund	No answer	0	-
Green Plan Lebanon	No answer	0	-
Litani River Authority	24,437,032,228	0	-
South Lebanon Water Establishment	400,000,000	0	-
Qartaba Governmental Hospital	0	0	-

Dahr el Bachek Governmental Hospital	0	0	-
Nabatiyeh Governorate	No answer	-	-
Akkar Governorate	552,780,000	123,876,000	22.4%
Jezzine Municipality	150,000,000	0	-
Batloun Municipality	158,214,000	0	-
Saadnayel Municipality	0	0	-
Batroun Municipal Corporation	320,000,000	0	-
Al Buhaira Municipal Corporation	No answer	-	-
Chouf Souayjani Municipal Corporation	0	0	-

The value of tenders in comparison with the total value of procurement operations conducted by each administration between 2017 and 2021:

Administration	Value of tender	Value of procurement /LBP	Percentage of tender value from the total procurement value
Directorate General of Land and Maritime Transport	16,409,824,000	83,935,077,000	19.55%
Directorate General of Water and Electrical Resources	No answer	-	-
Directorate General of Oil	-	3,591,655,000	-
Directorate General of Agriculture	No answer	21,265,105,000	-
Directorate General of Ministry of Information	146,690,000	17,537,435,000	0.84%
Lebanese National Lottery	8,712,248,077	21,265,105,000	41%
National Social Security Fund	No answer	-	-
Green Plan Lebanon	No answer	-	-
Litani River Authority	24,437,032,228	32,120,000,000	76.1%
South Lebanon Water Establishment	400,000,000	-	-
Qartaba Governmental Hospital	0	1,276,266,777	0%

Dahr el Bachek Governmental Hospital	0	30,000,000,000	0%
Nabatiyeh Governorate	No answer	2,000,000,000	-
Akkar Governorate	552,780,000	603,597,000	91.6%
Jezzine Municipality	150,000,000	3,500,000,000	4.3%
Batloun Municipality	158,214,000	1,360,512,000	11.6%
Saadnayel Municipality	0	6,850,356,745	0%
Batroun Municipal Corporation	320,000,000	3,495,093,000*	9.1%
Al Buhaira Municipal Corporation	No answer	7,512,326,000	-
Chouf Souayjani Municipal Corporation	0	6,276,000,000	-

The average period between the date of bid opening and the date of contract awarding

Among the 20 interviewed administrations, 3 need less than a week to award a contract, 7 need less than a month, 7 others need from 1 to 3 months, 1 needs from 3 to 6 months, and 1 administration needs more than a year. Noting that also 1 administration does not interfere in the matter, as donors deal with this procedure.

The average period	Number of administrations	Administrations
Less than a week	3	Directorate General of Oil Nabatiyeh Governorate Akkar Governorate
Less than a month	7	Al Buhaira Municipal Corporation Chouf Souayjani Municipal Corporation Jezzine Municipality Saadnayel Municipality Dahr el Bachek Governmental Hospital South Lebanon Water Establishment Directorate General of Water and Electrical Resource
From 1 to 3 months	7	Batroun Municipal Corporation Directorate General of Land and Maritime Transport Batroun Municipality Lebanese National Lottery Green Plan Lebanon NSSF Litani River Authority
From 3 to 6 months	1	Directorate General of Ministry of Information
More than a year	1	Directorate General of Agriculture
Donors deal with the procedure	1	Qartaba Governmental Hospital

The average period for paying dues to contractors/suppliers after accepting works, supplies or services

Administrations' answers varied in this regard, as the average period for paying dues ranged between 1 and 3 months by 8 administrations, between 6 months and a year by 4 administrations. On the other hand, this period exceeded a year for 7 administrations. Noting that also 1 administration does not interfere in the matter, as donors deal with this procedure.

The average period	Number of administrations	Administrations
From 1 and 3 months	8	Batloun Municipality Saadnayel Municipality Lebanese National Lottery Dahr el Bachek Governmental Hospital NSSF South Lebanon Water Establishment Litani River Authority
Between 6 months and a year	4	Chouf Souayjani Municipal Corporation Batroun Municipal Corporation Directorate General of Oil Akkar Governorate
More than a year	7	Directorate General of Land and Maritime Transport Jezzine Municipality Nabatiyeh Governorate Directorate General of Ministry of Information Green Plan Lebanon Directorate General of Agriculture Directorate General of Water and Electrical Resources
Donors deal with the procedure	1	Qartaba Governmental Hospital

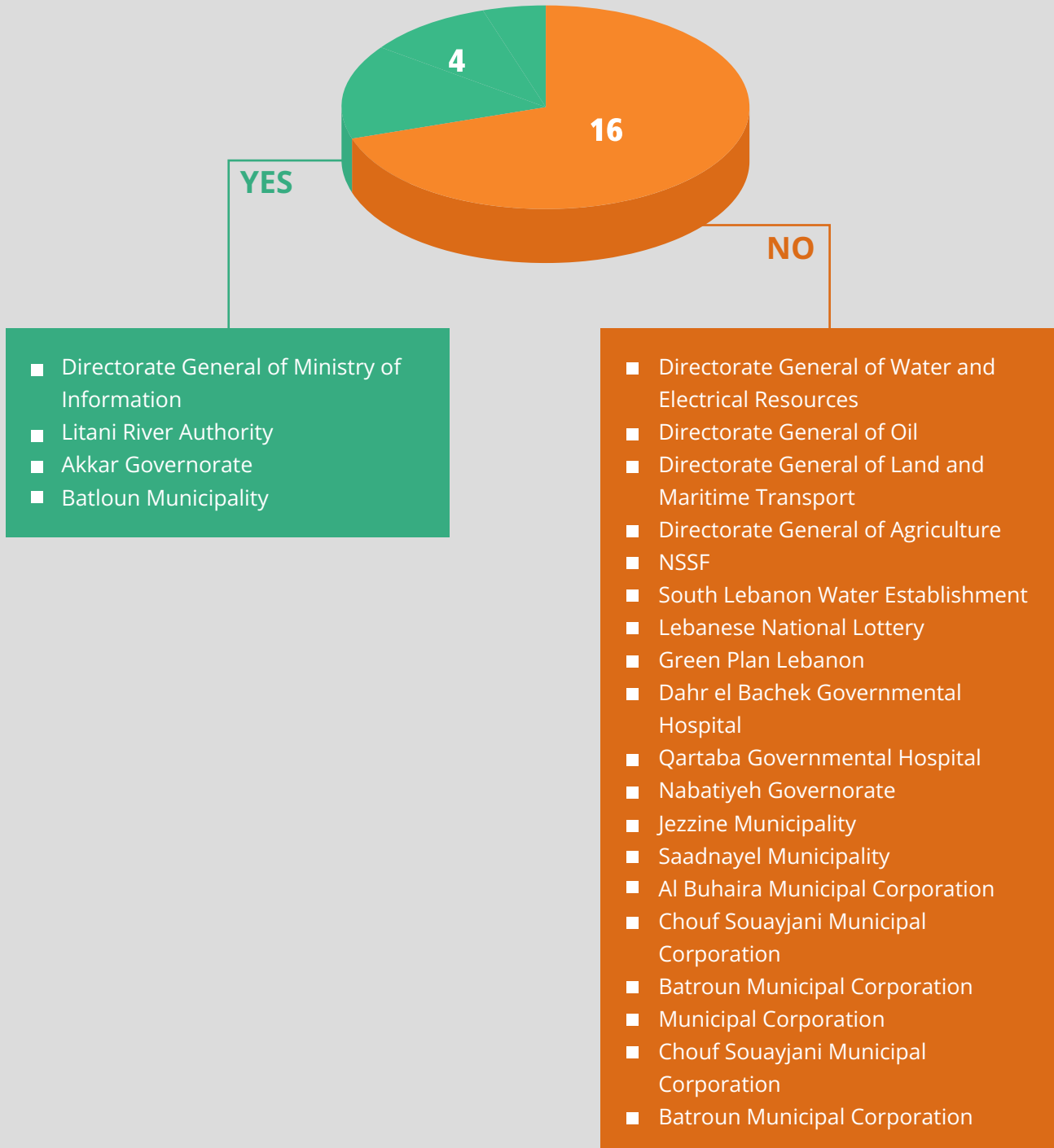
Specialized unit, department or employees to carry out public procurement operations

Only 11 out of 20 administrations include a specialized unit or department to carry out public procurement operations. While only 4 administrations include specialized employees.

SPECIALIZED UNIT OR DEPARTMENT



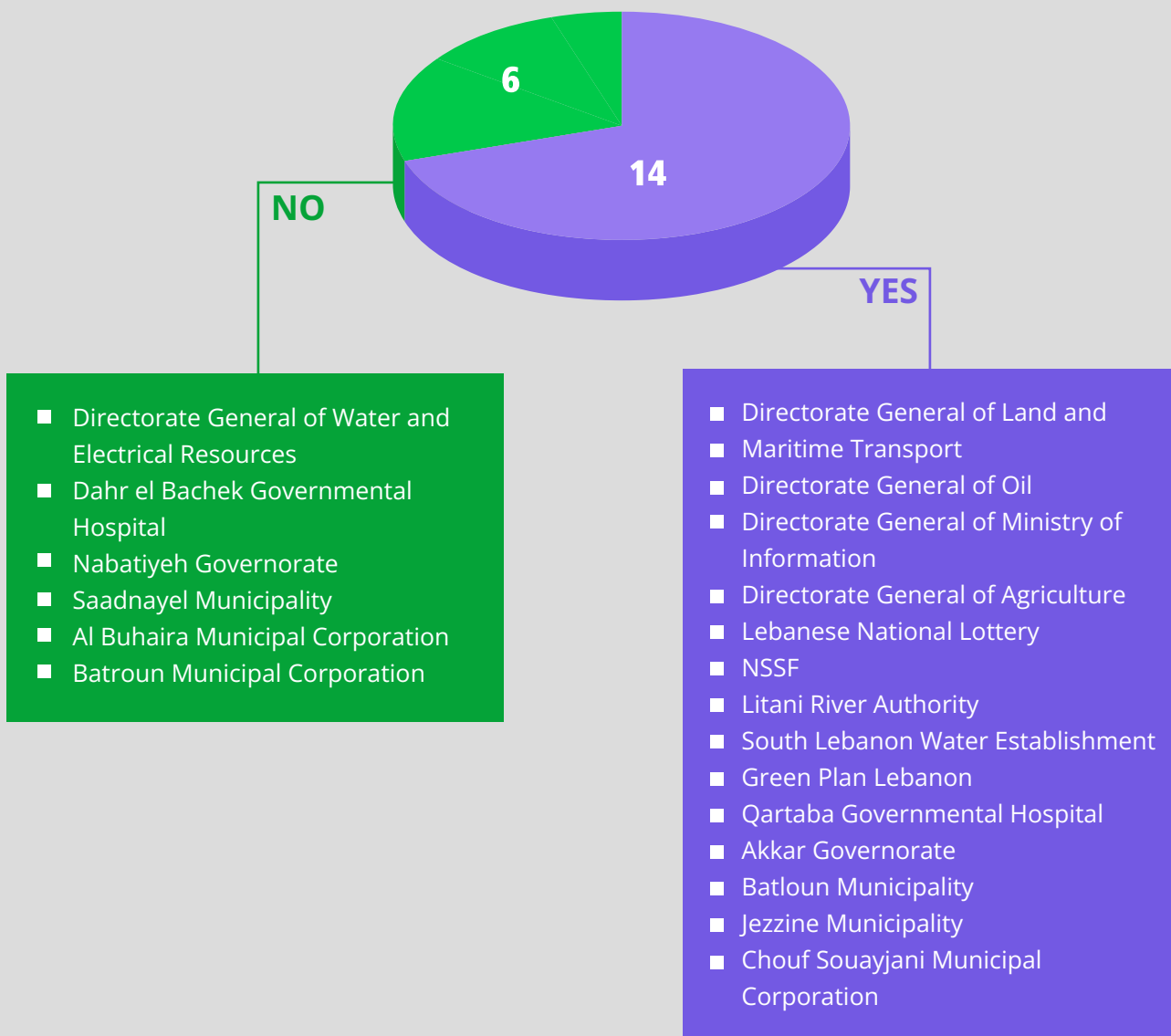
SPECIALIZED EMPLOYEES



Keeping a special record that includes all procurement related information

As a result of the information provided to us, we noticed that 14 administrations keep a special record of all procurement related information, while the other 6 only mention them in their cut-off procedures.

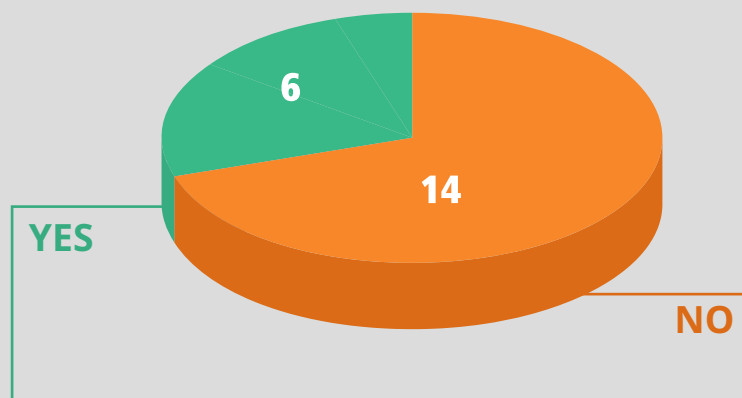
SPECIAL RECORD



Setting an annual report including all procurement operations

Only 6 out of the 20 surveyed administrations set an annual report including all conducted procurements, accomplishments, statistics and other publications.

ANNUAL REPORT



- Batroun Municipal Corporation
- Akkar Governorate
- Directorate General of Ministry of Information
- Directorate General of Agriculture
- South Lebanon Water Establishment
- Litani River Authority

- Directorate General of Land and Maritime Transport
- Directorate General of Water and Electrical Resources
- Directorate General of Oil
- Lebanese National Lottery
- NSSF
- Green Plan Lebanon
- Dahr el Bachek Governmental Hospital
- Qartaba Governmental Hospital
- Nabatiyeh Governorate
- Batloun Municipality
- Jezzine Municipality
- Saadnayel Municipality
- Al Buhaira Municipal Corporation
- Chouf Souayjani Municipal Corporation

Challenges facing the administrations in implementing the new Public Procurement Law

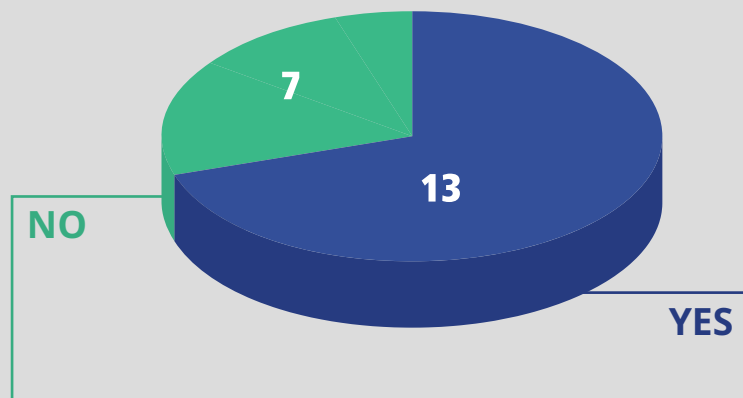
One of the objectives of this study is to explore the administrations' needs and the challenges they face during the implementation of the new Public Procurement Law. Noting that the Lebanese administrations are facing several challenges, including the shortage of human resources; as 17 out of 20 administrations suffer from a large vacancy in the number of their employees, and the lack of knowledge and skills as 15 out of 20 administrations reported that their employees need periodic training to develop and improve their skills. Further, the administrations also face a significant shortage of financial capabilities, as 19 out of 20 administrations suffer from this shortfall due to the failure in approving the budget and allocate the required amounts, which are already no longer sufficient, in addition to the fluctuations in the exchange rate of the Lebanese Pound against the US Dollar. Another challenge mentioned by 13 out of 20 administrations is the shortage of logistic equipment such as information technology and other necessities that administrations urgently need to implement the new Public Procurement Law with absolute effectiveness.

Shortages	Number of administrations
Financial capabilities	19
Human resources	17
Knowledge and skills	15
Logistic equipment	13

Internal Audit Unit

The new Public Procurement Law obliges procuring entities to assign one or more of their employees to handle the task of internal audit in order to ensure the implementation of the provisions of the law, decrees and regulatory decisions. After asking about the availability of such a unit, before the law came into effect, we found out that 13 administrations include an internal audit unit which tasks are either conducted by the Financial Department, the Accounting Department, the auditor, or the expenditure controller, depending on each administration.

INTERNAL AUDIT UNIT



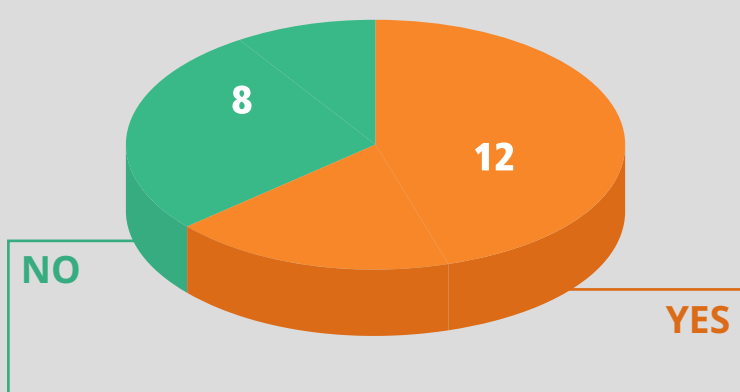
- Directorate General of Land and Maritime Transport
- Directorate General of Oil
- Lebanese National Lottery
- NSSF
- South Lebanon Water Establishment
- Qartaba Governmental Hospital
- Akkar Governorate

- Directorate General of Water and Electrical Resources
- Directorate General of Ministry of Information
- Directorate General of Agriculture
- Litani River Authority
- Green Plan Lebanon
- Dahr el Bachek Governmental Hospital
- Nabatiyeh Governorate
- Batloun Municipality
- Jezzine Municipality
- Saadnayel Municipality
- Chouf Souayjani Municipal Corporation
- Batroun Municipal Corporation
- Al Buhaira Municipal Corporation

Conducting a periodic evaluation of the employees performance

Performance appraisal aims to provide a positive result for employees by monitoring and following up their performance in order to identify and support the need for any training, motivate the employees and help them interact and develop their performance. Among the 20 administrations that were surveyed, only 12 administrations periodically evaluate the performance of their employees.

PERIODIC EVALUATION



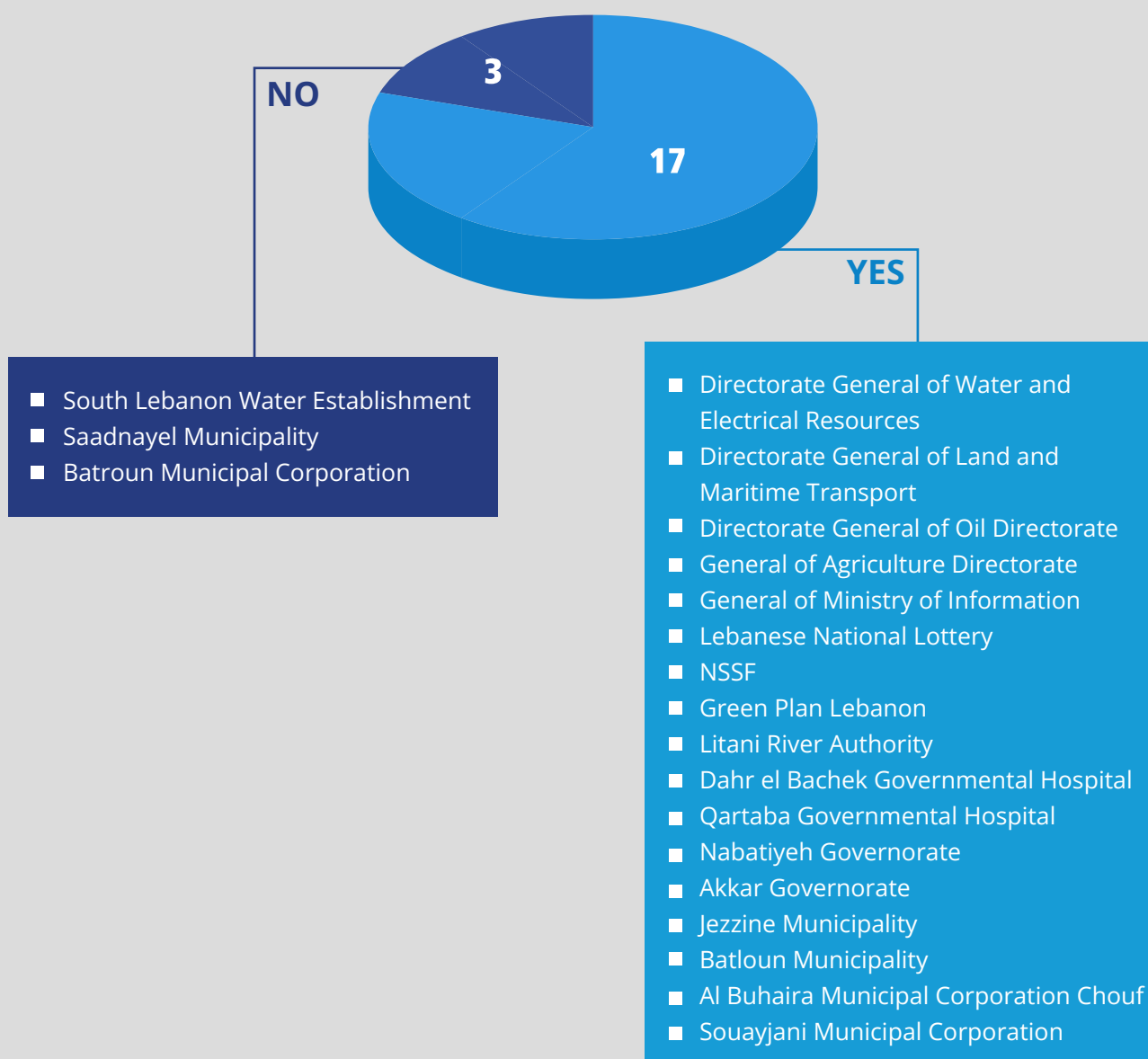
- Directorate General of Oil
- Directorate General of Agriculture
- NSSF
- Lebanese National Lottery
- South Lebanon Water Establishment
- Batloun Municipality
- Saadnayel Municipality
- Batroun Municipal Corporation

- Directorate General of Land and Maritime Transport
- Directorate General of Water and Electrical Resources
- Directorate General of Ministry of Information
- Litani River Authority
- Green Plan Lebanon
- Dahr el Bachek Governmental Hospital
- Qartaba Governmental Hospital
- Nabatiyeh Governorate
- Akkar Governorate
- Jezzine Municipality
- Al Buhaira Municipal Corporation
- Chouf Souayjani Municipal Corporation

Setting annual and medium-term procurement plans that meet the administration's needs in line with the required appropriations in its budget plan and its priorities

The new Public Procurement Law stipulates that administrations must identify their needs and prepare their annual plan for the upcoming year, provided that the estimated value is determined in accordance with the appropriations required in their draft budget. The annual plan for procurement is prepared on the basis of a standard form and procedures issued by the Public Procurement Authority, so that the plan can be annual or multi-year. As a result of our survey, we note that 17 out of 20 administrations set annual or medium-term plans, in which they determine their procurement needs.

SETTING ANNUAL OR MEDIUM-TERM PLANS



Cooperating with external experts and specialists

Due to the large vacancy in the administrations and the weak capabilities and skills of their employees, some of these 20 administrations have referred to external experts and specialists to complete the procurement procedures. The administrations need external experts to mainly assist them in setting the bidding documents, evaluating proposals and the services provided by contractors, supervising the implementation of the contract, and finally receiving the supplies, services or executed works.

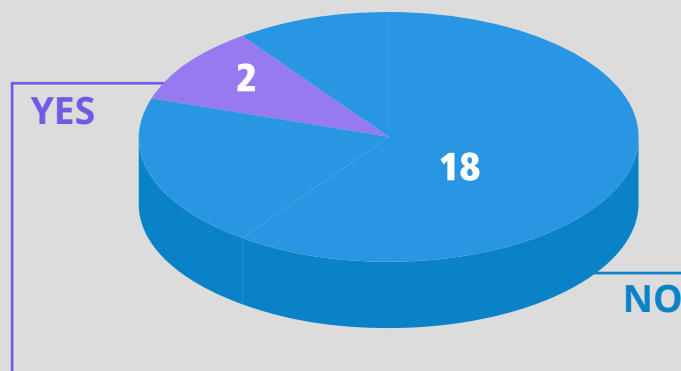
Cooperating with external experts and specialists	Number of administrations
Setting bidding documents	9
Evaluating services	6
Supervising the implementation of contract	5
Evaluating proposals	4
Receiving supplies, services or works	4

- **Setting bidding documents:** Directorate General of Water and Electrical Resources - Directorate General of Land and Maritime Transport - Directorate General of Agriculture - NSSF - Litani River Authority - Green Plan Lebanon - Saadnayel Municipality - Al Buhaira Municipal Corporation - Chouf Souayjani Municipal Corporation
- **Evaluating services provided by winning bidders:** Directorate General of Water and Electrical Resources - Directorate General of Land and Maritime Transport - NSSF - Green Plan Lebanon - Litani River Authority - Chouf Souayjani Municipal Corporation
- **Supervising the implementation of contracts:** Directorate General of Water and Electrical Resources - Directorate General of Land and Maritime Transport - NSSF - Green Plan Lebanon - Chouf Souayjani Municipal Corporation
- **Evaluating proposals:** NSSF - Green Plan Lebanon - Chouf Souayjani Municipal Corporation - Al Buhaira Municipal Corporation
- **Receiving supplies, executed services or works:** Directorate General of Land and Maritime Transport - NSSF - Green Plan Lebanon - Chouf Souayjani Municipal Corporation

Awarding some projects to other administrations or on behalf of other procuring entities, and conducting joint public procurements

Among the 20 administrations that were surveyed about public procurement and the implementation of its procedures, only 2 administrations assigned some projects to other administrations or carried out joint public procurement operations with or for other administrations, compared to 18 administrations that did not engage in such operations.

AWARDING OTHER ADMINISTRATIONS OR CONDUCTING JOINT PUBLIC PROCUREMENTS



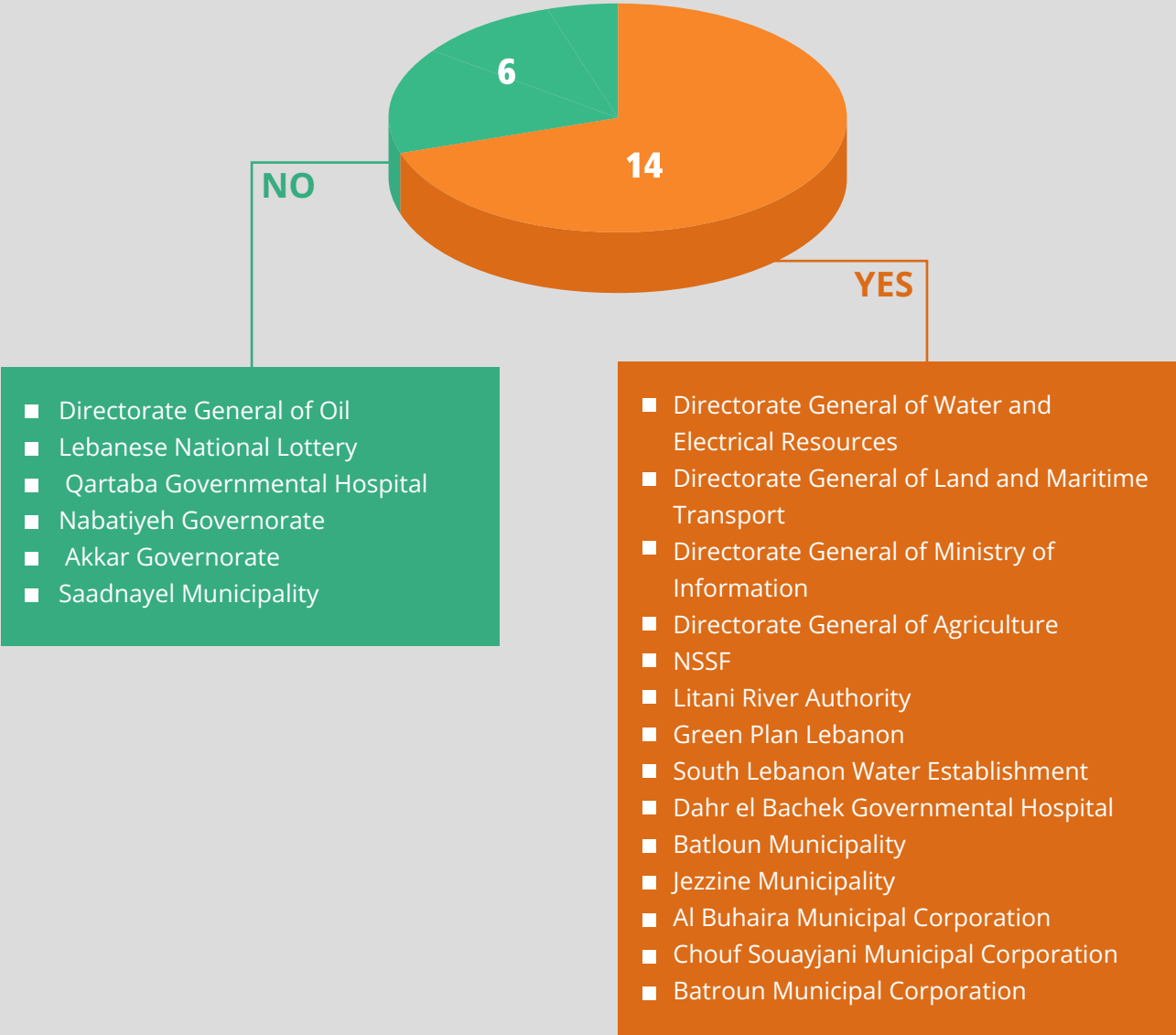
- Green Plan Lebanon
- Dahr el Bachek Governmental Hospital

- Directorate General of Agriculture Directorate
- General of Water and Electrical Resources
- Directorate General of Oil
- Directorate General of Land and Maritime Transport
- Directorate General of Ministry of Information
- NSSF
- Litani River Authority
- South Lebanon Water Establishment
- Akkar Governorate
- Nabatiyeh Governorate
- Lebanese National Lottery
- Qartaba Governmental Hospital
- Batloun Municipality
- Saadnayel Municipality
- Jezzine Municipality
- Al Buhaira Municipal Corporation
- Chouf Souayjani Municipal Corporation
- Batroun Municipal Corporation

The availability of a technical team supporting the administration in public procurement operations (from evaluating needs to implementing contracts)

The administration may need the support of a technical team to complete the procurement stages, as this team may be composed of the administration’s employees or external staff. Out of the 20 surveyed administrations, 14 are supported by a technical team composed of jurists, engineers, auditors and other specialists. On the other hand, 6 administrations rely only on the available non-specialized competencies of their employees.

AVAILABILITY OF TECHNICAL TEAM



The needed specialties varied between civil, topographical, agricultural, biomedical engineers, etc. The administrations were also supported by jurists and auditors:

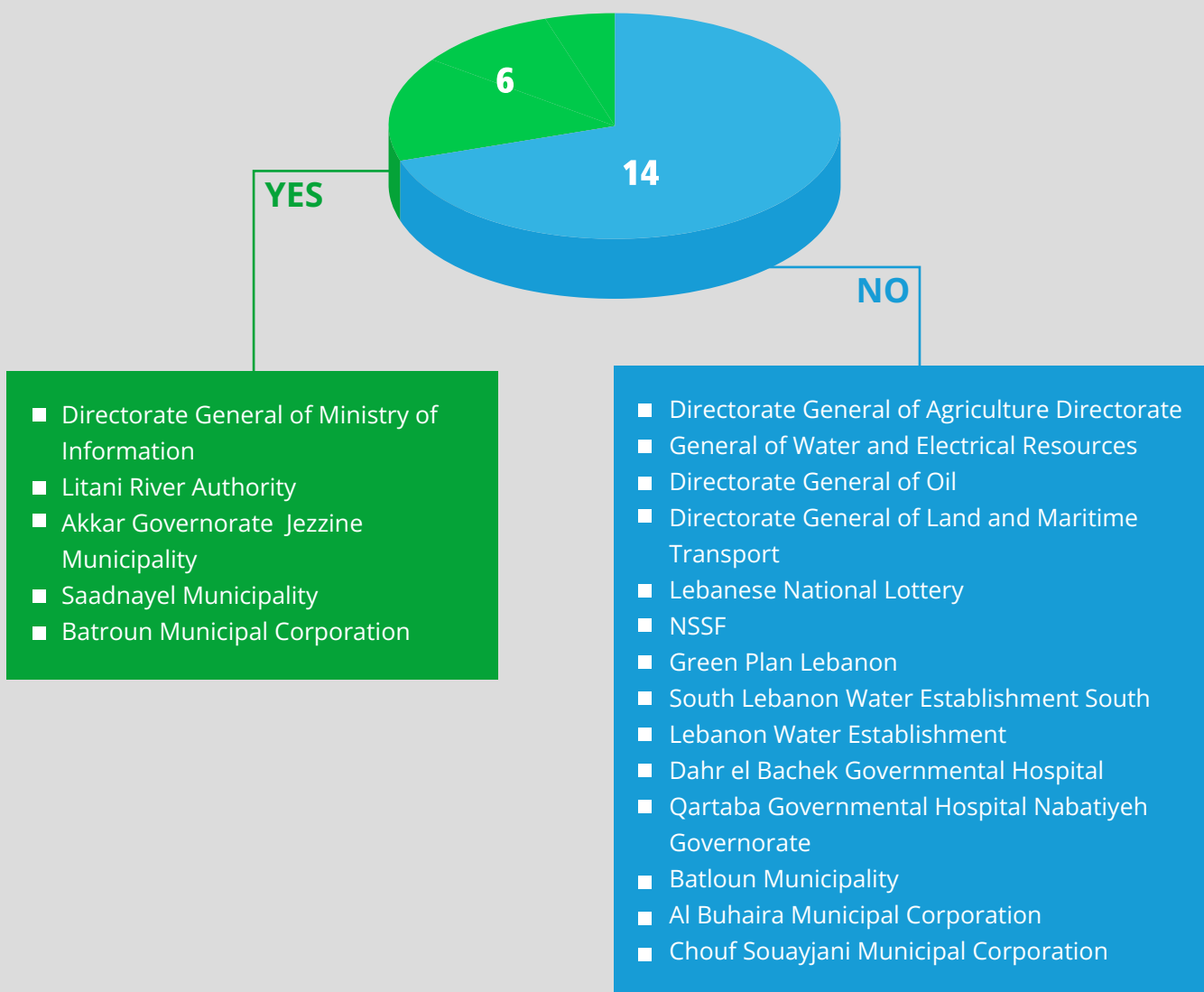
Specialty	Number of specialists
Jurist	80
Engineer	18
Auditor	8
Procurement specialist	1



Sufficient number of employees to monitor the procurement process stages

As mentioned earlier, the Lebanese administrations suffer from a significant shortage of human resources. Over and above that, 14 out of 20 administrations suffer from a shortage in the number of employees in charge of the public procurement tasks in particular.

SUFFICIENT NUMBER OF EMPLOYEES TO MONITOR PUBLIC PROCUREMENT PROCESS



A website for each administration, the availability of updates, search and download possibility, security and confidentiality procedures

The new Public Procurement Law provides for mandatory publication on the central electronic platform of the Public Procurement Authority, and on the procuring entity's website, if any. Noting that 15 out of 20 administrations have their own websites, among which 9 periodically update their websites.

Of the 15 administrations that have a website, 10 provide the ability to search and download information, and are also subject to procedures that ensure the privacy and confidentiality of information. In contrast, only 2 administrations provide their bidding documents on their website.

Administration's website	Number of administrations	Administrations
<p>The website is solely for this administration</p>	<p>15</p>	<p>Directorate General of Agriculture Directorate General of Water and Electrical Resources Directorate General of Oil Directorate General of Land and Maritime Transport Directorate General of Ministry of Information NSSF Green Plan Lebanon (out of service) Litani River Authority South Lebanon Water Establishment (out of service) Dahr el Bachek Governmental Hospital (out of service) Akkar Governorate Batloun Governorate Jezzine Municipality (suspended) Al Buhaira Municipal Corporation Chouf Souayjani Municipal Corporation (inactive)</p>

<p>Ability to search and download information</p>	<p>10</p>	<p>Directorate General of Agriculture Directorate General of Water and Electrical Resources Directorate General of Oil Directorate General of Land and Maritime Transport NSSF South Lebanon Water Establishment Green Plan Lebanon Akkar Governorate Batloun Municipality Jezzine Municipality</p>
<p>Subject to procedures ensuring the privacy and confidentiality of information</p>	<p>10</p>	<p>Directorate General of Agriculture Directorate General of Water and Electrical Resources Directorate General of Land and Maritime Transport Directorate General of Ministry of Information Green Plan Lebanon South Lebanon Water Establishment Akkar Governorate Batloun Municipality Jezzine Municipality Al Buhaira Municipal Corporation</p>
<p>Periodic update</p>	<p>9</p>	<p>Directorate General of Agriculture Directorate General of Water and Electrical Resources Directorate General of Ministry of Information Green Plan Lebanon South Lebanon Water Establishment Akkar Governorate Batloun Municipality Jezzine Municipality Al Buhaira Municipal Corporation</p>
<p>Electronically providing bidding documents</p>	<p>2</p>	<p>Directorate General of Oil Dahr el Bacheh Governmental Hospital</p>

Publication means used by administrations

The new Public Procurement Law provides for mandatory publication on the central electronic platform of the Public Procurement Authority, and on the procuring entity's website, if any. In addition, activities and procurement operations may be published through available traditional means, such as the Official Gazette and newspapers. Therefore, through our survey, we noticed that most administrations use the traditional means of publication, such as the Official Gazette, local newspapers, and the administration doors. While a few others rely on publishing their activities and procurement operations on the website, the guardianship authority's website, the doors of churches and mosques, their social media pages, or sometimes WhatsApp application to inform the administration's employees.

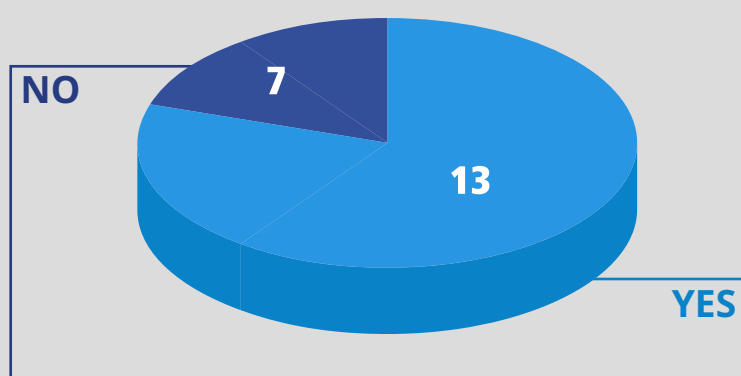
Publication means	Number of administrations	Administrations
Local newspapers	17	Directorate General of Agriculture Directorate General of Water and Electrical Resources Directorate General of Land and Maritime Transport Directorate General of Ministry of Information Lebanese National Lottery NSSF Green Plan Lebanon Litani River Authority South Lebanon Water Establishment Qartaba Governmental Hospital Nabatiyeh Governorate Akkar Governorate Batloun Municipality Jezzine Municipality Saadnayel Municipality Al Buhaira Municipal Corporation Batroun Municipal Corporation

<p>Administration doors</p>	<p>17</p>	<p>Directorate General of Agriculture Directorate General of Water and Electrical Resources Directorate General of Land and Maritime Transport Directorate General of Ministry of Information Lebanese National Lottery NSSF Green Plan Lebanon South Lebanon Water Establishment Dahr el Bachek Governmental Hospital Qartaba Governmental Hospital Nabatiyeh Governorate Akkar Governorate Batloun Municipality Jezzine Municipality Saadnayel Municipality Chouf Souayjani Municipal Corporation Batroun Municipal Corporation</p>
<p>Official Gazette</p>	<p>16</p>	<p>NSSF Directorate General of Agriculture Directorate General of Water and Electrical Resources Directorate General of Land and Maritime Transport Directorate General of Ministry of Information Lebanese National Lottery Green Plan Lebanon Litani River Authority South Lebanon Water Establishment Qartaba Governmental Hospital Akkar Governorate Batloun Municipality Jezzine Municipality Saadnayel Municipality Al Buhaira Municipal Corporation Batroun Municipal Corporation</p>
<p>Website</p>	<p>7</p>	<p>Directorate General of Water and Electrical Resources Directorate General of Oil Directorate General of Land and Maritime Transport NSSF Green Plan Lebanon Litani River Authority Jezzine Municipality</p>
<p>Other means</p>	<p>5</p>	<p>Directorate General of Oil NSSF Green Plan Lebanon Qartaba Governmental Hospital Batroun Municipal Corporation</p>

The designation of an employee in charge of the direct contact and communications with bidders regarding procurement procedures

The new Public Procurement Law provides for the obligation to appoint one or more employees of the administration's employees or workers to communicate directly with suppliers or contractors and to receive direct communications from them regarding procurement procedures. Out of the 20 surveyed administrations, only 13 administrations already had an employee appointed to perform these tasks.

EMPLOYEE IN CHARGE OF THE DIRECT CONTACT AND COMMUNICATION WITH BIDDERS



- Directorate General of Agriculture
- Directorate General of Oil
- Batloun Municipality
- South Lebanon Water Establishment
- Dahr el Bachek Governmental Hospital
- Qartaba Governmental Hospital
- Batroun Municipal Corporation

- NSSF
- Directorate General of Water and Electrical Resources
- Directorate General of Land and Maritime Transport
- Directorate General of Ministry of Information
- Lebanese National Lottery
- Green Plan Lebanon
- Litani River Authority
- Jezzine Municipality
- Saadnayel Municipality
- Nabatiyeh Governorate
- Akkar Governorate
- Al Buhaira Municipal Corporation
- Chouf Souayjani Municipal Corporation

The designation of an employee in charge of receiving and replying to access to information requests

The Public Procurement Law also stipulates the necessity of publishing the required information on the website of the administration and on the central electronic platform of the Public Procurement Authority to ensure transparency, taking into account the Right to Access Information Law; therefore, the 20 administrations were surveyed to check which of them has assigned an information officer, noting that only 12 administrations did, while the other 8 administrations stuck to handing these tasks over to the staff of the Registry's Bureau or the Clerical Office.

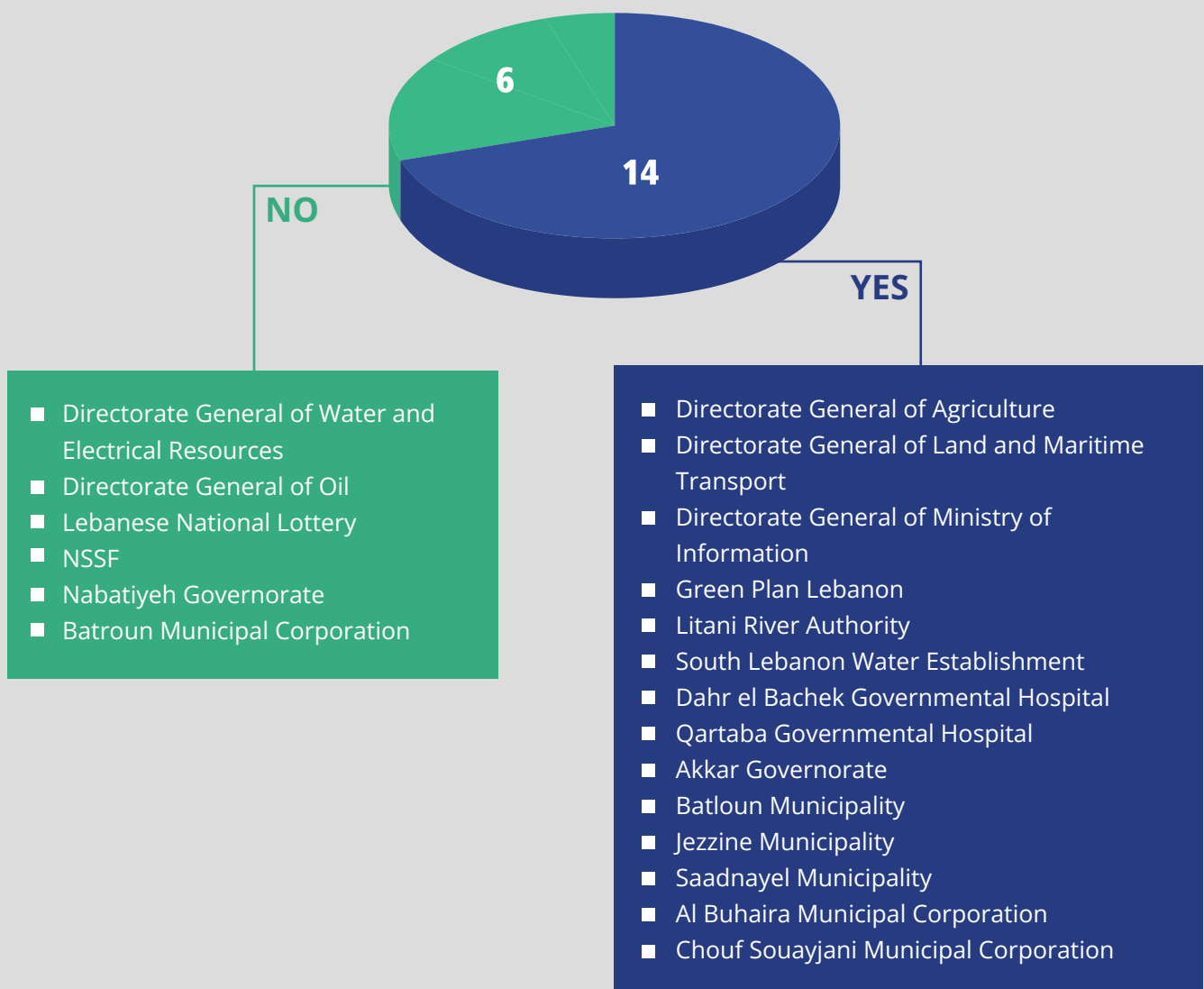
INFORMATION OFFICER



Computerizing files and documents

In light of the work of the Office of Ministry of State for Administrative Reform on a project to computerize simplified administrative procedures in ministries and public administrations in order to raise their readiness to provide electronic services and exchange information with other administrations within a unified methodology that guarantees quality standards and reduces costs, we found that 14 out of 20 administrations computerize their files and documents, while the 6 others don't due to poor skills, financial and logistical capabilities.

COMPUTERIZATION



The availability of a database of companies and contractors with whom the administration previously cooperated

This survey noted that only 10 out of the 20 administrations keep databases with the names of companies and contractors with whom they had previously cooperated, while the remaining 10 did not either because they did not directly cooperate with companies and contractors or because they always cooperate with the same name.

DATABASES OF PREVIOUS COMPANIES AND CONTRACTORS



The administrations' readiness to film and document the bid opening sessions upon the approval on the electronic procurement

The electronic procurement method will be adopted in two stages: the first includes publishing on the central electronic platform of the Public Procurement Authority and covers procurement related procedures. The second stage is the transition to electronic procurement after the issuance of the related implementing decrees. The results of the electronic procurement are announced through bid opening sessions broadcasted live to the bidders.

This survey concluded that 11 out of 20 administrations have all the necessary equipment to film and document the bid opening sessions, while the remaining 9 do not own the required advanced means.

ADMINISTRATIONS' READINESS TO FILM AND DOCUMENT BID OPENING SESSIONS

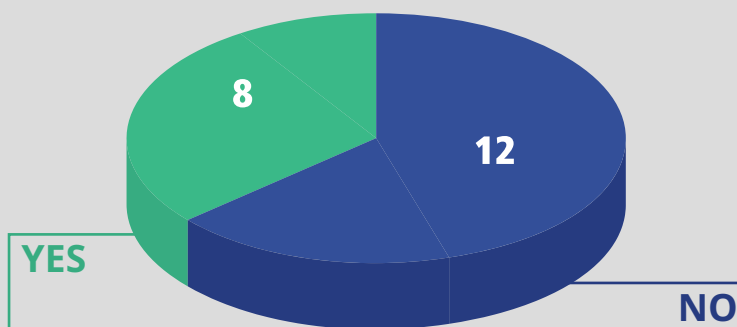


The availability of a risk management plan

Having a risk management plan is essential for the administrations as it limits the threats and risks that may affect them, especially with regard to information technology and data. As a result, the risk management plan must be developed after observing the threats that the administration may face and working to avoid or solve them as quickly as possible with loss control.

Despite the importance of setting this plan, we found that only 8 of the 20 surveyed administrations have developed a risk and disaster management plan. It is worth mentioning that one of these administrations worked on setting a plan, developing it and sending it to the Council of Ministers for approval, and according to them, the Council's response came that the country will not be facing disasters.

RISK MANAGEMENT PLAN



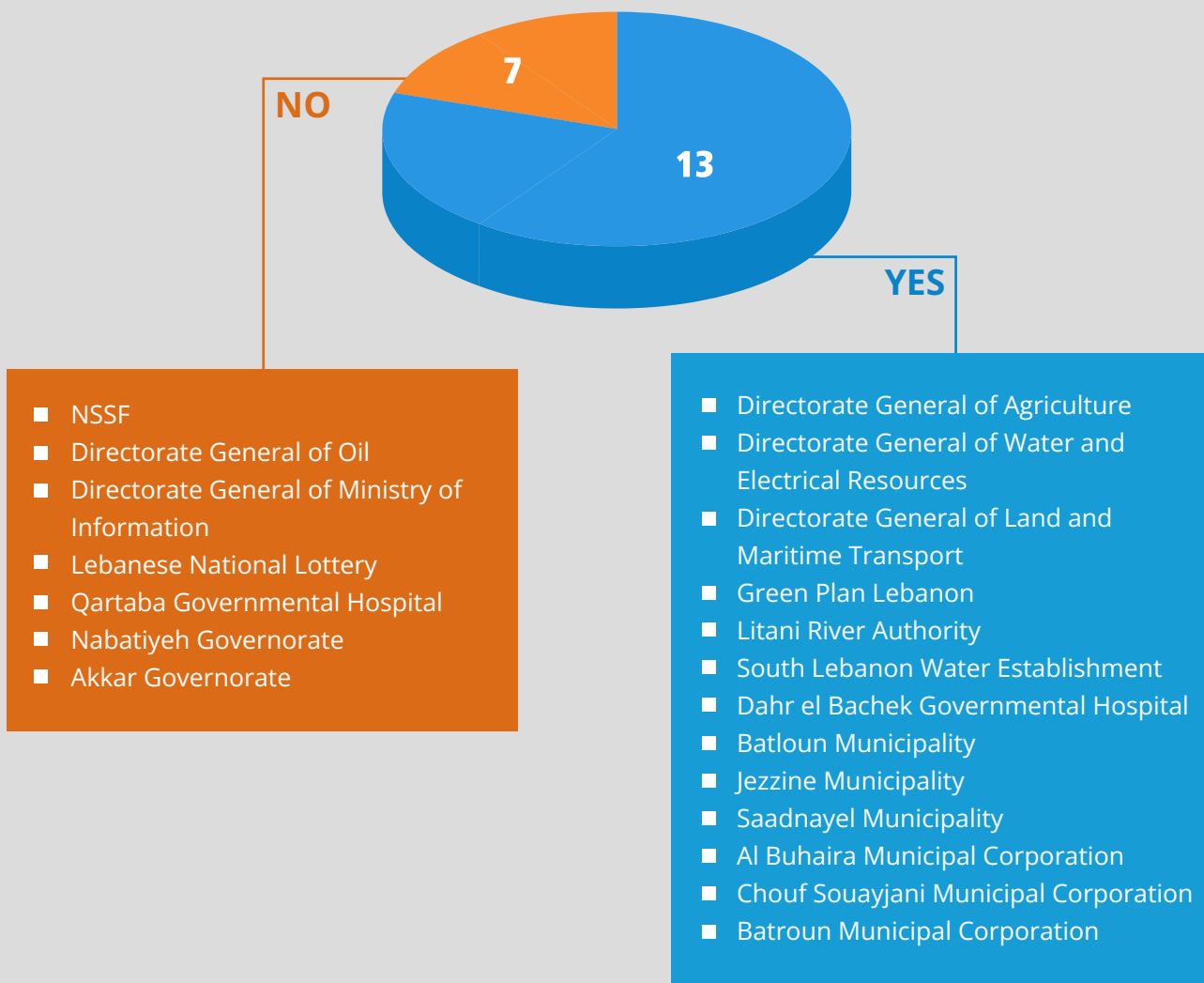
- NSSF
- Green Plan Lebanon
- Litani River Authority
- Dahr el Bachek Governmental Hospital
- Batloun Municipality
- Jezzine Municipality
- Akkar Governorate
- Chouf Souayjani Municipal Corporation

- Directorate General of Agriculture
- Directorate General of Water and Electrical Resources
- Directorate General of Oil
- Directorate General of Land and Maritime Transport
- Directorate General of Ministry of Information
- Lebanese National Lottery
- South Lebanon Water Establishment
- Qartaba Governmental Hospital
- Nabatiyeh Governorate
- Saadnayel Municipality
- Al Buhaira Municipal Corporation
- Batroun Municipal Corporation

Adopting sustainable public procurement in order to reduce the environmental impact

The new Public Procurement Law provides for the obligation to adopt, where possible, sustainable public procurement to direct the state's procurement capability towards sustainable goods and services in order to reduce the environmental impact and achieve the economic and social goals stipulated in international agreements and to comply with national priorities. The result of the survey showed that 13 out of 20 administrations allegedly adopt sustainable public procurement in order to reduce the environmental impact by mentioning the matter in their bidding documents, however we were not able to confirm these allegations, for we had no access to any bidding document.

SUSTAINABLE PUBLIC PROCUREMENT



Awarding on the basis of lots and groups

The new Public Procurement Law allows for the procurement to be divided into independent lots in two cases; one of which occurs when implementing development policies for the government, such as encouraging the participation of small and medium enterprises in public procurement. Noting that some administrations used to adopt this policy in order to avoid the control of the guardianship authority, Court of Audit and Public Procurement Management Authority.

As a result of the survey, which included 20 administrations, it was found that 12 administrations award on the basis of lots or groups, either to avoid the relevant authority's control or to encourage the participation of small and medium-size companies.

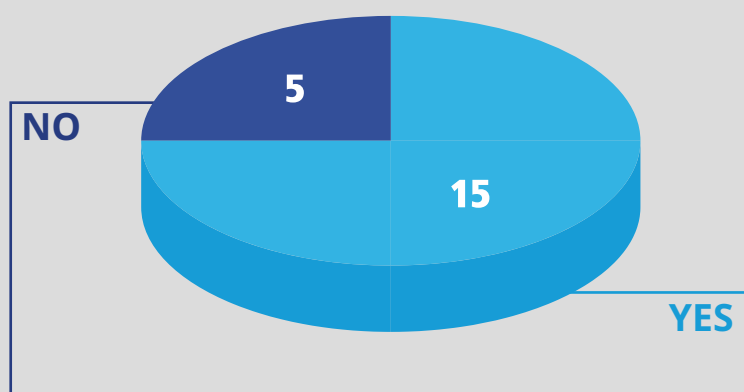
AWARDING ON THE BASIS ON LOTS OR GROUPS



Granting preference to products and services of national origin

The new Public Procurement Law also provides for granting preference to proposals including supplies of national origin. Noting that 5 administrations do not evaluate proposals on this basis, while the other 15 claimed that they follow this procurement policy by mentioning it in their bidding documents; however, we were not able to confirm the matter, as we had no access to any bidding document.

GRANTING PREFERENCE TO NATIONAL PRODUCTS



- Directorate General of Land and Maritime Transport
- Directorate General of Oil
- Lebanese National Lottery
- Dahr el Bachek Governmental Hospital
- Batroun Municipal Corporation

- Directorate General of Water and Electrical Resources
- Directorate General of Agriculture
- Directorate General of Ministry of Information
- NSSF
- Green Plan Lebanon
- Litani River Authority
- South Lebanon Water Establishment
- Qartaba Governmental Hospital
- Nabatiyeh Governorate
- Akkar Governorate
- Jezzine Municipality
- Batloun Municipality
- Saadnayel Municipality
- Al Buhaira Municipal Corporation
- Chouf Souayjani Municipal Corporation



Analysis for Each Administration



Ministry of Public Works and Transport - Directorate General of Land and Maritime Transport

On 18/05/2022, we visited the Directorate General of Land and Maritime Transport and contacted the Head of the Registry's Bureau, who informed us that the Directorate is not subject to any guardianship authority, and provided us with the value of the Directorate's annual budget, which recorded a significant decrease in the last two years, as detailed in the table below:

Year	Annual Budget Value
2017	6,668,670,000 LBP
2018	27,483,807,000LBP
2019	28,237,775,000 LBP
2020	28,176,480,000 LBP
2021	14,544,531,000 LBP
2022	9,523,268,000 LBP

The following table represents the decrease in the number of procurement operations carried out by the Directorate from 2017 to 2021, which includes all types of concluded contracts:

Year	Procurement Operations Number
2017	430
2018	560
2019	380
2020	200
2021	180
TOTAL	1,750

As for the value of expenditures, the below table indicates the significant decline in the Directorate's expenditures in the last two years:

Year	Expenditures Value*
2017	19,522,091,000 LBP
2018	28,388,704,000 LBP
2019	29,798,429,000 LBP
2020	3,138,199,000 LBP
2021	3,087,654,000 LBP

* (These numbers also include the paid salaries)

- The Head of the Registry's Bureau confirmed that the Directorate General of Land and Maritime Transport conducts tenders in coordination with the Public Procurement Management Administration in accordance with the Public Accountability Law.
- The Directorate claimed that it conducted 14 public tenders, valued at 16,409,824,000 LBP, from 2017 to 2021 of the 1,750 contracts concluded within 5 years). Noting that during 2020 and 2021, the Directorate did not conduct any tender, while two tenders were announced in 2019, to which no proposals were submitted by any bidder, so they were re-announced and awarded. Further, five tenders were awarded in 2018 and 7 in 2017.
- Upon checking the website of the Public Procurement Management Administration, we found out that the said Directorate conducted only 4 out of the 14 mentioned tenders in cooperation with the former:

Year	Procurement Number	Procurement value
2017	3	3,015,836,450 LBP
2018	0	-
2019	1	8,021,725,800 LBP
2020	0	-
2021	0	-
TOTAL	4	11,037,562,250 LBP

The terms of one contract were modified in each of the years 2018 ,2017, and 2019 before awarding, as these contracts were conducted according to comparative analysis, while no contracts were modified in 2020 and 2021.

The average period between the date of bid opening and the date of contract awarding usually ranged between one and three months. On the other hand, the period for paying dues to contractors/suppliers ranged between one and three years from the date of providing the works, supplies or services to the Directorate.

The Head of the Registry's Bureau also stated that the Directorate does not include a specialized department, unit or employees to carry out public procurement operations, it rather includes two committees; one to organize the bidding process and the second is the Acceptance Committee. The Directorate does not issue annual reports including all procurement operations, but all related information are registered in a special record kept in a safe place.

Moreover, the Directorate sets annual and medium-term procurement plans that meet its needs in line with the required appropriations in its budget plan, while relying on previous plans without a study mechanism to evaluate and analyze its procurement needs and prepare market studies.

The Directorate cooperates with experts and specialists from outside its offices to draw up bidding documents jointly with its technical and administrative staff composed of 3 trained employees. It also cooperates with specialized third parties to supervise the implementation of contracts, and to receive and evaluate the supplies, services or executed works. As for evaluating the proposals, the Directorate relies on its employees' competencies, especially the technical team consisting of engineers.

In addition, the Directorate assigned an employee responsible for receiving and responding to requests for information, as well as an employee responsible for communicating directly with bidders regarding procurement procedures. The Directorate also conducts a periodic evaluation of its employees' performance.

Noting that the Directorate intends to execute certain services with resources available in the administration rather than purchasing them from external sources, and it has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities, yet it has awarded some of its projects to the Council for Development and Reconstruction.

Among the challenges facing the Directorate General of Land and Maritime Transport in implementing the new Public Procurement Law, we mention the shortage of human resources, i.e. the number of employees who are assigned to follow up on the procurement stages, the employees' transportation difficulty due to the low value of the allocated transportation allowance, and the lack of financial capabilities due to the delay or failure to transfer credits from one year to another, in addition to the delay in approving the budget and allocating the required amounts. Moreover, the Directorate has not set a risk management plan and does not include an internal audit unit.

Technically and logistically, the Directorate relies on computerizing its documents and publishing them on its website, the Official Gazette, local newspapers, and the administration's doors. However, the bidding documents are not available on the website, yet copies can be obtained from the administration free of charge.

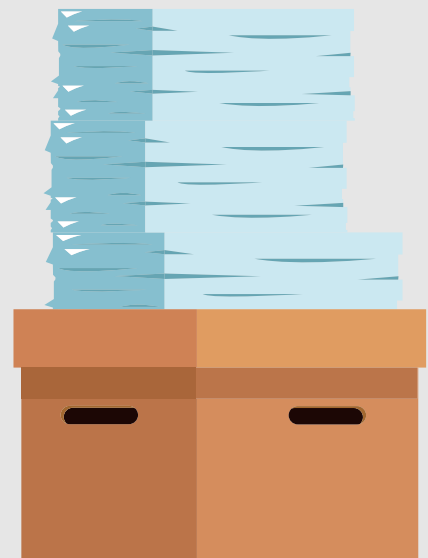
A website for the Directorate was created in cooperation with the Office of Ministry of State for Administrative Reform, but is not subject to any procedures to ensure the privacy and confidentiality of the provided information, as it has not been updated recently. Knowing that it provides the ability to download some information and documents like administrative transactions in different formats (such as excel, word...), while electronic services are not downloadable.

The Directorate has set a database of companies and contractors with whom it has previously cooperated, but did not publish it on its website, noting that the former does not grant preference to products and services of national origin.

The Directorate has adopted several procurement policies, including awarding on the basis of lots or groups, either to avoid the relevant authority's control or to encourage the participation of small and medium-sized enterprises, while striving to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure, in addition to allegedly adopting sustainable public procurement in order to reduce the environmental impact, the matter which we were not able to confirm.

On the other hand, after publishing the new Public Procurement Law in the Official Gazette, some employees learned on its provisions and underwent mandatory training with Institut des Finances Basil Fuleihan.

The Head of the Registry's Bureau stated that the Directorate has all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.



Criteria	Response
Surveyed entity's nature	Directorate General
Subject to any guardianship authority	No
Conducting tenders in coordination with the Public Procurement Management Administration	Yes - 14 tenders
Modifying the terms of a contract before awarding	Yes - 3 contracts
The average interval between the date of opening bids and the date of contract awarding	Between 1 and 3 months
The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	Between 1 and 3 years
Department/unit/employees specialized in conducting public procurement	No
Organizing annual report mentioning all procurement operations	No
Keeping a public procurement procedures record	Yes
Mechanism to study, evaluate and analyze your procurement needs	No
Cooperating with experts and specialists from outside the administration	Yes
Employee specialized in public procurement	Yes
Employee responsible for the direct contact and communications with bidders regarding procurement procedures	Yes
Conducting a periodic evaluation of employees performance	Yes

Executing certain services with resources available at the administration	Yes
Conducting joint public procurements with other administrations or for other procuring entities	No
Awarding some projects to other administration	Yes Council for Development and Reconstruction.
Challenges and shortages	Human resources Financial capabilities
Risk management plan	No
Internal audit unit	No
Computerization of files	Yes
Website availability	Yes
Database of companies and contractors with whom the administration previously cooperated	Yes
Granting preference to products and services of national origin	No
Awarding on the basis of lots and groups	Yes
Adopting sustainable public procurement in order to reduce the environmental impact	Yes
Informing employees of the Public Procurement Law provisions	Yes
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	Yes
The administration is equipped to film and document the bid opening sessions for electronic procurement	Yes



Ministry of Energy and Water - Directorate General of Water and Electrical Resources

On 2022/05/23, we visited the Directorate General of Water and Electrical Resources and contacted the Head of the Registry's Bureau and the Head of Legal Department, who informed us that the Directorate is not subject to any guardianship authority.



Although we made several inquiries and sent a request in accordance with the Right to Access Information Law, the Directorate did not provide us with the value of its annual budget for 2019 and 2022, the value of procurement or the number of tenders conducted over the past five years.

The following table indicates the Directorate's budgets from 2017 to 2020, according to the general budget published in the Official Gazette and available on Gherbal Initiative website, for the Directorate did not respond to any of the previously submitted requests:

Year	Annual Budget Value
2017	159,152,550,000 LBP
2018	129,341,580,000 LBP
2019	124,372,320,000 LBP
2020	55,933,338,000 LBP

The Head of the Registry's Bureau confirmed that the Directorate conducts tenders in coordination with the Public Procurement Management Administration in accordance with the Public Accountability Law.

The following table indicates the tenders conducted in coordination with the Public Procurement Management Authority, according to the latter's website:

Year	Procurement Number	Procurement Value
2017	91	107,014,014,140 LBP
2018	95	194,132,611,671 LBP
2019	0	-
2020	4	8,153,986,000 LBP
2021	0	-
TOTAL	190	309,300,611,811 LBP

- The average period between the date of bid opening and the date of contract awarding is usually less than a month. On the other hand, the period for paying dues to contractors/suppliers ranges between one and three months, and in some cases might exceed a year, from the date of providing the works, supplies or services to the Directorate, depending on the project's size.
- The Head of the Registry's Bureau also stated that the Directorate does not include a specialized department, unit or employees to carry out public procurement operations, and it does not issue annual reports including all procurement operations, and related information are not registered in a special record.
- However, the Directorate sets annual and medium-term procurement plans that meet its needs in line with the required appropriations in its budget plan, while relying on previous plans and a study mechanism to evaluate and analyze its procurement needs and prepare market studies, in accordance with the decisions of the Court of Audit.
- The Directorate previously cooperated with experts and specialists from outside its offices to draw up bidding documents, and occasionally to evaluate proposals. It has also cooperated with companies to supervise the implementation of contracts, and to receive and evaluate the supplies, services or executed works. Nevertheless, the Directorate relies on its employees' competencies, especially the technical team consisting of consultants, to accept the supplies, services or executed works.
- In addition, the Directorate assigned an employee responsible for receiving and responding to requests for information, as well as an employee responsible for communicating directly with bidders regarding procurement procedures and setting the bidding documents. The Directorate used to conduct a periodic evaluation of its employees' performance before 2018 in cooperation with the Office of the Minister of State for Administrative Reform.

- Noting that the Directorate intends to execute certain services with resources available in the administration rather than purchasing them from external sources, and it has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities, nor has awarded any of its projects to other administrations.
- Among the challenges facing the Directorate General of Water and Electrical Resources in implementing the new Public Procurement Law, we mention the shortage of human resources, i.e. the number of employees who are assigned to follow up on the procurement stages, the employees transportation difficulty due to the low value of the allocated transportation allowance, and the lack of financial capabilities due to the delay or failure to transfer credits from one year to another, in addition to the delay in approving the budget and allocating the required amounts, which are no longer sufficient. For example, the Directorate is currently using paper stacks donated from UNICEF.
- The Directorate also suffers from the delay in approving Implementing Decrees and taking all measures required for the implementation of relevant laws. Furthermore, the Directorate's employees need periodic training to improve their knowledge and skills.
- The Directorate also lacks logistic equipment, including IT devices and computers, as it was equipped in 2012 and has not been renovated since; noting that the IT Department is operating with only 2 UPS, therefore the service shuts down. The Head of the Registry's Bureau declared that the accounting program at the Directorate is linked with the program of the Ministry of Finance, so when it malfunctions at the Ministry, this reflects on the Directorate's work. The said Directorate did not set a risk management plan and does not include an internal audit unit, but each Department is responsible for their accounting.
- Technically and logistically, the Directorate does not rely on computerizing its documents, but it publishes the necessary documents and announcements on its website, the Official Gazette, local newspapers, and the administration's doors. However, the bidding documents are not available on the website, yet copies can be obtained from the administration.
- A website for the Directorate was created and is subject to the procedures that ensure the privacy and confidentiality of the provided information, as it is frequently updated. Knowing that it provides the ability to download information and documents in different formats (such as excel, word...), which was confirmed after checking the website.

- The Directorate sets a database of companies and contractors with whom it has previously cooperated, noting that it did not respond to the request for information submitted by Gherbal Initiative in 2021 regarding the contractors with whom it cooperated from 2001 to 2020.
- The said Directorate claimed that it grants preference to products and services of national origin, which would be mentioned in the bidding documents, the matter that we could not confirm, since we did not have access to these documents.
- The Directorate has adopted several procurement policies, including awarding on the basis of lots or groups, either to avoid the relevant authority's control or to encourage the participation of small and medium-sized enterprises by defining the classification of the required companies (for example, requesting the participation of fourth category companies, i.e. small and medium-sized enterprises), while striving to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure, and allegedly adopting sustainable public procurement in order to reduce the environmental impact, the matter which we were not able to confirm.
- On the other hand, even after publishing the new Public Procurement Law in the Official Gazette, the employees did not learn on its provisions and did not undergo mandatory training with Institut des Finances Basil Fuleihan.
- The Head of the Registry's bureau stated that Directorate General of Water and Electrical Resources does not have all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.

Criteria	Response
Surveyed entity's nature	Directorate General
Subject to any guardianship authority	No
Conducting tenders in coordination with the Public Procurement Management Administration	Yes
Modifying the terms of a contract before awarding	No
The average interval between the date of opening bids and the date of contract awarding	Less than a month

The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	Between 1 and 3 years More than a year
Department/unit/employees specialized in conducting public procurement	No
Organizing annual report mentioning all procurement operations	No
Keeping a public procurement procedures record	No
Mechanism to study, evaluate and analyze your procurement needs	Yes
Cooperating with experts and specialists from outside the administration	Yes
Employee specialized in public procurement	Yes
Employee responsible for the direct contact and communications with bidders regarding procurement procedures	Yes
Conducting a periodic evaluation of employees performance	No
Executing certain services with resources available at the administration	Yes
Conducting joint public procurements with other administrations or for other procuring entities	No
Awarding some projects to other administration	No

Challenges and shortages	Human resources Financial capabilities Logistic equipment Knowledge & skills
Risk management plan	No
Internal audit unit	Yes
Computerization of files	No
Website availability	Yes
Database of companies and contractors with whom the administration previously cooperated	Yes
Granting preference to products and services of national origin	Yes
Awarding on the basis of lots and groups	Yes
Adopting sustainable public procurement in order to reduce the environmental impact	Yes
Informing employees of the Public Procurement Law provisions	No
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	No
The administration is equipped to film and document the bid opening sessions for electronic procurement	No



Ministry of Energy and Water - Directorate General of Oil

On 01/06/2022, we visited the Directorate General of Oil and contacted the Head of the Registry's Bureau and the Head of Accounting Department who informed us that the Directorate is subject to the guardianship authority of the Ministry of Energy and Water, and provided us with the value of the Directorate's annual budget for 2019, while the budgets of the other years are extracted from the general budget published in the Official Gazette and available on Gherbal Initiative website:

Year	Annual Budget Value
2017	31,142,900,000 LBP
2018	15,158,575,000 LBP
2019	13,608,350,000 LBP
2020	10,929,105,000 LBP

The following table represents the number of procurement operations carried out by the Directorate from 2017 to 2021, which includes all types of concluded contracts:

Year	Procurement Operations Average Number
2017	10-49
2018	1-9
2019	1-9
2020	1-9
2021	1-9

As for the value of expenditures, the below table indicates the significant decline in the Directorate's expenditures in the last three years:

Year	Expenditures Value
2017	3,251,263,000 LBP
2018	238,025,000 LBP
2019	48,533,000 LBP
2020	36,740,000 LBP
2021	17,094,000 LBP

- The Head of the Registry's Bureau confirmed that the Directorate General of Oil did not conduct any tenders, while the Directorate's website include a section to announce tenders in order to purchase gasoline and diesel and deliver them to oil facilities in Tripoli and/or Zahrani, which contradicts the former's claims.
- Further, the website of the Public Procurement Management Authority published 3 tenders conducted in 2021 with the said Directorate, without indicating their values.
- Other procurement contracts were claimed to be conducted in accordance with the Public Accountability Law and awarded according to the best price. Noting that it did not amend the terms of any contract before the award during the 5 years.
- The average period between the date of bid opening and the date of contract awarding usually ranged within a week. On the other hand, the period for paying dues to contractors/suppliers ranges between 6 months and a year from the date of providing the works, supplies or services to the Directorate.
- The Head of the Registry's Bureau also stated that the Directorate does not include a specialized department, unit or employees to carry out public procurement operations. Further, the Directorate does not issue annual reports including all procurement operations, but all related information are registered in a special record kept in a safe place.
- Moreover, the Directorate sets annual and medium-term procurement plans that meet its needs in line with the required appropriations in its budget plan, while relying on a study mechanism to evaluate and analyze its procurement needs and prepare market studies.

The Directorate did not cooperate with experts and specialists from outside its offices to set bidding documents nor include specialized employees. It did not either cooperate with specialized third parties to evaluate proposals, supervise the implementation of contracts, and receive and evaluate the supplies, services, and executed works, for it relies on its employees' competencies, especially the technical team consisting of engineers and jurists.

In addition, the Directorate assigned an employee responsible for receiving and responding to requests for information, as well as an employee responsible for communicating directly with bidders regarding procurement procedures. The Directorate also conducts a periodic evaluation of its employees' performance.

Noting that the Directorate intends to execute certain services with resources available in the administration rather than purchasing them from external sources, it has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities, nor awarded any of its projects to other administrations.

Among the challenges facing the Directorate General of Land and Maritime Transport in implementing the new Public Procurement Law, we mention the acute shortage of human resources, i.e. the number of employees; for the Directorate used to include 43 employees, 13 of whom are still attending. In addition to the employees transportation difficulty due to the low value of the allocated transportation allowance, and the lack of financial capabilities due to the delay or failure to transfer credits from one year to another, as well as the delay in approving the budget and allocating the required amounts and the depreciation in the exchange rate.

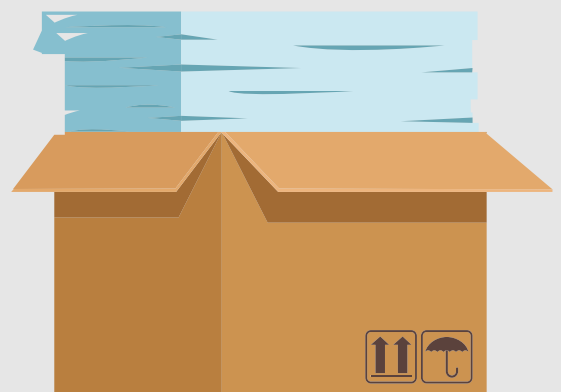
Moreover, the Directorate also suffers from a lack of logistic equipment and the inability to connect to the Internet due to old devices, and needs to urgently subject its employees to continuous training. The Directorate also did not set a risk management plan and does not include an internal audit unit.

Technically and logistically, the Directorate does not rely on computerizing its documents; instead, it publishes them on its website and provides hardcopies in the administration.

A website for the Directorate was created, but is not subject to any procedures to ensure the privacy and confidentiality of the provided information, as it has not been updated recently. Knowing that it provides the ability to download some information and documents in different formats (such as excel, word...).

For example, the Directorate did not publish its contract on the website, and claimed that it did not set a database of companies and contractors with whom it had previously cooperated, even though it responded, in 2021, to Gherbal's request for information regarding this matter.

- The Head of the Registry's Bureau informed us that the Directorate does not grant preference to products and services of national origin, due to the necessity of importing petroleum products.
- For example, the Directorate did not publish its contract on the website, and claimed that it did not set a database of companies and contractors with whom it had previously cooperated, even though it responded, in 2021, to Gherbal's request for information regarding this matter.
- The Head of the Registry's Bureau informed us that the Directorate does not grant preference to products and services of national origin, due to the necessity of importing petroleum products.
- The Directorate has adopted several procurement policies, including awarding on the basis of lots or groups, not in the aim of encouraging the participation of small and medium-sized enterprises, but according to appropriations and the allocated amounts, while striving to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure. The directorate does not adopt sustainable public procurement in order to reduce the environmental impact, because, according to them, their purchases do not affect the environment. However, it consults with the Industrial Research Institute on some projects.
- On the other hand, after publishing the new Public Procurement Law in the Official Gazette, the Directorate's employees did not learn on its provisions and did not undergo mandatory training with Institut des Finances Basil Fuleihan because the training schedule did not match the working hours.
- The Head of the Registry's Bureau stated that the Directorate does not have all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.



Criteria	Response
Surveyed entity's nature	Directorate General
Subject to any guardianship authority	Yes Ministry of Energy and Water
Conducting tenders in coordination with the Public Procurement Management Administration	No
Modifying the terms of a contract before awarding	No
The average interval between the date of opening bids and the date of contract awarding	Less than a week
The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	Between 6 months and a year
Department/unit/employees specialized in conducting public procurement	No
Organizing annual report mentioning all procurement operations	No
Keeping a public procurement procedures record	Yes
Mechanism to study, evaluate and analyze your procurement needs	Yes
Cooperating with experts and specialists from outside the administration	No

Employee specialized in public procurement	No
Employee responsible for the direct contact and communications with bidders regarding procurement procedures	No
Conducting a periodic evaluation of employees performance	Yes
Executing certain services with resources available at the administration	Yes
Conducting joint public procurements with other administrations or for other procuring entities	Yes Electricity of Lebanon Tripoli and Zahrani Oil Installations
Awarding some projects to other administration	No
Challenges and shortages	Human resources Financial capabilities Logistic equipment Knowledge & skills
Risk management plan	No
Internal audit unit	No
Computerization of files	No
Website availability	Yes
Database of companies and contractors with whom the administration previously cooperated	No
Granting preference to products and services of national origin	No
Awarding on the basis of lots and groups	No
Adopting sustainable public procurement in order to reduce the environmental impact	No
Informing employees of the Public Procurement Law provisions	No
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	No
The administration is equipped to film and document the bid opening sessions for electronic procurement	No



Ministry of Agriculture - Directorate General of Agriculture

On 23/05/2022, we visited the Directorate General of Agriculture and contacted the Head of Administrative Department at the Registry's Bureau, who informed us that the Directorate is not subject to any guardianship authority, and provided us with the value of the Directorate's annual budget for 2019, while we extracted the budget of the other years from the general budget published in the Official Gazette and available on Gherbal Initiative's website:

Year	Annual Budget Value
2017	30,800,240,000 LBP
2018	42,226,210,000 LBP
2019	57,097,504,000 LBP *
2020	35,548,741,000 LBP

* Noting that the Directorate's annual budget for 2019 is valued at 36,958,857,000 LBP according to the Official Gazette.

The following table represents the decrease in the number of procurement operations carried out by the Directorate from 2017 to 2021, which includes all types of concluded contracts:

Year	Procurement Operations Number
2017	50-199
2018	50-199
2019	10-49
2020	10-49
2021	10-49

As for the value of expenditures, the below table indicates the significant decline in the Directorate's expenditures in the last two years:

Year	Expenditures Value
2017	10,111,956,000 LBP
2018	7,410,421,000 LBP
2019	2,540,709,000 LBP
2020	302,019,000 LBP
2021	900,000,000 LBP

- The Head of Administrative Department confirmed that the Directorate General of Agriculture conducts tenders in coordination with the Public Procurement Management Administration in accordance with the Public Accountability Law, but he did not provide us with the number of conducted tenders, their values or dates.
- We checked the numbers and values of tenders conducted by the Directorate and published on the website of the Public Procurement Management Authority and spotted the following tenders conducted by the Directorate General of Agriculture:

Year	Procurement Number	Procurement Value
2017	2	921,750,000 LBP
2018	3	509,991,158 LBP
2019	3	422,044,061 LBP
2020	-	-
2021	0	-
TOTAL	8	1,853,785,219 LBP

- However, the Head of Administrative Department also informed us that several tenders were announced, for which no proposals were submitted, and thus they were re-announced and awarded.
- Besides, several contract terms were modified before awarding; usually the modification affects the requested quantities or the time limits.

- The average period between the date of bid opening and the date of contract awarding usually exceeds a year. Similarly, the period for paying dues to contractors/suppliers exceeds a year from the date of providing the works, supplies or services to the Directorate.
- The Head of Administrative Department also stated that the Directorate does not include a specialized department, unit or employees to carry out public procurement operations. However, its annual reports including all procurement operations, and related information are not registered in a special record, but procurement files are kept in a safe place. Noting that this process was previously computerised for a short period of time.
- Moreover, the Directorate sets annual and medium-term procurement plans that meet its needs in line with the required appropriations in its budget plan, relying on previous plans and a clear study mechanism to evaluate and analyze its procurement needs and prepare market studies, except in urgent cases, like locust control, the Ministry takes immediate measures.
- The Directorate cooperates with experts and specialists from outside its offices to draw up bidding documents, but it does not cooperate with specialized third parties to evaluate proposals, supervise the implementation of contracts or to receive and evaluate the supplies, services or executed works, for it relies on its employees' competencies, especially the technical team consisting of agricultural Engineers, auditors, jurists and previously and previously an architect.
- In addition, the Directorate assigned an employee responsible for receiving and responding to requests for information, in the absence of an employee responsible for communicating directly with bidders regarding procurement procedures. Knowing that the Directorate does not conduct a periodic evaluation of its employees' performance.
- Noting that the Directorate intends to execute certain services with resources available in the administration rather than purchasing them from external sources, and it has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities, nor awarded any of its projects to other administrations.
- Among the challenges facing the Directorate General of Agriculture in implementing the new Public Procurement Law, we mention the shortage of human resources, i.e. the number of employees who are assigned to follow up on the procurement stages, the lack of financial capabilities due to the delay or failure to transfer credits from one year to another, in addition to the delay in approving the budget and allocating the required amounts, which are no longer sufficient. Moreover, the Directorate suffers from shortage of knowledge and skills and the incompetence of some employees as they do not undergo training and are not specialized in the required domains.

- The Directorate did not set a risk management plan but includes an internal audit unit.
- Technically and logistically, the Directorate only computerized its documents for one year. It publishes its document in the Official Gazette, local newspapers, and the administration's doors.
- A website for the Directorate was created and is subject to the procedures that ensure the privacy and confidentiality of the provided information, as it is regularly updated. Knowing that it provides the ability to download some information and documents in different formats (such as excel, word...), but upon trying to access it, the website was not secured. Further, the bidding documents are not available on the website, yet copies can be obtained from the administration.
- The Directorate has set a database of companies and contractors with whom it has previously cooperated, noting that the former does not grant preference to products and services of national origin.
- The said Directorate has adopted several procurement policies, including awarding on the basis of lots or groups, either to avoid the relevant authority's control or to encourage the participation of small and medium-sized enterprises, and mentions the matter in the bidding document. It also strives to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure.
- The said Directorate also claimed to adopt sustainable public procurement in order to reduce the environmental impact and mentions the matter in the bidding document; however, we could not confirm this information, for we did not have access to these documents.
- On the other hand, even after publishing the new Public Procurement Law in the Official Gazette, some employees did not learn on its provisions and did not undergo mandatory training with Institut des Finances Basil Fuleihan, and the Head of Administrative Department at the Registry's Bureau was appointed as a trainer.
- The latter stated that the Directorate General of Agriculture does not have all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.

Criteria	Response
Surveyed entity's nature	Directorate General
Subject to any guardianship authority	No
Conducting tenders in coordination with the Public Procurement Management Administration	No
Modifying the terms of a contract before awarding	No
The average interval between the date of opening bids and the date of contract awarding	More than a year
The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	More than a year
Department/unit/employees specialized in conducting public procurement	No
Organizing annual report mentioning all procurement operations	No
Keeping a public procurement procedures record	Yes
Mechanism to study, evaluate and analyze your procurement needs	Yes
Cooperating with experts and specialists from outside the administration	Yes Setting bidding documents
Employee specialized in public procurement	Yes
Employee responsible for the direct contact and communications with bidders regarding procurement procedures	No
Conducting a periodic evaluation of employees performance	No
Executing certain services with resources available at the administration	Yes

Conducting joint public procurements with other administrations or for other procuring entities	No
Awarding some projects to other administration	No
Challenges and shortages	Human resources Financial capabilities Logistic equipment Knowledge & skills
Risk management plan	No
Internal audit unit	Yes
Computerization of files	No
Website availability	Yes
Database of companies and contractors with whom the administration previously cooperated	Yes
Granting preference to products and services of national origin	Yes
Awarding on the basis of lots and groups	Yes
Adopting sustainable public procurement in order to reduce the environmental impact	Yes
Informing employees of the Public Procurement Law provisions	Yes
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	Yes
The administration is equipped to film and document the bid opening sessions for electronic procurement	No



Ministry of Information - Directorate General of Ministry of Information

On 2022/05/24, we visited the Directorate General of Ministry of Information and contacted the Head of the Registry's Bureau, who informed us that the Directorate is not subject to any guardianship authority, and provided us with the value of the Directorate's annual budget for 2019, while the budget of the other years are extracted from the general budget published in the Official Gazette and available on Gherbal Initiative's website:

Year	Annual budget value
2017	13,313,400,000 LBP
2018	16,263,020,000 LBP
2019	13,581,350,000 LBP *
2020	14,610,572,000 LBP

* Noting that the Directorate's annual budget for 2019 is valued at 15,738,798,000 LBP according to the Official Gazette.

The following table represents the decrease in the number of procurement operations carried out by the Directorate from 2017 to 2021, which includes all types of concluded contracts:

Year	Procurement Operations Number
2017	704
2018	627
2019	427
2020	219
2021	195
TOTAL	2,172

As for the value of expenditures, the below table indicates the significant decline in the Directorate's expenditures in the last two years:

Year	Expenditures Value
2017	5,254,412,000 LBP
2018	3,488,549,000 LBP
2019	3,185,588,000 LBP
2020	2,649,641,000 LBP
2021	2,959,245,000 LBP

The Head of the Department of Supplies claimed that the Directorate General of Ministry of Information conducted 7 tenders between 2017 and 2021 of the 2,172 contracts conducted within 5 years) valued at 146,690,000 LBP, and awarded according to the best proposals. Noting that all tenders announced during these five years acquired proposals.

In addition, 6 tenders were awarded in 2021 and 1 in 2018, but the contracts' terms were not modified before awarding.

The website of the Public Procurement Management Authority provides the following information regarding tenders conducted with the said Directorate:

Year	Procurement number	Procurement value
2017	1	44,509,905 LBP
2018	1	22,973,670 LBP
2019	0	-
2020	1	258,241,500 LBP
2021	0	-
TOTAL	3	325,725,075 LBP

The average period between the date of bid opening and the date of contract awarding usually ranged between 3 to 6 months. On the other hand, the period for paying dues to contractors/suppliers exceeded a year from the date of providing the works, supplies or services to the Directorate, for in some cases, the payments were fulfilled in 4 years.

The Head of the Department of Supplies also stated that the Directorate includes a specialized department run by 1 specialized employee to carry out public procurement operations. Further, the Directorate used to issue, before Covid19 period, annual reports including all procurement operations, and all related information were registered in a special record kept in a safe place.

Moreover, the Directorate sets annual and medium-term procurement plans that meet its needs in line with the required appropriations in its budget plan, while relying on a study mechanism to evaluate and analyze its procurement needs and prepare market studies.

The Directorate did not cooperate with experts and specialists from outside its offices to set bidding documents nor include specialized employees. It did not either cooperate with specialized third parties to supervise the implementation of contracts, and to receive and evaluate the supplies, services, executed works, or proposals, for it relies on its technical and administrative staff in the Technical Department composed of 3 trained employees, in addition to an Acceptance Committee responsible for administrative (stationery, publications...) and technical (computer, generator, air conditioner...) activities.

A technical team consisting of jurists and procurement specialists also supports the Directorate during the procurement process.

In addition, the Directorate assigned an employee responsible for receiving and responding to requests for information, as well as an employee responsible for communicating directly with bidders regarding procurement procedures. The Directorate also conducts a periodic evaluation of its employees' performance.

Noting that the Directorate intends to execute certain services with resources available in the administration rather than purchasing them from external sources, it has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities, nor did it award any of its projects to other administrations.

Among the challenges facing the Directorate General of Land and Maritime Transport in implementing the new Public Procurement Law, we mention the acute shortage of human resources, i.e. the number of employees, the employees transportation difficulty due to the low value of the allocated transportation allowance, and the lack of financial capabilities due to the delay or failure to transfer credits from one year to another, as well as the delay in approving the budget and allocating the required amounts.

- The Directorate also suffers from a lack of logistic equipment such as computers, internet, etc., noting that the Directorate has not set a risk management plan.
- Nonetheless, the said Directorate includes an internal audit unit composed of a procurement auditor and a Financial Department that audits all finances.
- Technically and logistically, the Directorate relies on computerizing its documents and publishing them on its website, the Official Gazette, local newspapers, and the administration's doors. However, the bidding documents are not available on the website, yet copies can be obtained from the administration.
- The Directorate does not have its own special website, similarly to the National News Agency, but it is included within the website of the Ministry of Information, which covers its affiliated units. This website is subject to procedures that ensure the privacy and confidentiality of the provided information, as it is regularly updated. Knowing that it provides the ability to download information and documents in different formats (such as excel, word...).
- The Directorate has not set a database of companies and contractors with whom it has previously cooperated; however it reportedly grants preference to products and services of national origin and intends to mention this matter in its bidding documents, the matter which were not confirmed, as we had no access to any bidding document.
- The Directorate has adopted several procurement policies, including awarding on the basis of lots or groups to encourage the participation of small and medium-sized enterprises as much as possible by requesting unit prices. Noting that some companies submitted their proposals, but the mentioned policy has failed.
- The Directorate strives to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure, but it does not adopt sustainable public procurement in order to reduce the environmental impact.
The Directorate strives to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure, but it does not adopt sustainable public procurement in order to reduce the environmental impact.
- On the other hand, after publishing the new Public Procurement Law in the Official Gazette, some of the Directorate's employees learned on its provisions but did not undergo mandatory training with Institut des Finances Basil Fuleihan.
- The Head of the Department of Supplies stated that the Directorate does not have all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.

Criteria	Response
Surveyed entity's nature	Directorate General
Subject to any guardianship authority	No
Conducting tenders in coordination with the Public Procurement Management Administration	Yes
Modifying the terms of a contract before awarding	No
The average interval between the date of opening bids and the date of contract awarding	Between 3 and 6 months
The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	More than a year
Department/unit/employees specialized in conducting public procurement	Yes
Organizing annual report mentioning all procurement operations	Yes
Keeping a public procurement procedures record	Yes
Mechanism to study, evaluate and analyze your procurement needs	Yes
Cooperating with experts and specialists from outside the administration	No
Employee specialized in public procurement	Yes
Employee responsible for the direct contact and communications with bidders regarding procurement procedures	Yes
Conducting a periodic evaluation of employees performance	Yes
Executing certain services with resources available at the administration	Yes

Conducting joint public procurements with other administrations or for other procuring entities	No
Awarding some projects to other administration	No
Challenges and shortages	Human resources Financial capabilities Logistic equipment
Risk management plan	No
Internal audit unit	Yes
Computerization of files	Yes
Website availability	Yes The website of the Ministry of Information
Database of companies and contractors with whom the administration previously cooperated	No
Granting preference to products and services of national origin	Yes
Awarding on the basis of lots and groups	Yes
Adopting sustainable public procurement in order to reduce the environmental impact	No
Informing employees of the Public Procurement Law provisions	Yes
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	No
The administration is equipped to film and document the bid opening sessions for electronic procurement	No



Ministry of Finance - Lebanese National Lottery

On 24/05/2022, we visited the Lebanese National Lottery and contacted the Head of the Registry's Bureau and the Expenditure Officer, who informed us that the Directorate is subject to the guardianship authority of the Ministry of Finance.

The Expenditure Officer provided us with the value of the Directorate's annual budgets for 2019, 2020 and 2021, which maintained the same value, noting that the 2022 budget had not yet been set, and the annual budgets of the other years are extracted from the general budget published in the Official Gazette and available on Gherbal Initiative's website:

Year	Annual budget value
2017	115,800,000,000 LBP
2018	96,800,000,000 LBP
2019	92,000,000,000 LBP
2020	92,000,000,000 LBP
2021	92,000,000,000 LBP
2022 (estimated)	92,000,000,000 LBP

The following table represents the decrease in the number of procurement operations carried out by the Directorate from 2017 to 2021, which includes all types of concluded contracts:

Year	Procurement Operations Number
2017	16
2018	19
2019	9
2020	4
2021	6
TOTAL	54

As for the value of expenditures, the below table indicates the Directorate's expenditures in the last few years, recording an increase during 2021:

Year	Expenditures Value
2017	434,934,000 LBP
2018	431,897,000 LBP
2019	1,717,901,077 LBP
2020	427,830,000 LBP
2021	5,758,328,000 LBP

- The expenditure officer confirmed that the Lebanese National Lottery was conducting tenders in coordination with the Public Procurement Management Administration, as a tender was held, during the last fiscal year, to award the printing of the national lottery tickets and the lists of winning tickets.
- The procurement conducting method shall be set in accordance with the Public Accountability Law and by adopting the best proposal between two quotations for the purchase of inks for printing machines and stationery.
- The Directorate's data indicates that it conducted only 3 public tenders from 2017 to %5.55) 2021 of the 54 contracts concluded within 5 years) amounted to 8,712,248,077 LBP, all of which were awarded to the best proposals.
- The website of the Public Procurement Management Authority provides the following information regarding tenders conducted with the said Directorate:

Year	Procurement number	Procurement value
2017	0	-
2018	0	-
2019	1	1,393,416,300 LBP
2020	0	-
2021	1	5,323,338,000 LBP
TOTAL	2	6,716,754,300 LBP

- All announced tenders acquired proposals over these 5 years, and no contract terms were modified before awarding except when obtaining the approval of the Audit Bureau.
- The average period between the date of bid opening and the date of contract awarding usually ranged between one and three months, while the period for paying dues to contractors/suppliers also ranges between one and three months from the date of providing the works, supplies or services to the Directorate.
- The Head of the Registry's Bureau stated that the Directorate does not include a specialized department, unit or employees to carry out public procurement operations. The Directorate does not issue annual reports including all procurement operations, but all related information are registered in a special record, copies of which are kept in a safe place, while the original copy shall be kept by the Court of Audit at the Directorate of Public Accounting.
- Moreover, the Directorate sets annual and medium-term procurement plans that meet its needs in line with the required appropriations in its budget plan, while relying on previous plans without a study mechanism to evaluate and analyze its procurement needs and prepare market studies.
- The Directorate does not cooperate with experts and specialists from outside its offices, neither to set the bidding documents nor to supervise the evaluation of proposals, implementation of contracts, and the evaluation of supplies, services or executed works.
- In addition, the Directorate assigned an employee responsible for receiving and responding to requests for information, as well as an employee responsible for communicating directly with bidders regarding procurement procedures. However, the Directorate does not conduct a periodic evaluation of its employees' performance.
- Noting that the Directorate intends to execute certain services with resources available in the administration rather than purchasing them from external sources, and it has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities, or awarded some of its projects to other administrations.
- Among the challenges facing the National Lottery in implementing the new Public Procurement Law, we mention the shortage of human resources, i.e. the number of employees who are assigned to follow up on the procurement stages, and the lack of financial capabilities, due to the failure in providing the annual budget and the required amounts have not been allocated yet, thus the disbursement is currently made according to the expenditures of 2020 and on the twelve-year rule, especially since the Directorate deals with checks, not in cash. Among the difficulties facing the Directorate is also the failure to update the laws to keep pace with the requirements, in addition to the absence of a risk management plan or an internal audit unit.

- Technically and logistically, the Directorate does not rely on computerizing its documents and does not have a website to publish them or the bidding documents, it rather uses the Official Gazette, local newspapers, and the administration's doors. Knowing that bidding documents can be obtained from the administration.
- The Directorate has set a database of companies and contractors with whom it has previously cooperated; like Raidy Printing Group S.A.L., Inkript and Halim Library, noting that the former does not grant preference to products and services of national origin.
- The Directorate has adopted several procurement policies, excluding awarding on the basis of lots or groups to encourage the participation of small and medium-sized enterprises as much as possible, however, it strives to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure. In addition, the Directorate did not adopt sustainable public procurement in order to reduce the environmental impact.
- Moreover, even after publishing the new Public Procurement Law in the Official Gazette, none of the employees learned on its provisions or underwent mandatory training with Institut des Finances Basil Fuleihan.
- The Head of the Registry's Bureau stated that the Directorate does not have all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.



Criteria	Response
Surveyed entity's nature	Directorate General
Subject to any guardianship authority	Yes Ministry of Finance
Conducting tenders in coordination with the Public Procurement Management Administration	Yes
Modifying the terms of a contract before awarding	No
The average interval between the date of opening bids and the date of contract awarding	Between 1 and 3 months
The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	Between 1 and 3 months
Department/unit/employees specialized in conducting public procurement	No
Organizing annual report mentioning all procurement operations	No
Keeping a public procurement procedures record	Yes
Mechanism to study, evaluate and analyze your procurement needs	Yes
Cooperating with experts and specialists from outside the administration	No
Employee specialized in public procurement	Yes
Employee responsible for the direct contact and communications with bidders regarding procurement procedures	Yes
Conducting a periodic evaluation of employees performance	No

Executing certain services with resources available at the administration	Yes
Conducting joint public procurements with other administrations or for other procuring entities	No
Awarding some projects to other administration	No
Challenges and shortages	Human resources Financial capabilities Knowledge & skills
Risk management plan	No
Internal audit unit	No
Computerization of files	No
Website availability	No
Database of companies and contractors with whom the administration previously cooperated	Yes
Granting preference to products and services of national origin	No
Awarding on the basis of lots and groups	No
Adopting sustainable public procurement in order to reduce the environmental impact	No
Informing employees of the Public Procurement Law provisions	No
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	No
The administration is equipped to film and document the bid opening sessions for electronic procurement	No



National Social Security Fund

On 18/05/2022, we visited the National Social Security Fund and contacted the Financial and Accounting Consultant, who informed us that the Directorate is subject to the guardianship authority of the Ministry of Labor.



Although we made several inquiries and sent a request in accordance with the Right to Access Information Law, the Directorate did not provide us with the value of its annual budget for 2019 and 2022, the value of procurement or the number of tenders conducted over the past five years.

Therefore, we extracted the NSSF's annual budgets from the general budget published in the Official Gazette and available on Gherbal Initiative's website:

Year	Annual budget value
2017	403,795,000,000 LBP
2018	374,545,672,000 LBP
2019	348,697,137,000 LBP
2020	361,778,927,000 LBP

- The Financial and Accounting Consultant confirmed that the Fund does not conduct tenders in coordination with the Public Procurement Management Administration, assuring that other procurement methods were conducted according to the Fund's financial regulations.
- The latter also indicated that no proposals were submitted for tenders announced in 2021, thus they were awarded to the lowest priced proposal. Noting that no contract terms were modified before awarding.
- The average period between the date of bid opening and the date of contract awarding usually ranges between 1 and 3 months. Similarly, the period for paying dues to contractors/suppliers also ranges between 1 and 3 months from the date of providing the works, supplies or services to the NSSF, which is according to its Rules of Procedure, as the dues of some projects completed in 2019 are still not paid till date.

- The Financial and Accounting Consultant also stated that the Fund includes 2 specialized units to carry out public procurement operations: Department of Supplies and Tenders and Department of Buildings. The NSSF does not issue annual reports including all procurement operations, however, expenditures and incomes are generally recorded, and each of the said Departments registers procurement related information in a special record kept in a safe place.
- Moreover, the NSSF sets annual procurement plans that meet its needs in line with the required appropriations in its budget plan and its priorities, relying on previous plans and a clear study mechanism to evaluate and analyze its procurement needs, by asking each Department to indicate its needs. Which is done without a mechanism to prepare market studies.
- The Fund cooperates with experts and specialists from the Office of the Minister of State for Administrative Reform to set bidding documents, to receive and evaluate the supplies, services, executed works, supervise the implementation of contracts and evaluate services. The Fund is also supported by a technical team consisting of engineers and 70 to 80 jurists.
- In addition, the NSSF assigned an employee responsible for receiving and responding to requests for information, as well as an employee responsible for communicating directly with bidders regarding procurement procedures. But it does not conduct a periodic evaluation of its employees' performance.
- Noting that the said Fund intends to execute certain services with resources available in the administration rather than purchasing them from external sources, it has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities, nor awarded any of its projects to other administrations.
- Among the challenges facing the NSSF in implementing the new Public Procurement Law, we mention the acute shortage of human resources, i.e. the number of employees in charge of procurement operations. In addition, the Fund suffers from the shortage of knowledge and skills, as its employees need periodic training. As well as the shortage in financial capabilities due to the volatility of the Lebanese Pound exchange rate against the US Dollar and the difficulty of committing to a specific value.
- The Fund also needs logistic equipment, like IT devices, softwares and other needed equipment.
- The Fund has a risk management plan, through a targeted mechanism that includes an internal audit unit, which is not effective.

- Nevertheless, bidding documents are not available on the website, but can be obtained from the Corporation's Center.
- The NSSF has set a database of companies and contractors with whom it has previously cooperated, noting that the former claimed to grant preference to products and services of national origin, by exclusively accepting the participation of companies with financial number; however, we could not confirm the matter for we did not have access to the bidding documents.
- The Fund has adopted several procurement policies, including awarding on the basis of lots or groups, either to avoid the relevant authority's control or to encourage the participation of small and medium-sized enterprises by reducing needs and dividing them into batches. The Fund does not strive to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure, and does not adopt sustainable public procurement in order to reduce the environmental impact.
- On the other hand, after publishing the new Public Procurement Law in the Official Gazette, some of the Fund's employees learned on its provisions, and underwent mandatory training with Institut des Finances Basil Fuleihan.
- The Financial and Accounting Consultant stated that the NSSF has all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.

Criteria	Response
Surveyed entity's nature	Independent Fund
Subject to any guardianship authority	Yes Ministry of Labor
Conducting tenders in coordination with the Public Procurement Management Administration	No
Modifying the terms of a contract before awarding	No
The average interval between the date of opening bids and the date of contract awarding	Between 1 and 3 months
The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	Between 1 and 3 months

Department/unit/employees specialized in conducting public procurement	Yes
Organizing annual report mentioning all procurement operations	No
Keeping a public procurement procedures record	Yes
Mechanism to study, evaluate and analyze your procurement needs	Yes
Cooperating with experts and specialists from outside the administration	Yes
Employee specialized in public procurement	Yes
Employee responsible for the direct contact and communications with bidders regarding procurement procedures	Yes
Conducting a periodic evaluation of employees performance	No
Executing certain services with resources available at the administration	Yes
Conducting joint public procurements with other administrations or for other procuring entities	No
Awarding some projects to other administration	No
Challenges and shortages	Human resources Financial capabilities Logistic equipment Knowledge & skills
Risk management plan	Yes
Internal audit unit	No
Computerization of files	No

Website availability	Yes
Database of companies and contractors with whom the administration previously cooperated	Yes
Granting preference to products and services of national origin	Yes
Awarding on the basis of lots and groups	Yes
Adopting sustainable public procurement in order to reduce the environmental impact	No
Informing employees of the Public Procurement Law provisions	Yes
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	Yes
The administration is equipped to film and document the bid opening sessions for electronic procurement	Yes



Green Plan Lebanon

On 07/07/2022, we visited the Green Plan Lebanon and contacted the Head of the Accounting Department and Head of Technical Department, who informed us that the Plan is subject to the guardianship authority of the Ministry of Agriculture, and provided us with the value of the Plan's annual budget for 2019 and 2022, as detailed in the table below:

Year	Annual Budget Value
2017	2,404,000,000 LBP
2018	2,404,000,000 LBP
2019	2,404,000,000 LBP
2020	2,404,000,000 LBP
2022	39,000,000,000 LBP

The following table represents the number of procurement operations carried out by the Plan from 2017 to 2021, which includes all types of concluded contracts:

Year	Procurement Operations Number
2017	10-49
2018	10-49
2019	1-9
2020	1-9
2021	1-9



Even after many inquiries, we were not provided with the expenditures value of the past five years.

- The Head of Accounting Department confirmed that the Green Plan Lebanon did not conduct any tenders in coordination with the Public Procurement Management Administration, whoever other procurement conducting methods were indicated in accordance with the Public Accountability Law.

- The former also pointed out that the Green Plan is missing a President since 2017, while the Minister of Agriculture is covering the latter's duties.
- Noting that all tenders conducted by their Tender Committee have acquired proposals, and none of the contracts' terms were modified before awarding.
- The average period between the date of bid opening and the date of contract awarding is usually less than a month for procurement by invoice and between 1 and 3 months for public tenders. The period for paying dues to contractors/suppliers usually ranges between 1 and 3 months or exceeds a year depending on the project, from the date of providing the works, supplies or services to the Green Plan. For example, the Green Plan has not fulfilled the dues of some projects executed in 2019.
- The Head of Accounting Department stated that the Green Plan includes a specialized unit consisting of the "Official Tender Committee" and the "Procurement Committee" to carry out public procurement operations, and issues annual reports including all the technical operations, not the procurement operations, while all procurement related information are registered in a special record kept in a safe place.
- Moreover, the Green Plan sets medium-term procurement plans that meet its needs in line with the required appropriations in its budget plan and its priorities, while relying on a study mechanism to evaluate and analyze its procurement needs and prepare market studies.
- The Green Plan's Technical Department cooperates with specialists from outside its offices to set bidding documents. It also cooperates with other external specialists to evaluate proposals, supervise the implementation of contracts, accept supplies, services and executed works and evaluate executed services submitted by winning bidders, mainly Khatib & Alami company, engineer Mostapha Fawaz, Rafik El Khoury & Partners and LibanConsult.
- The Administration is also supported by a technical team composed of engineers who consult the jurist of the Minister's office when needed.
- In addition, the Green Plan assigned an employee responsible for receiving and responding to requests for information, as well as an employee responsible for communicating directly with bidders regarding procurement procedures. The Administration also conducts a periodic evaluation of its employees' performance.
- Noting that the said Administration intends to execute certain services with resources available in the administration rather than purchasing them from external sources, it has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities. However, it awarded some of its projects to other administrations, like the Ministry of Environment, the Ministry of Energy and Water and the Council of Development and Reconstruction.

- Among the challenges facing the Green Plan in implementing the new Public Procurement Law, we mention the shortage of human resources, i.e. the number of employees, and the lack of knowledge and skills, for its employees need periodic trainings.
- The Administration also suffers from financial shortage due to the delay in approving on the budget and the disbursement of the required amounts, which are no longer sufficient, as some purchases are still allocated in the budget according to an exchange rate of 1507.5 LBP.
- One of the reasons hindering the work of the Green Plan is the failure of the Lebanese state to pay its debts, which delays the process of paying the dues by donors, which in turn delays the process of paying the amounts owed to the contractors and winning bidders.
- The Administration also needs information and communications technology equipment, printers and other essentials, as only one computer is available for 5 engineers to work on.
- Noting that the Ministry of Agriculture has set a risk management plan for the Green Plan (even though the Directorate General of Agriculture informed us during our meeting that they do not have a risk management plan). The Green Plan includes an internal audit unit that analyses project values.
- Technically and logistically, the said Administration relies on computerizing its documents and publishes them on its website, the website of the Ministry of Agriculture, in the Official Gazette, local newspapers, and the Administration's doors. However, copies of the bidding documents are not available on the website, but can rather be obtained from the Administration.
- A website for the Green Plan is available, and as they claim is subject to the procedures that ensures the privacy and confidentiality of the provided information, as it is regularly updated, and provides the ability to download information and documents in different formats (such as excel, word...). Yet, after trying to access it, the Green Plan's website seemed to be out of service.
- The said Administration has set a database of companies and contractors with whom it has previously cooperated, as companies shall submit their files to the Green Plan to be studied and accepted or rejected in accordance with criteria and conditions set by the Ministry of Public Works and Transport. Noting that the Plan allegedly grants preference to products and services of national origin, and mentions the matter in the bidding documents, the matter which was not confirmed.

The Administration has adopted several procurement policies, including awarding on the basis of lots or groups, either to avoid the relevant authority's control or to encourage the participation of small and medium-sized enterprises by reducing the number of years of experience and work required in the bidding documents and the value of works already executed by companies, and by reducing the solvency value from 10 billion LBP for example.

Besides, one of the policies adopted by the Green Plan is not allowing contractors or companies, which are still in the process of implementing two projects at most, to submit proposals for new tenders launched by the said Plan.

The Administration also strives to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure, in addition to adopting sustainable public procurement in order to reduce the environmental impact by preparing a study on this impact and presenting it to the Ministry of Environment, which we could not confirm, for we did not have access to any study.

On the other hand, after publishing the new Public Procurement Law in the Official Gazette, some employees learned on its provisions, 3 of whom have undergone mandatory training with Institut des Finances Basil Fuleihan.

The Head of Accounting Department stated that the Green Plan has all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.

Criteria	Response
Surveyed entity's nature	Public Administration
Subject to any guardianship authority	Yes Ministry of Agriculture
Conducting tenders in coordination with the Public Procurement Management Administration	No
Modifying the terms of a contract before awarding	No
The average interval between the date of opening bids and the date of contract awarding	Less than a month (procurement by invoice) Between 1 and 3 months (tenders)
The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	Between 1 and 3 months More than a year

Department/unit/employees specialized in conducting public procurement	Yes Procurement Committee Official Tender Committee
Organizing annual report mentioning all procurement operations	No
Keeping a public procurement procedures record	Yes
Mechanism to study, evaluate and analyze your procurement needs	Yes
Cooperating with experts and specialists from outside the administration	Yes
Employee specialized in public procurement	Yes
Employee responsible for the direct contact and communications with bidders regarding procurement procedures	Yes
Conducting a periodic evaluation of employees performance	Yes
Executing certain services with resources available at the administration	Yes
Conducting joint public procurements with other administrations or for other procuring entities	No
Awarding some projects to other administration	Yes Ministry of Environment Ministry of Energy and Water Council for Development and Reconstruction

Challenges and shortages	Human resources Financial capabilities Logistic equipment Knowledge & skills
Risk management plan	Yes
Internal audit unit	Yes
Computerization of files	Yes
Website availability	Yes (out of service)
Database of companies and contractors with whom the administration previously cooperated	Yes
Granting preference to products and services of national origin	Yes
Awarding on the basis of lots and groups	Yes
Adopting sustainable public procurement in order to reduce the environmental impact	Yes
Informing employees of the Public Procurement Law provisions	Yes
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	Yes
The administration is equipped to film and document the bid opening sessions for electronic procurement	Yes



Litani River Authority

On 02/06/2022, we visited Litani River Authority and contacted the President and the Head of Tender Department, who informed us that the Authority is subject to the guardianship authority of the Ministry of Energy and Water, and provided us with the value of the authority's annual budget for 2019 and 2022, as detailed in the table below:

Year	Annual budget value
2017	37,100,000,000 LBP
2018	37,100,000,000 LBP
2019	42,700,000,000 LBP
2022	50,638,480,000 LBP

The following table represents the stability of the number of procurement operations carried out by the Authority from 2017 to 2021, which includes all types of concluded contracts:

Year	Procurement Operations Number
2017	10-49
2018	10-49
2019	10-49
2020	10-49
2021	10-49

As for the value of expenditures, the below table indicates the stability of the Authority's expenditures in the last five years:

Year	Expenditures Value
2017	8,130,000,000 LBP
2018	6,780,000,000 LBP
2019	6,095,000,000 LBP
2020	4,945,000,000 LBP
2021	6,170,000,000 LBP

- The Head of Tender Department confirmed that the Authority does not conduct tenders in coordination with the Public Procurement Management Administration, whoever other procurement conducting methods were indicated in accordance with the Public Accountability Law and the Authority's financial regulations.

- The Authority conducted 25 public tenders between 2017 and %24.5) 2021 of the total number of contracts concluded within 5 years) valued at 24,437,032,228 LBP (%82.11 of the total value of contracts conducted within 5 years), all of which are claimed to be awarded to the best proposals.

- Two public tenders were announced in 2021, for which no proposals were submitted by any bidder (%25 of the number of tenders conducted in 2021). Similarly, 7 tenders in 2020 did not acquire any proposals (%28 of tenders), 5 in %21.74) 2019 of tenders), 4 in %20) 2018 of tenders). However, no tenders were announced in 2017 for which no proposals were submitted, and no contract terms were modified before awarding.

- The average period between the date of bid opening and the date of contract awarding is usually less than a month for requests for proposals and between 1 and 3 months for public tenders. The period for paying dues to contractors/suppliers usually ranges between 1 and 3 months from the date of providing the works, supplies or services to the Green Plan.

- The Head of Tender Department stated that the Authority includes a specialized unit and specialized employees to carry out public procurement operations, and issues annual reports including all procurement operations, while all related information are registered in a special record kept in a safe place.

- Moreover, the Authority sets annual and medium-term procurement plans that meet its needs in line with the required appropriations in its budget plan, while relying on a study mechanism to evaluate and analyze its procurement needs and prepare market studies.

- The authority's Technical and Administrative Staff, consisting of 10 employees, cooperates with specialists from outside its offices to set bidding documents, like Électricité De France (EDF). It also cooperates with other external specialists to supervise the implementation of contracts and evaluate executed services. As for evaluating proposals and accepting supplies, services and executed works, the authority relies on its staff, especially the Acceptance Committee and the Supervision Committee that includes licensed engineers.

- In addition, the Authority assigned an employee responsible for receiving and responding to requests for information, as well as an employee responsible for communicating directly with bidders regarding procurement procedures. The authority also conducts a periodic evaluation of its employees' performance.

- Noting that the Authority intends to execute certain services with resources available in the administration rather than purchasing them from external sources, it has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities, nor did it award any of its projects to other administrations.

- The challenges facing the Authority in implementing the new Public Procurement Law were not discussed in details, however the authority, similarly to all other administrations and institutions, suffers from administrative red tape and procrastination.

- Technically and logistically, the Authority relies on computerizing its documents and publishing them on its website, in the Official Gazette and local newspapers. Knowing that bidding documents are not published on the website, but can rather be obtained from the Authority.

- A website was created to the Authority but it's not subject to any procedures to ensure the privacy and confidentiality of the provided information, as it has not been updated recently, and does not provide the ability to download information and documents in different formats (such as excel, word...).

- The Authority has set a database of companies and contractors with whom it has previously cooperated, noting that the former claims to grants preference to products and services of national origin, the matter which we could not confirm, for we did not have access to any bidding document.

- The Authority adopted several procurement policies, but has not adopted awarding on the basis of lots or groups to encourage the participation of small and medium-sized enterprises as much as possible, however, it strives to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure. In addition, the Authority alleges to adopt sustainable public procurement in order to reduce the environmental impact, the matter which we could not confirm, for we did not have access to any bidding document.

- On the other hand, after publishing the new Public Procurement Law in the Official Gazette, some employees learned on its provisions and underwent mandatory training with Institut des Finances Basil Fuleihan.
- The Head of Tender Department stated that the Directorate has all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.

Criteria	Response
Surveyed entity's nature	Independent Authority
Subject to any guardianship authority	Yes Ministry of Energy and Water
Conducting tenders in coordination with the Public Procurement Management Administration	No
Modifying the terms of a contract before awarding	No
The average interval between the date of opening bids and the date of contract awarding	Less than a month (requests for proposals) Between 1 and 3 months (public tenders)
The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	Between 1 and 3 months
Department/unit/employees specialized in conducting public procurement	Yes
Organizing annual report mentioning all procurement operations	Yes
Keeping a public procurement procedures record	Yes
Mechanism to study, evaluate and analyze your procurement needs	Yes
Cooperating with experts and specialists from outside the administration	Yes Setting bidding documents & evaluating services
Employee specialized in public procurement	Yes

Employee responsible for the direct contact and communications with bidders regarding procurement procedures	Yes
Conducting a periodic evaluation of employees performance	Yes
Executing certain services with resources available at the administration	Yes
Conducting joint public procurements with other administrations or for other procuring entities	No
Awarding some projects to other administration	No
Challenges and shortages	Administrative red tape
Risk management plan	Yes
Internal audit unit	Yes
Computerization of files	Yes
Website availability	Yes
Database of companies and contractors with whom the administration previously cooperated	Yes
Granting preference to products and services of national origin	Yes
Awarding on the basis of lots and groups	No
Adopting sustainable public procurement in order to reduce the environmental impact	Yes
Informing employees of the Public Procurement Law provisions	Yes
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	Yes
The administration is equipped to film and document the bid opening sessions for electronic procurement	Yes



South Lebanon Water Establishment



On 07/06/2022, we visited the South Lebanon Water Establishment and contacted the Head of Legal Department, who informed us that the Establishment is subject to the guardianship authority of the Ministry of Energy and Water. Even after many inquiries, we were not provided with the value of the Establishment's annual budget for the years 2019 to 2022, nor the value of expenditures in the last 5 years.

The following table represents the number of procurement operations carried out by the Establishment from 2017 to 2021, which includes all types of concluded contracts:

Year	Procurement Operations Number
2017	200-999
2018	200-999
2019	200-999
2020	200-999
2021	200-999

- The Head of Legal Department confirmed that South Lebanon Water Establishment does not conduct tenders in coordination with the Public Procurement Management Administration, but forms a Tender Committee for this matter, assuring that procurement methods are indicated in accordance with the Establishment's financial regulations.
- The Establishment conducted 32 public tenders between 2017 and 2021 of contracts conducted over 5 years) valued at approximately 400,000,000 LBP, all of which were awarded to the best proposals.
- Announced tenders always acquired proposals, except for 4 tenders in 2022. Noting that no contract terms were modified before awarding.
- The average period between the date of bid opening and the date of contract awarding is usually less than a month. On the other hand, the period for paying dues to contractors/suppliers usually ranges between 1 and 3 months from the date of providing the works, supplies or services to the Establishment.

- The Head of Legal Department also stated that the Establishment includes a Procurement Department and specialized employees to carry out public procurement operations. Besides, a Procurement Committee shall be formed to carry out requests for proposals when procurement value varies between 3 to 10 million LPB. Further, two years ago, the Establishment used to issue annual reports including all procurement operations, and all related information were registered in a special record kept in a safe place.
- Moreover, the Establishment sets medium-term procurement plans that meet its needs in line with the required appropriations in its budget plan and its priorities, without relying on a clear study mechanism to evaluate and analyze its procurement needs and prepare market studies. Noting that the Head of Legal Department pointed out that more than 200 transactions were cancelled last year and postponed to 2022 due to exchange rate volatility.
- The Establishment does not cooperate with experts and specialists from outside its offices to set bidding documents, evaluate proposals, supervise the implementation of contracts, receive and evaluate the supplies, services, executed works, or proposals, for it relies on its employees' competencies, especially the Studies and Procurement Department that sets bidding documents, in addition to the Technical Team consisting of jurists and engineers responsible for procurement operations.
- Contrary, the Establishment did not assign an employee responsible for receiving and responding to requests for information, as the administration is in charge of the matter, nor an employee responsible for communicating directly with bidders regarding procurement procedures. The Establishment does not conduct a periodic evaluation of its employees' performance, as it allegedly includes around 200 fixed workers.
- Noting that the Establishment intends to execute certain services with resources available in the administration rather than purchasing them from external sources, it has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities, nor did it award any of its projects to other administrations.
- Among the challenges facing South Lebanon Water Establishment in implementing the new Public Procurement Law, we mention the shortage of human resources; either contractual employees or daily laborers. In addition, the lack of knowledge and skills due to the employment of non-specialized persons who are not acquainted with the Laws, Implementing Decrees and their amendments, and the financial shortage due to the Ministry of Energy and Water's delay in approving on the budget and the disbursement of the required amounts, which are no longer sufficient.

- In terms of logistics, the Establishment needs information and communications technology equipment. Additionally, it did not set a risk management plan, and does not include an internal audit unit, as the Quality Control Department is not activated, and the Accounting Department is currently in charge of the auditing.
- Technically and logistically, the Establishment relies on computerizing its documents and publishing them in the Official Gazette, local newspapers, and on the administration's doors.
- A website for the Establishment was created and is subject to all procedures that ensure the privacy and confidentiality of the provided information, as it is frequently updated. Knowing that it provides the ability to download information and documents in different formats (such as excel, word...). Noting that we tried accessing the Establishment's website but it is out of service.
- The Establishment has set a database of companies and contractors with whom it has previously cooperated, noting that the former claims to grant preference to products and services of national origin, the matter which we could not confirm, for we did not have access to the bidding documents.
- The Authority adopted several procurement policies, including awarding on the basis of lots or groups, either to avoid the relevant authority's control or to encourage the participation of small and medium-sized enterprises as much as possible by limiting the procurement value in the bidding document. It also strives to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure. In addition, the Authority also claims to adopt sustainable public procurement in order to reduce the environmental impact, which also could not be confirmed, for we did not have access to the bidding documents.
- On the other hand, after publishing the new Public Procurement Law in the Official Gazette, some employees learned on its provisions and underwent mandatory training with Institut des Finances Basil Fuleihan.
- The Head of Legal Department stated that the said Establishment has all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.

Criteria	Response
Surveyed entity's nature	Public Establishment
Subject to any guardianship authority	Yes Ministry of Energy and Water
Conducting tenders in coordination with the Public Procurement Management Administration	No
Modifying the terms of a contract before awarding	No
The average interval between the date of opening bids and the date of contract awarding	Less than a month
The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	Between 1 and 3 months
Department/unit/employees specialized in conducting public procurement	Yes
Organizing annual report mentioning all procurement operations	Yes (previously)
Keeping a public procurement procedures record	Yes
Mechanism to study, evaluate and analyze your procurement needs	No
Cooperating with experts and specialists from outside the administration	No
Employee specialized in public procurement	No
Employee responsible for the direct contact and communications with bidders regarding procurement procedures	No
Conducting a periodic evaluation of employees performance	No
Executing certain services with resources available at the administration	Yes

Conducting joint public procurements with other administrations or for other procuring entities	No
Awarding some projects to other administration	No
Challenges and shortages	Human resources Financial capabilities Logistic equipment Knowledge & skills
Risk management plan	No
Internal audit unit	Yes
Computerization of files	Yes
Website availability	Yes (out of service)
Database of companies and contractors with whom the administration previously cooperated	Yes
Granting preference to products and services of national origin	Yes
Awarding on the basis of lots and groups	Yes
Adopting sustainable public procurement in order to reduce the environmental impact	Yes
Informing employees of the Public Procurement Law provisions	Yes
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	Yes
The administration is equipped to film and document the bid opening sessions for electronic procurement	Yes



Qartaba Governmental Hospital

On 21/06/2022, we visited Qartaba Governmental Hospital and contacted the hospital's Director, who informed us that the hospital is subject to the guardianship authority of the Ministry of Public Health, and provided us with the value of the hospital's annual budgets for 2019, noting that the 2022 budget had not yet been set.

Year	Annual budget value
2019	400,000,000 LBP
2022	Not set yet

The following table represents the stability in the number of procurement operations carried out by the hospital from 2017 to 2021, which includes all types of concluded contracts:

Year	Procurement Operations Number
2017	10-49
2018	10-49
2019	10-49
2020	10-49
2021	10-49

As for the value of expenditures, the below table indicates the hospital's expenditures in the last five years:

Year	Expenditures Value
2017	262,252,849.98 LBP
2018	219,158,731.29 LBP
2019	243,836,922.53 LBP
2020	283,647,082.27 LBP
2021	267,371,191.6 LBP

- The Head of the Director confirmed that Qartaba Governmental Hospital did not conduct tenders, while other procurement contracts (mostly procurement by invoice) were conducted in accordance with the Public Accountability Law. Noting that it did not amend the terms of any contract before the award during the 5 years.
- There is no average period between the date of bid opening and the date of contract awarding or to a specific period for paying dues to contractors/suppliers, as the hospital operates through aid and donations (mostly in kind aids), therefore, donors usually pay the dues.
- The Director stated that the hospital includes a Procurement Committee and specialized employees to carry out public procurement operations. The hospital does not issue annual reports including all procurement operations, but it registers related information in a special record kept in a safe place.
- Moreover, the hospital sets annual and medium-term procurement plans that meet its needs in line with the required appropriations in its budget plan and its priorities, while relying on a clear study mechanism to evaluate and analyze its procurement needs and prepare market studies.
- The hospital does not cooperate with experts and specialists from outside its management, neither to set the bidding documents nor to supervise the evaluation of proposals, implementation of contracts, or the evaluation of supplies, services or executed works.
- In addition, the hospital did not assign an employee responsible for receiving and responding to requests for information, or an employee responsible for communicating directly with bidders regarding procurement procedures. However, the hospital conducts a weekly evaluation of its employees' performance.
- Noting that the hospital intends to execute certain services with resources available in the administration rather than purchasing them from external sources, such as the cleaning and maintenance services.
- The hospital has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities, nor did it award any of its projects to other administrations.
- Among the challenges facing Qartaba Governmental Hospital in implementing the new Public Procurement Law, we mention the shortage of human resources by %70, as the number of staff is allegedly limited to 18 employees, in addition to the financial shortage due to the delay in approving the budget and allocating the required amounts, which are no longer sufficient.

- The hospital also stated that the hospital's ambulances were donated as a grant, adding that most medicines and first aid materials are unavailable at the hospital.
- In terms of logistics, the hospital needs information and communications technology equipment.
- Furthermore, the hospital has not set a risk management plan and does not include an internal audit unit.
- Technically and logistically, the hospital relies on computerizing its documents, and publishes them in the Official Gazette, local newspapers, the hospital's doors and the doors of churches and mosques.
- The hospital does not have a website but has a Facebook page where it publishes all its activities, announcements and hospital related information.
- The hospital has set a database of companies and contractors with whom it has previously cooperated, noting that the Director alleges that the hospital grants preference to products and services of national origin; however, we could not confirm this information.
- The hospital has not adopted awarding on the basis of lots or groups to encourage the participation of small and medium-sized enterprises as much as possible, however, it strives to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure. In addition, the hospital adopts sustainable public procurement in order to reduce the environmental impact.
- Moreover, even after publishing the new Public Procurement Law in the Official Gazette, none of the employees learned on its provisions or underwent mandatory training with Institut des Finances Basil Fuleihan, due to the nature of their work that requires their permanent presence at the hospital.
- The Head of the Accounting Department stated that the hospital has all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.

Criteria	Response
Surveyed entity's nature	Governmental Hospital
Subject to any guardianship authority	Yes Ministry of Public Health
Conducting tenders in coordination with the Public Procurement Management Administration	No
Modifying the terms of a contract before awarding	No
The average interval between the date of opening bids and the date of contract awarding	-
The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	-
Department/unit/employees specialized in conducting public procurement	Yes
Organizing annual report mentioning all procurement operations	No
Keeping a public procurement procedures record	Yes
Mechanism to study, evaluate and analyze your procurement needs	Yes
Cooperating with experts and specialists from outside the administration	No
Employee specialized in public procurement	No
Employee responsible for the direct contact and communications with bidders regarding procurement procedures	No
Conducting a periodic evaluation of employees performance	Yes
Executing certain services with resources available at the administration	Yes

Conducting joint public procurements with other administrations or for other procuring entities	No
Awarding some projects to other administration	No
Challenges and shortages	Human resources Financial capabilities Logistic equipment
Risk management plan	No
Internal audit unit	No
Computerization of files	Yes
Website availability	No
Database of companies and contractors with whom the administration previously cooperated	No
Granting preference to products and services of national origin	Yes
Awarding on the basis of lots and groups	No
Adopting sustainable public procurement in order to reduce the environmental impact	No
Informing employees of the Public Procurement Law provisions	Yes
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	Yes
The administration is equipped to film and document the bid opening sessions for electronic procurement	No



Dahr el Bachek Governmental Hospital

On 2022/06/28, we visited Dahr el Bachek Governmental Hospital and contacted the Head of Accounting Department and the Head of Procurement Department, who informed us that the hospital is subject to the guardianship authority of the Ministry of Public Health, and provided us with the value of the hospital's annual budgets, which which maintained the same value over the past 3 years, noting that the 2022 budget had not yet been set.

Year	Annual budget value
2019	9,000,000,000 LBP
2020	9,000,000,000 LBP
2021	9,000,000,000 LBP
2022	Not set yet

The following table represents the stability in the number of procurement operations carried out by the hospital from 2017 to 2021, which includes all types of concluded contracts:

Year	Procurement Operations Number
2017	50-199
2018	50-199
2019	50-199
2020	50-199
2021	50-199

As for the value of expenditures, the below table indicates the stability in the hospital's expenditures in the last five years, as it recorded an amount of almost 6 million LBP:

Year	Expenditures Value
2017	6,000,000,000 LBP
2018	6,000,000,000 LBP
2019	6,000,000,000 LBP
2020	6,000,000,000 LBP
2021	6,000,000,000 LBP

- The Head of the Procurement Department confirmed that Dahr el Bachek Governmental Hospital did not conduct tenders, while other procurement contracts were conducted in accordance with the Public Accountability Law. Noting that it did not amend the terms of any contract before the award during the 5 years.
- The average period between the date of bid opening and the date of contract awarding usually ranged within a month. On the other hand, the period for paying dues to contractors/suppliers ranges between 1 and 3 months from the date of providing the works, supplies or services to the hospital.
- The Head of the Procurement Department stated that the hospital includes a Procurement Committee and specialized employees to carry out public procurement operations. The hospital does not issue annual reports including all procurement operations, or register related information in a special record.
- Moreover, the hospital sets annual and medium-term procurement plans that meet its needs in line with the required appropriations in its budget plan, while relying on previous plans without a study mechanism to evaluate and analyze its procurement needs and prepare market studies, while pricing according to the "Sayrafa" platform.
- The hospital does not cooperate with experts and specialists from outside its management, neither to set the bidding documents nor to supervise the evaluation of proposals, implementation of contracts, and the evaluation of supplies, services or executed works. The hospital includes a technical team composed of biomedical engineers and procurement audits.
- In addition, the hospital did not assign an employee responsible for receiving and responding to requests for information, or an employee responsible for communicating directly with bidders regarding procurement procedures. However, the hospital conducts a periodic evaluation of its employees' performance.

Noting that the hospital intends to execute certain services with resources available in the administration rather than purchasing them from external sources, and it has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities, yet it has awarded some of its projects to the Council for Development and Reconstruction.

Among the challenges in implementing the new Public Procurement Law, Dahr El Bacheh Governmental Hospital allegedly suffers shortage of human resources, as the number of staff is now limited to 120 employees, and the lack of financial capabilities, due to the failure in providing the annual budget and the required amounts have not been allocated yet. The hospital is also facing a hard time dealing with companies, for some are refraining from delivering supplies unless the amounts due are paid in cash, either according to the price indicated by Sayrafa platform or according to the daily exchange rate, while others are retrieving medicines and equipment from hospital warehouses in case the full dues are not immediately paid.

Noting that the Head of the Accounting Department is demanding training to improve the employees' technical skills and knowledge of modern laws.

The hospital also lacks a risk management plan, but includes an internal audit unit composed of 1 auditor.

Technically and logistically, the Directorate relies on computerizing its documents and allegedly publishing them on its website and on the administration's doors. Knowing that bidding documents are not published on the website, but can rather be obtained from the hospital.

The Head of Accounting Department claims that the website it's not subject to any procedures to ensure the privacy and confidentiality of the provided information, as it has not been recently updated, and does not provide the ability to download information and documents in different formats (such as excel, word...). Noting that we tried accessing the hospital's website but it seems that it is out of service.

The hospital has set a database of companies and contractors with whom it has previously cooperated, noting that the former does not grant preference to products and services of national origin.

The hospital has not adopted awarding on the basis of lots or groups to encourage the participation of small and medium-sized enterprises as much as possible, however, it strives to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure. In addition, the hospital reportedly adopts sustainable public procurement in order to reduce the environmental impact.

- Moreover, even after publishing the new Public Procurement Law in the Official Gazette, none of the employees learned on its provisions or underwent mandatory training with Institut des Finances Basil Fuleihan, due to the nature of their work that requires their permanent presence at the hospital, even though they could attend the online training, but they prefer to attend in person.
- The Head of the Accounting Department stated that the hospital does not have all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.

Criteria	Response
Surveyed entity's nature	Governmental Hospital
Subject to any guardianship authority	Yes Ministry of Public Health
Conducting tenders in coordination with the Public Procurement Management Administration	No
Modifying the terms of a contract before awarding	No
The average interval between the date of opening bids and the date of contract awarding	Less than a month
The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	Between 1 and 3 months
Department/unit/employees specialized in conducting public procurement	Yes
Organizing annual report mentioning all procurement operations	No
Keeping a public procurement procedures record	No
Mechanism to study, evaluate and analyze your procurement needs	Yes
Cooperating with experts and specialists from outside the administration	No

Employee specialized in public procurement	No
Employee responsible for the direct contact and communications with bidders regarding procurement procedures	No
Conducting a periodic evaluation of employees performance	Yes
Executing certain services with resources available at the administration	Yes
Conducting joint public procurements with other administrations or for other procuring entities	No
Awarding some projects to other administration	Yes Council for Development and Reconstruction
Challenges and shortages	Human resources Financial capabilities Knowledge & skills
Risk management plan	Yes
Internal audit unit	Yes
Computerization of files	Yes
Website availability	Yes Out of service
Database of companies and contractors with whom the administration previously cooperated	Yes
Granting preference to products and services of national origin	No
Awarding on the basis of lots and groups	No
Adopting sustainable public procurement in order to reduce the environmental impact	Yes
Informing employees of the Public Procurement Law provisions	No
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	No
The administration is equipped to film and document the bid opening sessions for electronic procurement	Yes



Nabatiyeh Governorate

On 14/06/2022, we visited the Nabatiyeh Governorate and contacted the Head of Finance and Informatics Department, who informed us that the Governorate is subject to the guardianship authority of the Ministry of Interior and Municipalities, and provided us with the value of the Directorate's annual budgets, which recorded a significant decrease in the last years, as detailed in the table below:

Year	Annual budget value
2017	974,375,000 LBP
2018	1,390,930,000 LBP
2019	1,400,000,000 LBP *
2020	1,400,000,000 LBP *
2021	1,400,000,000 LBP
2022	2,000,000,000 LBP

* Noting that, according to the Official Gazette, the Governorate's annual budget for 2019 is valued at 1,220,674,000 LBP and for 2020 is valued at 1,173,178,000 LBP

The following table represents the stability in the number of procurement operations carried out by the Governorate from 2017 to 2021, which includes all types of concluded contracts:

Year	Procurement Operations Number
2017	10-49
2018	10-49
2019	10-49
2020	10-49
2021	10-49

As for the value of expenditures, the below table indicates the significant Governorate's expenditures, which amounted to about 400 million LBP during each of the last five years:

Year	Expenditures Value
2017	400,000,000 LBP
2018	400,000,000 LBP
2019	400,000,000 LBP
2020	400,000,000 LBP
2021	400,000,000 LBP

- The Head of Finance and Informatics Department confirmed that the Nabatiyeh Governorate was conducting tenders in coordination with the Public Procurement Management Administration in accordance with the Public Accountability Law. Noting that the website of the Public Procurement Management Authority indicates otherwise, as no tenders conducted by Nabatiyeh Governorate in cooperation with the said Authority has been published.
- Noting that the website of the Public Procurement Management Authority indicates otherwise, as no tenders were published as conducted by the Authority and Nabatiyeh Governorate.
- The Head of Finance and Informatics Department also notified us that the Governorate conducted 10 public tenders from 2017 to 2021, all of which were awarded to the lowest priced proposal provided that it fulfils the bidding document. Noting that 1 tender was announced in 2021, for which no proposals were submitted by any bidder, so it was re-announced and awarded. Further, no contracts were modified before their award.
- The average period between the date of bid opening and the date of contract awarding usually ranged within a week. On the other hand, the period for paying dues to contractors/suppliers extends to one year from the date of providing the works, supplies or services to the Governorate.
- The Head of Finance and Informatics Department also stated that the Governorate does not include a specialized department, unit or employees to carry out public procurement operations. The Governorate does not issue annual reports including all procurement operations, and related information are not registered in a special record, but procurement files are kept in a safe place.

- Moreover, the Governorate sets annual and medium-term procurement plans that meet its needs in line with the required appropriations in its budget plan, without a clear study mechanism to evaluate and analyze its procurement needs and prepare market studies.
- The Governorate does not cooperate with experts and specialists from outside its offices to draw up bidding documents, nor cooperates with specialized third parties to evaluate proposals, supervise the implementation of contracts, and to receive and evaluate the supplies, services or executed works.
- In addition, the Governorate assigned an employee responsible for receiving and responding to requests for information, as well as an employee responsible for communicating directly with bidders regarding procurement procedures. The Governorate also conducts a periodic evaluation of its employees' performance.
- Noting that the Governorate intends to execute certain services with resources available in the administration rather than purchasing them from external sources, and it has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities, nor has awarded any of its projects to other administrations.
- Among the challenges facing the Nabatiyeh Governorate in implementing the new Public Procurement Law, we mention the shortage of human resources, i.e. it suffers from vacancy in several positions; the Department of Municipal Affairs is completely vacant, the Head of the Department of Administrative Affairs is appointed by proxy, as well as the governor himself.
- The Governorate's employees also face transportation difficulty due to the low value of the allocated transportation allowance. The lack of financial capabilities due to the delay or failure to transfer credits from one year to another, in addition to the delay in approving the budget and allocating the required amounts, have resulted in the Governorate's inability to conduct any procurement operation in 2022; thus the Governorate is trying to operate based on the annual budget of 2021, which is insufficient.
- The Head of Finance and Informatics Department also mentioned the lack of gasoline and diesel fuel to supply the Governorate with electricity and the lack of paper, which is obliging them to use their mobile phones to photograph documents and send referrals.
- Noting that the Governorate includes an internal audit unit, but has not set a risk management plan, whereas a «Disaster Management Committee» is formed at the time.
- Technically and logistically, the Governorate does not rely on computerizing its documents and does not have a website to publish its instruments, but uses the Official Gazette, local newspapers, and the administration's doors for this purpose. Further, copies of the bidding documents can only be obtained from the Governorate's center.

- The Governorate has not set a database of companies and contractors with whom it has previously cooperated, noting that the former claims to grant preference to products and services of national origin and mentions the matter in the bidding document; however, we had no access to any of these documents, therefore this information could not be confirmed.
- The Governorate did not award on the basis of lots or groups, but alleged that its limited procurement has encourage the participation of small and medium-sized enterprises as much as possible, while striving to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure, however, it does not adopt sustainable public procurement in order to reduce the environmental impact.
- On the other hand, after publishing the new Public Procurement Law in the Official Gazette, the Governorate's employees did not learn on its provisions, nor underwent mandatory training with Institut des Finances Basil Fuleihan.
- The Head of the Finance and Informatics Department stated that the Governorate has all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.

Criteria	Response
Surveyed entity's nature	Governorate
Subject to any guardianship authority	Yes Ministry of Interior and Municipalities
Conducting tenders in coordination with the Public Procurement Management Administration	Yes
Modifying the terms of a contract before awarding	No
The average interval between the date of opening bids and the date of contract awarding	Less than a week
The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	More than a year
Department/unit/employees specialized in conducting public procurement	No

Organizing annual report mentioning all procurement operations	No
Keeping a public procurement procedures record	No
Mechanism to study, evaluate and analyze your procurement needs	Yes
Cooperating with experts and specialists from outside the administration	No
Employee specialized in public procurement	Yes
Employee responsible for the direct contact and communications with bidders regarding procurement procedures	Yes
Conducting a periodic evaluation of employees performance	Yes
Executing certain services with resources available at the administration	Yes
Conducting joint public procurements with other administrations or for other procuring entities	No
Awarding some projects to other administration	No
Challenges and shortages	Human resources Financial capabilities
Risk management plan	No
Internal audit unit	Yes
Computerization of files	No
Website availability	No

Database of companies and contractors with whom the administration previously cooperated	Yes
Granting preference to products and services of national origin	Yes
Awarding on the basis of lots and groups	No Limited procurement
Adopting sustainable public procurement in order to reduce the environmental impact	No
Informing employees of the Public Procurement Law provisions	No
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	No
The administration is equipped to film and document the bid opening sessions for electronic procurement	Yes



Akkar Governorate

On 2022/05/26, we visited Akkar Governorate and contacted the Head of the Accounting Department by proxy, who informed us that the Governorate is subject to the guardianship authority of the Ministry of Interior and Municipalities, and provided us with the value of the Directorate's annual budgets, which recorded an increase in the last year due to rise of the exchange rate, as detailed in the table below:

Year	Annual budget value
2017	415,090,000 LBP
2018	517,847,000 LBP
2019	602,736,300 LBP
2020	553,477,000 LBP
2021	536,960,300 LBP
2022 (estimated)	125,713,083,000 LBP

The following table represents the stability in the number of procurement operations carried out by the Governorate from 2017 to 2021, which includes all types of concluded contracts:

Year	Procurement Operations Number
2017	10-49
2018	10-49
2019	10-49
2020	10-49
2021	10-49

As for the value of expenditures, the below table indicates the significant Governorate's expenditures, which increased during the last five years:

Year	Expenditures Value
2017	91,000,000 LBP
2018	91,121,000 LBP
2019	134,958,000 LBP
2020	139,131,000 LBP
2021	147,387,000 LBP

The Head of the Accounting Department by proxy confirmed that Akkar Governorate was conducting tenders in coordination with the Public Procurement Management Authority in accordance with the Public Accountability Law, after obtaining the approval of the Court of Audit and the Minister of Interior and Municipalities. Knowing that the said Ministry has conducted 1 public tender, in coordination with the Authority and on behalf of Akkar Governorate, awarded to the lowest-priced proposal submitted by Berco S.A.L. for cleaning services on January 07, 2020, valued at 123,876,000 LBP.

Noting that around 4 to 5 proposals were submitted to each of the announced tenders in the last five years, and no contracts were modified before being awarded.

The average period between the date of bid opening and the date of contract awarding usually ranged between one and 3 months. On the other hand, the period for paying dues to contractors/suppliers ranged between 6 months and a year from the date of providing the works, supplies or services to the Governorate.

The Head of the Accounting Department by proxy also stated that the Governorate includes a specialized committee to carry out public procurement operations, composed of the Governor and the accountant. The Governorate issues annual reports including all procurement operations, and registered related information in a special record kept in a safe place.

Moreover, the Governorate sets annual procurement plans that meet its needs in line with the required appropriations in its budget plan, based on a clear study mechanism to evaluate and analyze its procurement needs and prepare market studies.

The Governorate does not cooperate with experts and specialists from outside its offices to draw up bidding documents, nor cooperates with specialized third parties to evaluate proposals, supervise the implementation of contracts, and to receive and evaluate the supplies, services or executed works.

In addition, the Governorate assigned an employee responsible for receiving and responding to requests for information, as well as an employee responsible for communicating directly with bidders regarding procurement procedures. The Governorate also conducts a periodic evaluation of its employees' performance.

Noting that the Governorate intends to execute certain services with resources available in the administration rather than purchasing them from external sources, and it has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities, nor has awarded any of its projects to other administrations.

Among the challenges facing Akkar Governorate in implementing the new Public Procurement Law, we mention the shortage of knowledge and skills, for its employees aren't frequently trained.

The Head of the Accounting Department by proxy also declared that the Governorate suffers from the lack of financial capabilities due to the delay in the approval process for disbursing expenditures after the approval of the Court of Audit and the Directorate of Value Added Tax. She also pointed out the difficulty of dealing with companies in Akkar, as some of them do not have a financial number, thus the Governorate faces difficulty in communicating with contractors. The Governorate also suffers from a lack of logistic equipment such as the internet and modern computer devices.

The Governorate does not include an internal audit unit, but has set a risk management plan.

Technically and logistically, the Governorate relies on computerizing its documents but does not publish them on its website; it rather uses the Official Gazette, local newspapers, and the administration's doors for this purpose. However, the bidding documents are not available on the website, yet copies can be obtained from the Governorate.

The Governorate's website is subject to procedures that ensure the privacy and confidentiality of the provided information, as it is regularly updated. Knowing that it provides the ability to download information and documents in different formats (such as excel, word...), which was confirmed upon checking the website.

The Governorate has not set a database of companies and contractors with whom it has previously cooperated, even though it provided us with such data upon submitting a request for information in 2021.

Noting that the former allegedly grants preference to products and services of national origin and mentions this matter within its bidding documents; however, we had no access to any of these documents, therefore this information could not be confirmed.

The Governorate has adopted several procurement policies, noting that its limited procurement has prevented it from awarding on the basis of lots or groups to encourage the participation of small and medium-sized enterprises. The Governorate strives to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure, however, it does not adopt sustainable public procurement in order to reduce the environmental impact.

On the other hand, after publishing the new Public Procurement Law in the Official Gazette, some of the Governorate's employees learned on its provisions, but did not undergo the mandatory training with Institut des Finances Basil Fuleihan because, according to them, the Institute did not contact the Governorate yet.

The Head of the Accounting Department by proxy stated that the Governorate has all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.

Criteria	Response
Surveyed entity's nature	Governorate
Subject to any guardianship authority	Yes Ministry of Interior and Municipalities
Conducting tenders in coordination with the Public Procurement Management Administration	Yes
Modifying the terms of a contract before awarding	No
The average interval between the date of opening bids and the date of contract awarding	Less than a week (request quotations) Between 1 and 3 months (tenders)
The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	Between 6 months and a year
Department/unit/employees specialized in conducting public procurement	No

Organizing annual report mentioning all procurement operations	Yes
Keeping a public procurement procedures record	Yes
Mechanism to study, evaluate and analyze your procurement needs	Yes
Cooperating with experts and specialists from outside the administration	No
Employee specialized in public procurement	Yes
Employee responsible for the direct contact and communications with bidders regarding procurement procedures	Yes
Conducting a periodic evaluation of employees performance	Yes
Executing certain services with resources available at the administration	Yes
Conducting joint public procurements with other administrations or for other procuring entities	No
Awarding some projects to other administration	No
Challenges and shortages	Financial capabilities Logistic equipment Knowledge & skills
Risk management plan	Yes
Internal audit unit	No
Computerization of files	Yes

Risk management plan	Yes
Internal audit unit	No
Computerization of files	Yes
Website availability	Yes
Database of companies and contractors with whom the administration previously cooperated	No
Granting preference to products and services of national origin	Yes
Awarding on the basis of lots and groups	No
Adopting sustainable public procurement in order to reduce the environmental impact	Yes
Informing employees of the Public Procurement Law provisions	Yes
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	No
The administration is equipped to film and document the bid opening sessions for electronic procurement	Yes



Jezzine Municipality

On 07/06/2022, we visited Jezzine Municipality and contacted the Head of the Accounting Department and the Chief Treasurer, who informed us that the Municipality is subject to the guardianship authority of the Ministry of Interior and Municipalities. The Head of the Accounting Department provided us with the value of the Municipality's annual budget, which recorded an increase last year, as detailed in the table below:

Year	Annual budget value
2019	3,000,000,000 LBP
2020	3,000,000,000 LBP
2021	3,000,000,000 LBP
2022	3,300,000,000 LBP

The following table represents the stability in the number of procurement operations carried out by the Municipality from 2017 to 2021; around 500 procurement per year, which includes all types of concluded contracts:

Year	Procurement Operations Number
2017	500
2018	500
2019	500
2020	500
2021	500
TOTAL	2,500

As for the value of expenditures, the below table also indicates the stability in the Municipality's expenditures in the last five years:

Year	Expenditures Value
2017	700,000,000 LBP
2018	700,000,000 LBP
2019	700,000,000 LBP
2020	700,000,000 LBP
2021	700,000,000 LBP

The Head of the Accounting Department declared that Jezzine Municipality does not conduct tenders in coordination with the Public Procurement Management Administration, but rather by virtue of the authentication of the Minister of Interior and Municipalities and in accordance with the Public Accountability Law.

The Municipality conducted 1 public tender from 2017 to 2021 (0.04% of the 2,500 contracts concluded within 5 years) valued at 150 million LBP, all of which were awarded to the lowest priced proposal provided that it fulfils the bidding document. Noting that all announced tenders acquired proposals, and none of the contracts' terms were modified before awarding.

The average period between the date of bid opening and the date of contract awarding is usually less than a month. On the other hand, the period for paying dues to contractors/suppliers usually exceeds a year from the date of providing the works, supplies or services to the Municipality, where 10% of the project's value shall be retained as guarantee, which shall be reimbursed a year after receiving the project.

The Head of the Accounting Department also stated that Jezzine Municipality includes a specialized unit to carry out public procurement operations consisting of 3 committees: Procurement Committee, Supplies Acceptance Committee and Works Acceptance Committee. The Municipality does not issue annual reports including all procurement operations, but all related information are registered in a special record kept in a safe place.

Moreover, the Municipality sets medium-term procurement plans that meet its needs in line with the required appropriations in its budget plan, while relying on a clear study mechanism to evaluate and analyze its procurement needs and prepare market studies.

The Municipality cooperates with experts and specialists from outside its offices to supervise the implementation of contracts and evaluate the services provided by winning bidders. As for setting bidding documents, evaluating proposals and accepting supplies, services and implemented works, they are carried out by members of the Municipal Council and the aforementioned specialized committees. A technical team of its employees also supports the Municipality.

In addition, the Municipality did not assign an employee responsible for receiving and responding to requests for information, for the request shall be recorded at the Clerical Office and the staff will transfer it to the competent reference. However, the Municipality assigned an employee responsible for communicating directly with bidders regarding procurement procedures. Noting that it conducts a periodic evaluation of its employees' performance.

Noting that Jezzine Municipality intends to execute certain services with resources available in the administration rather than purchasing them from external sources, and it has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities, nor awarded any of its projects to other administrations or municipalities.

Among the challenges facing the Municipality in implementing the new Public Procurement Law, we mention the lack of financial capabilities due to the delay in distributing the allotments of the Independent Municipal Fund, which are no longer sufficient. In addition to the shortage of knowledge and skills; for employees are in need of frequent training.

The Municipality also suffers from the difficulty facing private companies in adopting a fixed price due to the fluctuation of prices from day to day according to the exchange rate.

The Municipality has set a risk management plan, includes an internal audit unit consisting of an auditor and has contracted with an accounting company.

Technically and logistically, Jezzine Municipality is the first municipality in Lebanon to computerize the official documents. It publishes its documents on its website, the Official Gazette, local newspapers, and the administration's doors. However, the bidding documents are not available on the website, yet copies can be obtained from the Municipality.

A website for the Municipality is available and subject to the procedures that ensure the privacy and confidentiality of the provided information, as it has not been updated recently. Knowing that it provides the ability to download information and documents in different formats (such as excel, word...). However, we were not able to access it due to its suspension.

The Municipality has not set a database of companies and contractors with whom it has previously cooperated, noting that the former grants preference to products and services of national origin and mentions this matter within its bidding documents, which was not confirmed as we had no access to any of the bidding documents.

The Municipality has adopted several procurement policies, including awarding on the basis of lots or groups, either to avoid the relevant authority's control to encourage the participation of small and medium-sized enterprises that has a financial number, while striving to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure, in addition to allegedly adopting sustainable public procurement in order to reduce the environmental impact, the matter which we could not confirm.

On the other hand, after publishing the new Public Procurement Law in the Official Gazette, some employees learned on its provisions, but did not undergo mandatory training with Institut des Finances Basil Fuleihan.

The Chief Treasurer stated that the Municipality has all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.

Criteria	Response
Surveyed entity's nature	Municipality
Subject to any guardianship authority	Yes Ministry of Interior and Municipalities
Conducting tenders in coordination with the Public Procurement Management Administration	No Authentication of the Minister of Interior and Municipalities
Modifying the terms of a contract before awarding	No
The average interval between the date of opening bids and the date of contract awarding	Less than a month
The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	More than a year
Department/unit/employees specialized in conducting public procurement	Yes
Organizing annual report mentioning all procurement operations	No

Keeping a public procurement procedures record	Yes
Mechanism to study, evaluate and analyze your procurement needs	Yes
Cooperating with experts and specialists from outside the administration	Yes - Supervising contracts implementation - Evaluating services provided by winning bidders
Employee specialized in public procurement	No
Employee responsible for the direct contact and communications with bidders regarding procurement procedures	Yes
Conducting a periodic evaluation of employees performance	Yes
Executing certain services with resources available at the administration	Yes
Conducting joint public procurements with other administrations or for other procuring entities	No
Awarding some projects to other administration	No
Challenges and shortages	Financial capabilities Knowledge & skills
Risk management plan	Yes
Internal audit unit	Yes
Computerization of files	Yes
Website availability	Yes Suspended

Database of companies and contractors with whom the administration previously cooperated	No
Granting preference to products and services of national origin	Yes
Awarding on the basis of lots and groups	Yes
Adopting sustainable public procurement in order to reduce the environmental impact	Yes
Informing employees of the Public Procurement Law provisions	Yes
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	No
The administration is equipped to film and document the bid opening sessions for electronic procurement	Yes





Batloun Municipality

On 2022/05/27, we visited Batloun Municipality and contacted the Head of Municipality and the Financial Director, who informed us that the Municipality is subject to any guardianship authority of the Ministry of Interior and Municipalities. The Financial Director provided us with the value of the Municipality's annual budget for 2019 to 2022, while we extracted the budget for 2017 and 2018 from the Municipality's website:

Year	Annual budget value
2017	850,000,000 LBP
2018	850,000,000 LBP
2019	750,000,000 LBP
2020	700,000,000 LBP
2021	600,000,000 LBP
2022	720,000,000 LBP

The following table represents the decrease in the number of procurement operations carried out by the Municipality from 2017 to 2021, which includes all types of concluded contracts:

Year	Procurement Operations Number
2017	162
2018	176
2019	189
2020	116
2021	132
TOTAL	775

As for the value of expenditures, the below table also indicates the stability in the Municipality's expenditures in the last five years:

Year	Expenditures Value*
2017	374,895,000 LBP
2018	293,494,000 LBP
2019	234,230,000 LBP
2020	166,389,000 LBP
2021	291,504,000 LBP

- The Financial Director declared that Batloun Municipality does not conduct tenders in coordination with the Public Procurement Management Administration because the amounts are not large enough, as they rely on the municipal law to conclude procurement operations, which relies on request for proposals and procurement by invoice.
- The Municipality conducted 6 public tenders (%0.77 of the 755 contracts concluded within 5 years) valued at 158,214,000 LBP: 5 tenders in 2017 and 1 in 2018, all of which were awarded to the lowest priced proposal provided that it fulfils the bidding document. Noting that all announced tenders acquired proposals, and none of the contracts' terms were modified before awarding.
- The average period between the date of bid opening and the date of contract awarding usually ranged between 1 and 3 months. Similarly, the period for paying dues to contractors/suppliers also ranged between 1 and 3 months from the date of providing the works, supplies or services to the Municipality.
- The Head of Municipality also stated that Jezzine Municipality includes a specialized unit to carry out public procurement operations consisting of 2 specialized employees. The Municipality does not issue annual reports including all procurement operations, but all related information are registered in a special record kept in a safe place.
- Moreover, the Municipality sets annual procurement plans that meet its needs in line with the required appropriations in its budget plan and its priorities, while relying on a clear study mechanism to evaluate and analyze its procurement needs and prepare market studies.

- The Municipality does not cooperate with experts and specialists from outside its offices to set bidding documents, or to evaluate proposals, accept supplies, services and implemented works, supervise the implementation of contracts or evaluate the services provided by winning bidders. The municipality is rather supported by a technical team consisting of a civil engineer.
- In addition, the Municipality did not assign an employee responsible for receiving and responding to requests for information or an employee responsible for communicating directly with bidders regarding procurement procedures. Noting that it does not conduct a periodic evaluation of its employees' performance.
- Noting that Batloun Municipality intends to execute certain services with resources available in the administration rather than purchasing them from external sources, and it has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities, nor awarded any of its projects to other administrations or municipalities, but it cooperated with "Al Arqoub and Al Harf Villages Development Association".
- Among the challenges facing the Municipality in implementing the new Public Procurement Law, we mention the shortage of human resources, i.e. the number of employees, as the Municipality currently includes only one municipal police and 2 municipal employees, in addition to the lack of financial capabilities due to the delay in distributing the allotments of the Independent Municipal Fund, which are no longer sufficient. It also suffers from shortage of knowledge and skills, as employees are in need of frequent training and skills development programs. The Municipality is also unable to financially aid the villagers who guard the town at night.
- The Municipality has set a risk management plan by creating a "risk management committee" for the village and an internal audit unit.
- Technically and logistically, a website for the Municipality is available and subject to the procedures that ensure the privacy and confidentiality of the provided information, as it has not been updated recently. Knowing that it provides the ability to download some information and documents in different formats (such as excel, word...), but upon trying to access it, the website was not secured.
- Batloun Municipality also computerize the official documents and publishes its documents on its website, the Official Gazette, local newspapers, and the administration's doors. However, the bidding documents are not available on the website, yet copies can be obtained from the Municipality.

The Municipality has not set a database of companies and contractors with whom it has previously cooperated since it did not require any works, noting that the former allegedly grants preference to products and services of national origin and mentions this matter within its bidding documents; however we could not confirm this allegation, for we had no access to any bidding document.

The Municipality has adopted several procurement policies, and although it conducted awarding on the basis of lots or groups, it was not able to encourage the participation of youth, small and medium-sized enterprises because the municipality's procurement is limited. Knowing that it strives to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure, in addition to allegedly adopting sustainable public procurement in order to reduce the environmental impact, which couldn't have been confirmed, also because we had no access to any of the bidding documents.

On the other hand, even after publishing the new Public Procurement Law in the Official Gazette, the employees did not learn on its provisions, and did not undergo mandatory training with Institut des Finances Basil Fuleihan.

The Head of Municipality stated that the Municipality has all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.

Criteria	Response
Surveyed entity's nature	Municipality
Subject to any guardianship authority	Yes Ministry of Interior and Municipalities
Conducting tenders in coordination with the Public Procurement Management Administration	No
Modifying the terms of a contract before awarding	No
The average interval between the date of opening bids and the date of contract awarding	Between 1 and 3 months
The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	Between 1 and 3 months

Department/unit/employees specialized in conducting public procurement	Yes
Organizing annual report mentioning all procurement operations	No
Keeping a public procurement procedures record	Yes
Mechanism to study, evaluate and analyze your procurement needs	Yes
Cooperating with experts and specialists from outside the administration	No
Employee specialized in public procurement	No
Employee responsible for the direct contact and communications with bidders regarding procurement procedures	Yes
Conducting a periodic evaluation of employees performance	No
Executing certain services with resources available at the administration	Yes
Conducting joint public procurements with other administrations or for other procuring entities	No
Awarding some projects to other administration	No
Challenges and shortages	Human resources Financial capabilities Knowledge & skills
Risk management plan	Yes
Internal audit unit	Yes
Computerization of files	Yes

Website availability	Yes
Database of companies and contractors with whom the administration previously cooperated	No
Granting preference to products and services of national origin	Yes
Awarding on the basis of lots and groups	No
Adopting sustainable public procurement in order to reduce the environmental impact	Yes
Informing employees of the Public Procurement Law provisions	No
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	No
The administration is equipped to film and document the bid opening sessions for electronic procurement	Yes



Saadnayel Municipality

On 17/06/2022, we visited Saadnayel Municipality and contacted the Town Clerk who informed us that the Municipality is subject to the guardianship authority of Bekaa Governorate and the Ministry of Interior and Municipalities. Additionally, the Financial Director provided us with the value of the Municipality's annual budget for the last five years, as detailed in the table below:

Year	Annual budget value
2019	3,000,000,000 LBP
2020	3,000,000,000 LBP
2021	3,000,000,000 LBP
2022	5,000,000,000 LBP

The following table represents the decrease in the number of procurement operations carried out by the Municipality from 2017 to 2021, which includes all types of concluded contracts:

Year	Procurement Operations Number
2017	1000 procurement operations and above
2018	1000 procurement operations and above
2019	1000 procurement operations and above
2020	200-999
2021	200-999

As for the value of expenditures, the below table also indicates the stability in the Municipality's expenditures in the last five years:

Year	Expenditures Value
2017	3,284,868,819 LBP
2018	852,903,333 LBP
2019	849,602,133 LBP
2020	735,663,960 LBP
2021	1,127,318,500 LBP

- The Town Clerk declared that Saadnayel Municipality did not conduct any public tenders over the last five years, therefore it did not coordinate with the Public Procurement Management Administration, for the authentication of procurement is subject to the Governor's approval in order to execute projects on its own. Knowing that the municipality decided on the procurement method in accordance with the Public Accountability Law.
- The average period between the date of bid opening and the date of contract awarding is usually less than a month. On the other hand, the period for paying dues to contractors/suppliers usually ranges between 1 and 3 months from the date of providing the works, supplies or services to the Municipality.
- The Town Clerk also stated that Jezzine Municipality includes a specialized unit to carry out public procurement operations consisting of the Procurement Committee. The Municipality does not issue annual reports including all procurement operations, and the related information are not registered in a special record.
- Moreover, the Municipality does not set annual or medium-term procurement plans, but relies on a clear study mechanism to evaluate and analyze its procurement needs and prepare market studies.
- The Municipality cooperates with experts and specialists from outside its offices to set the bidding documents, but relies on the capabilities of its employees to evaluate proposals, accept supplies, services and implemented works through the "Acceptance Committee", and to supervise the implementation of contracts and the services provided by winning bidders. However, the Municipality does not include a technical team.

- Noting that Saadnayel Municipality intends to execute certain services with resources available in the administration rather than purchasing them from external sources, and it has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities, nor awarded any of its projects to other administrations or municipalities.
- Among the challenges facing the Municipality in implementing the new Public Procurement Law, we mention the shortage of human resources; for the municipality only includes 20 employees, 4 waste trucks and 15 ambulances. In addition to lack of financial capabilities due to the delay in distributing the allotments of the Independent Municipal Fund, which are no longer sufficient.
The Municipality also suffers from the large number of refugee camps, as more than 100 tents are located within the municipality's borders, and the lack of fuel.
Further, it faces a shortage of knowledge and skills, as employees are in need of frequent training and skills development programs.
In terms of logistics, the municipality needs information and communications technology equipment.
- The Municipality did not set a risk management plan, but includes an internal audit unit.
- The Municipality does not have a website, but computerizes its official documents and publishes them in the Official Gazette, local newspapers, and on the administration's doors. Noting that copies of the bidding documents can be obtained at the Municipality.
- The Municipality has not set a database of companies and contractors with whom it has previously cooperated since it did not implement any public works, noting that the former claims to grant preference to products and services of national origin and mentions this matter within its bidding documents; however, we could not confirm these claims, for we had no access to any bidding document.
- The Municipality has adopted several procurement policies, including awarding on the basis of lots or groups, either to avoid the relevant authority's control or to encourage the participation of small and medium-sized enterprises by granting institutions from the town preference over others, while striving to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure. However the Municipality did not adopt sustainable public procurement in order to reduce the environmental impact.
- On the other hand, even after publishing the new Public Procurement Law in the Official Gazette, the municipal employees did not learn on its provisions and did not undergo mandatory training with Institut des Finances Basil Fuleihan.
- The Chief Treasurer stated that the Municipality does not have all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.

Criteria	Response
Surveyed entity's nature	Municipality
Subject to any guardianship authority	Yes Ministry of Interior and Municipalities
Conducting tenders in coordination with the Public Procurement Management Administration	No
Modifying the terms of a contract before awarding	No
The average interval between the date of opening bids and the date of contract awarding	Less than a month
The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	Between 1 and 3 months
Department/unit/employees specialized in conducting public procurement	Yes Procurement Authority
Organizing annual report mentioning all procurement operations	No
Keeping a public procurement procedures record	No
Mechanism to study, evaluate and analyze your procurement needs	Yes
Cooperating with experts and specialists from outside the administration	Yes Only to set bidding documents
Employee specialized in public procurement	No
Employee responsible for the direct contact and communications with bidders regarding procurement procedures	Yes The Head of Municipality and the Municipal Council members
Conducting a periodic evaluation of employees performance	No
Executing certain services with resources available at the administration	Yes

Conducting joint public procurements with other administrations or for other procuring entities	No
Awarding some projects to other administration	No
Challenges and shortages	Human resources Financial capabilities Logistic equipment Knowledge & skills
Risk management plan	No
Internal audit unit	Yes
Computerization of files	Yes
Website availability	No
Database of companies and contractors with whom the administration previously cooperated	No
Granting preference to products and services of national origin	Yes
Awarding on the basis of lots and groups	Yes
Adopting sustainable public procurement in order to reduce the environmental impact	No
Informing employees of the Public Procurement Law provisions	No
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	No
The administration is equipped to film and document the bid opening sessions for electronic procurement	No



Batroun Municipal Corporation

On 21/06/2022, we visited Batroun Municipal Corporation and contacted the Head of Accounting Department and the Head of Procurement Department, who informed us that the Municipal Corporation is subject to the guardianship authority of the Ministry of Interior and Municipalities. While the Head of the Accounting Department provided us with the value of the Corporation's annual budget, which recorded a significant decrease in the last year, as detailed in the table below:

Year	Annual budget value
2019	1,100,000,000 LBP
2020	1,100,000,000 LBP
2021	1,100,000,000 LBP
2022	9,000,000,000 LBP

The following table represents the decrease in the number of procurement operations carried out by the said Corporation from 2017 to 2021, which includes all types of concluded contracts:

Year	Procurement Operations Number
2017	200-999
2018	200-999
2019	200-999
2020	200-999
2021	200-999

As for the value of expenditures, the below table also indicates the stability in the Municipality's expenditures in t As for the value of expenditures, the below table indicates the decline in the Corporation's expenditures in 2021:

Year	Expenditures Value*
2017	958,437,000 LBP
2018	809,516,000 LBP
2019	856,251,000 LBP
2020	870,889,000 LBP
2021	The previous fiscal year's audit were not carried out

- The Head of Procurement Department confirmed that Batroun Municipal Corporation conducted 32 tenders at the value of 320,000,000 LBP from 2017 to 2021, of all which were awarded to the lowest priced proposal.
- Three announced tenders in 2017 and 2018 to which no proposals were submitted by any bidder, as well as 2 other tenders that were announced between 2019 and 2021, which were re-conducted and awarded. While no contracts' terms were modified.
- The average period between the date of bid opening and the date of contract awarding usually ranged between one and three months. On the other hand, the period for paying dues to contractors/suppliers ranges between 6 months and a year from the date of providing the works, supplies or services to the Corporation.
- The Head of Procurement Department also stated that the Corporation includes a "Procurement Committee" specialized in carrying out public procurement operations. The said Corporation issues annual reports including all procurement operations, but does not keep a special record including all related information.
- Moreover, the Corporation sets annual procurement plans that meet its needs in line with the required appropriations in its budget plan and its priorities, while relying on a clear study mechanism to evaluate and analyze its procurement needs and prepare market studies.
- The Corporation does not cooperate with experts and specialists from outside its offices to set bidding documents, or to evaluate proposals, accept supplies, services and implemented works, supervise the implementation of contracts or evaluate the services provided by winning bidders. The Corporation is rather supported by an engineering team consisting of 3 engineers and an administrator.

In addition, the said Municipal Corporation did not assign an employee responsible for receiving and responding to requests for information, nor an employee responsible for communicating directly with bidders regarding procurement procedures. The Corporation does not either conduct a periodic evaluation of its employees' performance.

Noting that Batroun Municipal Corporation intends to execute certain services with resources available in the administration rather than purchasing them from external sources, and it has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities, nor awarded any of its projects to other municipalities or administrations, but participated, through contributions, in the implementation of other municipalities' projects.

Among the challenges facing Batroun Municipal Corporation in implementing the new Public Procurement Law, we mention the shortage of human resources, i.e. the number of employees that has been reduced by half, noting that it currently only includes one policeman. In addition to the lack of financial capabilities due to the delay in distributing the allotments of the Independent Municipal Fund, which are no longer sufficient. As well as the employees transportation difficulty due to the low value of the allocated transportation allowance. The Head of the Accounting Department also stated that the Corporation faces logistic difficulties like the lack of information and communications technology equipment.

In addition, the Directorate has not set a risk management plan, but includes an internal audit unit to monitor and audit the expenditures.

Technically and logistically, the Corporation does not rely on computerizing its documents, but publishes them in the Official Gazette, local newspapers, and the District Administration's doors (Qaimaqamiya). Since the Corporation does not have a website, copies of the bidding documents can only be obtained from its Center.

The said Municipal Corporation does not set a database of companies and contractors with whom it has previously cooperated, noting that the former does not grant preference to products and services of national origin. However, it only cooperates with companies that have a financial number.

The Corporation has adopted several procurement policies, including awarding on the basis of lots or groups, either to avoid the relevant authority's control or to encourage the participation of small and medium-sized enterprises by encouraging the participation of companies located within its territories. It also strives to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure, in addition to allegedly adopting sustainable public procurement in order to reduce the environmental impact, the matter which we could not confirm, for we had no access to the bidding documents.

- On the other hand, even after publishing the new Public Procurement Law in the Official Gazette, some employees did not learn on its provisions and did not undergo mandatory training with Institut des Finances Basil Fuleihan.
- The Head of the Accounting Department stated that Batroun Municipal Corporation has all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.

Criteria	Response
Surveyed entity's nature	Municipality Corporation

Employee responsible for the direct contact and communications with bidders regarding procurement procedures	No
Conducting a periodic evaluation of employees performance	No
Conducting a periodic evaluation of employees performance	No
Executing certain services with resources available at the administration	Yes
Conducting joint public procurements with other administrations or for other procuring entities	No Offering contributions to implement projects for the Corporation's municipalities
Awarding some projects to other administration	No
Challenges and shortages	Human resources Financial capabilities Logistic equipment Knowledge & skills
Risk management plan	No
Internal audit unit	Yes
Computerization of files	No
Website availability	No
Database of companies and contractors with whom the administration previously cooperated	No
Granting preference to products and services of national origin	No Financial number
Awarding on the basis of lots and groups	Yes
Adopting sustainable public procurement in order to reduce the environmental impact	Yes
Informing employees of the Public Procurement Law provisions	No
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	No
The administration is equipped to film and document the bid opening sessions for electronic procurement	Yes



Al Buhaira Municipal Corporation

On 2022/07/04, we visited Al Buhaira Municipal Corporation and contacted the Head of Accounting and Procurement Department, who informed us that the Municipal Corporation is subject to the guardianship authority of the Ministry of Interior and Municipalities and provided us with the value of the Corporation's annual budget for 2019 and 2022, while we extracted the budget for 2017 and 2018 from the Municipal Corporation's website:

Year	Annual budget value
2017	3,450,000,000 LBP
2018	3,600,000,000 LBP
2019	3,446,200,000 LBP
2020	Not published
2021	3,590,000,000 LBP
2022 (estimated)	4,715,000,000 LBP

The following table represents the stability in the number of procurement operations carried out by the said Corporation from 2017 to 2021, which includes all types of concluded contracts:

Year	Procurement Operations Number
2017	200-999
2018	200-999
2019	200-999
2020	50-199
2021	50-199

As for the value of expenditures, the below table indicates the increase in the Corporation's expenditures in 2021:

Year	Expenditures Value
2017	1,698,282,000 LBP
2018	1,269,673,000 LBP
2019	1,303,119,000 LBP
2020	1,141,819,000 LBP
2021	2,099,433,000 LBP

- The Head of Al Buhaira Municipal Corporation confirmed that the Corporation did not coordinate with the Public Procurement Management Administration, it rather relies on awarding the procurement according to the lowest price. The Corporation conducted 1 public tender in 2018 but did not specify its value. Noting that no contracts' terms were modified over the five years before awarding.
- The average period between the date of bid opening and the date of contract awarding is usually less than a month. On the other hand, the period for paying dues to contractors/suppliers ranges between 3 and 6 months from the date of providing the works, supplies or services to the Corporation.
- The Head of Accounting and Procurement Department stated that the Corporation does not include a specialized unit or specialized employees to carry out public procurement operations. The said Corporation does not either set annual reports including all procurement operations or a special record including all related information.
- However, the Corporation sets annual procurement plans that meet its needs in line with the required appropriations in its budget plan and its priorities, without a clear study mechanism to evaluate and analyze its procurement needs and prepare market studies.
- The Corporation cooperates with experts and specialists from outside its offices to set bidding documents and evaluate proposals, but it relies on its employees to accept supplies, services and implemented works, supervise the implementation of contracts or evaluate the services provided by winning bidders. The Corporation is also supported by a technical team consisting of civil engineers and topographical engineering.

In addition, the said Municipal Corporation assigned an employee responsible for receiving and responding to requests for information, and an employee responsible for communicating directly with bidders regarding procurement procedures. The Corporation conducts a periodic evaluation of its employees' performance.

Noting that Batroun Municipal Corporation intends to execute certain services with resources available in the administration rather than purchasing them from external sources, and it conducted joint public procurement operations with other administrations or for the benefit of other procuring entities, but did not award any of its projects to another administration or municipality.

Among the challenges facing Batroun Municipal Corporation in implementing the new Public Procurement Law, we mention the shortage of human resources, as the number of employees is insufficient and they also lack the necessary expertise on applying the law. This is aside from the lack of revenues needed to hold additional courses and purchase equipment.

Further, the Directorate has not set a risk management plan, but includes an internal audit unit to monitor and audit the expenditures.

Technically and logistically, the Corporation relies on computerizing its documents and publishes them in the Official Gazette and local newspapers. However, bidding documents are not available on the website, but can be obtained from the Corporation's Center. Noting that a website for the Corporation is available and is subject to the procedures that ensure the privacy and confidentiality of the provided information, as it is regularly updated. Knowing that the website provides the ability to download some information and documents in different formats (such as excel, word...), but after trying to access it, we noticed that it is not secured.

The said Municipal Corporation does not set a database of companies and contractors with whom it has previously cooperated, but allegedly grants preference to products and services of national origin, and mentions this matter in the bidding documents; however, this claim could not be confirmed, for we had no access to the bidding documents.

The Corporation has adopted several procurement policies, including awarding on the basis of lots or groups, either to avoid the relevant authority's control or to encourage the participation of small and medium-sized enterprises through procurement by invoice, request for proposals and securing needs from several contractors to try to involve everyone in the procurement process.

The Head of the Accounting and Procurement Department also declared that most procurement operations are conducted with small and medium-size establishments, noting that the costs of most needs does not exceed the permissible limit for adopting the procurement by invoice. Therefore, the number of public tenders is limited and did not exceed %5 during the last five years.

- Knowing that the said Corporation strives to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure, in addition to allegedly adopting sustainable public procurement in order to reduce the environmental impact, the matter which has not been confirmed.
- On the other hand, after publishing the new Public Procurement Law in the Official Gazette, some employees learned its provisions and underwent mandatory training with Institut des Finances Basil Fuleihan.
- The Head of Al Buhaira Municipal Corporation indicated that the Corporation has all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.

Criteria	Response
Surveyed entity's nature	Municipal Corporation
Subject to any guardianship authority	Yes Ministry of Interior and Municipalities
Conducting tenders in coordination with the Public Procurement Management Administration	No
Modifying the terms of a contract before awarding	No
The average interval between the date of opening bids and the date of contract awarding	Less than a month
The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	Between 1 and 3 months
Department/unit/employees specialized in conducting public procurement	No
Organizing annual report mentioning all procurement operations	No
Keeping a public procurement procedures record	No
Mechanism to study, evaluate and analyze your procurement needs	No
Cooperating with experts and specialists from outside the administration	Yes To set bidding documents and evaluate proposals
Employee specialized in public procurement	Yes
Employee responsible for the direct contact and communications with bidders regarding procurement procedures	Yes

Conducting a periodic evaluation of employees performance	Yes
Executing certain services with resources available at the administration	No
Conducting joint public procurements with other administrations or for other procuring entities	Yes
Awarding some projects to other administration	No
Challenges and shortages	Human resources Knowledge & skills Financial capabilities Logistic equipment
Risk management plan	No
Internal audit unit	Yes
Computerization of files	Yes
Website availability	Yes
Database of companies and contractors with whom the administration previously cooperated	No
Granting preference to products and services of national origin	Yes
Awarding on the basis of lots and groups	Yes
Adopting sustainable public procurement in order to reduce the environmental impact	Yes
Informing employees of the Public Procurement Law provisions	Yes
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	No
The administration is equipped to film and document the bid opening sessions for electronic procurement	Yes



Chouf Souayjani Municipal Corporation

On 27/05/2022, we visited Chouf Souayjani Municipal Corporation and contacted the Head of the Municipal Corporation who informed us that the Municipal Corporation is subject to the guardianship authority of the Qaimaqam, the governor and the Ministry of Interior and Municipalities.

While the Head of Accounting Department provided us with the value of the Corporation's annual budget that witnessed an increase during the last year, as detailed in the table below:

Year	Annual budget value
2019	2,000,000,000 LBP
2020	2,000,000,000 LBP
2021	2,200,000,000 LBP
2022 (estimated)	2,200,000,000 LBP

The following table represents the stability in the number of procurement operations carried out by the said Corporation from 2017 to 2021, which includes all types of concluded contracts:

Year	Procurement Operations Number
2017	265
2018	266
2019	188
2020	291
2021	178
TOTAL	1,188

As for the value of expenditures, the below table indicates the decline in the Corporation's expenditures in 2021:

Year	Expenditures Value
2017	1,579,000,000 LBP
2018	1,634,000,000 LBP
2019	1,074,000,000 LBP
2020	1,100,000,000 LBP
2021	889,000,000 LBP

- The Head of Chouf Souayjani Municipal Corporation confirmed that the Corporation does not conduct tenders in coordination with the Public Procurement Management Administration because its budget is limited, and it rather complies with the Municipal Law and the Public Accountability Law.
- The Corporation did not conduct any public tenders. As per requests for proposals, it usually awards the lowest priced proposal, provided that it abides by the required characteristics set by the bidding document. Additionally, the Corporation did not amend the terms of any contract before its award.
- The average period between the date of bid opening and the date of contract awarding is usually less than a month. On the other hand, the period for paying dues to contractors/suppliers ranges between 6 months and a year from the date of providing the works, supplies or services to the Corporation, and which is divided as follows: %20 of the due amount shall be paid after the 1st stage, %50 after the 2nd and %30 after the acceptance.
- The Head of Procurement Department also stated that the Corporation includes a "Procurement Committee" specialized in carrying out public procurement operations. The said Corporation does not issue annual reports including all procurement operations, but keeps a special record including all related information.
- Moreover, the Corporation sets annual procurement plans that meet its needs in line with the required appropriations in its budget plan and its priorities, while relying on a clear study mechanism to evaluate and analyze its procurement needs and prepare market studies.

- The Corporation cooperates with experts and specialists from outside its offices to set bidding documents, evaluate proposals, accept supplies, services and implemented works, supervise the implementation of contracts or evaluate the services provided by winning bidders. The Corporation is also supported by a technical team consisting of the Corporation's employees.
- In addition, the said Municipal Corporation did not assign an employee responsible for receiving and responding to requests for information. On the contrary, it assigned an employee responsible for communicating directly with bidders regarding procurement procedures. The Corporation conducts a periodic evaluation of its employees' performance.
- Noting that Chouf Souayjani Municipal Corporation intends to execute certain services with resources available in the administration rather than purchasing them from external sources, and it has not conducted any joint public procurement operation with other administrations or for the benefit of other procuring entities, nor awarded any of its projects to other administrations or municipalities.
- Among the challenges facing Batroun Municipal Corporation in implementing the new Public Procurement Law, we mention the shortage of human resources, i.e. the number of employees, even though a Development Office was recently added.
- In addition, the Corporation lacks financial capabilities due to the delay in distributing the allotments of the Independent Municipal Fund, which are no longer sufficient. It also suffers from a shortage of knowledge and skills, as the employees need to undergo periodic training.
- The Head of the Municipal Corporation also pointed out the difficulty of dealing with companies within the region, since most of them do not have a financial number.
- In addition, the Corporation has set a risk management plan and an "Emergency Unit" has been formed to control fires, Covid19, solid waste and food security problems, etc. The Corporate also includes an internal audit unit, consisting of a Financial Committee, to monitor and audit the expenditures.
- Technically and logistically, the Corporation relies on computerizing its documents and publishes them in the Official Gazette and local newspapers, on the administration's doors and its Facebook page.
- Noting that a website for the Corporation was created but has not been activated, thus they are working on a new one that has not been launched yet. Therefore, the current website is not subject to the procedures that ensure the privacy and confidentiality of the provided information, as it is not updated and does not provide the ability to download information and documents in different formats (such as excel, word...), which was confirmed after checking the website.
Wherefore, copies of the bidding documents are not published on the website, but can rather be obtained from the Corporation's Center.

- The said Municipal Corporation sets a database of companies and contractors with whom it has previously cooperated, but allegedly grants preference to products and services of national origin, and mentions this matter in the bidding documents; however, this claim could not be confirmed, for we had no access to the bidding documents.
- The Corporation has adopted several procurement policies, including awarding on the basis of lots or groups. Either to avoid the relevant authority's control or to encourage the participation of youth, small and medium-sized enterprises located within the Corporation's territories.
- It also strives to achieve all economic and social goals to ensure a balance between potential public benefit and the best value from public expenditure, in addition to allegedly adopting sustainable public procurement in order to reduce the environmental impact, the matter which couldn't have been confirmed, for we had no access to the bidding documents.
- On the other hand, even after publishing the new Public Procurement Law in the Official Gazette, some employees did not learn on its provisions and did not undergo mandatory training with Institut des Finances Basil Fuleihan.
- The Head of the Municipal Corporation stated that the said Corporation has all the necessary equipment to film and document the bid opening sessions when the electronic procurement shall be decided to proceed.

Criteria	Response
Surveyed entity's nature	Municipal Corporation
Subject to any guardianship authority	Yes Qaimaqam Governorate Ministry of Interior and Municipalities
Conducting tenders in coordination with the Public Procurement Management Administration	No
Modifying the terms of a contract before awarding	No
The average interval between the date of opening bids and the date of contract awarding	Less than a month
The average period for fulfilling dues to the winning bidders/suppliers after accepting the works, supplies, and services	Between 6 months and a year

Department/unit/employees specialized in conducting public procurement	Yes Procurement Committee
Organizing annual report mentioning all procurement operations	No
Keeping a public procurement procedures record	Yes
Mechanism to study, evaluate and analyze your procurement needs	Yes
Cooperating with experts and specialists from outside the administration	Yes
Employee specialized in public procurement	No
Employee responsible for the direct contact and communications with bidders regarding procurement procedures	Yes
Conducting a periodic evaluation of employees performance	Yes
Executing certain services with resources available at the administration	Yes
Conducting joint public procurements with other administrations or for other procuring entities	No
Awarding some projects to other administration	No
Challenges and shortages	Human resources Knowledge & skills Financial capabilities Logistic equipment
Risk management plan	Yes
Internal audit unit	Yes Financial Committee
Computerization of files	Yes
Website availability	Yes Not Activated

Database of companies and contractors with whom the administration previously cooperated	No
Granting preference to products and services of national origin	Yes
Awarding on the basis of lots and groups	Yes
Adopting sustainable public procurement in order to reduce the environmental impact	Yes
Adopting sustainable public procurement in order to reduce the environmental impact	Yes
Informing employees of the Public Procurement Law provisions	No
Subjecting employees to mandatory training with Institut des Finances Basil Fuleihan	No
The administration is equipped to film and document the bid opening sessions for electronic procurement	No





Conclusion

One of the reasons that led to the weakening of the state's ability to manage and reform its financial system is the significant shortage of capabilities and competencies at all levels in the Lebanese administrations, in addition to the clear deterioration in the technological systems, the inefficiency of information management systems, the decline in the level of services, and the incompatibility of skills required in comparison with those available.

We also noticed that the administrations generally lack internal organization, especially regarding the employees, as most of them did not review the law despite its publication in the Official Gazette. Further, a large number of administrations did not subject their employees to mandatory training, either because of the time pressure, the lack of knowledge of the law's issuance, or because of transportation difficulties or poor Internet connection. Noting that the new Public Procurement Law stipulates that the Procurement and Acceptance committees shall be formed of properly trained employees in accordance with the provisions of said law.

One of the challenges facing the employees is the high fuel prices and the difficulty of transportation, therefore most of them were frequently absent. In addition to the open strike of employees, which paralyzed the work of administrations and the citizens transactions, and affected the movement of import and export.

As a result of the study, it was found that the administrations suffer from a significant weakness in computerization and archiving, and continuous power and internet outages, which impede their daily work and the public utility's functioning.

We also noticed that many administrations do not conduct their tenders in coordination with the Public Procurement Management Authority and do not include a specialized procurement unit nor staff.

Additionally to the shortage of human resources, the administrations also suffer from a significant lack of financial capabilities, especially after the fluctuation of the Dollar exchange rate against the Lebanese Pound.

Administrations also suffer from a lack of knowledge and skills, as they requested continuous training for their employees, and mentioned the lack of logistical equipment from information technology and other modern and advanced means that help complete their work easily and quickly.

Through this study, we found that many administrations do not have a website that allows access to all the required information or to publish tenders announcements or the bidding documents.

As a result of the great shortage of employees, some administrations have resorted to experts from outside their offices to cover the vacancy in order to complete tender stages: setting the bidding documents, evaluating services provided by the winning bidders, evaluating proposals, and supervising contract implementation.

We also noticed that many administrations do not adopt some development policies such as conducting an environmental impact assessment study, developing a risk management plan, granting preference to products of national origin, etc.

Noting that several administrations have adopted awarding on the basis of lots or groups, either to avoid the control of the authorities or to encourage the participation of small and medium-sized companies.

