

COVID-19 Africa Public Finance Response Monitor



Streamlining public procurement processes during COVID-19: Balancing efficiency and accountability



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Acronyms and abbreviations

Africa CDC	African Centres for Disease Control and Prevention
AMSP	Africa Medical Supplies Platform
ARMP	Regulatory Authority on Public Procurement (or the l’Autorité de Régulation des Marchés Publics du Sénégal)
AU	African Union
CABRI	Collaborative Africa Budget Reform Initiative
CSD	central supplier database
DMA	Disaster Management Act
EPG	emergency procurement guideline
IMF	International Monetary Fund
MFMA	Municipal Finance Management Act
OECD	Organisation for Economic Development
PFM	public financial management
PFMA	Public Finance Management Act
PPE	personal protective equipment
SCM	supply chain management
SIU	Special Investigating Unit
SMEs	small to medium-size enterprises
UNICEF	United Nations International Children’s Emergency Fund





Introduction



The COVID-19 pandemic placed governments worldwide under extreme procurement pressure to scramble and source COVID-19-related essential works, goods and services (Transparency International, 2020). Possibly only equivalent to the world wars in the twentieth century, the global nature of the pandemic, unlike previous emergencies, has meant increased competition between countries for the same supplies. The responses to the pandemic, notably lockdowns and confinement measures, have also put supply chains at risk (OECD, 2020). This resulted in sky-rocketing demand for certain works, goods and services, increasing the risk of fraud and corruption and undesirable practices like price gouging (Transparency International, 2020).

Africa has had recent experience with a viral epidemic in the form of the Ebola virus crisis in 2014 that impacted countries in West Africa, namely Sierra Leone, Liberia, Guinea and Nigeria (Dupuy & Divjak, 2015). Furthermore, Africa also has its share of political instability and civil unrest and, therefore, lessons learnt from the Ebola virus crisis have influenced emergency procurement requirements, as illustrated by the development of the African Union's (AU's) internal emergency procurement guidelines (EPGs) in 2018. However, the specific procurement pressure introduced by the COVID-19 pandemic, such as increased competition, has been further complicated by increased uncertainty (OECD, 2020). Consequently, COVID-19-related procurement has called for unprecedented emergency procurement processes.

It is within this context that many African governments were forced temporarily to amend their own public procurement rules for purchasing COVID-19-related works, goods and services. Procurement rules are critical to ensuring accountability as they include extensive checks and balances to ensure that the procurement process is properly followed

and the correct individual or organisation is awarded the contract. Therefore, the rules in place are stringent, with many levels of authorisation. This usually translates into a time-consuming process, but following all the steps and lengthy time periods may not be appropriate in an emergency. In emergency public procurement, the necessity for proper procurement process must be balanced against the requirement of urgency and the ability of governments to respond with speed to source the required goods and services.

This report provides a general overview of the emergency procurement measures implemented by African ministries of finance and procurement authorities in response to the COVID-19 crisis and evaluates those measures against considerations of accountability and transparency. It is critical that this balance is achieved because the emergency procurement process is very susceptible to corruption (Schultz, 2008). The report utilises data collected as part of the Collaborative Africa Budget Reform Initiative's (CABRI) COVID-19 Public Finance Response Monitor (PF Response Monitor) and contributes a big-picture analysis of how African public financial management (PFM) systems have fared during this crisis.

The data collected for the PF Response Monitor comes from a variety of sources, including budget documents, government press releases, international financing institutions' press releases, news articles, trackers and information provided by ministries of finance and health officials. Information sourced from news articles are cross-checked with official documents or information contained in the other trackers. A set of questions was disseminated to African ministries of finance to learn how they have used their PFM systems to reallocate resources, disburse, track and account for emergency

Many African governments were forced temporarily to amend their own public procurement rules for purchasing COVID-19-related works, goods and services.



expenditure, and ensure effectiveness and efficiency in spending. The emergency procurement-related questions are listed in Annexure 1.

The data collected by the PF Response Monitor has been supplemented by on-line research on emergency procurement and further exploration of the sources used in the PF Response Monitor. Additional and in-depth research was conducted for the case studies, including interviews with government and procurement officials. This has all been collated to present a comprehensive report that represents an overview of emergency procurement during the COVID-19 crisis.

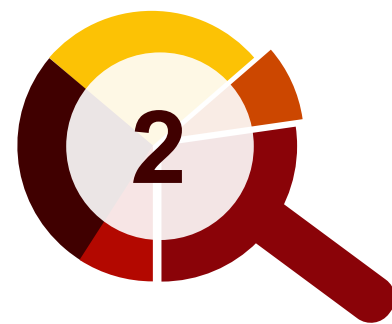
The report also looks at case studies of two African governments, Senegal and South Africa, and at the emergency procurement processes followed by the AU. These two countries were chosen because they represent differing procurement approaches, and the information was readily

available in order to compile a more in-depth case study. The AU emergency processes represent a unique continental approach and solution to the particular procurement challenges presented by COVID-19.

Not all of the data on emergency procurement processes was readily available and, therefore, the report acknowledges that there will be limitations in the completeness of the information presented. Furthermore, it may be premature to evaluate the implementation of the emergency procurement processes because the COVID-19 pandemic is ongoing and has not been subject to proper audit and review. However, the findings of this report contribute to the current discussions on policymaking for emergency procurement processes and provide high-level insights to African ministries of finance and procurement officials to improve their emergency procurement process.



Principles of emergency public procurement



Key public procurement principles include: (i) value for money; (ii) fairness and integrity; (iii) effective competition; (iv) transparency; and (v) accountability (AU Procurement Manual, 2016; Lynch, 2013). It is desirable that these principles of public procurement are adhered to as far as possible during emergencies, but it can be expected that they would have to be compromised in some ways to allow for urgent purchases.

Value for money is defined as the trade-off between price and performance that provides the greatest overall benefit under the specified evaluation criteria (AU Procurement Manual, 2016). Value for money is synonymous with 'economy' and 'efficiency' and can be demonstrated by comparison with market prices for the goods or services (Lynch, 2013). It is enabled by effective competition by applying the principles of fairness, integrity and transparency. Therefore, it is critical to ensure that there are enough suppliers, who are independent of each other and who are competing for the same opportunity under the same conditions (AU Procurement Manual, 2016). Arguably, value for money or economy is one of the public procurement principles that may be compromised as part of any emergency procurement process, due to the potential to contract directly and not engage in open bidding. Furthermore, the principle of value for money would have been more difficult to adhere to with respect to COVID-19-related purchases because of the competition for works, goods and services and price-gouging practices.

Transparency requires public procurement processes to be open to applications from all qualified organisations and individuals (Lynch, 2013). These measures could also be relaxed during emergency procurements with other procurement measures such as restricted or selective bidding, which limit the availability of solicitation documents to only those firms meeting certain qualifications. Further measures include the request for quotations (or shopping) and direct contracting (sole source) (Lynch, 2013; World Bank, 2015). A popular measure to counter the risks involved in altering the open competition stage of the bid process is the use of framework agreements and pre-existing suppliers. In these instances, it is assumed that the traditional procurement processes and supplier due diligence have already been followed; this reduces the risk of emergency procurement by utilising pre-approved suppliers (World Bank, 2015).

Transparency also means that the public should have access to public procurement information, although it is

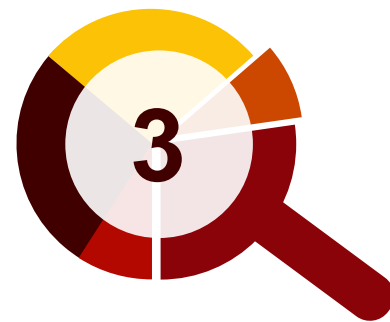
not an absolute requirement because some information would be regarded as confidential (Lynch, 2013). It seems that this measure is critical as an *ex post facto* measure after emergency procurement has occurred by publishing details of the awarded contract and audited financials of the expenditure, which ensures enhanced accountability.

Accountability in public procurement is also enabled by the segregation of duties and the appointment of separate officials to: (i) determine the procurement need; (ii) undertake the procurement; and (iii) effect the payment (AU Procurement Manual, 2016). This reduces the chance of collusion by having separate people in charge of the various stages of the procurement process. The segregation of duties and allocation of responsibilities should also hold the officers involved in the procurement accountable for their actions. During an emergency, the segregation of duties for different stages of the procurement process may be collapsed to allow for an expedited process. However, the payment of procurement is usually effected by a different department (finance) and it is expected that this segregation would be maintained. The use of emergency procurement procedures decreases the standard checks and balances and increases the risk of fraud and corruption within the procurement process (Transparency International, 2020). It could be expected that some procurement officials may be reluctant to take on the risk imposed by emergency procurement processes that would be subject to *ex-post facto* review.

Other key accountability principles include ensuring that funds are only used for the purposes they were entrusted (verification of the assets purchased) and that all transactions are properly authorised and are supported by written evidence (AU Procurement Manual, 2016; Lynch, 2013).

It is critical that in an emergency these public procurement principles are adhered to as far as possible, and that there is a fine balance achieved between the speed of procurement and ensuring transparency and accountability. This was evidenced in the procurement challenges associated with the Ebola virus outbreak identified by the Auditor General of Sierra Leone. In this instance, payments for supplies were duplicated and undocumented, funds were paid to private individuals rather than to organisations, taxes and healthcare worker salaries were not actually paid out as claimed, hazard pay was improperly provided to police and military personnel and procurement procedures were disregarded (Dupuy & Divjak, 2015).

African governments' emergency procurement responses during COVID-19



3.1 Emergency procurement processes

Procuring essential works, goods and services under emergency conditions is not a new concept for governments. Several countries worldwide have well-designed and tested rules relating to emergency procurement (OECD, 2020). These rules usually allow governments to negotiate directly with potential contractors, and include no prior publication requirements, no time limits, no minimum number of candidates to be consulted, and additional procedural requirements are also released, such as a shorter bid validity period, no requirement for bid security, lighter due diligence checks and electronic/virtual opening of bids (World Bank, 2020; OECD, 2020).

However, the particular circumstances of the COVID-19 pandemic have placed emergency procurement processes under extreme pressure by responding to unlimited demand against supply shortages for the same essential personal protective equipment (PPE) and medical supplies. This saw increased competition for these goods between countries and also sometimes between central governments and regional or local authorities. This also led to increased price volatility for goods and services, and undesirable practices such as price gouging (Open Contracting Partnership, 2020).

The responses of African finance ministries in the PF Response Monitor and the case studies indicated that their pre-existing procurement rules did allow for deviations providing for emergency procurement. However, many of the emergency procurement provisions do not seem to be comprehensive enough requiring the governments to issue further detailed notices for COVID-19-related emergency purchases. Furthermore, the emergency procurement measures had to go beyond any established emergency procurement rules to respond effectively to the particular procurement challenges associated with COVID-19-related purchases.

A recent World Bank survey stated that countries with a well-developed legislative framework for emergency procurement were better prepared to face the COVID-19 pandemic, having to introduce fewer amendments or new legislation. Past exposure to similar pandemics such as the Ebola virus pandemic represented opportunities to strengthen the readiness of public procurement systems (Cocciolo, et al.; World Bank, 2020). This was evident in the AU's development of their own internal emergency procurement guidelines from procurement lessons learned from the Ebola virus outbreak.

The emergency procurement measures (see Table 1) that were enacted by African governments include:

- Simplified contractual procurement procedures for Covid-19-related goods and services
- Pooled procurement at central level to ensure rapid delivery of goods and services
- Delegation of purchasing to subnational government or line ministries
- Sole-source contracts (or direct contracting).

Table 1 records the readily available information from African countries on their specific emergency procurement processes. Data on emergency purchases for countries are often not disclosed in open data formats or are only partially published (Open Contracting Partnership, 2020). The exclusion of a country from this table does not provide conclusive evidence that the measure has not been implemented, but rather that this information is not publicly available. It is possible that further information will be available once the emergency procurement processes applied for COVID-19 can be reviewed, and this should be added to further analysis on this topic.

Algeria, Angola, Cameroon, Chad, Comoros, Eswatini, The Gambia, Morocco and South Africa simplified and shortened the contractual procurement process for COVID-19-related goods, services and works. Benin, Cameroon, Gabon, The Gambia, Mozambique, the Seychelles, Sudan and Togo appointed special committees, units or ministries to focus on the COVID-19 procurement decisions and the allocation of resources.

Procurement processes could be pooled at a central level to ensure a co-ordinated approach and rapid delivery of goods or services. The alternative option is to decentralise procurement and delegate authority to regional areas to allow more relevant and usually more rapid decision-making in target areas. However, it seemed that the centralisation of procurement was the preferred method for COVID-19-related purchases for African countries including Ethiopia, Niger and South Africa. It is accepted that the benefits of centralised purchasing activities include economies of scale, lower transaction costs, stronger purchasing power and improved capacity and expertise (OECD, 2020). Arguably, the benefits of centralised purchasing became even more important in the context of COVID-19, which has seen unprecedented increased competition to purchase the same goods and services and practices such as price gouging.

Therefore, it would be undesirable to have different regions or departments within the same country competing against each other for limited goods and services, which may drive up the prices of those purchases. In addition, most of the COVID-19-related purchases for PPE and medical equipment were imported (Holland & Knight, 2020) and countries would have lost some of the benefits of using decentralised purchasing to buy from a local market. Furthermore, after discovering several incidents of corruption associated with a decentralised procurement system in respect of PPEs, South Africa advocated for centralising its procurement process

to reduce the risk of corruption and wasteful expenditure (Davis, 2020).

In addition to the procurement measures listed above, there was a group of measures linked to the payment aspect of the procurement process (see Table 2). These included:

- expedited supplier payment procedures
- retroactive financing
- no bid security
- advance payments
- direct payments on a case-by-case basis.

Table 1: COVID-19 emergency procurement processes in Africa

Country name	Simplified contractual procurement procedures for COVID-19-related goods and services	Pooled procurement at central level to ensure rapid delivery of goods and services	Delegation of purchasing to subnational government or line ministries	Sole source contracts/Direct contracting
Algeria	X			
Angola	X			
Cameroon	X			
Chad	X			
Comoros	X			
Eswatini	X			
Ethiopia		X	X	
Gambia	X	X		
Ghana				X
Kenya			X	
Malawi	X			
Morocco	X			
Mozambique				X
Niger		X		
Senegal	X	X		X
South Africa	X	X		

Table 2 records available information from African countries on their specific payment processes that facilitated emergency procurement. Again, the exclusion of a country from this table does not provide conclusive evidence that the measure has not been implemented, but rather that this information is not publicly available. It is possible that further information will be available after the emergency procurement processes applied for COVID-19 can be reviewed, and this should be added to further analysis on this topic.

To ensure rapid delivery of goods, there was an expedited supplier payment programme in countries such as Botswana, Gambia, Rwanda and South Africa, and advance payments in other countries such as Cabo Verde, Ethiopia and South Africa. These enhanced payment processes would have been necessary in COVID-19 procurement conditions where there was a demand to source suppliers because some suppliers would not even deliver goods or services until they were paid.

Table 2: COVID-19 emergency procurement processes relating to finance in Africa

Country name	Expedited supplier payment procedures	Retroactive financing	No bid security	Advance payments	Direct payments on case-by-case basis
Botswana	X				
Cabo Verde		X	X	X	X
Ethiopia				X	
Gabon	X				
Gambia	X				
Mali					X
Rwanda	X				
Senegal	X		X	X	X
South Africa				X	
South Sudan	X				
Zambia	X				

3.2 Transparency and accountability measures

The COVID-19 pandemic placed public procurement systems under extreme pressure, exposing the systems to integrity risks. Thus, a greater emphasis was placed worldwide on improving transparency and accountability related to emergency contracting (OECD, 2020). Furthermore, evidence from the Ebola epidemic illustrated that corruption played a key role in the outbreak, spread and slow containment of the virus, thereby highlighting the need to focus on transparency and accountability in the COVID-19 procurement process (United Nations, 2020).

A large majority of African countries received COVID-19-related funding from international organisations such as the International Monetary Fund (IMF) and World Bank.¹ African governments committed to stringent measures to ensure transparency and accountability of emergency procurement to reduce the risk of corruption and fraud as a condition for receiving such funding.

The transparency measures related to the publishing of procurement information (see Table 3) aim to allow public accountability for COVID-19-related spending. These have included publishing:

¹ It is reported that at least 33 African countries received some form of COVID-19-related financial assistance from the IMF Lending Tracker.

- COVID-19 procurement contracts above a minimum value
- Names and beneficial ownership of companies awarded contracts
- Bids and tender prices
- Expenditure reports.

Table 3 records readily available information from African countries on their specific transparency measures. This information was more readily available online because it was reflected in countries' commitments to receive funding for COVID-19 from organisations such as the IMF and World Bank. It is possible that further information will be available once the emergency procurement processes applied for COVID-19 can be reviewed, and should be added to further analysis on this topic.

Most African countries are committed to publishing information about the awarded procurement contracts on government websites as a measure of ensuring accountability. It was also a consistent practice in many countries including Djibouti, DRC and Mali that the publishing of contracts was linked to amounts above a certain threshold (for example, US\$100 000).

Governments have used e-procurement systems to increase transparency and efficiency in public procurement, providing free access to relevant stakeholders to procurement information and making authorities more accountable to the public. E-procurement systems allow for automation and standardisation of procedures throughout the entire procurement cycle, and reduce the time needed to perform tasks, thereby promoting efficiency (OECD, 2019). However, the adoption of e-procurement has been slow in Africa due to lack of capacity, information technology infrastructure and resistance to change of administrative processes (Anthony, 2018). The COVID-19 pandemic stimulated an escalation in the use of technology due to the particular circumstances of the COVID-19 virus, which required social distancing and remote working and, consequently, encouraged the trend towards increased use and development of e-procurement. African governments used pre-existing on-line portals or developed a COVID-19 dedicated on-line digital portal for publishing COVID-19 procurement information. For example:

- In Makueni County, Kenya, the county government has enhanced the Makueni Open Contracting Portal, which publishes data in Open Contracting Data Standard, to include Covid-19 procurement data. The county plans to tag all Covid-19 tender data in the system and to track and analyse these data to inform government decisions, and involve civil society and communities in the improvement of emergency procurement processes (Kilroy & Migwe-Kagume, 2020).
- In November 2020, the Ministry of Economy and Finance of Madagascar set up its digital platform for the reporting and publication of COVID-19-related revenue and expenditure. The portal includes the publication of the public contracts awarded for COVID-19-related purchases.

This trend toward e-procurement represents an opportunity for governments not only to enhance efficiency, transparency and accountability but also to use the data collected from the process to improve future procurement processes in general and particularly for emergency procurement.

The e-procurement systems provide a practical way to manage supplier information, which is critical in managing corruption risks. The e-procurement systems could, thus, flag information such as the existence of multi-purpose suppliers, the previous experience of firms, the types of goods and services they can deliver, and the identification of any conflicts of interest (Open Contracting Partnership, 2020). Furthermore, for whatever corruption is flagged, e-procurement systems should include measures that red-flag and retain such data. As a measure to ensure the integrity of supply chains in the future, beneficial ownership data would be required to ban suppliers implicated in COVID-19-related wrongdoing and this could be accommodated by e-procurement systems (Williams-Elegbe, S., 2020).

In addition to enhanced transparency measures, African governments have committed to several additional accountability and transparency measures (see Table 4) including:

- validating delivery of services and goods
- undertaking more frequent internal audits
- publishing COVID-19-specific reporting more frequently
- publishing expenditure report
- developing specific budget lines for COVID-19 reporting.

Table 4 records readily available information from African countries on their accountability measures applied to COVID-19 related procurement. This information was more readily available online because it was reflected in countries' commitments to receive funding for COVID-19 from organisations such as the IMF and World Bank. It is possible that further information will be available once the emergency procurement processes applied for COVID-19 can be reviewed, and should be added to further analysis on this topic.

Other measures captured in the PF Response Monitor include: passing of supplementary budgets or spending plans; the establishment of dedicated COVID-19 bank accounts at either central banks or commercial banks; and special supervisory committees for COVID-19 funding and expenditure.

Some African countries reduced accountability measures to speed up the procurement process, for example Congo and Côte d'Ivoire suspended tax audits, but this was not a general trend.

Table 3: COVID-19 emergency procurement transparency measures

Country name	Publishing of procurement contracts (those that exceed a certain threshold)	Publishing name of companies awarded contracts	Publishing beneficial ownership information of companies receiving contracts published	Publish bids and tenders and prices	Publish Expenditure Reports
Benin	X	X			
Botswana		X			
Cameroon	X		X		X
Chad	X		X		X
Comoros	X	X	X		X
Djibouti	X		X		
DRC	X		X		
Egypt	X	X	X		X
Eswatini	X	X	X		X
Ethiopia	X				
Gabon	X				X
Guinea	X	X	X		X
Lesotho	X	X	X		X
Liberia	X	X	X		X
Madagascar	X	X	X		X
Malawi	X	X	X	X	X
Mali	X	X	X		X
Mauritania	X	X	X		
Mozambique	X	X	X		X
Namibia					X
Nigeria	X	X	X	X	X
Rwanda	X	X		X	
São Tomé & Príncipe	X				X
Senegal		X		X	X
Seychelles	X	X	X	X	X
Sierra Leone	X	X	X		X
South Africa	X	X	X	X	X
South Sudan	X	X	X		X
Uganda	X	X	X		X
Zambia					X

Table 4: COVID-19 emergency procurement accountability measures

Country name	Validate delivery of products and services	Separate COVID-19 account or fund to track spending	Increased internal audits	Specific COVID-19 external audits
Burkina Faso	X			
Burundi				X
Cameroon		X		X
CAR				X
Chad		X		
Comoros		X		X
Congo		X	X	X
Djibouti				X
DRC				X
Egypt	X			
Eswatini	X	X	X	X
Ethiopia				X
Gabon	X	X	X	X
Gambia			X	X
Guinea	X	X	X	X
Kenya				X
Lesotho	X		X	X
Liberia	X			X
Madagascar	X			X
Malawi	X			X
Mali	X	X		
Mauritania	X			
Morocco		X		
Mozambique	X			X
Nigeria		X	X	X
Rwanda				X
São Tomé & Príncipe	X			X
Senegal		X		X
Seychelles				X
Sierra Leone	X			X
South Africa	X	X	X	X
South Sudan	X			X
Tanzania				X
Uganda	X	X		X

The use of COVID-19-specific external audits was identified as the most popular accountability measure to audit COVID-19 specific spending.² However, if this process is conducted only at the end of the COVID-19 crisis, then governments may lose crucial insights enabling adjustments to be made during an ongoing crisis. Arguably, the use of increased internal audits, which are traditionally shorter than external audits, could be an effective measure in implementing more timely adjustments. Accountability measures and reviews of the procurement process should be conducted at an earlier stage than at the end of the emergency to allow for corrections to be made to the procurement process during the emergency (Williams-Elegbe, 2020). The timing of the accountability measures would have to reflect the length of the crisis, as some emergencies could be short term such as civil conflicts, while others, like pandemics, lend themselves to longer time periods.

Another accountability measure adopted by several African countries was the use of a separate COVID-19 fund to create a clearly defined audit trail, but there were other objectives identified through the use of these funds. These included the need to (i) centralise procurement; (ii) raise and pool together public and private resources, which standard budget practices may not allow; and (iii) shorten the steps in the budgeting, spending or procurement processes to respond to the emergency (Allen et al., 2020). While extra-budgetary funds have been utilised previously by African governments, their use became a popular measure to respond to the specific challenges of the COVID-19 crisis, requiring emergency procurement processes while developing enhanced accountability measures for the funds. However, in practice, the reverse has often been found to be true, and extra-budgetary funds have also attracted financial mismanagement with limited accountability (Allen et al., 2020). It is regarded as premature to properly evaluate the use of these funds during the COVID-19 pandemic, and this should be re-evaluated later (Allen et al., 2020).

Despite all these transparency and accountability measures, there were still instances of alleged corruption reported in the news in respect of the COVID-19 emergency procurement processes in Botswana, DRC, Lesotho, Mauritius, Mozambique, Namibia, South Africa, Zimbabwe (Heywood et al. Daily Maverick, 2020) and Senegal (Baudin et al., 2020). For example, the Ministry of Industrialisation, Trade and SME Development of Namibia identified small to medium-size enterprises (SMEs) across the country to make masks on behalf of the government of Namibia. However, the Market Namibia Tender Bulletin later reported that the ministry did not issue a public tender for the procurement of suitable materials for mask production. No information was available on where the ministry had acquired the material that was distributed to mask-makers, but it was reported that the material was valued at N\$40 000 (US\$2 400). According to the Procurement Tracker Namibia, the masks were to be provided for between N\$15 (US\$0.91) and N\$25 (US\$1.51), but the price had been increased drastically by some of the state-sponsored mask manufacturers, resulting in a public uproar. Mask-makers, however, claimed that the material provided by the government was not of good quality and that they had to buy better fabric, which pushed up the price of masks. In May 2020, Lesotho's National Emergency Command Centre, comprising various government ministries and departments, and which is charged with spearheading the fight against Covid-19, was accused of misusing public funds meant to fight the virus. According to the *Lesotho Times*, a leaked budget revealed corrupt procurement plans regarding a non-contact thermometer.

The number of instances of alleged corruption for COVID-19-related emergency procurement in Africa bring into question the efficacy of the transparency and accountability measures targeted at reducing the risk of corruption in emergency procurement processes.

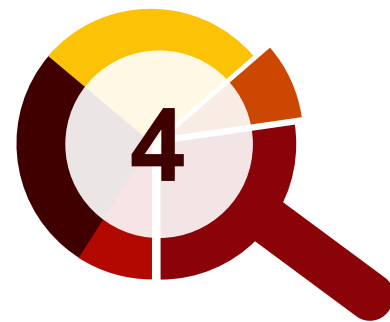
The number of instances of alleged corruption for COVID-19-related emergency procurement in Africa bring into question the efficacy of the transparency and accountability measures targeted at reducing the risk of corruption in emergency procurement processes.

² At least 33 African countries have made reference to COVID-19-specific external audits.

Policy insights for the emergency procurement process

- The procurement measures implemented in many African countries seemed to be based on the current PFM laws and regulations and were adapted as required to retain the principles of public procurement as far as possible. This was as opposed to having pre-existing comprehensive emergency procurement provisions, which would have aided better preparedness for the COVID-19-related purchases.
- Consistent principles followed by countries included the shortening of procurement timelines and the establishment of a separate team or committee to enable emergency procurement decisions.
- The centralisation of procurement measures was more popular than the delegation of procurement authority. This conforms to the particular challenges of COVID-19-related procurement with increased competition for limited works, goods and services. Centralising purchasing would be an effective measure to reduce competition within a particular country. It was also cited by South Africa as a measure to reduce corruption.
- Expedited payment processes would be necessary where there are supply shortages to be able to effectively compete against other countries.
- The digitisation of the procurement process or e-procurement is a measure that can be implemented to speed up the procurement process during emergency situations and can also enhance transparency measures by making the information more widely accessible.
- Another accountability measure would be to utilise the information on the beneficial ownership of procurement contract awardees to ban or suspend those that had transgressed previous procurement processes from future procurement awards. The proper data management of this information facilitated through e-procurement would be critical for future application.
- There is a greater emphasis on transparency and accountability measures *ex-post facto*. This is where governments could validate expenditure and conduct COVID-19 specific external audits. Due to the high levels of corruption associated with the COVID-19 procurement, the efficacy of the transparency and accountability measures should be reviewed. One of the insights was that the accountability measures utilised only after the emergency has been resolved may not achieve the desired outcome, and should be implemented at an earlier stage to make adjustments during the emergency. This is particularly appropriate for long-term emergencies such as pandemics.
- Therefore, in addition to COVID-19 external audits, governments should increase internal audits as an enhanced accountability measure to be able to make the necessary adjustments to emergency procurement processes during an ongoing crisis.
- The use of separate funds for COVID-19 funding has been another popular measure utilised by African governments to fast-track procurement processes and provide enhanced accountability. However, there is debate about whether the use of extra-budgetary funds is susceptible to corruption. These funds should be subject to rigorous transparency and accountability measures, and the efficacy of these funds should be further reviewed after the pandemic.

Case studies: Emergency procurement during COVID-19



4.1 Senegal

4.1.1 Emergency procurement processes and rules

The President of Senegal issued a special decree, Decree No. 2020-781 of 18 March 2020, which excluded COVID-19-related work, goods and services from the pre-existing Public Procurement Code. On this basis, contracting authorities could rely on direct acquisitions without following the formal procurement processes. However, despite the adoption of this decree, some contracting authorities continued to rely on the advice of the Regulatory Authority on Public Procurement, or the l'Autorité de Régulation des Marchés Publics du Sénégal (ARMP), before beginning to contract for COVID-19 related procurement. This meant that the Senegalese procurement officials would still follow the traditional tender processes for emergency contracting. The direct acquisition process would have increased the procurement risk and may have caused reluctance amongst procurement officials to follow that process. Instead, they sought reassurance from the ARMP. If the procurement officials had a more comprehensive and detailed set of emergency procurement procedures to follow, they might have been more confident about following those procedures.

The special decree was also seen as a duplication of the emergency procurement measures available under Article 76 of the Public Procurement Code,³ which allows for direct contracting in the event of a pressing (i.e. an unpredictable and extreme) emergency, such as the COVID-19 pandemic.

A new COVID-19 committee has been set up to co-ordinate the COVID-19 operations response. The committee, which has a broad composition, includes key ministries (economy and finance, budget, health, etc.), representatives of the national assembly, subnational authorities, civil society, etc.⁴ The committee retains the ability to refer the matter to the ARMP.

Senegal, like several other Francophone countries, including Cameroon, Comoros, Congo, Gabon and Guinea, has established special earmarked accounts, *comptes d'affectation spéciale*, for COVID-19-related procurement.

On the revenue side, these accounts are meant to be funded primarily from resources outside the state budget, such as donations from individuals and firms and donor grants. On the spending side, they are usually subject to simplified, lighter-than-usual authorisation procedures for COVID-19-related procurement, but still managed by the Treasury.

A suggested improvement to the current emergency procurement system was a specific manual of procedures or codes that have been adapted for the health care system (Samba, 2021).

4.1.2 Implementation of the emergency procurement provisions

The administrative doctrine of the ARMP has been to support the contracting authorities in making acquisitions in a speedy manner while preserving the principles of transparency and competitiveness. Senegal adopted a case-by-case method to applying procurement decisions. Therefore, in some cases, such as the purchase of rice,⁵ although direct purchase systems were encouraged as part of the COVID-19 procurement process, the standard procurement process, which included competitive bidding, were followed. The prevailing view was that even though direct purchases were allowed, competitive bidding would support the value-for-money principle.

There were allegations in the news of irregularities in the Senegalese government's response plan in awarding contracts. Civil society organisations have also sounded the alarm, pleading for more transparency. But the government of Senegal and the companies cited in the particular case have denied any possibility of fraud or collusion (Baudin et al., 2020).

4.1.3 Transparency and accountability measures

All contracting authorities are required to report on action and public procurement processes undertaken with regard to COVID-19. The ARMP audits these steps (with the ability to appeal to external auditors) but the oversight bodies such as the Court of Auditors and the General Inspectorate retain their ability to audit. Senegal also launched the

³ Article 76 of the Public Procurement Code, 2014 version, has the terms of direct agreement. Subsection 1.b states that there can only be a direct agreement to proceed provided that supplies, services or work are required as a result of an unforeseen circumstance beyond the parties' control

⁴ More details on the composition of this committee can be found at: <https://www.sec.gouv.sn/d%C3%A9cret-n%C2%B0-2020-965-portant-cr%C3%A9ation-et-fixant-les-r%C3%A8gles-d'organisation-et-de-fonctionnement-du>

⁵ As part of the Covid-19 response and support to the economy, Senegal distributed 100 000 tons of miscellaneous food to one million households, or 8 million Senegalese, across the country.

procedure for the recruitment of audit firms for the audit of the contracting authorities to reveal any irregularities in the COVID-19 procurement process. On 30 October 2020, Senegal published a special report on the Force- COVID-19 fund, outlining expenditure and revenue flows from and to the fund since its inception (PF Response Monitor).

4.2 South Africa

4.2.1 Emergency procurement processes and rules

In March 2020, regulations for the South Africa's Disaster Management Act 57 of 2002 (DMA) were enacted, which stipulated that emergency procurement for institutions is still subject to the Public Finance Management Act, 1999 (PFMA) and the Municipal Finance Management Act, 2003 (MFMA) (South African National Treasury Instruction No. 05 of 2020/21).

There are two options available for emergency procurement in South Africa: (i) the emergency procurement method; and (ii) procurement based on urgency which makes it impractical to issue an open competitive bid (Corruption Watch Letter, 2021, paragraph 9.1). Previous law enacted by National Treasury allowed deviation from the standard procurement processes, such as competitive bids, only in cases of emergency and sole-supplier status. Deviation is allowed in situations that pose immediate risk to health, life, property or environment and where it is impractical to invite competitive bids. The reasons for the deviation must be recorded and approved by the appropriate accounting officer (South African National Treasury Instruction No. 05 of 2020/21). Any other deviation will be allowed in exceptional circumstances subject to prior written approval from the relevant treasury (Corruption Watch Letter, 2021, paragraph 9.1).

The emergency procurement regulations require that all purchases of more than R1 million include a report on the goods and services, names of suppliers and reasons for dispensing with the competitive bidding process. In addition, the threshold requirements for COVID-19-related works, goods and services to contain or minimise the effects of the disaster have been increased to allow purchase without National Treasury approval (South African National Treasury Instruction No. 05 of 2020/21).

Maximum prices for PPE and cloth masks were set by National Treasury to reflect realistic market prices (South African National Treasury Instruction No. 05 of 2020/21).

On 30 March 2020, the Minister of Finance issued a conditional exemption notice under the MFMA to ensure effective and efficient service delivery and to minimise any potential delay in decision-making. National Treasury also issued an Instruction Note 8 of 2019/20 applicable to PFMA institutions and a MFMA Circular 100 for municipalities and

municipal entities, to speed up the procurement of goods/commodities required to reduce and control the spread of the virus. This is in support of effective and efficient service delivery and to curb the possible abuse of supply chain management (SCM) systems. The instruction note and the circular also list prices of goods/commodities to try to control against price gouging.

On 30 June 2020, the South African government established the following strategies for COVID-19 PPE product procurements: (i) all PPE products will be centrally procured, warehoused and distributed for the public sector; (ii) through the Solidarity Fund up-front credit will be provided in order to pay suppliers for bulk orders and ensure sustained liquidity; and (iii) all government institutions are ordered to pay central implementer agents within ten days in order for these agents to recover the working capital advancements and to refund the Solidarity Fund (PF Response Monitor).

In terms of the worldwide scramble for procurement of the COVID-19 vaccines, the chief procurement officer advised the Department of Health on the procurement procedures to be followed where it is impractical to follow a competitive bidding process in-line with the public procurement rules (Corruption Watch Letter, 2021, paragraph 8). The Department of Health was advised to seek approval from the National Treasury on a case-by-case basis to deviate from standard procurement processes based on urgency which makes it impractical to invite competitive bids (Corruption Watch Letter, 2021, para. 9.1). This type of limited approval illustrates the level of oversight that the National Treasury intends to exercise over the procurement process for COVID-19-related expenditure. Each type of procurement would have to be specifically authorised by the National Treasury to deviate from the public procurement regulations.

The current procurement processes remain in place and will be kept central in respect of the purchase of the COVID-19 vaccines in 2021. This is to allow for comprehensive central control of procurement. This approach is intended to minimise opportunity for corruption, provide for central record-keeping of agreements and centralised contact with manufacturers. It also allows for a more focused negotiation strategy with combined volumes for public and private health care practises (Corruption Watch Letter, 2021, para. 9.5).

The Department of Health also had to request for deviation from the procurement processes for the transport, storage and distribution for COVID-19 vaccines for the short term. These departures included a single-source procurement method and a closed bid for four storage providers to store and distribute vaccines for a period of six months. The motivation for the deviation was based on urgency to ensure the vaccine reached frontline workers (Corruption Watch Letter, 2021, para. 9.4). In the long term, this procurement process would be open to competitive bidding.

4.2.2 Implementation of the emergency procurement provisions

In August 2020, the Special Investigating Unit (SIU) of South Africa announced a probe into allegations of corruption involving the R500-billion relief fund. At least 90 businesses are suspected of setting up corrupt contracts with the health department. One deal, reportedly worth around R125 million, relates to a company called Royal Bhaca supplying the government PPE in Gauteng. It charged more than four times the regular price. In another corrupt deal, after inflating face mask prices by up to 900%, companies Sicuro Safety and Hennox Supplies admitted guilt and were fined (PF Response Monitor).

These instances of corruption associated with COVID-19 procurement questioned the method of deviation from the current procurement processes. It also led to the focus on centralising procurement of PPE and COVID-19 vaccines as a measure to counter potential corruption.

4.2.3 Transparency and accountability measures

The following transparency and accountability measures were implemented as part of the regulations to the DMA in March 2020:

- Internal system for financial control, risk management and reporting to account for the funds used for COVID-19
- Ensure the officials committing any expenditure are duly authorised or properly delegated
- Increase internal audit functions to conduct audit checks to proactively detect and prevent irregularities
- Regular monitoring of expenditure and generating frequent expenditure reports (South African National Treasury Instruction No. 05 of 2020/21).

To give effect to the strict monitoring and reporting measures required during times of emergency procurement, a new instruction note and circular was issued in May 2020 for COVID-19 emergency procurement, to open the supply of these products to all suppliers conforming to specifications and are registered on the central supplier database of the government. The instruction note and circular sets out the required PPE item specifications, the maximum prices at which the government will procure these PPE items, and outlines the emergency procurement, monitoring and reporting requirements (PF Response Monitor).

In July 2020, the South African government received financial assistance from the IMF for COVID-19-related procurements and, accordingly, made several commitments to the IMF. The South African government will publish COVID-19 public procurement contracts, validate delivery of products and services, publish beneficial ownership information of companies receiving COVID-19 procurement contracts, conduct COVID-19 specific audit and publish results and

publish COVID-19 expenditure reports (PF Response Monitor).

In October 2020, special templates were created to report expenditures related to COVID-19 and a new category was added to the standard chart of accounts (PF Response Monitor).

Public procurement of COVID-19 vaccines would be subject to the same monitoring and oversight as all public procurement and expenditure. The only enhanced measure for COVID-19 vaccine procurement is the engagement of the Auditor-General to conduct real-time audits on the procurement of the COVID-19 vaccines (Corruption Watch Letter, 2021, para. 9.6). In the light of widespread corruption allegations targeted at the PPE procurement process, it is questionable whether there is an overreliance on the monitoring and oversight mechanisms of the current process and the timely review of the Auditor-General.

4.3 The African Union

4.3.1 Emergency procurement processes and rules

The AU has recognised the need to adjust its standard procurement policy for emergency situations, as reflected in its own internal EPGs that were developed with the benefit of insight from previous pandemics such as the Ebola virus outbreak.⁶

The EPGs aim to balance the need to facilitate a rapid and effective response, on the one hand, and the general public procurement principles, on the other. The EPGs require an assessment of the specific requirements for the emergency, the identification of associated risks that may undermine efficient procurement measures and the development of mitigation measures.

One of the key principles outlined in the EPGs is the consideration of the following alternative sources of goods, services and works before the full emergency procurement measures are enacted:

- Existing stocks from AU or neighbours
- Existing supplier framework agreements (purchase orders can be issued directly to the pre-existing suppliers and, ideally, regardless of an emergency, these should be in place for a 3-year option as an alternative)
- Procurement directly from UN or specialised agencies
- Direct contracting of previously used local or regional suppliers.

The emergency procurement methods in the EPGs still retain an element of flexibility to be adapted to each individual emergency but would be subject to justifications for departure from the guidelines.

⁶ This information was provided by an African Union official.

4.3.2 Implementation of the emergency procurement provisions

The AU established the Africa Centres for Disease Control and Prevention (Africa CDC) in 2017 as a direct response to lessons learnt from the Ebola virus outbreak of 2014–2016. The rapid spread of the virus required a more timely and co-ordinated response from the AU and, therefore, encouraged the formation of a specific unit to deal with future virus outbreaks (Kalanado & Manlan, 2020). The AU, through the Africa CDC, established the 'Africa Joint Continental Strategy for COVID-19 Outbreak', which included the objective of SCM by establishing a supply chain for shared resources including PPE, laboratory supplies and medical countermeasures. A working group for supply chains and the stockpiling of medical commodities was formed with the following deliverables:

- Work with existing supply chain systems to develop functioning regional laboratory referral networks to help countries without diagnostic capacity to find a suitable, timely option for testing
- Build and manage relationships with reliable manufacturers, and connect member states who either have depleted stockpiles or who are anticipating meaningful needs given positive cases
- Build out a stockpile and manage supply chains for shared continental resources such as PPE, laboratory supplies and equipment, and, if necessary, medical countermeasures.⁷

The Africa CDC also launched the Africa Medical Supplies Platform (AMSP)⁸ in partnership with the African Export-Import Bank, as a pooled procurement portal to facilitate country procurement of critical medical and laboratory supplies from certified suppliers. The single-source platform enables faster, more transparent and cost-effective access to COVID-19 supplies on an equitable basis to all 55 member states. In January 2021, the AMSP commenced with the COVID-19 vaccines pre-order programme for AU member states. To support vaccination operations, the AMSP has also launched a new category on vaccine accessories, which will help member states to procure products such as ultra-low temperature freezers, PPE, cotton-wool rolls, syringes and needles.⁹

The African Union applied its own internal emergency procurement guidelines for COVID-19-related procurement.

Initially, it tried to use traditional emergency procurement methods such as shortened bid processes and direct contacting of suppliers. However, it found that it was unable to source appropriate suppliers due to the procurement challenges of lack of supply and increased prices as part of the COVID-19 pandemic. Therefore, for PPE and other COVID-19-related items, the African Union was able to use UNICEF for procurement and the UN food programme for distribution services. Contracting with UN agencies directly is allowed as an option for emergency procurement in terms of the AU's own EPG. UNICEF has pre-existing contractual arrangements or framework agreements with suppliers for specific emergency products and had already ensured that they were able to provide these COVID-19 related products. However, the emergency procurement measures, including contracting with UN agencies were only implemented while the procurement of the products represented an emergency. Due to the long-term and ongoing nature of the COVID-19 pandemic, the AU has been able to revert to its traditional procurement processes including for the purchase of COVID-19-related products. It was important for the AU to follow the traditional procurement processes where it was practical to do so in order to adhere to their procurement guidelines.¹⁰

4.3.3 Transparency and accountability measures

The AU acknowledged that the emergency procurement operations would require a high level of scrutiny due to the high expenditure rate and profile. Therefore, throughout the procurement, complete documentation of the procurement process had to be maintained in accordance with the AU's standard procurement processes. The AU also implemented enhanced reporting requirements, with reports to be submitted three months after the end of the emergency situation and such reports to be audited internally.¹¹

In addition to the accountability measures available, the AU chairperson appointed a board of trustees specifically for the COVID-19 response fund. They provide oversight to the fund's disbursement (African Union, 2020). Furthermore, a procurement plan and budget were developed for COVID-19-related items, which was approved by the accounting officer of the AU.¹²

⁷ African Union Joint Continental Strategy for COVID-19 Outbreak.

⁸ Available to view on: www.AMSP.africa.

⁹ <https://www.africanews.com/2021/01/19/africa-medical-supplies-platform-amp-opens-covid-19-vaccines-pre-orders-for-55-african-union-member-states/>

¹⁰ This information was provided by an African Union official.

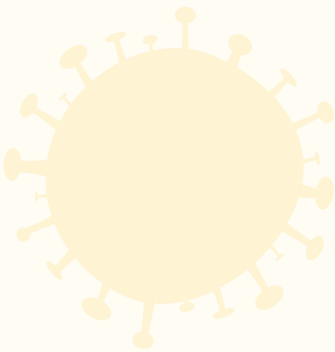
¹¹ African Union Official.

¹² African Union Official.

Policy insights for the emergency procurement process

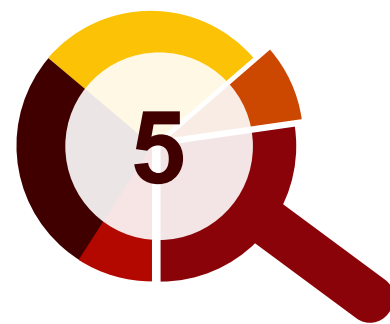
- The pre-existing procurement rules in Senegal and South Africa had sufficient scope to apply emergency procurement principles to the emergency situation of the COVID-19 pandemic. In addition to that, however, new regulations and notices were enacted in order to respond to the particular procurement requirements of this emergency.
- Despite setting up separate protocols for emergency procurement practices including direct contracting, the Senegalese government still relied on their pre-existing procurement practises such as competitive bidding as advised by the AMRP. This illustrated the potential reluctance of procurement officials to follow the emergency procurement processes due to the inherent risks in the processes. A point to consider is if the emergency procurement process had been outlined in greater detail before the crisis whether it would have been followed more closely.
- South Africa had to apply for deviations from the public procurement process on a case-by-case basis. This may have slowed down operations but ensured that the National Treasury maintained a degree of oversight.
- As indicated by both Senegal and South Africa, a centralised procurement process was utilised in many cases to co-ordinate procurement for both public and private purchase for COVID-19-related items such as COVID-19 vaccines. This was deemed to be an effective measure to decrease internal country competition for the same goods and to decrease the potential for corruption.
- In terms of the lessons learned from Senegal, it is critical to create specific codes for the response-plan expenditure. To have a COVID-19 response plan with its own coding system allows the relevant expenditure to be isolated at any time, for refund and audit purposes.
- A significant focus of the South African government's approach was to mitigate against the risk of price gouging on essential goods (such as PPE) by fixing the price on these goods to minimise the potential for abuse.
- Despite a number of transparency and accountability measures, both Senegal and South Africa have had reported instances of corruption. It seems that most of the measures were introduced after the fact, once the damage had already been done.
- Despite widespread allegations of corruption in the procurement of PPE, South Africa also seemed to still be relying on its pre-existing procurement accountability measures to review the new COVID-19 vaccines procurement. It is questionable whether there should be a greater degree of flexibility in the monitoring and oversight mechanisms when potential issues have already been identified.
- In addition to pre-existing public procurement legislation and regulations, it may be useful to have emergency procurement protocols such as the AU's EPG to serve as guidance in these types of situations. The protocols, however, still have to be flexible to adapt to the specifics of the emergency situation. However, having a comprehensive set of emergency procurement guidelines that has been developed in advance was proven to help the ability respond to the crisis.
- A number of African countries reported simplified and shortened contractual procurement processes for COVID-19 related goods, services and works, and others appointed special committees, units or ministries to focus on the COVID-19 procurement decisions and the allocation of resources. Both of these approaches would be consistent with measures implemented in terms of the AU EPGs.

- The AU's development of the on-line AMSP platform is a critical approach to centralise procurement on a continental level for a scarce resource such as COVID-19 vaccines. It is a trend that may become increasingly important for the procurement of essential goods and services that are in short supply on a global scale.
- The difficulties that the AU initially experienced using some of its own emergency procurement processes should be subject to further review and amendment of processes.
- Due to the success of using UN agencies' framework agreements, the AU should develop its own framework agreements with the emergency suppliers so that it is less dependent on the UN agencies for procurement. UN agencies would charge an additional price on top of the manufacturer's price for the sourcing of the required emergency procurement goods, works and services. The preapproval of the suppliers would reassure the AU that the required due diligence of the suppliers had already been conducted. This is an approach that could be followed by African governments.
- The experience of the AU also highlights that the emergency procurement processes may not be followed throughout the existence of the 'emergency'. Once the demand and lack of supply of PPE equipment dropped, the AU was able to follow its standard procurement processes.
- The AU developed enhanced accountability measures for its COVID-19-related procurement, including the appointment of a board of trustees for oversight, and increased reporting mechanisms.





Conclusion



The world is still battling the COVID-19 pandemic, highlighting the importance of improving emergency public procurement processes. Countries are in the midst of a scramble to secure COVID-19 vaccines. Therefore, a review and analysis of emergency public procurement is critical now to better manage the ongoing crisis, as well as for future emergencies.

Many African governments did not appear to have extensive emergency procurement processes in place but used the exceptions or deviations allowed in their pre-existing public procurement legislation to apply to purchases of COVID-19 works, goods and services. This was further supplemented by specific new emergency procurement processes for the COVID-19-related purchases. These were also applied on a case-by-case basis to the specific purchases.

The COVID-19 pandemic also presented unique challenges to the emergency procurement processes with supply-side shortages and unprecedented levels of competition for the same works, goods and services, which saw the development of undesirable practices such as price gouging. Measures implemented to counter these COVID-19 specific procurement challenges included centralising procurement processes and introducing fixed prices for the specific products that were in demand such as PPE and medical supplies.

There was also substantial focus on the post-transaction enhanced transparency and accountability necessary to protect the integrity of the public procurement system. The publication of contract details, including the beneficial owners, was a consistent approach proposed by most African countries. Other measures such as validation of goods and services, publication of expense reports, and COVID-19-specific audits were also adopted. It was recommended that the transparency and accountability measures be focused on monitoring during the procurement process so that adjustments could be made for future purchases.


Several countries digitised their procurement processes after being forced to by the COVID-19 pandemic, and utilised on-line portals for publishing COVID-19-related procurement information. It is anticipated that some of these e-procurement trends will continue after the COVID-19 pandemic. The use of data from these portals will also provide vital information to manage suppliers for future emergency procurements.

However, the instances of corruption that were reported in the news questioned the efficacy of such transparency and accountability measures and, therefore, further work is still required on emergency procurement measures to mitigate the risk of abuse of the system. The establishment of framework agreements with preapproved suppliers was advanced as an optimal measure to mitigate against the potential for corruption of emergency procurement.

There must be a sound justification for deviating from standard public procurement processes, and it should be done on a case-by-case basis. It is not the existence of the emergency *per se* that should inform whether the emergency procurement processes should be followed, but rather whether the specific requirements of the emergency determine that it is not practical to follow traditional procurement processes.

African ministries of finance and procurement officials should review the implementation of the emergency procurement processes during the COVID-19 crisis and ensure that there is enhanced transparency and accountability. Detailed emergency procurement measures should be developed to provide better guidance to those implementing the purchasing with an element of flexibility to respond to the particular needs of any crisis. The procurement challenges of the pandemic are also ongoing and will require that the emergency procurement processes be subject to regular review and amendment.

It is not the existence of the emergency per se that should inform whether the emergency procurement processes should be followed, but rather whether the specific requirements of the emergency determine that it is not practical to follow traditional procurement processes.



Annexure 1

Survey on adjustments to PFM processes in response to COVID-19. Questions asked relevant to procurement

1. What adjustments have you made to PFM rules and processes to ensure rapid delivery of COVID-19 goods and services?

- Use of single-source procurement
- Establishment of pooled procurement at central level
- Elimination of bid securities and guarantees
- Increasing advances paid to suppliers
- Decree setting out emergency processes
- Utilising development partner procurement assistance, e.g. Bank Facilitated Procurement
- Decentralised budget reallocation decisions to line ministries or local government
- Decentralised spending approval to line ministries or local government
- Allowing ministries to spend beyond existing budget appropriation
- Creation of a special COVID-19 budget line
- Allowing existing budget lines to be used for COVID-19 expenditure
- Establishment of extra-budgetary funds
- Other (please specify)

2. What efficiency and cost-effectiveness measures have you introduced into your healthcare financing and purchasing processes? Please tick all that apply.

- Pooled procurement
- Public-private partnerships
- Delegation of purchasing to subnational government
- Emergency recruitment of healthcare workers
- Insurance for frontline healthcare workers
- Other (please specify)

3. Have you introduced additional, COVID-19-specific transparency and accountability measures for COVID-19 financing and expenditure?

- Publishing all COVID-19 related contracts
- Undertaking more frequent internal audits
- Commitment to ex-post audit of COVID-19 related expenditures
- Commitment to publishing COVID-19 audit findings
- Established dedicated budget lines to facilitate tracking of funds
- Collaborating with CSOs to disseminate information on COVID-19 financing
- Publishing statements on commitments and payments of COVID-19-related activities
- Set up a supervisory committee for COVID-19 funding
- Set up a supervisory committee for COVID-19 expenditure
- Commitment to ex-post validation of delivery of contracts

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