

Annex I – Summary of main changes between current Procurement Guidelines¹ and proposed procurement Regulations for Borrowers

	Topics / Issues	Ref. in the PG, and the CG	Ref. in Proposed Procurement Regulations	Proposed Changes: Regulations	Impacts / Comments
1	Structure of the Procurement Regulations The current procurement guidelines (Goods, Works, and Non-consulting Services) and consultant procurement guidelines are separate documents with several repeated provisions.			The provisions for goods, works, non-consulting services and consulting services has been consolidated in the Procurement Regulations (Regulations) while distinguishing specific provisions. The main body of the Regulations has been kept succinct with relevant Annexes expanding key concepts, procedures and requirements.	This introduces efficiency, ease of applicability, and ease of reference.
2	Core Principles	PG1.2, CG1.4	Section I	The Regulations expands the considerations for the economy, efficiency and transparency in the current guidelines into seven Core Procurement Principles as, value for money, economy, integrity, fit-for-purpose, efficiency, transparency, and fairness.	Promotes the implementation of the Bank's procurement vision: "Procurement in Investment Project Financing supports clients to achieve value for money with integrity in delivering sustainable development."
3	Applicability For IPFs, the current framework does not facilitate the recognition of other procurement arrangements that may be the	PG1.5, CG1.7	Section II – A.	Clearly states applicability to IPF (excluding guarantees and financial intermediaries). Allows the use of alternative procurement arrangements.	Under APA the Regulations permit other procurement arrangements to be used if appropriate.

¹ Procurement Guidelines (PG) – Procurement of Goods, Works, and Non-Consulting Services under IBRD Loans and IDA Credits & Grants by World Bank Borrowers (January 2011); and Consultants Guidelines (CG) – Selection and Employment of Consultants under IBRD Loans and IDA Credits & Grants by World Bank Borrowers (January 2011).

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	most appropriate to development objectives.				The justification and impact of exclusions of Financial Intermediaries and Guarantees is provided in the CODE/AC paper, Section II, paragraphs 15-18.
4	Roles and Responsibilities, Bank The current framework emphasizes a transaction-based approach to oversight.	PG/CG Appendix 1	Section III –A.	Promotes World Bank’s focus on strategic planning and oversight under a risk-based approach, carried out through a variety of acceptable fiduciary instruments. In addition, it introduces hands-on expanded implementation support to the Borrower; which is particularly important in operations under paragraph 12, OP 10.00.	Introduces a strategic use of World Bank oversight and resources focusing on managing risk and delivering outcomes. Permits the World Bank to adjust its level of support, from providing hands-on support as needed through to utilizing third parties to provide assurance as appropriate depending on the operating context.
5	Accountability Lack of clarity in the current framework dilutes accountability for results.	N/A	Section III - B.	Enhances the existing concept of accountability, combining requirements of transparency and responsibility.	Ensuring that the lines of accountability are defined during appraisal and during the life of the project.
6	The participation of SOEs has been difficult in certain contexts i.e., market transition economies.	PG1.10(b), CG1.13 (b)	Section III- E, paragraph 3.28 (b), (c), and Section VII par. 7.12 and Section VIII, par.8.19.	Sets appropriate conditions for SOE’s participation in World Bank-financed procurement and permit sole-source contract awards to SOEs under particular circumstances.	Recognizes the role of SOEs and as development players in particular markets where they operate. Permit the use of SOEs as appropriate to the context of the operation.

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7	Hiring of Civil Servants as an exception.	CG1.13(d)	Section III – E. 3.28(d)	The Regulations remove additional constraints of resignation, retiring and leave of absence as long as (i) their services is critical to project implementation, (ii) does not create conflict of interest, and (iii) does not conflict with the Borrower’s laws and Bank’s Procurement Framework.	Streamlining the hiring of civil servants in exceptional circumstances with appropriate safeguards to mitigate against abuse.
8	Procurement Strategy for Development The current framework has no specific instructions or guidance connecting the procurement functions with project’s development objectives.	N/A The requirement for the Bank to assist the borrower in preparing the procurement strategy for the project, is reflected in the BP 11.00 par 12.	Section IV, Annex V	Requires the design and implementation of a procurement strategy addressing how procurement activities will be carried out in a manner that supports the identified needs and delivers the best value for money under a fit-for-purpose approach. This strategy is based on the context in which the project is operating (e.g. fragile and conflict-affected situations; disaster/emergency; small economies; development of domestic contracting, manufacturing, and consulting industries), and takes into account factors that may affect the achievement of the development objectives.	More upfront work will make follow-on procurement more effective and far more likely to succeed. Provides a more strategic approach to current tools such as the Project Appraisal Document, Procurement Plan and operational manual. This ensures that development results are delivered through a procurement process that is appropriate to the project context and market conditions. Rather than having to create exceptions or special arrangements in the Procurement Framework to deal with these critical issues, the policy has been designed from the outset to apply tailored, fit-for-purpose procurement approaches more generally. Thus the entire Procurement Framework is designed to be context-specific.

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9	<p>Advance Procurement and Retroactive Financing</p> <p>The current procurement guidelines while allowing advance procurement and retroactive financing (carrying out procurement at the Borrower's risk prior to signing the Legal Agreement, require that advance procurement shall be <i>in accordance</i> with the procurement guidelines.</p>	PG1.11, CG1.14	Section V – A.	The Regulations require that advance contracting shall be consistent with the Policy Core Procurement Principles and Governance requirements of these Procurement Regulations.	This facilitates project implementation by having a more appropriate requirement to procurement carried out in advance by the Borrower. Consistency with the Bank's Core Procurement Principles and Governance requirements removes currently faced operational challenges while mitigating the risks.
10	<p>Domestic Preference (DP)</p> <p>Current procurement guidelines allow domestic preference to be applied to the locally manufactured equipment in single responsibility (other than turnkey) to be applied.</p>	PG2.55~2.56, Appendix 2	Section V – B. Annex VI	The Regulations while keeping the current provisions for DP disallows the use of DP to industrial plants.	This removes cumbersome application of DP to integrated plants by trying to identify a myriad of individual components/items. Based on experience, DP for such integrated plants is hardly used, if at all, as it is not practical in the current market environment.
11	<p>Online Procurement Planning and Tracking Tool</p>	N/A	Section V. – D.	The Regulations introduces the use of online procurement planning and tracking tool by the Borrower. The Bank is currently developing such an online procurement planning and tracking tool.	Enhances efficiency and transparency in procurement processes.

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12	<p>Leased Assets and Procurement of Second Hand Goods</p> <p>The current procurement guidelines do not treat leasing and the procurement of second hand goods, the latter is mentioned in OP10.00 but not operationalized further through the procurement guidelines.</p>	N/A	Section V – F.& I.	The Regulations include provisions for the leased assets and procurement of second hand goods. As well as risk mitigation measures (safeguards) to be put in place.	The enabling of leasing and procurement of second hand goods to be used when appropriate (fit-for-purpose) could contribute to project outcomes.
13	<p>Sustainable Procurement</p>	N/A	Section V - G. Annex VII	New requirement that allows Borrowers to include sustainability requirements into procurement processes, where they are applied in ways that do not contravene the Core Procurement Principles.	Contribution to sustainable development.
14	<p>Value Engineering (VE)</p> <p>The only reference to VE in the current procurement framework is through a clause in the FIDIC conditions of contract of the SBDs (for large works, applicable to construction).</p>	N/A	Section V – H.	The Regulations expands the use of VE to the procurement cycle as appropriate and as agreed in the Project Procurement Strategy.	Introducing a systematic and organized approach to provide the necessary functions in a project at optimal cost.

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15	Contract Conditions Besides requiring the use of Bank's standard selection documents, the current procurement guidelines are not comprehensive enough (a few provisions are included) in the treatment of the minimum requirements of contract conditions to apply to international contracts.	PG2.38	Section VI – B. Annex IX	An Annex dedicated to contract conditions in international procurement is provided explicitly requiring that the Borrower shall use the applicable World Bank's Standard Selection Documents for international procurement, and in cases where the World Bank Standard Selection Documents are not available, the Borrower shall at least include the stated minimum contractual provisions.	This sets the standard that should apply for international contracts where Bank may not have standard selection documents that fit the nature and specificity of the activity such as PPP due to their diverse arrangement.
16	Abnormally Low Bids New, not treated in the current procurement guidelines.	N/A	Section VI – U.	Abnormally low bids has been introduced in the proposed procurement framework with necessary safeguards, i.e., if it is to be used the procedure shall be disclosed in the bidding documents and the bidder during bid evaluation shall be given the opportunity to clarify/justify its abnormally low bid for the Borrower's analysis. For contracts subject to prior review treatment of abnormally low bids will be subject to Bank's no objection.	This will cause bidders to price their bids diligently. It also mitigates against the risk of poor of performance in contract execution due to unreasonably low bid prices.
17	Standstill Period New, not treated in the current procurement guidelines.	N/A	Section VI – W.	The Regulations have included standstill period for bidders/consultants to submit their complaint before the borrower proceeds to signing the contract in all cases. This period comes between the notification of <u>intent</u> to award contract and the <u>actual</u> contract award. In addition to consulting services, there will be a standstill period following the notification of the results of technical evaluation.	This encourages bidders/consultants to submit their complaints in a timely manner and is expected to contribute to transparency in the procurement process.

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18	<p>Notification of the Intention to Award a Contract New, not treated in the current procurement guidelines.</p>	N/A	Section VI – X.	The current procurement guidelines do not include a provision for notifying bidders/consultants of the intention to award a contract. Notification of the intention to award a contract has been added in the Regulations.	This together with the standstill period will contribute to transparency in the process.
19	<p>Contract Management New, not treated in the current procurement guidelines.</p>	N/A	Section VI – DD. Annex XI	Recognizing the impact of successful contract management, the Regulations have included contract management as one of the key provisions with an annex dedicated to it. The Regulations provide for contract management plan with minimum requirements to be included in such a plan, monitoring and evaluation of contract performance against the plan using KPIs linked to risk.	Successful contract management is a challenge. The Regulations together with subsequent guidance tools will contribute to improving the success of implementing contracts to deliver project development objectives.
20	<p>Lack of Fit-for-purpose Approach to Market Procurement methods were listed but were not systematically linked to a fit-for-purpose approach to market and project development objectives.</p> <p>PG/CG mention that procurement rules and procedures depend on the circumstances of a particular case. However the fit for purpose is not embraced as a core principle and not followed through.</p>	PG1.2, CG1.4	Section IV, VII, Section VIII Annex V, Annex X, Annex XII	Fit-for-purpose is one of the core principles and this has been followed throughout the Regulations including in determining appropriate requirements, market approach, selection methods and evaluation criteria.	Allows procurements to be context specific, reflecting market dynamics and facilitates value for money and fit-for-purpose solutions to meet project development objectives.

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21	<p>Approved Procurement Methods The list of procurement methods was limited and does not adequately take into account the operational context to deliver results and developments in the international procurement practice.</p>	PG Section II, Section III	<p>Section VII</p> <p>Annex XII</p> <p>Annex XIII</p> <p>Annex XIV</p> <p>Annex XV</p>	<ol style="list-style-type: none"> 1. The Regulations introduces market approaches, procurement arrangements and methods to be based on an assessment of market, risk, complexity, and national capacity at the country, project and procurement levels. 2. New procurement methods, such as competitive dialogue and e-reverse auction, have been added based on international good practice. 3. Restrictive treatment in the current procurement guidelines have been modified to allow for the enhanced use of procurement arrangements such as framework agreements. 4. Moving from the current purely process oriented approach, arrangements such as PPPs have been comprehensively treated in collaboration with relevant bodies of the Bank. 	<p>Better positioned to deliver fit-for-purpose solutions tailored to the specific requirements of the country, project, or procurement.</p> <p>A much more effective and efficient use of procurement arrangements, such as PPPs and framework agreements, is put in place to support the achievement of project development objectives.</p>
22	<p>ICB As per the current procurement guidelines ICB is the most appropriate method of procurement.</p>	PG1.3	<p>Section VII. – 7.14, 7.16, and 7.17</p> <p>Annex XII</p>	<p>An open competitive approach to market is the preferred approach. Open international competitive procurement is the preferred approach for complex, high-risk and/or high-value activities.</p>	<p>Approach to market, procurement arrangement and methods that deliver VfM and fit-for-purpose as agreed with the Bank in the Project Procurement Strategy for Development (PPSD) provides more options to best achieve value for money and fit-for-purpose solutions.</p>

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23	National Competitive Procurement	PG3.3 and 3.4	Section VII. – 7.18-7.20	Streamlined requirements for national completion.	Enhances the use of national competitive procurement.
24	Single Stage – Two Envelope (for Goods, Works and Non-Consulting Service)	N/A	Section VII – B.8.	Introduces two envelope process, as appropriate with necessary safeguards.	Further expands fit-for-purpose approach.
25	Request for Proposals Selection Method (RfPs) New, not treated in the current procurement guidelines.	N/A	Section VII – A.1. Annex XII	For international competitive procurement, with the use of the Bank's standard selection documents and prior review, the Regulations introduce the RfPs as a competitive method to be used when due to the market or the nature of the procurement, the Borrower is not able to clearly specify its requirements, thereby allowing firms to offer proposals that vary in the degree in which they meet the requirement of the selection documents. To address variations in proposals, the Regulations provide appropriate evaluation approach.	Provides a platform for innovative offers and solutions that best fits the purpose.
26	Request for Bids Selection Method (RfBs) Current procurement guidelines treat approaches such as international, national, open, limited as separate procurement methods.	N/A	Section VII – A.2. Annex XII	Besides the RfPs, for most procurement where the Borrower could provide its requirements, the various market approaches are consolidated as the RfB method with the available market approaches to be used as appropriate.	Consolidation of market approaches that could be adapted to fit the purpose. For most procurement the RfB together with the appropriate market approach would be sufficient to deliver results.
27	Shopping Now referred to as Request for Quotations. Often raised	PG3.5	Section VII – A.3.	Advertisement for Requests for Quotation is the preferred method because it encourages competition and	Many Borrowers have asked for this method, which is in their national procurement

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	concerns of transparency, lack of competition, leading to mis-procurement and confusion amongst borrowers because it could be an overused method.		Annex XII	adds more transparency to the procurement process. This approach generally mirrors the procurement system in the country of operation.	legislation. This also increases transparency in the selection of providers without delaying the process.
28	Direct Selection	PG3.7~3.8 CG3.8~3.11	Section VII – A.4. Annex XII Section VIII – B.8. Annex XII	The Regulations have expanded the conditions to use direct selection taking into consideration issues faced in operations such as when a contract not originally financed by the Bank but of a similar nature may be extended provided that it is justified. In all cases the safeguards for direct selection including fairness, reasonableness of price and contract fragmentation to avoid thresholds for more competitive methods are explicitly stated.	More fit-for-purpose approach.
29	Commercial Practices Mentioned only in Procurement Guidelines footnote in connection with Operations Involving a Program of Imports and in 3.13 Financial Intermediaries	PG.foot note 60	Section VII- C.3. Section VIII – D.1.	The Regulations refer to the use of commercial practices as long they are consistent with the Core Procurement Principles.	Allows the use of private sector procurement practices as appropriate with necessary safeguards. Eliminates the problem of trying to apply relatively rigid requirements of the procurement guidelines to commercial practices.
30	Competitive Dialogue Method Lack of a method which allows the rigorous engagement with the market to identify the solutions that best suit the Borrower's requirements.	N/A	Section VII. C.1. Annex XIII	The Regulations have included Competitive Dialogue for international procurement with Bank's prior review, in line with good practices and with necessary safeguards, including details of the procedures to be followed at each step.	Allows greater flexibility when there is room for the Borrower to enhance its requirements and get the best solutions from the market.

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31	Public Private Partnerships Public-private partnerships (PPP) were restricted to open competitive bidding procedures which in practice had ended in requiring strict international competitive bidding, such as ICB. The current approach was purely process based and has resulted in significant hurdles to finance PPPs.	PG3.14~3.15	Section VII – C.2. Annex XIV	The Regulations drafted in coordination with the relevant Bank bodies (PPP Teams) treat PPPs in a more comprehensive manner including their feasibility and procurement approach. Consistent with the Core Procurement Principles and governance requirements, sets the standard for a reasonable and practical approach while providing needed safeguards. Treatment of unsolicited proposals, which has been a request from Borrowers/industry is now included.	Given the nature of PPPs, a practical means to ensure that project development objectives and outcomes are met. This is expected to enhance Bank’s financing of PPP operations. The proposed approach to PPPs has been developed in close collaboration with PPIAF. The PPIAF team considers that the proposed approach for PPPs, based on international best practices, suitably addresses the requirements for PPP development.
32	UN Agencies UN Agencies limited in their use.	PG3.10, CG3.15	Section VII – C.4. Section VIII - D.2. Annex XII	Added the possibility for the World Bank to set up framework agreements with UN and other Multilateral and Bilateral Organizations from which Borrowers may procure.	Added efficiency and expedited procurement for Borrowers, in particular in FCS and emergency situations.
33	E-reverse Auctions New, not treated in the current procurement guidelines.	N/A	Section VII -C.5. Annex XII	The Regulations have added e-reverse auctions that may be used for straight-forward procurement when the Borrower’s requirements are unambiguously defined and the award decision is to be made on the basis of price only.	Increased efficiency for simple procurement.

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34	<p>Framework Agreements Framework agreements in the Procurement Guidelines included limitations for period and aggregate amounts and did not allow for use of borrower's existing framework agreements. The Consultant Guidelines did not include any provision for Framework Agreements.</p>	PG3.6	Section VII – D.1. Section VIII – G.1. Annex XV	Removed limitations in the current procurement guidelines, expands the use of framework agreements to consulting services, and added the possibility to use existing Borrower framework agreements.	Expedites procurement; enables (i) Borrowers to benefit from consolidation of requirements as a result of economy of scale, (ii) delivery as and when it is needed.
35	<p>Financial Intermediaries – Goods, Works and Consulting Services Current procurement guidelines requires private sector practices and international or national bidding.</p>	PG3.13	Section II – A.	Management recommends to exclude from the Procurement Framework the procurement of goods, works, non-consulting services and consulting services financed by the Bank through loans made by eligible financial intermediaries (FIs).	The proposed Procurement Framework seeks to address certain deficiencies in the current procurement policy concerning lending through financial intermediaries (FI) to private borrowers.
36	<p>Loan Guarantees The current procurement guidelines requires procurement under loans guaranteed by the Bank may adopt other rules and procedures provided that timeliness, quality and reasonable prices are kept.</p>	PG3.18, CG3.14	Section II – A		The new Procurement Framework will not apply to Bank Guarantees . The currently applicable principle of “due economy and efficiency”, which emanates from the Bank’s Articles of Agreement and is also reflected in OP10.00, will continue to apply and be interpreted in the same manner.
37	<p>Shortlisting of Consultants Resulted in few proposals because of the use of a summary of terms of reference with the requests for expression of interest.</p>	CG2.6~2.8	Section VIII B.1. Annex XII - 4.1	Require full and complete terms of reference to be issued with the request for expression of interest.	Enhances competition and increases the probability that shortlisted legal entities will submit proposals.

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38	Number of Shortlisted Firms Mandatory requirement that shortlists be comprised six legal entities.	CG2.6	Section VIII – B.1.	The shortlist shall include a sufficient number, not less than five (5) and not more than eight (8) eligible firms, with the possibility to accept less than (5) under-stated exceptional circumstances (not enough qualified firms could be identified, the size or the nature of the assignment does not justify a wider competition)	Remove the limitations and increase the opportunity for a larger number of firms to submit proposals. Increased competition with potential impact on enhanced quality proposals and more competitive prices. While having considerations to smaller number of firms in short list in specific circumstances.
39	Shortlists Restrictions (1) Shortlist should comprise no more than two firms from the same country and at least one from a developing country.	CG2.6	Section VIII - B.1	Shortlists to comprise legal entities that have relevant qualifications.	Ensures the selection of legal entities that best fit the requirements for an assignment.
40	Shortlists Restrictions (2) Shortlist may comprise only national consultants below a certain threshold.	CG2.7	Annex XIIp	The threshold approach has been replaced with a context driven approach that takes account of the local market conditions and the operating context to deliver a fit-for-purpose approach.	Ensures the selection of legal entities that best fit the requirements for an assignment.
41	Shortlists and Key Staff Basis for shortlisting of firms not clearly specified in the consultant guidelines.	N/A	Section VIII B.1.	The Regulations require that shortlisting shall be on the basis relevant experience, managerial and organizational capabilities of the firms.	This requirement clarifies the perennial problem with some Borrowers evaluating key staff as part of the shortlisting process. This skews the shortlist because firms have no obligation to include in their technical proposal the same key staff that were included in their expression of interest. As a result, qualified firms could

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					be excluded from the short disqualified and less qualified firms included in the shortlist with the latter having no obligation to adhere to the same key staff.
42	CQS and Advertisement Consultants Qualification Selection (CQS) was not clear regarding requirement for advertising.	CG3.7	Section VIII B.7. Annex XII	Clarifies that advertising is not required.	Added flexibility minimizes delays for emergency situations or low value assignments.
43	Project Implementation Support Personnel Lack of clarity which has in some operations resulted in treating the support personnel as consultants to be employed as per Bank's procurement guidelines.	N/A	Section VIII – E.	Project implementation support personnel other than key positions identified in the legal agreement may be selected by the Borrower according to its personnel hiring procedures for such activities, as reviewed and found acceptable by the World Bank.	Streamlining the hiring of project implementation personnel.
44	Value for Money New, not treated in the current procurement guidelines.	N/A	Annex I	The Regulations dedicate an annex for Value for Money highlighting that its application permeates the entire procurement cycle from planning to contract execution.	Effective, efficient, and economic use of resources including in the evaluation of bids. Lowest evaluated bid may not always deliver the best value for money.
45	Evaluation Criteria The current procurement guidelines are based on the lowest evaluated bid.	PG2.59	Annex X	The regulations provide the means to achieve VfM through an evaluation that may include a combination of initial cost, life-cycle-cost and rated type criteria as appropriate to the specifics of the procurement.	Delivering VfM outcomes by using appropriate and pre-disclosed evaluation criteria that not only takes into account the initial costs but also life-cycle-costs and rated type criteria, the latter

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					for aspects that could not be easily be converted into monetary terms. For most procurement, lowest evaluated bid will continue to be the criteria. However for complex and innovative procurement, a combination of cost and rated criteria is expected to draw enhanced solutions, encourage innovation and deliver better outcomes.
46	Bank's Procurement Oversight The current guidelines provide for prior and post review. The determination of whether a contract is subject to prior or post review is based on thresholds set by the Bank.	PG Appendix 1, CG Appendix 1	Annex II	Risk based approach to identify contracts that should be subject to prior/post review taking into consideration project level risk to determine the mandatory prior review thresholds, and activity/contract level risk as appropriate.	Better fiduciary assurance that takes not only project level risk but also the specific risk at the activity/contract level. More strategic approach to post-procurement review and therefore enhanced risk management. More strategic use of Bank resources. Staff do not have to prior review low risk activities. More Bank's attention to high risk activities notwithstanding the value.
47	Complaints WB interaction dealing with complaints is limited to the pre award process.	PG Appendix 3, CG Appendix 3	Annex III	Enhanced the way how the Bank handles complaints, including contract-related correspondences.	Complaints handling is a critical concern for suppliers and contractors. Many private sector organizations

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				To that end, World Bank will centrally monitor procurement related complaints, recognizing that complaints arising from the execution of the contract are governed by the contract between the Borrower and the contractor/consultant, and provide more support to task team leaders (TTLs) and Global Practices, including by setting operating standards and developing measures for complaints tracking. The Regulations have set business standards for the Borrower and the Bank.	are frustrated with the Bank's current approach to handling complaints and can feel abandoned by the Bank if something goes wrong with procurement, in particular during contract implementation.
48	Negotiation For competitive procurement of goods, works, and non-consulting services, negotiation not an option.	N/A	Section VII – B.11.	Introduce the possibility of negotiation, as appropriate and with probity safeguards.	Adds flexibility to the procurement process to better achieve value for money and fit-for-purpose. Negotiations must be held in the presence of an independent third party, agreed with the World Bank.
49	Best and Final Offers Requesting best and final offers not permitted in the procurement of goods, works, and non-consulting services.	N/A	Section VII – B.10.	Introduces the use, when appropriate, of a one-time request for best and final offer.	Adds flexibility to the procurement process to better achieve value for money and fit-for-purpose.
50	Fraud and Corruption provisions. Specifically, the footnotes to the definitions of corrupt, fraudulent, collusive and coercive practices in the existing Procurement and Consultant	PG1.16~1.17, CG1.23~1.24	Annex IV	The Fraud and Corruption provisions that apply to the procurement framework are set out in the Anti-Corruption Guidelines and Annex IV of the Regulations. Since the relevant terms are defined in the Anti-Corruption Guidelines, which do not include such	As agreed with INT and LEG, 20. Fraud and Corruption Annex to the Regulations will be aligned to the Anti-Corruption Guidelines.

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	Guidelines will not be carried over into the new Regulations.			footnotes, it would be clearer and more consistent to similarly exclude the footnotes from Annex IV. This would also avoid the potential risk of creating an internal inconsistency among the governing documents, which may lead to a more narrow interpretation of the relevant terms in the procurement context as compared to other areas covered by the Anti-Corruption Guidelines.	
51	Debarment by borrower	PG. foot note 62,	Section III – E. 3.28(f)	Extending the use of borrower's debarment for any kind of procurement method. The current procurement framework allows borrowers to apply their own debarment list for national competitive procurement with the agreement of the Bank	This proposal was sponsored by LEG, and agreed with INT. The Bank's inability to permit borrower to apply their own department to bank financed contracts potentially leads anomalous results. The use of such debarments for fraud and corruption through a judicial or administrative process should be agreed with the Bank and subject to a due process in place. Specific methodology will be developed.