

"There shall be Royal Audit Authority to audit and report on the economy, efficiency, and effectiveness in the use of public resources."

(Article 25, The Constitution of The Kingdom of Bhutan)

VISION

A credible Supreme Audit Institution that promotes value for money and good governance in public operations and contributes towards achieving the societal aspirations of Gross National Happiness.

MISSION

RAA is an independent constitutional body which contributes to accountability, transparency and effective service delivery. In the service of Tsa-Wa-Sum (the King, Country and People), we audit without fear, favour or prejudice and provide timely, reliable and quality audit services to assist effective decision making in the public sector.

RAA CORE VALUES

TEAM WORK: We believe in team spirit and diversity to unleash our full potential in achieving common goals through respect, trust and support.

INTEGRITY: We are independent, INTEGRITY honest and incorruptible in our conduct & remain impartial and trustworthy. CORE **VALUES**

ACCOUNTABILITY: We are accountable for our own actions in a similar way we propound accountability in audited agencies.

PROFESSIONALISM: We perform quality audit services through dedicated and competent work force conforming to auditing standards and best practices.

> TRANSPARENCY: We are transparent in all our dealings and actions, and promote culture of openness and submit ourselves to scrutiny.

AUDIT JUIRISDICTION

- · Ministries, Departments, Divisions, Units, Dzongkhags, Gewogs, Thromdes, autonomous bodies, • Any Entity or Activity upon command of the Druk foreign-assisted or special projects
- · Judiciary and Judicial Bodies, Legislature and related institutions
- Constitutional bodies
- · Defense and Security Services
- All corporations, Financial Institutions including the Central Bank and their subsidiaries.

- Political parties
- Gyalpo
- Zhung Dratshang, Rabdeys and all related institution.
 All entities including non-governmental organizations, trusts, charities and civil societies fully or partly funded by the government; whose loans are approved or guaranteed by the government; and
 - · Any entity whether private or public engaged in extracting, processing, trading and mining of natural resources of the State.

Not withstanding the provisions of any laws relating to the accounts and audit of any public authority, the Parliament, by resolution may direct that the accounts of such entities be audited by the Authority.

(Section 91 of Audit Act 2018)

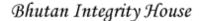


क्षेत्रावियाधीरमाष्ट्रयायाष्ट्रयाष्ट्रयायाष्ट्रयाष्ट्रयाष्ट्रयाष्ट्रयाष्ट्रयाष्ट्रयाष्ट्रयाष्ट्रयाष्ट्रयाष्

गल्र मी अर्थि सुवायया स्वाय स्वाय स्वाय स्वाय



क्रुव्यःगुलुरः स्रेश्वः विचः द्वरः दिह्य ROYAL AUDIT AUTHORITY





ष्पराषे षे १ हे - षे के मे १ / १५/१०११ - ११/००१

ह्ये केंगः ०५/११/२०२१

स्वालुर्गाः अर्थाः अर्थाः अर्थाः विस्वाल्याः अर्थाः विद्याः अर्थः विद्याः विद

(ন্মুশ)

त्र्वृग्गःगीः 🕏 सः विचः पॅरसः खुच

र्गार:कगा

ૹૢ૾ૢૢ૽ૢૢૢ૽ૢૢૢૢૢૢૢૢૢૢૢૢૢૢૢૢૢૹૢ૽ૢૢૢૢૼ <u>૽</u> ૢૢૼૢૢૢૼૼૢૢૢૼૺૢૢૢૼૢૢૢૢૢ	i
कःविद्याः विद्याः विद्याः क्षेत्रः विद्याः क्षेत्रं विद्याः क्षेत्रः विद्याः कष्टित्यः विद्याः कष्टित्यः विद्य	<i>ງ</i>
ଶ୍ୱିସ' ଞ୍ ଟ୍ୟ	<i>ງ</i>
५णव [.] रूथ:म्चे.चर्ह्-५.र्नुब्रा	२
ર્વસંત્રાન્ય:ત્યુત્ય:ર્ત્ <u>યુ</u> ત્ય:ર્ત્તુ	ર
ত্ত্ব ⁻ র্কবৃ 	ર
कः.वशः १ मा माबुरःमोः आर्वः स्त्रुचः त्यसः त्यमशः वरःमोः ५ मावः रत्यः ५ रःमोर्ने रः त्ये वः र्ह्या	و
क'.ঀয়'ৄয়': ऄॗॖॖॣॖॖয়'য়ঢ়য়'ঢ়ৢ৾ঢ়ৢৢয়ৢৢয়ৢৢয়ৢ	23
बहुगःर्देवा	9 4
ক:পৃষ্য ে না র্ট্র্যান্তর্বা	२०

कृषः लुवै पड्ड <u>५</u> देवा

i

વર્શ્વુમ:લેવ:શ્નવન્નાત્યુ: ર્વોદ:વો:યાત્રુદ:દ્રેત:ર્ત્યુ: યાનુઆવાર્યદ્ર: শુ: ક્રું:અર્ઠત:ર્ત્યુ: ફ્રું:અર્ઠત:ર્ત્યુ: ફ્રું:અર્ઠત:ર્ત્ય: ફ્રું:અર્ઠ:ર્ત્ય: ફ્રું:અર્ઠત:ર્ત્ય: ફ્રું:અર્ઠત:ર્ત્ય: ફ્રું:અર્ઠત:ર્ત્ય: ફ્રું:અર્ઠત:ર્ત્ય: ફ્રું:અર્ઠત:ર્ત્ય: ફ્રું:અર્ઠ:ર્ત્ય: ફ્રું: ફ્રું:અર્ઠ:ર્ત્ય: ફ્રું:અર્ઠ:ર્ત્ય: ફ્રું:અર્ઠ:ર્ત્ય: ફ્રું:અર્તા: ફ્રું:અર્તા: ફ્રું:અર્તા: ફ્રું: ફ્રું:

- मिल्र-मि'अपूर्म् मैं न.प्यन् द्वीत्र द्वीत् व्याचा प्रमुच क्षेत्र क्षेत्
- अ्रम्ब्र्युन्। त्रवयाः श्रीः त्यात् त्याद्वात् प्राप्तुः प्राप्तुः विष्णः विष्णः विष्णः विष्णः विष्णः विषणः विष्णः विषणः विषणः
- पार्थिट.मी.शाम्, म्रींच.पड्ड्यं, म्रींट.पद्यच.धु.येट. पार्थश्व.पर्थे.वा
 पार्थिट.मी.शाम्, म्रींच.पड्ड्यं, म्रींट.पद्यच.धु.येट. पार्थश्व.प्रशाशम् , पार्थः प्राप्ति, प्राप्

- श्रुषःर्कन् देशः महत्रः मर्वे देतेः देतः स्थः **"र्वेदःहरः"** म्यायः मर्गान् त्यम् देते स्वीः मामायः स्वीतः स्वतः स्वीतः स्वतः स्वीतः स्वीतः स्वतः स्वीतः स्वतः स्वीतः स्वतः स्वतः स्वी

- अर्षे श्चुन तन् शे त्यस श्चे र्द्ध गीश र्केंट र्ष्वे अर्थ र्वेंट र्ष्वे अर्थ र्वेंट र्ष्वे अर्थ र्वेंट र्वें अर्थ र्वेंट र्वेंट र्वें अर्थ र्वेंट रवेंट र्वेंट र्वेंट र्वेंट रवेंट र्वेंट रवेंट र
- र्नोश्वर्यादेते प्रचेत्र प्
- वर्हेद्राक्ष्राय्यम् इवायक्षेत्रीत्रः वित्रक्ष्राय्वेष्यद्रावर्ष्यप्रदेश्वेष्यः वित्रम् वित्रम् वित्रम्
- गलुर-गि'अर्थि:श्चुन-र्त्तुः वरः वर्धेव-र्क्त-र्-र-र-र-व्य-वर्धिव-र्यो-र-विव-र्यो-र-विव-र्यो-र-विव-र्यो-प्रविव-र्यो-र-विव-र-
- अाम् म्रीतालकार्मे स्वामका प्रमान प्रम प्रमान प्रम प्रमान प
- अर्थि: अत्यन् अरियादात् विष्यः क्ष्या विष्यः श्रीति क्ष्यः श्रीति क्षयः श्रीति क्ष्यः श्रीति क्षयः स्रीति क्
- श्रुश्यः विद्यात् विद्यात्य
- अ:र्थरश्रात्राम् श्रीतः प्रदेश्वर्षात्रात्त्रीयः प्रदेशः प्रदेशः
- यन्तर् ति क्षेत्रः कष्ते क्षेत्रः क्षेत्रः कष्ते कष
- र्टिला क्रिया क्षेत्र त्वा मीका मूंका क्ष्रिया प्राप्त प्राप्त हिंग्य क्ष्रिय क्

• जल.कृ.क्.म्व. प्रायत् प्रमान्त्रीं प्राप्त प्राप्त प्रमान्त्रीं प्राप्त प्रमान्त्रीं क्षित्र प्राप्त क्षित प्राप्त क्षित क्

क.चंत्रा भा नश्चर विच ग्री र्श्वर

क्यि.पिटश्रा

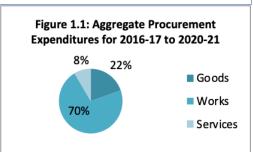
मृत्याया त्येष त्यवप क्षेत्र।

ब्राह्म के स्वरंश के स्व

વર્શ્વર. મુંદ. હતુના મું. વિરાયક્ષ્યા માના ક્યાર મું. ત્રુધા ક્ષેત્ર લામાં ત્રુધા મું. ત

म्रेग'सम्भः न मि द्वेत्र'र्वे २०१७-१० व्यतः २०२०-२१ ईतः ग्रेः वसुग'ग्रह्म-गोस्क्रियःगोः चन्त्रेतः र्ह्म						
इस्याम्रह्म	५०१५-१७	२०१७-१५	9094-9F	९०१८-९०	१० २०-२१	নৰ্কুমনা
व्यक्तः श्रुपः ग्रुः चन् ःवेंदः रही	दब्देश्दन0-नर	दत्रभत्र-००	૭૫, ન્<થ.પથ	१०,१००-१६	q <i>6,9</i> 4q.9&	222,24 4 .6¢
७.८्रॅ शस्त्र	6,4921.26	७,५७७.०७	સુત્રીયાં ૧. ૧ વ	4,9/20.014	6,4901.26	2C,4DD.OC
ભૂર્ <u>ફ</u>	12,124.C4	12,409.40	20,046.14	24,24,0.02	22,444.42	201,442.94
ৰ বন্ধ: <u>ট্</u> ৰাৰ্শ্ব্য	2,624.021	9,624.60	9,624.60	2,2120.66	२,०३०.५६	7,290.07
त्रबुग्।गृतुरःगी:बर्'र्सरःपॅरसःचर्स्स्रस्।	૯૫.૫૫૧,૧૭	46,449.46	૯૯,૦૫૯.૧૧	ત્વે,ત્વે કે. કેર	و٢.و٩٥,و١	१८,०१७,०१
बर्-ब्रॅट-वी-ब्रॅट-बर-वर्ष्ट्रसम्बन्धः स्रॉट-ब्रुप्ट-बर्- वर्-ब्रॅट-वी-ब्रॅट-बर-ब्र्स्ट्रसम्बन्धः स्रॉट-ब्रुप्ट-बर्-	«دب.نا» (هاب.نا»	૯૫.૧૮%	4 6.06%	46.04%	વ્હ⊹અહ%	€0:00%
दर ःवर्षेदःभेतुःभेतः व्यंदसः वर्षेदः *	૧૫૯,૧૧૧.૯૫	Jac.436.00	124,00c.40	カカケカ(はあ)かん	૧૧.૪,૯૫૧.૪૯	ન્ચક્,વપક્ .હક
बर-लॉर्य-इंब-क्रुन-लॉन्स-लॉर्य-स्य-स्य-स्य-स्य-स्य-स्य-स्य-स्य-स्य-स	26.p.2%	૧૯૭ ૯%	%رە،،م	11.90%	100%	૧૧.ચર્જ

चितुरापुरसः ५५०१ हैसः द्वृतायपार्थमा मी- दयरसः हैसः व्यस्य प्रात्तरसः ग्री- वद्यमा गातुरमी व्यं यक्ष्य ५५०५ हैस विद्यापा



ફ્રુૈ'ર્ભે 19૯૧૧ મુૈ.ભૂ. વર્ષ, જાત્વ. શ્રીવ.ગ્રી.ળવો.કેવ.જ્..સુ.ચી.વાનર.વર્સ.લવટ.હુવજાળનાર્વર. જાત્વ.શ્રીવ.મું.ળવા.લીવાના तर्नु त्येनशः क्षुर अर रचन के नायन प्येन पर स्थापन की त्ये प्रति स्थापन स्यापन स्थापन स्यापन स्थापन १००० मैं र्ते वरमुरमा निष्य स्वित्र प्रमान्य स्वत्र स्वत्र प्रमान्य स्वत्र स्वत्र प्रमान्य स्वत्र स्वत्य स्वत्र स्वत्र स्वत्र स्वत्र स्वत्र स्वत्य स लु: कु:के:इग्रथः स्रे:पक्षुरः पर्वे: तप्प्र-१:त्रिग्।

५ गाद र ता ची नहें ५ १ दें । मिलुर मी आर्व स्तुन से र त्युमाश्वर त्यु । योगाश स्तुर अर स्वश्वर स्वाप स्वाप स्वाप अर्थ स्तुमाश ची । न्यादःर्धः र्वे देख्यान्त्रः अञ्चन्त्रः अञ्चन्त्रः विष्यान्त्रः विष्यान्त्रः अर्थे अर्थः विष्यान्त्रः विषयः ञ्चूरातन् देवि देवाया केवर्थे देवाया वे प्यत्यन् सार्द्धवायाया वर्षे ज्ञून पडत पी वा दि ज्ञून पवि देवा केवर्थे ॱठवःग्रे'न्रबःप्रद्वेत्रन्दःप्रमावःप्राप्ते अर्थिःश्चेन् प्रयम् द्वेतैःर्नेवःसुःश्चेवःसुनः पदिःवदः न्यन्यान्त्रीतःन्दःपद्वेताः বর:বুশার:শ্বুদা:ভর:শ্রী: मार्थर मार्ने र द्वं प्रमामा प्रह्में र प्रवर प्रें र पर्ट र क्रिं क्रिंत क्रिंत क्रिंत प्रक्रिय क्रिंत प्रक्रिय क्रिंत क

- अर्थि: श्रुप: ग्री: चु: रेअ: प्रदे: मुश्य: मिर्हर् ग्री: व्यव्यः मेशः र्तुः तु: प्रमाना प्रदेव रुदः प्रदः मित्रः मी अर्थे: श्रुप: ग्री: प्रमाना प्रदेव रुदः प्रमाना प्रदेव रुदः प्रमाना प्रदेव रुद्धः प्रमाना प्रदेव रुद्धः प्रमाना प्रदेव रुद्धः प्रमाना प्रमाना प्रदेव रुद्धः प्रदेव रुद्धः प्रमाना प्रमाना प्रदेव रुद्धः प्रमाना प्रमाना प्रमाना प्रदेव रुद्धः प्रमाना प्रमाना प्रमाना प्रमाना प्रमाना प्रपत्ते रुद्धः प्रमाना . तर्ने मीया अर्थि स्मृत मु:रेया दरायुः मायर मार्ने र ग्री मनय मिया सुं र्ये र या वर्षे दे र वर्षे द र युः यु मायर मार्ने र ग्री मायर मियर स्वापित स्व यनरे.बु.मु.घरे.वर. अपू.मैंच.कु.जशांवीयायरः जुवायाःमैंर.यनवा.पूरःरेग्रीतायरीवा
- मीलामिबिटा द्वेश बिना ने नरायहूर मीला नर्षेत्र द्वेश बिना क्षेत्र खे. मीर्थर जी विद्यामा निकास के की मीर्थ स्थान तयन् से मी खन् । यन वर्षे विष्टुन प्रमुन् न्हुल तसे वर्षे मुं स्वर्भ से प्रमुन वर्षे भी स्वर्भ से प्रमुन स ५८:त्यार्क्षेन् प्रवेच प्रवेच प्रवेच कुन् वन प्रवासी विभया श्री विभया श्री वा विभया प्रवास विभया विभया प्रवास विभया प्रवास विभया प्रवास विभया प्रवास विभया प्रवास विभया विभया प्रवास विभया प्रवास विभया गहर हैं। यार्श्रेम्बरम् दराद्येयायदे म्बर् देवाबर् म्बर् केंग्बर मुख्यायमित स्वर् देवाबर मुख्यायमित स्वर् मुदार् बरः र्क्ष्णःभ्रुषःलगाःजुषःर्क्षःखनःकुःर्द्याश्वःश्चेःचुरःश्वःरेःग्वेशः गलिरःग्वेःश्वारःश्चेनःर्क्षःषरः खलानननःभ्रःर्क्षःग्वेः र्दुलायदीः कुर् चर् महरूर्रे र्सेन्यते कं मुरायधेवायम् । तरुमा

ૡૡૢૺૼૺૼૼૼૼૼૼૼૡઌૺ૱ૡ૽ૼ૱ઌૢૼ૱ૹૢ૽ૼ૱ઌઌ૽ૼૹ૾ૢૣ૽૱ૡઌ૱ૹ૾ૺઌૹૠૢ૽ૺૡૢૼ૽૿૽૽ૹ૾૾૱ઌ૽૽ૼૹૢ૾ૢઌઌઌ૱ૹ૾ૺ૱૱૾૽ૼૹ૾૽ૡૢૼ૽૽ૢૡૡઌૹ૽ૢૼઌ क्ष्.मी.ही.नर्ज्ञ्यम.मी.र्ज्ञ्य-क्र्य-बर-मणामह्मेयमाल्यनात्मा मिल्ट-मीमा मार्या ह्यूंनावरातुः नृद्धामी मार्यान बे'बरः चरःकर्'कुच'श्रे'पर्गा

२श्चेम्बःसुवःर्ह्यु

୵ୠ୕୕୕୕୕୕୕୕୶୶୷୕ଌୄ୕ୄ୷୵ୠ୕୷୶୕୷୷୷ୣୡ୕୴୵ଃ

ત્રું વસ્તાવર્મી ત્રું. કે. ત્રસા વધ્તી. હિરાન મેં વદ્ધાર્થી ત્રાફ્રેયા છે. ત્ર

८८. बिच.बिट.बुी प्रह्म त्या त्या के.क्ष्य क्षे.जी. चयाचा तहूय क्षे.प्राप्त प्रमाय प्रमाय प्राप्त प्रमाय प्रम प्रमाय प्रम प्रमाय प्रमाय प्रमाय प्रमाय प्रमाय प्रमाय प्रमाय प्रमाय प्रमाय

هِم:هَمْ

कःमुखः या मालुरःमी स्रोवः स्त्रुपः त्यस्य त्युम् स्वरःमी प्रमादः रूपः प्रदःमि राधे दः ही

भार्यः श्रुपः पञ्चरः धीमाः प्रदः श्रुपः मालिः ब्रदः सुर्वः विदः सुर्वः अतः स्वयः स्वयः स्वयः स्वयः स्वयः स्वयः

लीलः मार्ड्, म्. पट्ट, पी. चर. कट . मैच . क्षेट्र . पटटी मी ट्रिश्ट स्थान प्रमान स्थान स्

र्च्याप्तराह्मत्ता वर्षेत्रार्धतात्रेत्राक्षेत्राच्या तेष्यस्य कुत्वत्रः कुं:चुरापतेःगवत्रार्देत्रःक्षेत्रार्भेशःकेगाःक्षेःशर्भेरः कुर्पावतः

र्वेबः क्रुन् पर्वेर के द्रम्य से महर र्येन के बर त्या

मिलुर-मी'अर्थि:श्रुच-पर्दी: ५'ख्रेंदी'नर-४'७८: बी'न्बर्ब

गालुर-गो'आर्थ-श्रुप-पदीः ५'ह्रेप्टै'चर-द,'यपरः क्षे'न्यरक्ष-श्रुपः

ટ્રિસ્ટર્સુલ લે. લે. લે.થે.ત્રાયા છે. સાત્રાસી. તરાત્રસીર ટે.લેર્ટ્સા મારા ત્રાસ્ટર્યા સ્થિત છે. ત્રાસ્ટર્યા સે સાત્ર ત્રાસ્ટર ત્રાસ્ટર્યા સે સાત્ર સ્ટર્યા સે સાત્ર સ્ટર્યા સે સાત્ર સાત્ર સ્ટર્યા સે સાત્ર સે સાત્ર સ્ટર્યા સે સાત્ર સ્ટર્યા સે સાત્ર સ્ટર્યા સે સાત્ર સ્ટર્યા સે સાત્ર સે સાત્ર સ્ટર્યા સે સાત્ર સ્ટર્યા સે સાત્ર સ્ટર્યા સે સ્ટર્યા સે સ્ટર્યા સે સાત્ર સ્ટર્યા સ્ટર્યા સે સાત્ર સ્ટર્યા સે સ્ટર્યા સે સ્ટર્યા સે સ્ટર્યા સે સ્ટર્યા સે સ્ટર્યા સે સ્ટર્યા સ્

ૡૼૼૼૼૼૼઌૄૺ૽ૣૼૹ૾ૻ૱ૹૢૣ૾ૢૢૢૢૢૢૢૢૢઌઌઽૢ૽૽ૼ૽ૼ૱ૢૢૢૢૹ૽૽૾ઌૹૢ૾ૢ૾૱ઌ૽૽ૼૺૹ૽ૢૢૢ૱૽ૻૺૹ૽૱ઌ૽ૺ૱૱ઌઌૡૡૺૡ૽ૺૹ૽૽ૡઌ૽ૺૡૡૡૺ ૡઌ૱૽૽ૢ૽ૺૡ૽ૺ૱

४.७ ऑर्वे क्षुच ग्री तकर मृदि ५८ देश तमम ग्री महम् दिया परम क्षे से म्या

ઌ૿ૺૺૡૺ૱૱ઌ૾ૺ.ચક્ષ્યું કે.જી.તફે. જ્વાર-કુ.સ્ત્રા.કુના.જીય.તનાં સુંચા.ઝુ.તનાં વર્ચા.ચીત.વલેંગનનું સાન્યસ્ત્રી. વક્સેંયે ક્રીયા જાયનાં ક્રિયા. સુંચા.સુંચ.નું.ત્યાં રાત્ર. કુ.જી. રાત્રના કૃષ્ય. જેરે.લેર્ચા.જીય.તના હું.વેર્યા.જી.વધ્યા.જુ.વધ્યા.જુ.વધ્યા.જુ. તું.લેર્યા.સુંચ.નું.ત્યાં કૃષ્ય. કૃષ્ય. કૃષ્ય. કૃષ્ય. કૃષ્ય. કૃષ્ય. કૃષ્ય. કૃષ્ય.જીય.તના હૃષ્ય. કૃષ્ય. કૃષ્ય. કૃષ્ય. તું.લેર્યા. હૃષ્ય. કૃષ્ય. કૃષ્ય કૃષ્ય. इण्यार्क्ष:ब्रन्तः मेन्टिक् न्याः मेर्क् न्याः क्रांध्यः क्रांध्यः विश्वः विश्वः विश्वः विश्वः विश्वः विश्वः व ने प्योत्रः

- च्रिक्षः वार्स्स्रेटः वी : चर्चः क्ष्मेटः विका वार्क्षेक्षः वार्षेक्षः वार्षः व्यक्षः विक्षः विक्षः

४.४ वर्षिःर्श्वेन्'मःहुं'न्नः विषा'यमण्यः ने'यमः र्वेकःर्क्वेद्यःमहुं'णै'ग्विकःसून्'ग्वि'वर्धेन्'यम्बास्थासे'येन्या

४.४ देव पश्चर दु ने पुरुष्ठ वर सु कर क्रिंब हु पूरिया

વર્સુ નુસ્ત્રાર્ભાર્લ્સ, ર્થ્ફરે, ક્રેમ્ડ્રિ, જ્વાના ત્રામાં સુરાય વર્ષા ત્રામાં ત્રામાં ત્રામાં સુરાય કર્યા ત ત્રામાં ત્રામાં ત્રામાં કર્યા ત્રામાં ત્રામા ત્રામાં ત્રામા ત્રામાં ત્રામ

४.८ श्चिट खिल ५८ से न्यरमायादी हेदासार्यिक मार्कु यो। देदार्योदा यो श्चिदा हेमार्सुः र्वेदात्र वृत्यार्थ प्राम

<u> ने खु.चक्रेब.</u>के. तर्चिब.बु.सूर.क्रन.लब.तक्र.बर.बी.बूर.क्रन.क्रे.बर. अंचनानचना.क्री.बूचा.बु.सूर.क्रे. क्रे.ने.शुब.तरीबी

४.५ अर्थि: क्षुप्तः ग्री: त्यसः र्देव रर्द्धः वटः खुदः देगाः मी: त्यू: दटः सः स्ववस्य

मोष्याक्षर्यः भीत्रः अःक्ष्र्रेतः सत्रः यरिम्। अष्ट्ः स्त्रीतः क्षेः त्याः स्त्रः यर्तमः स्त्रीतः क्षेः त्याः स्त्रः वितः स्त्रमः वितः स्त्रमः स्त्रः स्तरः स्त्रः स्तरः स्त्रः स्त्रः स्त्रः स्तरः स्त्रः स्

यसर्देवः श्रे च द्वे दर्गेयः यहुगा

स्तरः श्रेः अर्थरः त्यसः मार्थन्यः न्तरः श्रे सः श्रेः मार्थे सः कः सः सः सहनाः स्ट्रः स्त्रः स्त्रः सहनाः स्तरः स्त्रः सहनाः स्त्रः स

चक्ष्यं चाष्य्यः वच्याः त्यां विद्रायः चिद्रायः विद्राविद्यः क्षेत्रायः विद्यायः विद्य

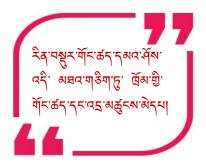
२.७ भू'तम्बर'५८'यम्बर'यम्बर'३अअ'यर्ग्ने'र्रे'र्थे५म्।

४.७ र्कन् प्रहें त्राथमान्त्रे र्कुं मी प्रमादा र्ने तान्नी तरक्ष मी सक्र प्रायमेणा सेन्या

ૹાર્યઃ શ્રુંવઃ વદઃ તો. પેટેજા નું નાવશ્નાનું દર્દા કોંશાવાયું. શ્રું શ્રાધી શ્રુંતા ત્વારા કું પ્રાપ્ત કોંશાવાયું શ્રુંતા ત્વાયા કું તો નાવશ્વાયું કોંગા કોંગા કું તાલું કોંગા કોંગા કું તાલું કોંગા કોંગા કું તાલું કું તાલું કોંગા કું તાલું કું કું તાલું કું તાલું કું કું તાલું ક તાલું કું તાલું કું કું તાલું કું તાલું કું તાલું કું તાલું કું કું તાલું કું કું તાલું કું કું તાલું કું કું

१.५ श्रुमार्कन् विदायते र्वेद न्द्रिमार्तुः देवायेदायम् प्यन्य

_{९.०} रेब्'नश्रुरःर्वेटःर्ढन्'न्बयःर्वेशःयदैः र्वेशःग्रीःर्वेटःर्ढन्'न्ट्यइःबर्ढ्ट्श्यन्धन्धा



^{মার্ম} শ্রুঁশ্বশ	নুইন্ধ ইন্নিন্দ্ <u>ৰ</u> ীথ <mark>অন্</mark> বন্	ર્થેત્-હંત્-ર્ફ્ેક્ત- ^{ર્} બેત્ય (ત્ દુવઃ ગ્રહ્મ:)	र्खेशःश्चेर्मेतःरूर् मेतःरूर्-देशःहैमः (५५७गःग्रमः)	र्वेदःर्ढन्:खन्:यदः (न्दुव्यःग्रवः)	%
યશ્ચે.ઝુ.૧ સમ્ફાર્મીળ	Theophyline 69 mg+etophylin 231mg tab	रःदप	o.แฆ๕ (MRP)	ગ.પગ(ડ	1,1 <i>1</i> <6%
यः ह्रेंगीय लाष्यितर दुशा	Magnum Boots	६,३००.००	€9 3 .00	३,५५ ७.००	ቦ ≇ቦ%
यक्षे.दे.क. बर.हे.ग्रांजी	Ethionamide 250 mg tab	292.00	12.e4 (MRP)	<i>૧૦</i> ૫.૫૫	r22%
व.व.लाव.५.८४४४	Multi-function printer	૧,૧૪,૫૩,૫૩,૦૦	\u24,\u27.\u24	<i>५</i> ३०,५१०.१५	44.40%
षायर.स.त. के. लुष २.५.तरदेशी	Biometric system	પ ,પ૦૫, ૧ ૧થ.૦૦	३,०६२,५३७.००	<i>२,</i> ८७२,३००.००	49%
पहुरी पहुरी अप ह. अप. चुना यू.जू.हुम. श्रुम् र र्ज. क्षर.	Heavy Duty printer (Xerox Phaser 5550dn)	ን ୭/0/ዓ የ.00	<i>909,</i> 4,44.04	<i>હ</i> ્ર,૨૦ હ .,૧૧	<i>७</i>

१.७० ५ चे लियायय र्कर हे प्यें प्यये देव पश्चर में प्रक्रिं प्वयः में बार्ष वर खर प्यर लिया के प्रकार में वर खर

ત્યન્ત્રાં કું. મું. ત્રું. તે ત્રું. ત્રે ત્રું. ત્રું. ત્રું. ત્રું. ત્રું. ત્રું. ત્રું. ત્રું. ત્રું.

84Z	शाूर स्नैय.जन्न.कृ	देव'चसूर'र्वे(र'र्कर'र्न्थयःर्भेश (द्दुव्य'ग्रब्य)	रेद'य <u>श</u> ्चर'य	<u>ভ</u> ্ব'শ্ব্
2	त्र बुगः र्कतः मन्तिः मर्गोतः र्केषाया	۲,000	विरःरेग	0%
3	तर्चे बार्श्चि इत्र. क्ट्रेय. यहूष. ट्यट. यहूषी	00.00م	<u> </u>	0%
3	बरःब्रेन्-न्रःब्र्लायदे वः स्वापना	090.00م	लेख.लप्टु.मु.सू।	1%
٩	यमःभ्रः न्दः भ्रेः र्बेट्न सः स्वृतः । वसःभ्रः न्दः भ्रेः र्वेदन सः स्वृतः । वसःभ्रः न्दः भ्रेः स्वृतः ।	p3p.00	त्येट:देगा	۷%
ų	झे य .मीका.मीखेट.क्र्याका.लुच.क्ट्रा	00.9م	विट:देग	11%
(ı	श्ची.क्र्यान्त्रा	00.9م	ायेट:देगा	11%
ป	८ ५ .केर.न्याया.र्ज्ञ.केष.केष्य	9,20.00	छो:चे	\3 %
4	ग् . क्ट।	9,340.00	શ્રે-દ્યે-છોશ્રા	40%
ľ	म्येज.यषिट.त्रुषम्ब.सीट.उचाचा.म्री	وه.٥٥ له, ۶	ब.बा	320%
90	यबुग्।यम् र्नेष् मक्कुन्।यबेथःन्नःयम्।यकुनःन्यः	३, २५०.००	শ্ৰ-বশ	444 %

	वहेंबा			
99	त्यन्त्र्याः स्ट्री त्यन्त्र्याः स्ट्री त्यन्त्र्याः स्ट्रीयाः स्ट्रीयः स्ट्रीयाः स्ट्रीयः स्ट्रीयाः स्ट्रीयः	३, 600.00	म्रीज.लूटश	3 00%
23	तत्त्रुगाःगीः चर्चगाः तत्त्रुः कृषः क्वेंगस्य	३,७००.००	ข ึ่ਯ.ศูะฟ	312%
23	तर्चेग.चर्जे.चर्चज.कू्चन्न.कृ	રૂ,,,,,,,,,	ले.ची	300%
26	ब्रचश हेंग झुव विगा	6, 200.00	ब .ह्य	ત્રુલગ%
24	मैज.लूटश.शघय.प्राप्ट. योषश.केंटश.केंथ.कू्यांश	e ,300.00	ৰ'ৰা	ર્ય 🛠
16	र्मणःतत्त्रुगःद्वेयःयहुगःकुःम	٧,٤٥٥.٥٥	क्षि:धे:बेहा	3 Վቦ%

१.११ मृतुरमी'अर्थि'स्रुपादर मृर्थिचेयाद्रराद्रदान्नुद्रमुं ग्रीमुर्खुदायमा केदासुरायेमामार्भियायेद्रम्

कार्च: श्रुपायकतः ध्येषाः प्रदान स्त्रुपाः स्वायक्षेत्रः स्वायक्षेत्रः स्वायक्षेत्रः स्वायक्षेत्रः स्वायक्षेत्र वायव्यायञ्ज्ञयायः तयन दर्भयः स्वायक्षेत्रः स्वयक्षेत्रः स्वयक्षः स्वयक्षेत्रः स्वयक्षः स्वयक्षेत्रः स्वयक्षः स्वयक्षेत्रः स्वयक्षः स्वयक्षेत्रः स्वयक्षः स्वयक्षेत्रः स्वयक्षः स्वयक्षः स्वयक्षेत्रः स्वयक्षः स्वयक्षेत्रः स्वयक्षः स्वयक्षेत्रः स्वयक्षः स्वयक्षेत्रः स्वयक्षः स्वयक्षेत्रः स्वयक्षेत्रः स्वयक्षः स्वयक्षेत्रः स्वयक्षः स्वयक्षः स्वयक्षः स्वयक्षेत्रः स्वयक्षः स्वयक्षेत्रः स्वयक्षः स्वयक्षः स्वयक्षः स्वयक्षः स्वयक्षः स्वयक्षेत्रः स्वयक्षः स्वयक्षः स्वयक्षेत्रः स्वयक्षः स

- त्या के पा क
- तथाकृ ग्रीका प्रत्याका का प्रत्या का प्रत्या विषय के प्रत्या का क्षेत्र के प्रत्या के

१.११ वान्ड्यार्स्स् सुन् जेंबामहरार्धेन्य

- श्रुं'र्थ. ४००० प्र्य. यह्म्बान्त्रभट्ट, चार्थेयाः भ्रम्भात्त्रभ्यः चर्थ्यान्त्रभ्यः चर्थाः चर्यान्त्रभ्यः चर्थ्यान्त्रभ्यः चर्थाः चर्यान्त्रभ्यः चर्थाः चर्यान्त्रभ्यः चर्थाः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्थाः चर्यान्त्रभ्यः चर्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यान्त्रभ्यः चर्यः चर्यान्त्रभ्यः चर्यः चर्यान्त्रभ्यः चर्यः चर्यः
- शुःर्देः सुरः धुंन्य्यतेः न्वरः दरः उप्तास्य सिर्यः ग्रीयः प्रति स्थिः स्थाः स्थाः स्थाः स्थाः स्थाः Auto Clear X-Ray केनाः शुःर्दे मुखः श्रीः न्वर्यः सुः स्वरः स्व
- ध्रुं'र्थं २०१५ ध्रुं'त्त्रं प्रते वरः र्श्वयान्द्रम् अर्थः वर्षः वरः वर्षः वर्षः वर्षः वर्षः वर्षः वर्षः वर्षः वर्षः

१.७३ ५५,०। तम्रमः र्सू ५ तम् विष्य

कःमुख्यः यः श्चीरःयहरःषीःश्चुःक्रीवःर्द्ध।

ट्रे.ल्ट्रः चिष्ट-त्रचुल-अफ्.स्रीय-तन्त्र-तियान्त्र-प्रियान्त्र-प्रम्य-स्रीय-क्री-प्रम्य-प्य

४.७ मृतुर-मी'अर्थि-श्रुप-त्र-त्रनेवाकम्बाक्ष-सेन्-प्रते-श्रीन्-युक्ष-र्त्तु-मृत्वकाने-व्यन्ना

શ્રૈશ. જ્ર્રેન્ડ્રેન્ડ્રિયા ત્રાપ્ત્રિયા ત્રાપ્તિ ત્રાપ્ત્રિયા ત્રાપ્તિ ત્રાપ્ત્રિયા ત્રાપ્ત્રિયા ત્રાપ્ત્રિયા ત્રાપ્ત્રિયા ત્રાપ્ત્રિયા ત્રાપ્ત્રિયા ત્રાપ્તિ ત્રાપ્ત્રિયા ત્રાપ્તિ ત્રાપ્તે ત્રાપ્તે ત્રાપ્તિ ત્રાપ્ત્રિયા ત્રાપ્તે ત્રાપ્તે ત્રાપ્તે ત્રાપ્તે ત્રાપ્તે ત્રાપ્તે ત્

- ग्रिन्म्भूर्ये प्रभावस्य द्वं त्वर् व्यक्त प्रमाय क्ष्य क्य
- प्रमानिक्षित्।

 ब्रियाविक्ष्णिः श्रुष्याः श्र

- द्धुप्रमाश्चर्यं श्चें श्चर्या श्चें राज्यं राज्यं स्वायं स्वयं स्
- द्वनःमश् (व्युगानी में र्-क्र-क्री चुर-देन दनः निद्यस्पे र्क्ट-क्षिं क्रिक्ट क्षेत्र में र-क्र्र-क्षेत्र चेत्र च्या क्षेत्र क्षेत्र
- न्तर्या नृत्यन्भात्रा जयाज्ञेन्द्रन् श्रीमान्त्रा न्यान्त्रितः श्रीमान्त्रा न्यान्त्रितः स्वान्त्रित् स्वान्त्रित् स्वान्त्रितः स्वान्त्रित् स्वान्त् स्वान्त्रित् स्वान्त् स्वान्त् स्वान्त् स्वान्त्रित् स्वान्त् स्वान्य स्वान्त् स्वान्त्यः स्वान्त्यः स्वान्त् स्वान्त् स्वान्त्य

दः यहारार्श्वेन प्रमान सम्बन्धः क्रिन्स् स्राप्ति स्रापति स्रापति स्राप्ति स्रापति स्रापति स्राप्ति स्राप्ति स्राप्ति स्राप्ति स्राप्ति स्राप्ति स्

ઌૹ.ઌકુષ. જાત્યું.ૹ૾ૣૼ.ય... કે.કૂંતા.ત્રી.તજાતીયાજ.૨૮. ષ૮.તત્વ્રાપ્ટ.૧૪.લદ્ભુય. ટે.તજા.પીષ.ફ્રીંટ.ક્ષ્ય.તહાતી.જ્રીંક્ષેટ.ક્ષેટ.જ્રીટ.જી.

- a) तम्ब्रायम्प्यम्यम्यम्भः कें मिश्रः व्यक्तिः स्वर्मः स्वर्मः स्वरं मिश्रः व्यक्तिः स्वरं मिश्रः स्वरं स्वरं
- 4) तर्क्च नहुन् न
- क्, प्रचा,त्यचा,क्र.चंश्व, द्विश्वश्च प्रमेश्व, श्वेन्त्र, द्विश्वश्च प्रचाना, प्रच
- बेन्या ८) अर्पि श्रुपारमाद प्रदेन प्रार्द्ध न्दः यहा अर्पि श्रुपार प्रदेश प्रद
- ढ़) श्रुअः क्रन् न्वायद्वितः क्रुं श्रीनःश्रीनः योन्नान्तः मालुनः मी आर्थः श्रुवायः में दे त्यायः विवायत्व व

दःद खुर् देग्'गे'र्खुग्रथ'सुय'सेर्य

यद्यन बुदु.जॅ.यचिष.धूँट.ट्र.लूट.तपु.कृ.तथ.कृ.लूटन.लुध.दट. जल.कृ.थट.सूल.कुच.थट.र. आप्.क्रैंच.कु.जॅ.यचिथ.कृ. चटच. आप्.क्रैंच.कु.जॅ.पं.यचिथ.कृ. चिथट.च्र.च्रियचिश.द्रश.च.रपु.थट.जल.त्तर. किच.क्रे.यटीची जल.कृ.कृंख.थट. आप्.क्रैंच.वहूध.कृंट. मुँट.रेट.क्ष्रिय.पह्र्य.जम.क्ष्य.रेट.योड्रुयो.प्यर.तर्जूम.हे.पर्ययो। ह्यैर.त्येट.जी. क्येज.प्यत.येट. भाष्.म्री पर्जूभम.क्री.क्ष्र्य.जम.क्ष्य.पर्ययो

- **३०१८. ब्रैंगश्चीयर्थ्,शुर्थाश्चीयःश्चित्रःश्चीयःश्चीयःयर्थः** श्चित्रः श्चितः श्चित्रः श्चित्रः श्चितः श्चितः श्चित्रः श्चितः श्चितः
- 4) देव प्रश्नुर र्हेन् वास्तु स्तु त्र त्रेव प्राप्त स्वत् प्रते त्या स्वत् स्तु स्वत् स्तु स्वत् स्य

મલે શું મુૈત-ત્યાના કુયા લ્યા લે ત્યાં તે ત્યાં તે ક્યા લે પ્રાપ્ત ક્ષ્માન સ્થાન સ્

क् मीयः देगाम्बरः मीयः विद्यत्यः मेवः विदेश्यतः विदेश्यतः विदेश्यतः विदेश्यविद्यत्यत्यतः विदेश्यविद्यत्यत्यतः विदेश्यविद्यत्यत्यतः विद्यत्यतः विद्यत्यतः

इ.५ तन् नर्डेद नस्री नदित्यमायुगमायदमास्रे सेन्या

 $\frac{2}{3} \frac{1}{3} - \frac{1}{3} - \frac{1}{3} \frac{1}{3} - \frac{1}{3} \frac{1}{3} - \frac{1}{3} \frac{1}{3} \frac{1}{3} - \frac{1}{3} \frac{1}{3} - \frac{1}{3} \frac{1}{3} \frac{1}{3} - \frac{1}{3} - \frac{1}{3} \frac{1}{3} - \frac$

३.७ व्रॱहेंग'र्र'व्रु'र्ग्ग्र' श्चेर श्चेर सेर्प

तन्त्रसः जःस्वीस्यत्वेत्त्रम् स्वेत्रःस्वेतःस्वेतःस्वेतः ने ज्यसः न्द्वाः स्वेतःस्वितः स्वेतःस्वितः स्वेतःस्वित स्वितः स्वतःस्वान्तः स्वेत्यःस्वतःस्वितःस्वतः स्वान्तः स्वतः न्द्वाः स्वेतःस्वितःस्वानःस्वितः। स्वान्यम् । स्व

इ.व हैकार्थे सह्या तु स्वार्थ सुवादवर र्थे द्या

मी. चलु.र्नेति.यट.रचर्र्न्यं पूर्यं अपूर्मं में त्रि.प्रक्रां अहंगां वर्षे विषय अपूर्मे में वर्षः से वर्षः में वर्षः से वर्षः में वर्षः से वर्षः में वर्षः से वर्षः में वर्षः मे

लुब्रन्तम्। तक्रम्, नृट्णाण्यात्म्, वृत्तम्, वृत्तम्नम्, वृत्तम्, वृत्तम्नम्, वृत्तम्नम्, वृत्तम्, वृत्तम्नम्, वृत्तम्।

તન્દ્રન્ટ્રેન્સ્ટ્રિયા શ્રદ્મન્ડ્રિયાત્રદ્ધ: ક્રૈશન્યુદ્ધ:શ્રદ્ધાનો,નુંન્યું,નેરો.થેદ. તજમ.ત્રાહું,શ્રાનક્ષ્મ:તમ. શ્રાહ્મ^{ક્ર}ેન.ગ્રી.તજા.શ્રે. શ્રાહ્મ^{ક્ર}ેન.તજા.કૃં.શ્રું.ત્રીશ. તુવ:ત્રદ્ધાનું ^{ક્ર}ેન.શ્રે.

यह्याः र्देवा

 $\frac{1}{2} \left(\frac{1}{2} - \frac{1$

कुं.कृं.बुन. २८७१.कुं.बोबब्य.बूट.श्र.वह्न्व.त्तर.वर्टेबो यश्च.त्र.ताजन.वर्ट.टु. वर्ष्ट्य.कुंर.बूट.टू.लूट्त.जन. जन. स्ट. टु.जन. श्रेंन.क्ट्र.खंद.तदु.जैं.कृं.बु.ह्म्बे.जन. २८०. २८०१.वह्नं.बुट.टू. क्ट्र.बट.रट.बीच.वचन.श्रटे.तदु.बट.

क्रम्बर या ब्रिंबरदेनबर्स्

ড়ામ્યું વાર્ષી ત્યારા કુંવા તાલું કુંવા માથે કુંવા તે કુંવા તે કુંવા તે કુંવા તે કુંવા તાલું કુંવા તે કુંવા તે કુંવા તાલું કુંવા તે કુંવા તાલું કુંવા તે કુંવા તાલું ક

- 1. વર્દેત ર્જન રુત કૃવયા અદ્યુત શું છું કે અ શું નેંત્ર ત્યું અર્થિ ક્રુવ વસ્ત્ર ખેવા ન દ ક્રિવયા અદ્યાન ક્રિવયા અદ્યાન ક્રિવયા અદ્યાન ક્રિવયા અદ્યાન કરાયે ક્રિવયા અદ્યાન કરાયે કર્યા અદ્યાન કરાયા અદ્યાન કર્યા અદ્યાન કર્યા અદ્યાન કર્યા અદ્યાન કર્યા અદ્યાન કરાયા અદ્યાન કર્યા અદ્યાન કર્યા અદ્યાન કર્યા અદ્યાન કરાયા અદ્યાન કરાયા અદ્યાન કર્યા અદ્યાન કર્યા અદ્યાન કર્યા અદ્યાન કર્યા અદ્યાન કરાયા અદ્યાન કર્યા અદ્યાન કરાયા અદ્યાન કર્યા અદ્યાન કર્યા અદ્યાન કર્યા અદ્યાન કર્યા અદ્યાન કર્યા અદ્યાન
- 2. र्न्त्रित्रक्ष्मिः व्याप्ति व्यापति व्याप्ति व्यापति व्या
- 3. ७५-२ मानी भूर्र र गुतर्श्चे र इस मालमा र्स्न मी र्ने दास प्रमान प्रम प्रमान प्रम प्रमान प्

्र यहें व रहे न रहे न रहे व रहे न रहे व रहे न र

ઌ૽ૺ. ષાષ્ટ્ર શ્રેંતિ.તરુવ.ત્યુના.તર્યાના હુ. વેટ. ખે.તર્શેર. હુન. તનર . ત્ર્યાત્તવ, ટ્રેશનેશ. તલ્યા. જ્રીન. વરવ. ત્ર્રાના વર્ષે. તલ્યા. ક્રીન. તલ્યા. તલ્યા. ક્રીન. તલ્યા. તલ્યા. ક્રીન. તલ્યા. ક્રીન. તલ્યા. તાલું. તાલ્યા. તલ્યા. તે. તલ્યા. તે. તે. તલ્યા. તલ્યા. તલ્યા. તલ્યા. તલ્યા. તે. તલ્યા. તલ્યા. તલ્યા. તે. તલ્યા. તલ્યા

- श्रुअः र्कत् छुत्रः न्दर्भः न्दरः ब्विचशः हें ना र्कुः विद्वानिः न्यायः न्यायः स्थायः विद्वानिः विद्व
- बर्चर्यात्रस्यात्र्वीत्राक्ष्यात्रम्यात्र्वीयात्रम्यात्रस्यात्रस्य स्वात्रस्य स्वत्य स्वात्रस्य स्वत्य स्वात्रस्य स्वात्यस्य स्वात्रस्य स्वात्रस्य स्वात्रस्य स्वात्
- च्याश्राच्चाः वृ. ख्री द्राचाश्री स्वाप्तान्तर्त्, च्रीश्राच्चमा मान्न स्वाप्तान्तर्त् वृ. क्री. क्री. क्री. स्वाप्तान्तर्त् स्वाप्तान्त्रय्त् स्वाप्तान्त्रय्त् स्वाप्तान्त्रय् स्वाप्तान्त् स्वाप्तान्यः स्वाप्तान्त् स्वाप्तान्त् स्वाप्तान्त् स्वाप्तान्त् स्वाप्तान्त् स्वाप्तान्त् स्व

- देश्यह्मायन्द्रम् विन्यत्त्रम् विन्यत्त्तम् विन्यत्त्रम् विन्यत्त्रम्

८१ देव'यसूर'यर्द्धगायायते'स्रायकात्युं र्वव द्वरा/द्वेडे'विगार्द्ध'गायवायर्गेद्र'रवद्र'द्रविमा

कु.जी. चिरकात्मिच-कु.जर्यी रितर्य, चूर्य्य, चूर्य्य, चूर्य्य, चूर्य, चू

र्गूश्रश्चर्र-८-तर्श्वर, रेक्ने.खुन.क्यरे.रंगून.कर्या। स्मिन.क्यरे.कुप्तर्था क्षुप्तर्थः स्वास्त्रायद्वर्थः श्राप्तर्भ्या हे.क्यर्यायद्वरः स्वाप्तर्थः व्यत्यर्थः स्व स्वाप्तयर्थः स्वाप्तर्थः स्वाप्तर्थः स्वाप्तर्थः स्वाप्तर्भयः स्वाप्तयः स्वाप्तयः स्वाप्तयः स्वाप्तर्भयः स्वाप्तयः स्वाप्तयः स्वाप्तयः स्वाप्तयः स्वाप्तयः स्वाप्तर

यम् स्वीयात्तर, स्यास्त्रीयात्रप्तर्था।

अपनाती. जावाजुप्तरायुः सुंस्यात्रप्तर्था।

अपनाती. जावाजुप्तरायुः सुर्याः चूलाः सुर्याः सुर्यः सुर्याः सुर्याः सुर्याः सुर्याः सुर्याः सुर्याः सुर्याः सुर्यः सुर

ત્યન્ય વર્ષે વર્ષે ત્યાં કું ક્રેન્ડ વર્ષે ક્ષાં ત્યાન વર્ષે કું ત્યા કું

८.५ वर्हेर् कंन्य्यर सेन्न्र रहेर में रासर स्वायन प्रवस्था न्यर कंन् हो वास्य वर्ष वर्ष स्वरं स्वरं स्वरं स्वरं

વર્ષા શ્રુંના તું કાર્યા તર્સ્સા ત્રાના સુત્ર તું કો વાલી ત્રાસ્ત્ર ત્રામાં કો ત્રામાં કો ત્રામાં કો ત્રામાં ક ત્રામાં શ્રુંતા ત્રું કો ત્રામાં ત્રું કો ત્રામાં ત્રું કો ત્રામાં કો ત્રું કો ત્રામાં કો ત્રું કો ત્રામાં કો ત ત્રું કો તું કો ત્રું કો ત્રામાં ત્રું કો ત્રામાં ત્રું કો ત્રામાં કો ત્રું કો ત્રું કો ત્રામાં કો ત્રું કો ત ત્રું કો તે ત્રું કો ત્રું કો ત્રામાં કો ત્રું કો ત્ર

ब्दःत्वर्षेद्रःद्रश्चादद्वेद्दरः द्रद्धियःश्चेद्वेद्वःद्वरःद्वः श्चेदःश्चेदःवर्चेःद्वेद्या

यर्रे :र्क् :बरः ग्रानुबाःग्रायाः र्क् :र्कुर्यः छोदः

८.७ ५५० द्वपः देशः भ्रुवः त्वपाः वीवः eGP देशः शुण्यावायः देतः हे पाः भ्रुणः भ्रुः श्चितः श्चितः स्वतः देवः वे त्यवः व्यवाः विवाः व

 ૾ફ્રેંત્ર ર્ત્તું ભરમ સ્રે લેંદ : ૧ર્જે પ્રત્યું લવન : ૧લેંગ હોવા ત્રાપાલ : ૧૧૧૧ કેંત્ર : ૧૧૧૧ કેંત્ર : ૧૧૧૧ કેંત્ર : ૧૫૧૧ કેંત્ર : ૧૫૧૫ કેંત્ર : ૧૫૫ કેંત્ર : ૧૫૫

८ अर्विः अन्यायम् से र्स् वीमास हैं गान्य स्थाने प्राप्त निम्

- तमारवीलाक्ष्यां कु.यनरे देशः नर्षेत्र हुँ रे.भायनरे नयु. हे.भाजनः नर्षेत्र हुँ रे.यनरे नयु.जन्न हुँ ये कुँ वीमाबीनः

- प्रमात्यमानी मात्रकाळी मार्चु प्रदेश प्रमात्रका मात्रका प्रमात्रका मात्रका मात्र

 - > वगागठन ने प्पॅन प्यते वित्र क्षेत्र क्षेत्र क्षेत्र क्षेत्र क्षेत्र प्राप्त वित्र क्षेत्र क
 - > र्ष्ट्रेब च्चेब र्स्तुः ग्रम्थाय वर्गी ५ 'तय५ ' दे ' प्येद ' प्यति ' द्र्योत ' द्र्येत ' द्येत ' द्र्येत ' द्येत ' द्र्येत ' द्र्येत ' द्र्येत ' द्र्येत ' द्र्येत ' द्र्येत '
 - > धुषार्क्षर भी तकर माली र्सु पश्चर र्श्वेर तपन ती (न्यायहें कर पीर केय)
- પ્રાંફ્રિં અદ્વાનસું ખેતું નવેતું ત્વેના વર્ષો અન્ય સું ત્વન સું વર્ષો નવેત્રા સું વર્ષો અન્ય સું ત્વન સું વર્ષો અન્ય સું વર્ષો અન્ય સું ત્વન સું વર્ષો અન્ય સું ત્વન સુ

तह्नवःश्ची-त्रव-त्रविकःभून-वै-कुःजन्न-प्रकेत्वि-कुःतिवी। खर-नुवा-क्ष-प्रक्ष-प्रक्ष-प्रकेत्वि-कुःजन्न-कुःवि-कुःवि-कुःवि-कुःवि-किःवि-किःकुःवि-किःवि-किःकुःवि-किःकुःवि-किःकुःवि-किःकिःवि-किःकिःवि-किःकिःवि-किःवि

८० र्भेवाकायतीयतीयतीया

- प्रचारप्रचामार्ष्य्यास्यः भ्रींबाक्षात्रविष्यत्रित्वत्रेत्वास्यः चीत्रविष्यः चित्रविष्यः चित्रविष्यः चीत्रविष्यः चित्रविष्यः चीत्रविष्यः चित्रविष्यः चित्रविष्य

८.१० वर्जे अतुराष्ट्री तुषायुद्धा मानदायवेषयायवन् दे द्वार कंदारे मा मी विषय वाका पर्जे न्वें न्वें पा

इक्ष.ज्.रेट्-.चडुचा.चर. मृ.मुश.मुँचा.बुद्ध.मूर्य.ली. चिथ्य.प्यन्तका.प्यन्यसाली वचा.प्यचिताली. प्राय्ययन शुर्यात्य वच्या स्थात्य वच्या स्था वच्या स्थात्य वच्या स्था वच्या स्थात्य वच्या स्थात्य वच्या स्थाय स्थाय वच्या स्थाय स्य

सेंद्र, विश्व अर्थित चेंद्र, यद्र, यद्र, विद्वा, द्वान्तरीयी विद्वा, विद्वा, विद्वा, विद्वा, विद्वा, विद्वा, विद्वा, द्वा, विद्वा, द्वा, विद्वा, विद्

७,११ श्री स्याप्त स्थित स्थित

्रेचे ख्रियत्वर, ट्रे. जी. ट्र. ट्र्स क्. मी. श्रीश.क्. ट्रे. प्रट्र. यहे. क्य. याचे. अवतः श. ट्र. यहें जी. याचे प्रत्ये प्राप्त क्षेत्र क्षे

८.७१ तज्ञुगा मी १०४४ १८कर में रि. वर्ष र १८५१ हिंग्य १५८ । वर्ष मा १८५१ हिंग्य १५८ ।

शर्क्ट्रस्यान्द्रस्य न्यस्त्र स्वयं स्वयं

त्यन् द्रित्र क्षेत्र क्षेत

क्री.क्रे.च.प्तवा.क्रु.ट्यांक्षाक्षेया ट्रे.चर्डिंग्ज्ञे.ट्रुंक्रालीयाक्ष्यंत्रे. व्याव्यः व्यावः व्याव्यः व्याव्यः व्याव्यः व्यावः व्याव्यः व्यावः व्यः व्यावः व्यः व्यावः वयः वयः व्यावः व्यावः

८.७३ तम्बादाधीयर द्रमायहर मयसासु द्रसादहित दर हेसा कर् ही द्रसाद मार्थिय

चतुः शुःश्रम् त्यावे तहूष्यः स्थ्री ब्री ब्रिश्यः श्रवीयः त्यान्तः चयन्त्र स्थ्रीयः स्थ्रियः स्थ्रेयः स्थ्रेयः स्थ्रेयः स्थ्रियः स्थ्रेयः स्येयः स्थ्रेयः स्यः स्थ्रेयः स्येयः स्थ्रेयः स्थ्रेयः स्थ्रेयः स्थ्रेयः स्येयः स्थ्येयः स्थ्येयः स्थ्रेयः स्थ्येयः स्थ्येयः स्थ्येयः स्थ्येयः स्थ्येयः स्थ्येयः

दग्व- र्चेश-र्स्ट्रव-मा/र्केट-प्यश्क्रं मीशः विम्यः मिश्रिणःर्स्च्रिन-त्र्यः वेद-त्वव्यः मुद्द-त्वेशः न्द्रिणः न्द्र्यः स्वाप्यामिशः विम्यः व

क्र्रॅंस.व्हें. जुष्य.ख्रुय.तथा चक्र.क्र्रेंय.चे.जुं.जंर-ट.वचुंज.चतु. जय.त्यींज.क्र्रंयट. चर्ग्न्ट.क्र्रं.चट. च्र्य.क्र्रंयट. च्र्य.क्र्रंय.च्र्य.च्र

म्रीया तिया हुंचा म्रीया हुंच द्वारा त्वारा स्ट्रीय स्ट्रीय ता स्ट्रीय ता स्ट्रीय ता स्ट्रीय ता स्ट्रीय ता स्टर्मीय ता स्ट्रीय ता स्टर्मीय ता स स्टर्मीय ता स्टर्मीय ता स्टर्मीय ता स स्टर्मीय ता स्टर्मीय ता स्ट

ह्मण्या व्यक्षः स्वेत्वः व्यक्षः व्यक्षः व्यक्षः व्यक्षः स्वेतः स

मेश दह्यावर्षा क्रान्त स्वार्ध स्वार्ध स्वार्ध स्वार्ध स्वार्ध स्वार्थ स्वार्

यक्ष्र-क्ष्म्याक्ष्म्याक्ष्म्याक्ष्म्याच्छ्याद्वे त्रियायद्वयाद्वे त्याक्ष्म्याद्वे त्याक्ष्म्याव्यवे त्याक्ष्म्याद्वे त्याक्ष्म्याव्यवे त्याक्ष्म्याद्वे त्याक्ष्म्यावे त्याक्ष्म्याद्वे त्याक्ष्म्यावे त्यावे त्यावे

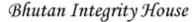


AUDITOR GENERAL'S ADVISORY SERIES

REVIEW ON GOVERNMENT PROCUREMENT SYSTEM



मुलागब्दा द्वेश विच द्वर प्रहेंबा ROYAL AUDIT AUTHORITY





RAA/AG-SP/25/2021-22/098

Dated: 5th November 2021

This Auditor General's Advisory Series on "Review of Government Procurement System" is issued in accordance with Section 114 of the Audit Act of Bhutan 2018 intended towards promoting accountability, transparency, integrity and value for money in government procurements. The copy of report shall be made available on RAA's website.

Auditor General of Bhutan

ACRONYM

ADB : Asian Development Bank

ACC : Anti-Corruption Commission

AIN : Audit Identification Number

BoQ : Bill of Quantities

BSB : Bhutan Standards Board

BSR : Bhutan Schedule of Rates

CDB : Construction Development Board

CiNET : Construction Industry Information System

CPWD : Central Public Works Department of India

CRPS : Contractor Registration and Performance System

DGM : Department of Geology and Mines

DNB : Department of National Budget

DNP : Department of National Properties

DPA : Department of Public Accounts

DPR : Detailed Project Report

e-GP : Electronic Government Procurement

FAM : Finance and Accounting Manual

FRR : Financial Rules and Regulations

FY: Financial Year

GCC : General Conditions of Contract

GDP : Gross Domestic Product

GPPMD : Government Procurement and Property Management Division

IRB : Independent Review Body

LMC : Labour and Material Coefficient

MoF : Ministry of Finance

NIT : Notice Inviting Tender

OECD : Organization for Economic Cooperation and Development

PFA : Public Finance Act

PRR : Procurement Rules and Regulations

RAA : Royal Audit Authority

RGoB : Royal Government of Bhutan

SBD : Standard Bidding Documents

SCC : Special Conditions of Contract

ToR : Terms of Reference

TABLE OF CONTENTS

Executive Summary	i
PART I: ABOUT THE REVIEW	1
Background	1
Problem Statements	2
Objectives	2
Scope	
PART II: ISSUES AND CHALLENGES IN GOVERNMENT PROCUREMI	
PART III: COMMON CAUSES	13
CONCLUSION	19
PART IV: RECOMMENDATIONS	21

EXECUTIVE SUMMARY

Government procurement constituted 40% of government expenditures for last five years (2016-17 to 2020-21). In terms of its contribution to country's economy, it accounted for 10-15 per cent of GDP on average. It constitutes a significant market and an important aspect of country's economic growth.

Procurement Rules and Regulations (PRR) renders basic structures and processes for organising government procurement. It had undergone series of amendments since it was first developed as a separate Procurement Manual in 1988. Despite numerous amendments, the PRR is yet to render an efficient system capable of reducing administrative red tape and costs in government procurements. With limited progress in e-procurement with the development of eGP, the strategic focus in government procurement is almost non-existent whereby the government is far from leveraging on digital technologies in integrating all processes of procurement. The existing processes are the legacies carried forward and have reduced relevance and applicability in current times when options of ICT technologies exist for transformation. There are numerous areas where continuity of old processes result in duplications and redundancies, limiting the ability of the government to embrace transformational changes.

The other issue in government procurement is the inability to ensure quality standards and mismanagement of public funds in the procurement of goods and services. Numerous issues of excess payments and compromised quality in the provision of goods and services continue to persist across procuring agencies as reported in successive Annual Audit Reports. Besides, range of non-compliance issues that have potential to undermine the fundamental objectives of government procurement continue to occur. Thus, the lack of strategic approach in integrating government procurement to consolidate processes and facilitate innovations, and inability to ensure quality of deliverables have become impediments in achieving value for money in government procurement.

The review identified following reasons that are seen to cause the above issues:

- Incoherent policies in government procurement that imposes limitations on procuring agencies to go for quality;
- The enforcement of procurement norms is weakened basically due to lack of accountability culture and mechanism for sanctions on delinquent officials and parties, and also due to inadequacies in monitoring and coordination functions between different agencies and authorities;
- There is a lack of overall capability of the procurement systems in the country to render high professionalism in managing government procurement;
- Limited ICTisation of procurement processes to render efficient processes, and facilitate strategic approach towards organising government procurement.

Government procurement is plagued with numerous irregularities having potential to undermine good governance. Therefore, to render procurement processes that respond to the needs of the time and facilitate value for money in public procurement, transformative changes must be initiated strategically. The systems and processes must be overhauled and must be reinforced through a strong culture of ethics and

professionalism. The RAA's recommendations are intended to respond to those challenges confronting the government procurement today and drive transformative change in its procurement function. Therefore, the RAA suggests recommendations categorised under three thematic areas — (i) Enabling Procurement Rules and Regulations; (ii) Strengthening internal controls and oversight functions; and (iii) Enforcing accountability and stricter sanctions. Specific recommendations are:

- PRR should undergo transformative change to render more efficient and effective procurement system. Government procurements should be allowed to be conducted through direct contracting or sourcing where there is a visible case of achieving better deal of receiving quality goods and services at lower cost.
- There is a need to remove restriction on specifying "brand" to ensure quality.
- Procuring agencies should conduct market research to understand the availability
 of choices in the market and the indicative market prices for required products.
- There is a need to prescribe due diligence in all stages of procurement cycle from the need analysis and pre-feasibility studies to delivery and conclusion of contract and reinforcing its application and compliance to render objective decision-making.
- There is a need for centralized procurements to enhance efficiency and reap the advantage of economies of scale.
- eGP should be made more robust, dynamic and user-friendly system to enhance efficiency and control in government procurements.
- A system of robust and standardized monitoring and supervision must be rendered to ensure that procuring agencies obtain required deliverables at right price and quality.
- There is a need to propound ethical behavior through development of Ethical Code of Conduct for procurement officials.
- Defect liability period must be determined based on the value, type, complexity and expected life of the structures to ensure adequate coverage of risks that may surface due to poor quality of works.
- The construction duration for the project should be determined scientifically based on the critical path method factoring in the resources to be deployed, availability of materials, seasonality, etc. to reflect more realistic deadline of the project.
- There is a need for robust collaborative and oversight mechanism for effective enforcement and administration of public procurement.
- Bhutan Schedule of Rates (BSR) must be reviewed holistically to provide comprehensive guidance for incorporation of work items and the prices.
- There is a need to reinforce ethical behaviors through prescription of stricter sanctions and penalties to improve accountability.
- MoF should develop a mechanism to hold Consultants/firms accountable for shortcomings in their deliverables.
- Agencies should strictly control employees engaged in private trade or activities/situations having inherent conflict of interests.

PART I: ABOUT THE REVIEW

BACKGROUND

Government agencies purchase goods and services with public resources and for public purposes in fulfilling their functions. Such purchases are generally referred to as government or public procurement which consume substantial public resources.

Government procurement constituted 40% of government expenditures for last five years (2016-17 to 2020-21)¹ as summarized in **Table 1.1**. In terms of its contribution to country's economy, it accounted for 10-15 per cent of the GDP on average. Therefore, it constitutes a significant market and an important aspect of country's economic growth.

Table 1.1: RGoB's procurement expenditures during FY 2016-17 to 2020-21						
(in million Nu. Particulars 2016-17 2017-18 2018-19 2019-20 2020-21 TOTAL						
Particulars	2016-17	2017-18	2010-19	2019-20	2020-21	IOIAL
Procurement Expenditures:	23,270.78	25,754.00	15,887.57	20,109.14	26,132.14	111,153.69
Goods	4,517.26	4,577.07	3775.15	5,194.75	4,517.26	24,577.04
Works	17,135.45	19,501.34	10,436.83	13,189.73	17,588.81	77,852.18
Services	1,618.07	1,675.60	1,675.60	1,724.66	2,030.54	8,724.48
Total RGoB's Expenditures:	49,966.61	56,331.36	44,054.13	57,572.28	71,091.81	279,016.19
% of Procurement Expenditures to Total	46.57%	45.72%	36.06%	34.93%	36.76%	40.00%
GDP*	156,112.65	174,516.00	176,404.30	179,567.99	186,652.99	873,253.93
% of Procurement Expenditures to GDP	14.91%	14.76%	9.01%	11.20%	14.00%	12.73%
Source: RGoB's Annual Financial Statements, DPA, MoF *Budget Report, MoF						

The **Figure 1.1** represents expenditure related to procurement of goods, works and services, representing 22%, 70% and 8% respectively over the period from 2016-17 to 2020-21.

Figure 1.1: Aggregate Procurement
Expenditures for 2016-17 to 2020-21

8%
22%
Goods
Works
Services

The procurement system had undergone several reforms

undergone several reforms since the development of a separate

¹ Source: RGoB's Annual Financial Statements, Department of Public Accounts, MoF

Procurement Manual in 1988 which was later revised in 1998. It was only in 2009, the Procurement Rules and Regulations (PRR) was issued, and undergone major revision in 2019.

PROBLEM STATEMENTS

Despite several reforms being initiated in government procurement regime, the inherent problems have still persisted, and not much could be done to transform the procurement

system. The Procurement Rules and Regulations (PRR) which are intended to provide effective controls and accountability, the rigidity and administratively burdensome processes it prescribed have smothered initiatives and hindered progressive developments in government procurement system. Some of the problems persisting in the current procurement system include:

- The procurement process is seen to be restrictive to innovative solutions and not responsive to current needs in terms of enhancing efficiency and effectiveness in government procurement system. Despite subjecting to regular reviews and amendments, the PRR is yet to bring transformative change in procurement system to enable innovative solutions and facilitate efficiency in procurement process.
- The Annual Audit Reports of the RAA highlight various issues related to fraud and corruptions, excess payments, execution of sub-standard works, cost and time overruns, wastages and misuse, non-compliances to laws and override of controls, etc., in the procurements conducted by government agencies. The rampant irregular practices in government procurements have fueled concerns on the taxpayers' money being wasted in government procurements.

All these issues and challenges are seen to have bearing on the overall quality of goods and services procured by the procuring agencies and impede government in achieving value for money in its procurement.

OBJECTIVES

The overall objective of the review is to recommend measures to bring about transformative improvements in government procurement system and support government's intent of achieving value for money in its procurement regime.

raide ioi inierio, in ite processioni

The specific objectives are:

- 1. To identify gaps in the current procurement processes and recommend changes for eliminating redundant processes and embracing ICT platforms in managing government procurements;
- To cause the authorities to bring about innovative approaches in government procurement system that facilitates quality and value for money in public procurement through enhanced professionalism and controls;
- To persuade for promulgation of ethical behaviors in public procurement process by specifying stricter sanctions on officials or parties responsible for perpetration of fraud and corruption in public procurement and breach of public trusts; and
- 4. To highlight the need for policy changes in areas where restrictions placed through such policies are seen to impede the objectives of public procurement.

SCOPE

The review was based on the issues observed in existing procurement practices, and analysis of the information gathered from various audit reports issued by the RAA. The RAA attempted

diagnostic reviews to identify underlying causes of various lapses in government procurement. The study also entailed review of authorities governing the public procurement such as Procurement Rules and Regulations, Standard Bidding Documents, General Conditions of Contract, Special Conditions of Contracts, Bhutan Schedule of Rates, Evaluation Guidelines etc.

PART II: ISSUES AND CHALLENGES IN GOVERNMENT PROCUREMENT SYSTEM

Despite numerous amendments made to the Procurement Rules and Regulations, it has not been able to address the issues confronting the government procurement system. Besides undermining the governance, government is not able to achieve quality of goods and services procured and remain derailed in realizing overarching objective of value for money in public procurement.

Government procurement is still being perceived as a major area of fraud and corruption, inefficiencies and wastages involving huge amounts of public resources.

The government procurement is still being perceived as a major area of fraud and corruption, inefficiencies and wastages involving huge public resources. The review indicated persistent recurrence of irregularities and inadequacies in government procurements which provide strong indication of possible risk of fraud and corruptions, and not achieving value for money in its procurement regime.

The review has identified range of problems throughout the procurement cycle as discussed below:

2.1 Inadequate procurement planning and feasibility studies

There is absence of effective procurement planning. The purchases made are not analyzed properly to determine the exact need in terms of specifications, quantity and timing. As a result, goods procured were either not used or underutilized. There is a tendency of making procurement of goods towards the end of the financial year as shown by the trend of expenditure at the national level.

Also, in construction works, adequate investment in requisite feasibility studies are not made which result in faulty designs, drawing and estimates. This have cascading impact on cost and time overruns. Equally more concerning is the wasteful and avoidable expenditure entailing from wrong decisions made on the basis of inadequate feasibility studies and affecting the sustainability of the structures created. The cost implications are astounding in case of complex construction projects such as hydropower. Some of the instances noted were as below:

- Punatsangchhu II changed the power house setup from surface to underground without carrying out adequate pre-construction/sub-surface investigations. As a result, besides loss of six lives, the project incurred wasteful expenditure of Nu. 500 million on Down Stream Surge Chamber (DSSC) which also affected the scheduled completion date of underground powerhouse thereby incurring additional estimated expenditure of Nu. 800 million to Nu.1000 million for corrective measures.
- Dzongkhag Administration, Samdrup Jongkhar incurred an additional expenditure of Nu. 1.76 million due to change of site for the construction of two blocks of four unit staff quarter at Khoyar Primary School in Gomdar Gewog.

2.2 Inadequate database on suppliers, contractors and consultants

The registry and information database of suppliers, contractors and consultants are prerequisite for robust public procurement functions. With eGP initiated by the MoF, it opens up opportunities for carrying out efficient government procurement functions. However, to leverage on eGP and reap the optimum benefits of the existing platform, it needs to be revamped and made more robust and enabling platform. The PRR should also stipulate requirements for all government procurements to be executed through eGP system. Therefore, the contractors/suppliers/consultants should be encouraged to be registered in eGP system and create registry of information.

2.3 Deficiencies in bid evaluation

There are deficiencies in the evaluation systems, especially on determining criteria and assigning weightage to parameters. The award of works using existing evaluation system is principally driven by the financial bids. The technical evaluation is used only to qualify the bidders for final evaluation. The final evaluation therefore does not take into account technical superiority of bidders. The technical criteria prescribed in the Standard Bidding Documents (SBD) are also rigid and does not encourage innovative solutions. The pre-determined criteria are not accommodative of specialized needs of procuring agencies.

Besides, there were also cases of improper bid evaluations such as restrictive technical specifications, unjust rejection of bids, failure to reject non-complying

bids, acceptance of imbalanced rates, use of unfair evaluation criteria etc., which undermined the fairness in the evaluation and selection of bidders.

2.4 Inaccurate cost estimates for buildings and public infrastructures

BSR is a guiding document for projecting the costs of construction works and widely used by all procuring agencies. However, there are inadequacies in BSR which are discussed below:

- BSR does not reflect the current market prices and there is no formalized system of conducting market research for price analysis. The labour coefficients have remained static despite improvements in construction technologies;
- There are varying practices in application of cost index on estimates by different agencies resulting in inconsistent estimates prepared by procuring agencies;
- BSR is not comprehensive resulting in ambiguity in nomenclature, unit of measurement and rates of items of work.

Thus, the rates of BSR are not reflective of current market prices.

2.5 Lack of professionalism in procurement functions

Institutionalization of procurement function within agencies is yet to attain desired level of professionalization in terms of delineating responsibilities, instituting control mechanisms and building professional capacity. The procurement functions need to be recognized as professional functions rather than being

placed as part of administrative function.

The persisting ethical issues and noncompliances complemented by lack of punitive actions have further aggravated in absence of ethical code of conduct. This is applicable to both the public officials as well as private parties, whose conduct must be legally bound through specific ethical codes and sanctions

Persisting ethical issues or non compliances complemented by lack of punitive actions is seen to be rooted in non-existence of accountability mechanisms stipulated in specific authorities or rules and regulations.

stipulated in authorities governing the public procurement functions.

Lack of adequate skills for vendors/contractors to do a contract business could also be a reason for quoting unreasonably low price. Before submitting the bid, a contractor is expected to carry out a thorough assessment of the work required to be executed including a visit to the site and accordingly work out the budget estimate. It can also be assumed that when a contract is won at an unreasonably low price, the said project has to be executed at a huge loss, which will eventually have an impact on the long term sustainability of the business.

2.6 Diffusion of roles and responsibilities

The agencies mandated with specific roles in public procurement are individually or collectively seen faltering in effective and efficient delivery of their respective mandates. While some agencies have exhaustive roles specified by the PRR, more clarity of roles for some need to be made through clear stipulations in the rules and regulations. The existing rules do not prescribe clearly the requirements of exercising due diligence, and hence accompanying penalties or sanctions for faltering in its functions.

2.7 Absence of effective coordination amongst regulating agencies

There is no coordinated mechanisms amongst different regulating agencies to ensure compliances as well as to derive synergy in attaining common objective of public procurement. The compartmentalization of functions of different agencies is seen to act against common interest. This pertains to integrating functions, sharing information, exercising coordinated monitoring and controls etc. among relevant agencies to derive synergy in pursuit of common goals of public procurement.

The coordination mechanism is essentially critical in ensuring compliance to the prescribed rules, delivering quality of deliverables, obtaining fair prices, ensuring fairness and transparency of processes, and ensuring that any action/decision taken in the whole procurement process is basically driven by common interest of delivering value for money in public procurement.

2.8 Acceptance of inferior quality products

The procuring agencies lose on account of differential prices when inferior quality products are supplied in place of specified quality besides affecting the

performance. Identification of genuine and duplicate/recycled products may be difficult in absence of capacity of officials receiving the consignments particularly in respect of computers, laptops and ICT equipment.

2.9 Lowest evaluated bid not reflective of market price

The RAA observed cases where the lowest evaluated bids were found to be higher than the prevailing market prices. It confirms the perceptions that prices obtained through competitive bidding does not necessarily ensure competitiveness.

Lowest quoted rates do not necessarily reflect current market prices.

There had been cases where agencies paid astronomically higher prices in comparison to market price or Maximum Retail Price (MRP).

2.10 Variation in lowest evaluated price

The lowest evaluated price obtained through competitive bidding process for the same product varied significantly amongst different agencies. The analysis showed that procurement prices paid for HP Printer Cartridge 49A by sixteen agencies varied from Nu. 899 to as high as Nu. 4,400 representing variation in lowest and highest price range of 389%. The following table illustrates the price range:

SI. No.	Procuring Agencies	Lowest Quoted Rate (Nu.)	Bidder	Variance
1	BSB	899.00	Khengrig	0%
2	BNCA	900.00	Panglung	0%
3	MoHCA	910.00	SITC	1%
4	MoLHR	939.00	Khengrig	4%
5	Cabinet Secretariat	999.00	Khengrig	11%
6	NA	999.00	Khengrig	11%
7	ACC	1,290.00	AB	43%
8	Dratshang Lhentshog	1,350.00	CPS	50%
9	RBP	2,790.00	Nana	210%
10	BICMA	3,250.00	T Nam	262%
11	KGUMS	3,600.00	Gyelyong	300%
12	ECB	3,700.00	Gyelyong	312%
13	TCB	3,995.00	AB	344%
14	MoWHS	4,200.00	Muthri	367%
15	NEC	4,300.00	Nana	378%
16	CBS	4,400.00	CPZ	389%

2.11 Inadequate safeguards for perpetration of fraud and corruption in government procurement

The PRR provides requirement to declare conflict of interests by Chairperson and members of Tender Committee and prohibits spouse or dependent of a public servant to participate in supply of goods and services where he/she is employed.

However, there is no mechanism instituted to systematically capture information on the spouse and relatives of public servants carrying out business to safeguard against risk of procuring agencies making purchases from such business entities. The monitoring of such activities becomes difficult in such situations. Some of such cases were as follows:

- An agency bought computer and office equipment worth Nu.1.52 million from a firm owned by close relatives of the official by prescribing specific preferences in bid evaluation and award.
- An agency had awarded the contract for supply and installation of cubicles to a firm worth Nu.3.79 million. The firm was owned by relative of one of the senior officials in the agency.

2.12 Wastage of funds

The RAA noted considerable amount of public funds being wasted due to non-functioning or non-utilization of equipment procured. Some of the instances were:

- Chiller plant costing Nu.27.60 million bought and installed at JDWNRH in 2010 was not functional. It was later surrendered to DNP and sold fetching scrap value of Nu.240,000 only.
- Auto Clear X-Ray machine worth Nu.3.034 million procured by Regional Revenue and Customs Office, Paro for use at Paro International Airport was lying idle due to non-functioning of generator;
- Thermo Fisher Sample Storage tank for Cryo preservation and its accessories for Nu. 2.541 million by the National Biodiversity Centre, MoAF in May 2015 was lying idle due to non-availability of fund to buy reagents.

2.13 Excess payments

Excess payments in various forms are made to the contractors. Such payments basically arise from wrong certification of works done, non/short execution, double payments, payment at inflated rates, inadmissible payments, payment for variations at analyzed rates, use of wrong nomenclature of items, etc.

The extra payments in constructions are persisting issues that the RAA reports annually. While RAA suggests for remedial measures every time the cases of extra payments are noted, the issue still persist and pervade across almost all procuring agencies undertaking constructions. The extra payments made to parties involving millions of Ngultrums constitute significant portion of audit recoveries made by the RAA every year.

PART III: COMMON CAUSES

Based on the nature of issues discussed, the government procurement is prone to numerous irregularities due to circumstances rendered by incoherent policies, weak enforcement, accountability and sanctions, lack of professional capacity and limited use of ICT enabled procurement platforms. These are discussed below:

3.1 Incoherent policies in government procurement

There are silos in different policies of the government to pursue different socioeconomic objectives through public procurement. The government interventions come through fragmented policies and directives, and are not coordinated in a manner that complement with overall government procurement objectives usually resulting in conflicting objectives. The issues related to quality in government procurement in the country is rendered by following factors:

- i. The restriction imposed on specification of brand in the bidding documents sets an inherent limitation on procuring agencies' preferences for high quality goods. When markets are flooded with spurious and duplicate items, it is a challenge for the procuring agencies to obtain best quality at competitive rates given that price is a determinant factor in deciding the award of contract.
- ii. Preferential treatment for domestic goods and services without due regard to quality conformance limits the procuring agencies in exercising choice for better quality. In a bid to promote private sector, the agencies are encouraged to go for locally produced products without due regard to quality. Such a system indirectly encourages private sector to remain complacent and not improve the quality to compete with external products.
- iii. Although the PRR suggests for application of qualitative criteria in addition to price in evaluating tenders, the awards of contract are generally driven only by price. This is apparently due to lack of knowledge and skills within the procuring agencies to apply non-financial criteria evaluation of tenders for contracts. The technical capability is not factored in the computation of final scores. The existing evaluation criteria specified in the SBD are not exhaustive to make correct purchasing decisions when the needs of procuring agencies are highly specialized, such as, constructing

- **environmentally friendly buildings or infrastructures** or to procure products that support sustainable consumptions and productions.
- iv. The Bhutan Schedule of Rates (BSR) has limitations as far as reflecting the current market prices is concerned. It is intended to be used merely as reference of prices in estimating rather than guiding the procuring agencies preparing realistic estimates.
- There is lack of coordination between agencies like GPPMD, BSB and CDB to exercise oversight functions on quality. Having different mandates, these agencies have different approach in government procurement. GPPMD does not play monitoring role over procuring agencies and restrict their role in facilitating procurement process. The CDB limits its role to regulation of contractors and BSB restricting to mere service delivery in terms of certification. In the process, monitoring of quality is lax.

3.2 Weak enforcement, accountability and sanctions

There is a weak enforcement of procurement norms basically fueled by lack of robust monitoring mechanism, internal control and standards of conduct in procuring agencies. In absence of mechanism for enforcing accountability and sanctions on delinquent officials, it seems to have also contributed to poor performance by officials or parties involved. Some of these are:

- Lack of due diligence in administration and management of procurement activities by those charged with responsibility;
- ii. Inadequate procurement planning including feasibility studies and need assessment. The practice of conducting market research is yet to be internalized across procuring agencies;
- iii. Absence of sanctions for non-compliances and violations and inadequate mechanism to promote integrity and ethical conduct of public servants. There are no prescribed administrative and criminal sanctions enforced on poor performance and fraudulent practices. The debarment of suppliers and contractors is invoked only in case of serious offences that are reported and adjugated.
- iv. Absence of Ethical Code of Conduct for procurement officials or officials involved in procurements.

- v. **Inadequate monitoring and control mechanisms** including oversight functions leading to non-compliances to prescribed processes and important requirements;
- vi. There is a weak quality controls, absence of standardization of products suitable for public procurement and mechanism to check on use of spurious and low-quality goods and substitute items available in the market.

3.3 Lack of professional capacity

The procurement functions are fragmented across all levels of government. While bigger agencies have dedicated units charged with the responsibility of managing procurement, in most agencies, the procurement functions are integrated with Administration and Finance Section. Generally, there is a lack of overall capability of the procurement systems in the country.

- i. Lack of professional capacity is rendered by structures created to execute procurement functions in agencies. Except for few bigger agencies, the procurement is managed and integrated with administrative and accounts sections. Even where separate units are created for procurement functions, there is generally a gap in strength, skills and competencies of procurement officials. The lack of professional skills and competencies is one of the factors contributing to irregularities in public procurement.
- ii. The procurement function is generally treated as mere extension of administrative works and there is a lack of focus on strengthening the procurement workforce in the country. There is no room for initiating changes and improvements in procurement systems without dedicated approach to professional development of procurement officials.
- iii. Tender Committees compose of officials from irrelevant functions or incompetent personnel who lack skills and knowledge in procurement.

3.4 Limited use of ICT platforms leading to inefficient procurement process

The MoF has initiated eGP system and rolled out initial phase of e-procurement confining to limited modules. While it has made a start, there is a long way to go before it renders a robust and dynamic ICT enabled procurement system capable of conducting the government procurement more efficiently and effectively. Some of the factors leading to inefficiencies are:

- i. The system of strategic procurement planning is yet to be institutionalized. Generally, agencies do not conduct market surveys and analysis to explore innovative solutions, compare prices, and seek basis for negotiations. Even when such processes are initiated, the procuring agencies are not able to proceed in the absence of information;
- ii. There is a lack of standardization of goods where duplications of processes occur when multiple agencies individually source same products and undergo independent procurement process. Bulk purchases through centralized procurement are not facilitated in absence of standardization, and the agencies are not able to obtain economies of scale when the procurement process are not done for aggregated needs/demand of agencies;
- iii. Without a platform for conducting online procurement through auctions/reverse auctions, the agencies are not able to obtain competitive prices offered through online auctions;
- iv. In absence of direct link with the suppliers, multiple layers of middlemen are created and the procuring agencies bear the burden of additional costs. For instance, travel agents charge exorbitant prices for air tickets which could have been availed at cheaper price if procuring agencies deal directly with service provider or through initiating online purchase.

3.5 Inadequate system of exercising due diligence

The procuring agencies generally do not carry out market survey and fail to carry out due diligence exercise as part of the procurement process to ascertain the competitiveness of the quoted rates. If sufficient market studies or due diligence is exercised, the procuring agencies could obtain requisite quality goods at much economical price.

3.6 Ineffective supervision and monitoring

Supervision and monitoring of the procurement process are extremely crucial to ensure accountability, completeness, accuracy and enforcement of contractual obligations. Over the years, the RAA has noted numerous cases on inadequacies in supervision and monitoring ultimately leading to excess payments, incompletion, acceptance of defective goods, works and services, improper verification of bills, non-adherence to contractual terms etc. In constructions, monitoring and supervision is the only way to ensure quality of infrastructures.

The structural integrity of infrastructure depends on how diligently supervision and monitoring has been carried out.

Inadequacies in supervision and monitoring is one of the main causes for cases of defective works, inferior quality of goods, excess payments, non/short delivery/execution etc.

3.7 Purchases towards the fag end of the financial year

The procuring agencies do not plan their purchases and most of the procurement

activities are carried out towards the last quarter of the financial year. The rush of procurements towards close of the year are indicative that procurements decisions are being driven mostly by the availability of fund and not by the actual requirements of the procuring agency.

Procuring agencies do not plan their purchases and most of the procurement activities are carried out towards the last quarter of the financial year.

In order to avoid budget lapses and to exhibit financial performance by the budgetary agencies, the purchase decisions are taken towards the end of financial year without consideration of actual needs and proper procurement planning. The drive to avoid budget lapses and demonstrate financial performance is partly attributable to the budget approval process which requires prior year financial performance to determine the current period budget. Thus, compromising the quality of goods and services when the procurements are rushed towards close of the financial year.

3.8 Unrealistic timeframe affecting quality and timeliness of project completion

The procuring agencies' project timelines are determined by the financial year of the government. In the haste of completing the works before that particular financial year ends, seasonality aspect of the project timeline is often disregarded. Example, blacktopping of roads and concreting of structures are technically not feasible to be carried out during monsoon and winter respectively as that will adversely affect the quality. However, the constructions in complete disregard of such seasonal requirements have affected quality and structural integrity of the buildings or infrastructures. The practice is allowed when the SBD

of the Government does not consider such unavoidable eventualities like the snowfall and rainfall as forced majeure to be considered for time extension.

On the other hand, there are also government projects which have determined unrealistic project completion duration which allowed the agencies to complete the structure at their own pace and time. Therefore, there is no scientific basis for determination of construction durations which has provided opportunity to the project officials to lax in execution.

CONCLUSION

The PRR 2019 provides overall framework for government procurement. Government procurement is plagued with numerous irregularities having potential

to undermine good governance. Excess payments, provision of substandard works and goods, poor performance of contracts etc., are some of the common irregularities detected by the RAA across agencies. Besides, there are hosts of issues of non-compliances and irregular practices occurring across

Millions of Ngultrums are loss through extra payments, wasteful and infructuous expenditures, delivery of low quality outputs, etc. resulting in agencies not receiving value for money.



irregular practices occurring across agencies. Obtaining quality and value for money is a challenge.

Despite series of amendments made to the PRR, the government procurement system has not witnessed any visible or transformative change in its practice. It has not been rendered responsive to the changing needs and dynamics of market to ensure efficient processes to provide value for money in government procurement. The MoF has initiated e-procurement system through eGP platform but it is limited to basic modules and not capable of rendering desirable level of robustness and dynamism in organizing government procurement. The incoherence of policies, mandates, specific guidance etc. have become inherent limitation for agencies to ensure quality. The weak enforcement and monitoring mechanisms have had fair share of contributing to substantial irregularities in procurements. Responsibilities are diffused in absence of system of accountability for and sanctions on delinquent public officials and private parties. The situation is aggravated when there is no adequate overall capability in managing procurements in terms of both qualitative and quantitative aspects.

To render procurement processes that respond to the needs of the time and facilitate value for money in public procurement, transformative changes must be initiated strategically. The systems and processes must be overhauled and must be reinforced through a strong culture of ethics and professionalism. The RAA's recommendations are intended to respond to those challenges confronting the government procurement today and drive transformative change in its procurement function to achieve the value for money in government procurement.

PART IV: RECOMMENDATIONS

In face of multiple vulnerabilities offered by current procurement practices, achieving quality, rendering efficient procurement system through digital technologies and influencing ethical behaviors have never been more critical than today to deliver value for money in government procurement.

To make procurement system more robust and responsive to the needs of the time and also to facilitate innovations, the RAA recommends improvements in three thematic areas that needs to be steered by the Ministry of Finance.

- 1. Enabling Procurement Rules and Regulations (PRR) to render efficient and flexible processes
- 2. Strengthening internal controls and oversight functions to ensure effective enforcement
- 3. Enforcing accountability and stricter sanctions to drive professionalism and ethical behaviors

ENABLING PRR

The gullibility of procurement system rendered by rigid Procurement Rules and Regulations, redundant processes and diffused responsibility needs to be addressed to champion the public interest.

Based on the issues and challenges confronting the government procurement, there is a need for overhauling existing Procurement Rules and Regulations, simplifying processes to suit the present need and attaining improved governance in managing public resources.

4.1 PRR should undergo transformative change to render more efficient and effective procurement system

The Ministry of Finance should revise its Procurement Rules and Regulations to make it more responsive to market dynamics, render more efficient processes and enable innovative solutions. The PRR should allow a differentiated (responsive) enforcement, providing an appropriate framework for discretion – including boundaries and accountability.

The rigidity and administratively burdensome processes prescribed by the existing PRR have smothered initiatives and do not provide adequate opportunities for innovative solutions. With rapid technological advancement, the PRR needs to be revamped to cope with technology and to stay responsive to the changing market dynamics. The PRR needs to enable required changes on overall procurement processes which can be effectively conducted through IT system. Some of the specific areas to be reviewed in PRR to further enhance procurement efficiency and control include:

- Government procurements should be allowed to be conducted through direct contracting or sourcing where there is a visible case of achieving better deal of receiving quality goods and services at lower cost. As a case in point, purchasing flight tickets directly from online is often cheaper than purchasing through tendering process entailing bureaucratic procedures.
- With ICT enabled eGP, the time prescribed for bid submission online needs to be reviewed as NIT can be notified on real time basis. As the notice of tenders can be accessed by all registered firms, any bidder should be able to participate in the bidding.
- There may be a need to remove hierarchy and thresholds for Tender Committees at various levels in approving tenders to allow more flexibility in decision-making for procuring agencies. The thresholds are apparently designed to set financial limit for heads of agencies at various levels to authorize expenditure on procurement. However, as the heads of agencies have de jure financial power to authorize expenditure from the appropriated budget of their respective agencies, prescribing limit in administering tenders may only add to bureaucratic process. Further, the separation of decision-making and implementation may generate "red tape" and slow down agencies' ability to provide service entailing extra time and resources.
- There may be a need to review the existing bid evaluation processes and parameters in evaluation of bids. Evaluation Criteria should include criteria that reflect bidders' ability to respond to substantive requirements of the contract rather than mere financial bids. The evaluation criteria prescribed in SBD should also consider value-added services and after sales service or any other critical qualitative parameters.

• The evaluation of works needs to factor in the technical superiority into computation of final scores. The final point is basically driven by the financial bid only. Thus, there is a need to factor in technical superiority in the final score to safeguard against poor performance that will have impact on the quality of outputs. This could be done by assigning appropriate weightage for technical scores in computing the final score.

4.2 Need to specify Brands/Makes in bid solicitation

Stipulation of brand guarantees quality. Brand usually determines the quality of the product and by including this as a requirement, it would ensure the continuity and better life of the product. The PRR restricts specification of brands or make of items in bidding documents and limits agencies' option of procuring superior or established brand of products. Goods and services come at different range of quality at varying costs. Generally, agencies opt for lower priced products rather than durable and superior quality of established brand or make. For instance, inferior quality electric items procured at very cheap cost do not guarantee the same performance, durability and sustainability as those supplied by branded companies. Thus, the decision to opt for cheapest are rationalized apparently due to restrictions specified in the PRR. However, the reasonableness for opting higher brand must be thoroughly appraised as to the requirements based on project needs.

4.3 PRR should prescribe mandatory exercise of carrying out market research

In determining what to buy, estimating costs, and deciding on evaluation and selection criteria for award of contracts, it is helpful for procuring agencies to understand the availability of choices in the market and the indicative market prices for required products. Therefore, market research can provide two-fold advantage – information on the availability of products or services that meets the requirements of procuring agencies, and understanding the prevailing market prices which would help in determining the competitiveness of quoted prices. It helps to explore the availability of innovative solutions or new products or services which the procuring agencies may not have a knowledge about. Maintaining up-to-date market information will ultimately help to receive value for money in its actual procurements. Market research is too essential for specialized contracts of high value where the input materials can be sourced from the manufacturers and the opportunity of saving costs is substantial.

The procuring agencies should exercise prudence by carrying out proper market survey to ascertain the competitiveness of the quoted rates. If sufficient market studies or due diligence is exercised, the procuring agencies could obtain requisite quality goods at much economical price.

4.4 PRR should prescribe carrying out due diligence exercises of critical functions in public procurements

There is a need to prescribe due diligence in all stages of procurement cycle from the need analysis and pre-feasibility studies to delivery and conclusion of contract and reinforcing its application and compliance to render objective decision-making. Though PRR has an implicit intent of requiring the procuring agencies to demonstrate due diligence throughout the procurement cycle, most issues related to public procurement are seen to arise basically from agencies' inability to put in place the desirable system of prescribing procedures of due diligence to be carried out in the field. There are many critical functions in procurement processes that may require prescriptive procedures to ensure effective enforcement.

Some of these functions include, preparation of estimates based on actual market prices of labour and materials, ensuring correctness of drawings and designs, transparently and objectively evaluating bidder qualification and bid capacity, comparing quoted prices with market prices to ensure competitiveness of quoted prices, monitoring and supervisions, correctness in measurement of works, receiving deliverables conforming to samples and specifications, etc. Such functions need to be identified and procedures developed to ensure exercising due diligence. The PRR may also identify officials responsible to execute these functions and accountability prescribed if he/she fails to carry out required exercises.

4.5 Need for centralized procurements to enhance efficiency and reduce cost

The current arrangement of procurement functions operated by individual procuring agencies resulted in fragmented approach towards public procurements and duplicating administrative procedures for procuring the same items. The absence of collaborative mechanism in approaching the markets does

not facilitate strategic procurements at the government level to derive benefits of economics of scale through aggregation of demands.

In order to reduce administrative red tape and cost, and also obtaining better deals through demand aggregations and economies of scale, there is a need for centralized procurements especially for commonly procured items in government agencies.

STRENGTHENING
INTERNAL CONTROLS
& OVERSIGHTS

In addressing the issues that emanate from weak enforcement of procurement processes, there is a need for reinvigorating internal controls, monitoring mechanisms, building a culture of professionalism in procurement functions of government.

Some of these includes:

4.6 MoF should make eGP more robust, dynamic and user-friendly system

Facilitated by ICT platforms, the administration of procurement for goods, works and services should be conducted through eGP system. The e-GP system developed by MoF holds a huge promise and offers substantial reasons for government to move purchasing online. With technological innovation and development of new tools for electronic procurement, there is opportunity to revolutionize the way the government carry out its procurement functions. The IT interface would reduce or eliminate interaction between procurement officials and bidders. Besides enhancing transparency and efficiency of the process, this would reduce opportunity for collusive practices. The procuring agencies would be able to solicit wider participation resulting in more competitions and provide for better tool effective monitorina and planning. The suppliers/contractors/consultants wishing to participate in government procurement should be compulsorily registered in eGP system. There should also be adequate guidelines and necessary changes made in the PRR to facilitate e-GP system.

There is a need for an integrated system embracing all functionalities beyond e-GP to render enhanced capability of facilitating processes, decision-making, monitoring and enforcement.

4.7 Procuring agencies must strengthen monitoring and supervision

A system of robust and standardized monitoring and supervision must be rendered to ensure that procuring agencies obtain value for money through appropriate quality control and assurance mechanism. With numerous experiences of agencies landing up getting inferior quality of goods and services, there is a need to have reinforced mechanism in agencies to check the quality of goods and services delivered by the vendors/parties.

The inspections of conformance to quality attributes must be carried out and ensure what is delivered as the final outputs are delivered in the manner and form sought before taking over the completed structures and discharging the obligations under the contract. There is a need to strengthen controls in overseeing the execution of works. Monitoring must extend to all critical phases of procurement cycle and oblige mandatory response in case of serious violations or infringements for immediate recourse or actions. Some of the critical aspects of project management needs to be kept in mind in ensuring effective control systems in the implementation of projects:

- The submission of work schedules must be made mandatory to render basis for monitoring the progress and achievement of project milestones;
- Rationalize deployment of site engineers to various sites in terms of skills and experiences vis-à-vis number of sites;
- Absorption capacity of implementing agencies should be considered before executing any project;
- The process of validation of any decision taken at the level of site supervision must be instituted to ensure compliances to contract agreements:
 - ➤ Use of materials as per the specifications and quantities (cement, stone, wood, sand, etc.);
 - Engagement of committed resources (man and machineries);
 - ➤ Use of advances provided for specific purposes;
 - > Enforcement of Quality Plans (control and assurance).
- The cost and quality must be ensured through regular appraisal, review and validations by the higher authorities within the agency. Estimates must be supported by detailed workings to show quantities derived from drawings and designs;

 There should be a requirement for maintaining photographic evidences of items provided (especially those embedded) with details of measurements as a proof of works completed.

4.8 Promote professionalism and ethical behaviour in public procurement

There is a need to propound ethical behavior through development of Ethical Code of Conduct for procurement officials. The officials dealing with procurement plays a critical role in ensuring conformity to procurement rules, exercising prudence and minimizing wastes, resisting mismanagement and fraudulent practices. The government procurement must be recognized as a strategic profession rather than a simple administrative function. Therefore, capacities should be sufficient to ensure that the procurement officials are able to fulfil these important tasks. Besides a detailed guidelines in the form of Code of Conduct and communicating the Codes to officials is essential to raise awareness and build capacity to handle ethical dilemmas and promote integrity.

It will help to professionalize procurement functions and capacitate people dealing with procurement with necessary skills, competence and professionalism. There is a need to professionalize procurement services through a formal training and accreditation. Most of the issues in government procurement arise from incapacity of those managing procurement in agencies.

4.9 Need to increase defect liability period

The defect liability period must be determined based on the value, type, complexity and expected life of the structures to ensure adequate coverage of risks that may surface due to poor quality of works. A separate defect liability period should be prescribed for electrical, plumbing and civil works — roads, buildings and bridges. The defect liability period for works is prescribed based on the value of works for a period of 12 months. The following possibilities may be looked into to extend defect liability period:

- In obliging the contractors to commit to quality of constructions, the defect liability period should be extended to a reasonable period of time or tagged to certain proportion of expected life of the infrastructures.
- Letting contractors offer period of defect liability period and assigning additional scores.

4.10 Develop scientific approach in determining construction duration

The construction duration for the project should be determined scientifically based on the critical path method factoring in the resources (machineries and labour) to be deployed, availability of materials, seasonality, etc. to reflect more realistic deadline of the project. Construction duration are usually determined to align to the financial year of the government. When unreasonable duration is thrust upon the contractors, the completion is rushed to meet the deadline and, in the process, the quality is compromised. In the haste of completing the works before particular financial year ends, seasonality aspect of the project timeline is often disregarded. On the other hand, relaxed duration of construction period may also encourage laxity in actual execution and completion of works. The works such as blacktopping of road, and concreting of structures are technically not supposed to be carried out during monsoon and winter respectively as that will adversely affect the quality. Therefore, such unavoidable eventualities like the snowfall and rainfall not being considered as forced majeure, has arisen mainly due to lack of due diligence exercised by both the procuring agencies and the contractors. At the time of preparing a project plan, the procuring agencies should factor in some of the predictable eventualities like the rain and snowfall in the project duration. Otherwise, penalty imposed on parties based on unrealistic deadline is not justified. Thus, the duration for completion must be determined based on scientific techniques and predictable eventualities to ensure fairness and consistency across the procuring agencies.

4.11 Need for robust collaborative and oversight mechanism for effective enforcement and administration of public procurement

The erratic pricing of bid prices offered by the suppliers are basically facilitated by lack of information on prices of goods imported into the country. The Department of Revenue and Customs has the mandate to levy duties and taxes on imports and is supposed to maintain information on declared values of goods. If this information is shared, the procuring agencies would be able to comprehend range of prices of supplies and the possibility of paying exorbitant prices could be minimized.

The Bhutan Standard Bureau (BSB) is limited to providing services of certification of products. There is an opportunity for the BSB to pursue collaborative approach with procuring agencies and the regulating agencies in ensuring that quality of

works or goods conform to minimum standards through quality checks and vigilance functions on systematic basis.

The issues of quality are main concerns in the procurement of goods and works and it is going to persist as long as the spurious/inferior quality goods are available in the market. One control point therefore is to check influx of these inferior goods into domestic market through collaborative approach between the BSB, Department of Trade (MoEA) and the Department of Revenue and Customs (MoF) to exercise controls at the entry points. A platform for regulatory bodies such as MoF, CDB, BSB, MoWHS and other relevant agencies must be created to foster collaborations to drive quality of goods, works and services procured by the government.

4.12 Bhutan Schedule of Rates (BSR) must be more comprehensive and dynamic

The Bhutan Schedule of Rates (BSR) must be reviewed holistically to provide comprehensive guidance for incorporation of work items and the prices. The BSR provides basis for cost estimation of most construction projects undertaken by the government and it is only logical that the prices are updated on continuous basis. Estimates prepared based on BSR must be realistic, in that nomenclature of items suggested therein conform to correct technical solutions and prices indicated reflect current market prices. There should be institutionalized system of conducting research on prevailing market prices. There is an opportunity to integrate the process with e-procurement platform to source price information in conducting such studies. It should be dynamic document reflecting changes in technology in constructions. Anomalies and inconsistencies in application of cost indices must be addressed to ensure uniform estimation of the projects across procuring agencies.

ENFORCING
ACCOUNTABILITY &
STRICTER SANCTIONS

Public procurements are often prone to fraud and corruption. The problems can be addressed by strengthening accountability framework in public procurement system. It promotes integrity in the contractual works, supply of goods and services and promotes sound stewardship of public resources.

The review of procurement practices across the government agencies brought out that procurement regulations are not strictly adhered to and, therefore, giving rise to repeated cases of procurement lapses. Accountability and transparency are important tenets of public procurement to drive desirable behaviors of those charged with responsibilities as well as parties engaged in government procurement. Such system will help building trust in the government procurement process.

4.13 Stricter sanctions and penalties must be prescribed to improve accountability

There is a need to reinforce ethical behaviors through prescription of sanctions and accountability for departures based on the severity of the cases. Most of the issues indicative of deficiency in ethical conduct of officials are the results of weak enforcement and monitoring of conducts, limited transparency and inadequacies in the systems of holding responsible individuals and parties accountable through appropriate sanctions. Necessary sanctions should be prescribed for non-compliances to ethical codes as a deterrence measure. It shall provide legal basis for enforcing and regulating agencies to enforce professional conduct of officials. Grounds for sanctions must be explicitly specified by categories of offences committed by the parties. Alongside, it may also be important to consider necessary incentives to procurement officials or Committees to encourage ethical conducts. This would improve compliance and oblige public officials to demonstrate high ethical behaviors in managing the affairs of public procurement.

4.14 MoF should develop a mechanism to hold Consultants/firms accountable for shortcomings in their deliverables

Government agencies spend substantial public resources in engaging consulting firms/individuals for a range of services that are of an advisory or professional nature typically involved in providing expert or strategic advices. The PRR specifies engagement of consultants where the work involves the application of multi-disciplinary expertise and requires the support of consultants with requisite competence. For construction works, the consultants are usually engaged in drawing, design, estimation and supervision of the projects.

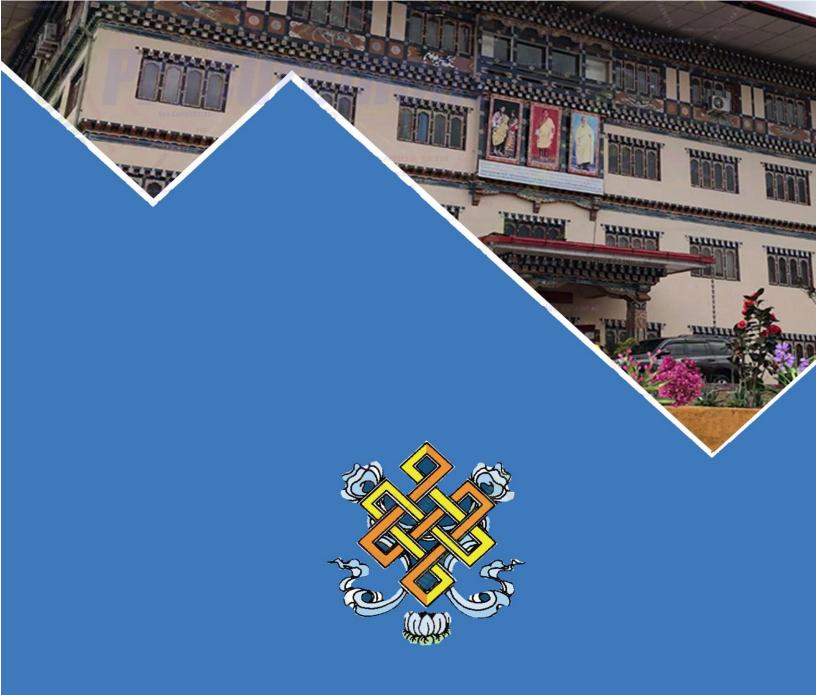
The RAA noted that the issues in some of the construction arise from deficiencies in the drawing, designs and estimates prepared by the consultants including major deviations. The deliverables under the contract are limited to outputs specified in the ToR and generally do not extend to ensuring results from their outputs. For

instance, the consultants cannot be held responsible for any quality compromises resulting from the faulty drawings and designs prepared by them. This is also applicable for other services requiring shelving of their reports and recommendations if not done properly. Therefore, the MoF should develop a mechanism to hold Consultants accountable for shortcomings in their deliverables.

4.15 Agencies should strictly control employees engaged in private trade or activities/situations having inherent conflict of interests

The government agencies, particularly those dealing in verifying or approving architectural drawings of private buildings or infrastructures should strictly refrain their officials (engineers/architects) from engaging in private works for payments. Such unauthorized engagement does not only affect efficient service delivery, but also have serious ramifications on the trust and credibility of the organization. Such unethical practice should be strictly monitored and heavy penalty imposed on officials found involved in private trade.

The spouse or dependents of the dealing officials of procuring agencies should not be allowed to participate in the supply of goods and services. The officials should be refrained from participation in the Tender Committee if there is a Conflict of Interest by way of participation.



Royal Audit Authority

P.O. Box: 191 | Kawangjangsa | Thimphu | Bhutan
Tel: +975-2-322111/328729/328730/324961 | Fax: +975-2-323491
Website: www.bhutanaudit.gov.bt | Email: info@bhutanaudit.gov.bt
ISBN 978-99936-18-97-3