

## 01-044 – Criminalisation to combat bid rigging in Public Procurement – Criminalización para combatir la colaboración en la contratación pública

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Healthy competition in every process of procurement is essential to competitive bidding that delivers the best value of money and non-monetary to stakeholders. In contradiction, monopoly like regime and anticompetitive practices are destructive that disallows fair bidding, denying the best acceptable tender coming with innovative solutions, products and services. It is also leading to corruption. Literature has highlighted, bid rigging cartels are very harmful and damaging to Public Procurement that citizens are ending up paying higher prices and the Government is losing best value for every cent spent per trade. It is a major threat and combating bid rigging is crucial. Despite persistent efforts by Government authorities to penalise offenders, the bid rigging cartel is still rampant. Therefore, there should be heavier punishments for deterrence and prevention other than financial penalty as in the current Competition Act in Malaysia. This paper aims to evaluate whether criminalisation of bid rigging offenses is effective to be as a deterrence mechanism in the future. The methodology employs online questionnaire surveys to respondents from Public Works Department of Malaysia (PWD) and relevant agencies. The main findings were that criminalisation can be imposed and effective to combat bid rigging in Public Procurement as a long term deterrence mechanism.

**Keywords:** *Criminalisation; Bid rigging; Public procurement*

La competencia sana en cada proceso de adquisición es esencial para una licitación competitiva que ofrezca el mejor valor monetario y no monetario a las partes interesadas. Por el contrario, un régimen de tipo monopolista y las prácticas anticompetitivas son destructivas y no permiten una licitación justa. También está conduciendo a la corrupción. Como lo destaca la literatura, los cárteles de manipulación de licitaciones son muy dañinos y perjudiciales para la contratación pública. Es una amenaza importante y combatir la manipulación de licitaciones es crucial. A pesar de los persistentes esfuerzos de las autoridades gubernamentales para castigar a los infractores, los carteles de manipulación de licitaciones siguen proliferando. Por lo tanto, deberían existir castigos más severos para la disuasión y la prevención, además de la sanción financiera. Este artículo tiene como objetivo evaluar si la penalización del delito de colusión en licitaciones es eficaz como mecanismo de disuasión. La metodología emplea una encuesta por cuestionario en línea a los encuestados del Departamento de Obras Públicas de Malasia (PWD) y agencias relevantes. Las principales conclusiones fueron que la criminalización puede imponerse y ser eficaz para combatir la manipulación de licitaciones en la contratación pública como mecanismo de disuasión a largo plazo.

**Palabras claves:** *Criminalización; Manipulación de licitaciones; Contratación pública*

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## 1. Introduction

Bid rigging is a type of cartel that is against healthy and fair market competition and it is the most harmful business strategy making citizens or consumers paying more for less quality (Ramaiah and Safinaz, 2021; Mohd Safri et. al, 2023). That means, it is a source of public fund wastages and leakages. Cartel is everywhere in the world prohibited while in most countries it is fined heavily. Due to its disastrous and very damaging character and dire consequences, bid rigging also eliminates the motivation and initiatives for new innovation in products and limiting investments for technological advancement which is essential for innovative construction (Ramaiah and Safinaz, 2021; Oke, Aigbavboa and Mangena, 2017; Mohd Safri et. al, 2023). This is amongst the recipe for disaster in public procurement eventually affecting the construction industry whereby new progress is confined and controlled by small players while cost is high and expensive. Cartel is a criminal offence in the United Kingdom and nine OECD (Organisation for Economic Co-operation and Development) countries with penalty and imprisonment. Whereas, Nineteen OECD member countries have criminal sanctions against all forms of cartels including bid rigging and another eleven member countries criminalise bid rigging while other cartel activities are subject to administrative sanctions (OECD, 2023). There is also a causal link or relationship between competition and corruption that more competition resulting in less corruption and vice versa, increased corruption leading to decreased competition (International Competition Network (ICC), 2015). In other words, anticompetition behaviour is not only bad for inflating cost and price as well as driving away innovation but also it flourishes corruption crime.

Bid rigging is an agreement either by written or oral between two or more bidders that prevents or restricts competition in tendering and they collude or conspire to decide the winning bidder or raise prices or lower quality of goods, works or services (Malaysian Competition Commission (MyCC), 2023, OECD, 2023). Despite persistent efforts the Government of Malaysia in particular through its enforcement agency namely Malaysian Anti-Corruption Commission (MACC) and also MyCC, bid rigging cartel is still rampant and prevalent in public procurement. This is attributed to the increasing number of reported cases in recent years. MyCC stated that bid rigging had long threatened the integrity of public procurement, draining valuable public resources that are meant for the benefit of the nation and people at large (MyCC, News Release, 2024). For example, in 2024 at least 13 suspected bid rigging cartels involving 561 enterprises in tenders that worth RM2.37 billion have been investigated and complaints involving 463 enterprises in tenders that were worth RM9.27 billion have been assessed. This indicates the huge amount of involvement of this harmful practice and subsequently the consequences it has on the public procurement.

Therefore the combat against bid rigging must be continued, persistent and rigorous enough to be effective and impactful in order to bring back the fairness, cleanliness, goodness and integrity of the soul objectives of public procurement thereby putting it back on the right track. More regimental and stern actions than in the past should be resorted to obtain the intended and desired results. As stated earlier, bid rigging has been criminalised in many countries around the world that resulting in imprisonment to the offenders. In those countries, it is a criminal offence.

Currently, particularly in Malaysia, bid rigging is prohibited by Section 4(2)d of the Competition Act 2010 (*Akta Persaingan* 2010) that is subjected to financial penalty but not a criminal offence. Therefore, there should be heavier punishments for deterrence and prevention of bid rigging in the future (Wirz, 2016; Mohd Safri et. al, 2023; Maslen, 2024). It is also to ensure that the process and integrity of public procurement is upheld at high level and public trust is in place. So far, there has been no previous studies conducted on evaluating criminalisation of bid ridding in public procurement in Malaysia (Mohd Safri et. al, 2023). Therefore, this

objective of this paper is to explore whether criminalisation of bid rigging offence is effective to be a deterrence mechanism for bid rigging in the future in Malaysia in the context of public procurement.

## **2. Research Objectives**

The main objective of this paper is to evaluate whether criminalisation of bid rigging offence is effective to be as deterrence mechanism in the future.. This objective is originated from the Research Question; Can criminalisation be imposed and effective to combat bid rigging in public procurement to act as long term deterrence mechanism? To achieve this, four (4) Research Objectives have been formulated as follows:

- i. To evaluate the awareness level on bid rigging in public procurement;
- ii. To identify the causes of bid rigging in public procurement;
- iii. To evaluate whether criminalisation can be imposed to combat bid rigging in public procurement;
- iv. To propose strategies in relation to Research Objective iii. ie. imposing criminalisation to combat bid rigging in public procurement.

## **3. Research Methodology**

This research has adopted a quantitative approach and employed an online questionnaire survey for data collection. The online questionnaire was emailed to all MACC staff, the Public Works Department (PWD) or also known as Jabatan Kerja Raya (JKR) technical staff, Ministry of Works (MOW) staff and also to several academicians that were in contacts with the author as the potential respondents. An extensive literature review was conducted to identify the common issues of bid rigging cartel in general and in public procurement, its types and causes of bid rigging that were repetitively quoted in previous studies, research papers and publications. The current provisions of Financial Penalty as in the Competition Act 2010, Malaysia has also been reviewed and studied. The possible options of punishments that can be imposed other than financial penalty as in the Competition Act 2010 were found from literature and subsequently have been validated by a legal expert in MACC.

The outcome of literature review was crucial and important as it became the main input for the design of the questionnaire. The questionnaire was piloted and subsequently validated by four (4) individuals that were regarded as well experienced and experts from MACC, PWD, MOW and academia for feedbacks to improve the design of the questionnaire. There were multiple choices and open-ended type of questions in the survey. The first section of the questionnaire was on background of the respondents. In the second section, the respondents were asked to evaluate their awareness level on bid rigging in public procurement, to identify the causes of bid rigging in public procurement, evaluation on imposing criminalisation to combat bid rigging in public procurement. The evaluation on strategies to combat bid rigging in Public Procurement were divided into multiple choice type and open-ended questions. The final part of the questionnaire was a general open-ended question for any comments, views or suggestions from respondents.

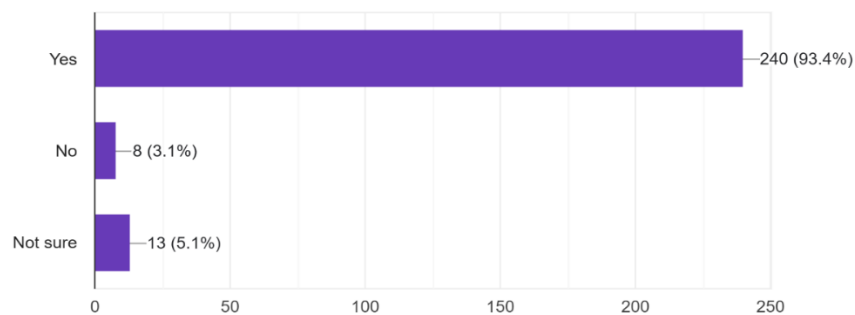
The open-ended questions were analysed using Thematic Analysis. The method of categorisation of bulk information in the literature to reduce numbers is based on common

themes that were employed by several authors, for example, Khairuddin (1998) in identifying procurement strategies and Muhamad Rosdi (2019) in his thesis on Islamic Leadership Principles in Project Management: Assessment of Its Applicability and Strategies for the Public Works Department of Malaysia. Indeed, thematic analysis is widely and commonly used qualitative analysis that involves identifying, developing and reporting patterns across a data set that leads to themes (Braun and Clarke, 2006; Thomas and Harden, 2007).

#### 4. Results and Findings

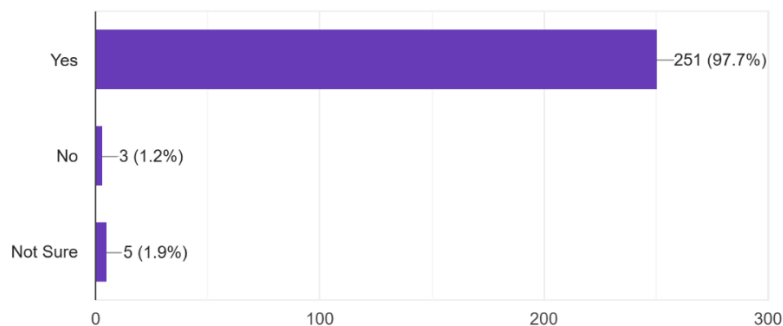
A total of 257 responses from all potential respondents were received within two (2) weeks of response period after the online questionnaire survey was sent to potential and targeted respondents on 6<sup>nd</sup> January 2025. The response rate is about 3.70% from estimated number of respondents. The respondents' background were diversified ranging from enforcement officers, technical professionals from various disciplines that were Architecture, Civil Engineering, Mechanical Engineering, Electrical Engineering and Quantity Surveying at different grades, levels, positions and years of working experience in project management, engineering and construction in infrastructure, building and road projects. There were also respondents from academia. The following paragraphs will present and discuss the results and findings from the survey.

**Figure 1: Evaluation on awareness of bid rigging in Public Procurement.**



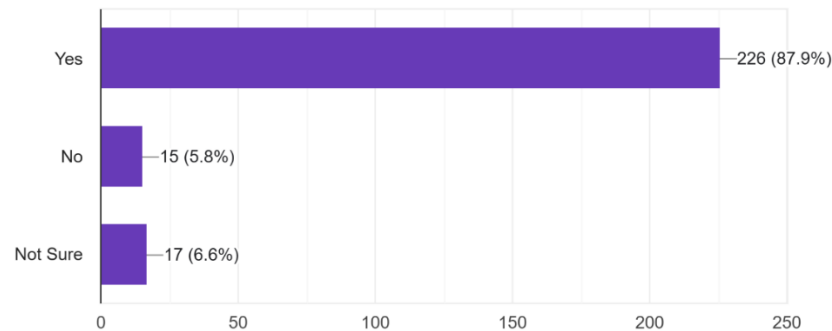
In Question No. 1, the respondents were asked, 'Are you aware that bid rigging has been occurring in Public Procurement?'. The results show that the majority of the respondents with high percentage of 93.4% representing 240 respondents were aware about the occurrences of bid rigging in public procurement. Only 8 respondents answered 'No' (3.1%) and 13 respondents answered 'Not Sure' (5.1%).

**Figure 2: Evaluation on awareness of bid rigging in Public Procurement.**



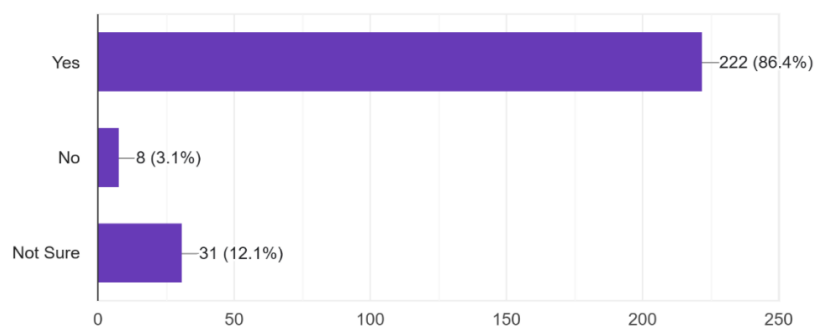
This Question No. 2 was referring to earlier Question No. 1. The question was, ‘In your opinion, do you agree that an open and fair competition is important in ensuring Public Procurement gets the best price, quality, product and value for money?’ The results have shown that high agreement 97.7% from 251 respondents was achieved which indicates that an open and fair competition is important in ensuring public procurement gets the best price, quality, product and value for money. Only a very small number of respondents answered ‘No’ (1.2%) which were 3 respondents and 5 respondents answered ‘Not Sure’ (1.9%).

**Figure 3: Evaluation on awareness of bid rigging in Public Procurement.**



This Question No. 3 was referring to the previous Question No. 2. The question was, in your opinion, referring to Question 2.0 above, do you agree that bid rigging is against open and fair competition thus it is harmful and damaging to Public Procurement? As shown by the results, high agreement of 87.9% representing 226 respondents was obtained which means that bid rigging is against open and fair competition thus it is harmful and damaging to public procurement. There were only 15 respondents answered ‘No’ (5.8%) and 17 respondents answered ‘Not Sure’ (6.6%).

**Figure 4: Evaluation on awareness of bid rigging in Public Procurement.**

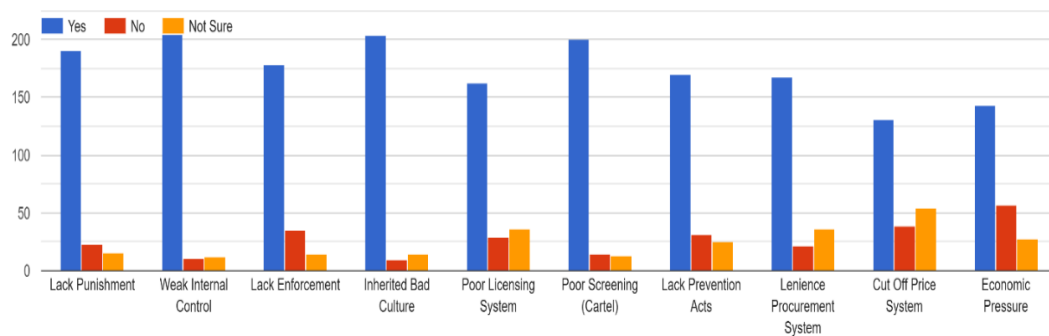


In Question No. 4, respondents were asked on imposing tender deposit or tender bond in facility management projects procurement in tender submission. The question was, ‘Based on PWD data, the imposing of Tender Deposit or Tender Bond in Facility Management Projects Procurement that becomes mandatory tender submission document, has been effective in reducing the involvement of cartel/ bid rigging. In your opinion, should it be extended to all physical projects?’.

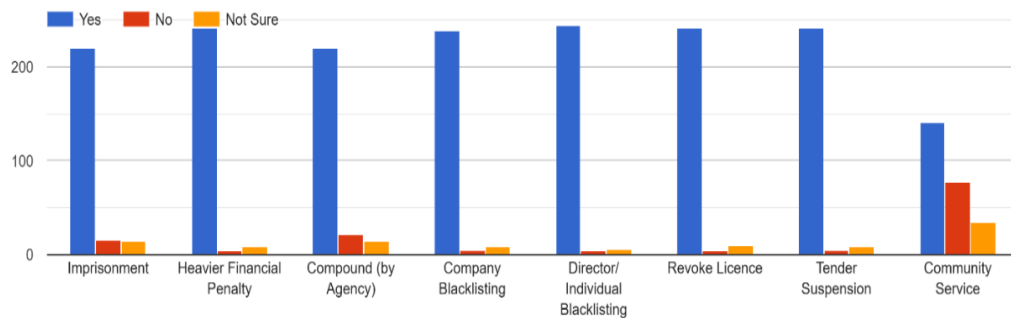
The results indicate that majority of respondents agreed (86.4%) representing 222 respondents that the imposing of tender deposit or tender bond in facility management

projects procurement that becomes mandatory tender submission document should be extended to all physical projects. 8 respondents (3.1%) answered 'No' and 31 respondents (12.1%) chose to answer 'Not Sure'. One of the experts in questionnaire piloting and validation as mentioned earlier in Research Methodology section had suggested that based on PWD experience and tender trend analysis, imposing Tender Deposit or Tender Bond in Facility Management Projects Procurement has been showing a positive outcome in intervening the bid rigging. Therefore, the results has supported the input from the expert during questionnaire validation stage. In this case, Tender Deposit is a sum of money that need to be paid by the tenderer for each tender document. It has put the tendering contractor or company in more financial burden and commitment at tender stage adding their tendering cost. It could prevent them from buying many tender documents like in case of bid rigging since they have to pay more, unlike as if those documents were free of charge.

**Figure 5: Identification on the Causes of Bid Rigging in Public Procurement.**

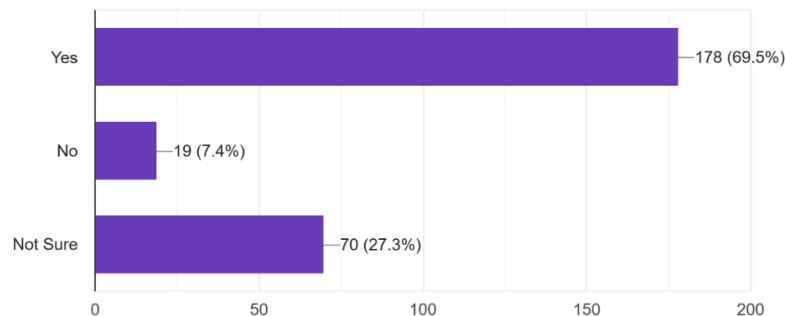


In Question No. 5, the respondents were asked to identify the causes of bid rigging. They were asked the followings, 'Based on your experience and in your opinion, what are the possible causes of bid rigging in Public Procurement?'. The results have shown that Weak Internal Control, Inherited Bad Culture, Poor Screening (Cartel), Lack Punishment and Lack Enforcement are the top five (5) from all ten (10) possible causes of bid rigging in public procurement. We can state that causes that are related to the weaknesses in the internal organisation or department of the procurement agencies (referring to Weak Internal Control) is the top cause and community or society culture related causes (referring to Inherited Bad Culture) is the second. Then, causes that are linked to the procurement and tendering process (referring to Poor Screening (Cartel)). Subsequently, causes that are associated with the loopholes on punishments and enforcement (referring to Lack Punishment and Lack Enforcement) that also are indirectly supporting the research of this paper on criminalisation.

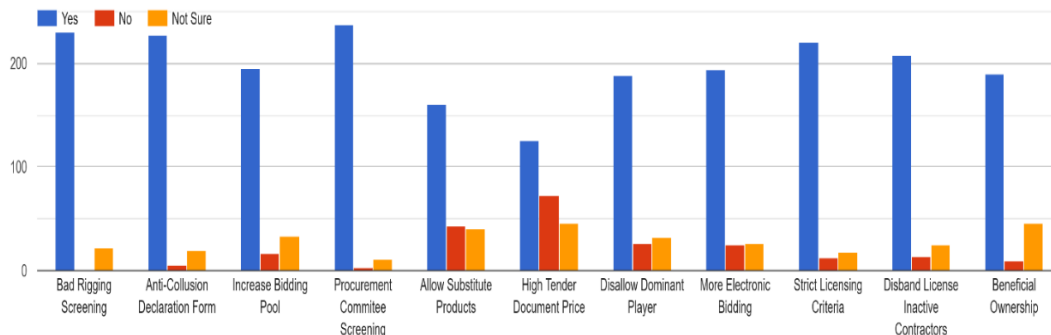
**Figure 6: Evaluation on Criminalisation to Combat Bid Rigging in Public Procurement.**

In Question No. 6, the respondents were asked on the possible options of punishments that can be imposed in the future other than the present provisions of Financial Penalty as in the Competition Act 2010.

From the results, it can be summarised that interestingly almost all the proposed punishments have received high percentage agreement of more than 85.0% from respondents except for Community Service which obtained 54.9% agreement. Generally, it can be stated that the results indicate a high support and aspiration of respondents towards having more and stronger punishments mechanism and regime in the future for this purpose that is combating bid rigging in public procurement. Indeed, in this regard, it is including imprisonment which is part of criminalisation.

**Figure 7: Evaluation on Criminalisation to Combat Bid Rigging in Public Procurement.**

In Question No. 7, the respondents were asked about their agreement on criminalisation to combat bid rigging in public procurement if they answer 'Yes' in the previous question. As shown by the results above, majority of respondents (69.5%) representing 178 respondents agreed that criminalisation can be imposed and effective to combat bid rigging in public procurement to act as long term deterrence mechanism. The other 19 respondents (7.4%) answered 'No' and 70 respondents chose 'Not Sure'.

**Figure 9: Evaluation on Strategies to Combat Bid Rigging in Public Procurement..**

In Question No. 9, the respondents were asked to evaluate the proposed strategies to combat bid rigging on public procurement. The results show that Procurement Committee Screening, Bid Rigging Screening, Anti-Collusion Declaration Form, Strict Licensing Criteria and Disband Inactive Contractors are the top five (5) Strategies to combat bid rigging in public procurement as chosen by the respondents.

The open-ended questions were on why did they agree that criminalisation to combat bid rigging in public procurement if they have opted 'Yes', and whether respondents have any strategies to propose and lastly general comments. There were hundreds of responses as stated by respondents for all the open-ended questions. Random Thematic Analysis with speed-reading was adopted to analyse. For the first open-ended question, several themes have been produced as follows:

- Criminalisation can create fear factor and act as a strong deterrence;
- Strong message to potential bid rigging bidders that no tolerance is allowed;
- Criminalisation increases the risks and costs when engaging in bid-rigging schemes, thereby discouraging potential offender;
- Encourages whistleblowing and cooperation with enforcement agencies;
- Enhance awareness for all parties and stakeholders;
- Increase accountability and transparency.

Whereas, for the second open-ended question, several themes on strategies have been identified as follows:

- Ensuring transparency and openness in all tender activities and processes;
- Robust whistleblower system with protection that encourages individuals to report;
- Implementation of electronic system and digitalisation widely;
- Strengthening anti-monopoly and anti-cartel laws;
- Education and Awareness to contractors and suppliers;
- Applying latest technology and Artificial Intelligence (AI) to for detection;
- Tender criterias are measured based on quality and time, not just the lowest price;
- Involvement MACC and MyCC in tender screening process;
- Tender deposit is made mandatory;



- Contract prohibition for subcontracting to third parties that becomes cartels.

As for the general open-ended question, the followings are the summary:

- Overcoming bid rigging requires a combination of preventive, transparency, monitoring and enforcement;
- Strengthening the Competition Act (2010) that makes bid rigging a criminal offence;
- Regular training and capacity-building programmes for procurement officers;
- MACC collaborates with MyCC to investigate and prosecute bid-rigging cases.

Based on the results, it can be stated as findings firstly, that there is high level of awareness about the occurrences of bid rigging in public procurement and secondly, that an open and fair competition in tendering is important in ensuring the public procurement would get the best price, quality, product and value for money since that is the ultimate purpose of procurement itself. The third findings, bid rigging is against open and fair competition thus it is harmful and damaging to public procurement. This is coincided with the literature. It means that bid rigging has hampered procurement from obtaining its purpose or objectives. As the fourth finding, imposing tender deposit or tender bond that becomes mandatory tender submission document should be implemented to all projects. This is seen as one mechanism to put pressure and giving more financial hurdles or burdens to potential bid rigging cartel tenderers or contractors from committing so. The first Research Objective is achieved.

The fifth finding is Weak Internal Control, Inherited Bad Culture, Poor Screening (Cartel), Lack Punishment and Lack Enforcement are the causes of bid rigging in public procurement. Weak Internal Control, Inherited Bad Culture, Lack Punishment and Lack Enforcement are related to revision of existing laws, cartel acts and regulations and effective implementation it. Support towards having more and heavier punishments to combat bid rigging were clearly indicated by respondents. It is coincided with literature as discussed in the earlier part of this paper. This fulfils the second Research Objective. The next finding is that criminalisation can be imposed and effective to combat bid bigging in public procurement to act as long term deterrence mechanism. Again, clearly, the strong desire towards heavier punishments including imprisonment that can be imposed in the future other than the present provisions of Financial Penalty have been obtained. It also further supports and justifies the previous studies on proposing criminalisation of bid rigging in the literature. The third Research Objective is achieved. For the fourth Research Objective, ten (10) strategies have been proposed and identified, and this achieves the final Research Objective.

## 5. Discussions

The findings provides an empirical support to move a step forward towards criminalisation of bid rigging cartel from the present provision of civil offence involving financial penalty as in Competition Act 2010, Malaysian Law. This could be a major achievement considering its success implementation or criminalisation actions and punishments in other countries as highlighted in literature that could be served as an effective, detrimental and deterrence mechanism to combat bid rigging in public procurement in the future. Public procurement in Malaysia have long been suffering and be the victims of such out of laws behaviour of a portion of contractors, and they could not be any longer allowed to exist by combating them with criminalisation mechanism. By resorting criminalisation, we will be reinstating the soul purpose of public procurement to be back on its respectful and honoured position. The integrity of public

procurement is given back and at the same time, corruption and power abuse that is link to anti-competition will be eliminated. This requires a concerted and collaborative efforts from all stakeholders involved in public procurement from MyCC, MACC, PWD, Government Authorities, Lawmakers and others.

## 6. Conclusion

This paper has contributed to literature and industry by proposing criminalisation to combat bid rigging in public procurement. This study is conducted in public procurement in Malaysia taking consideration the practice in other countries. The need for the conduct of this research is originated from the rampant and increasing cases of bid rigging cartel that have been reported in Malaysia and the need for taking more punishable actions than merely financial penalty in the current provisions of the relevant Act. The main finding is that criminalisation can be imposed and effective to combat bid bigging in public procurement to act as long term deterrence mechanism. This is coincided with the literature and findings of previous studies that supports the implementation of criminalisation in other countries other than Malaysia. The study provides the support for the future direction to operationalise or incorporate criminalisation into the existing act such as the Competition Act 2010, or for the lawmakers to establish a new act by itself pertaining to this, or amending other relevant acts and also for the Authority to have more awareness campaigns against bid rigging.

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### Communication aligned with the Sustainable Development Goals

