Red flags for conservation

INFRASTRUCTURE SAFEGUARDS FOR NATURE

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WWF

OPEN CONTRACTING PARTNERSHIP

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About Targeting Natural Resource Corruption

The Targeting Natural Resource Corruption (TNRC) project is working to improve biodiversity outcomes by helping practitioners to address the threats posed by corruption to wildlife, fisheries and forests. TNRC harnesses existing knowledge, generates new evidence, and supports innovative policy and practice for more effective anti-corruption programming. Learn more at tnrcproject.org.

Disclaimer

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Targeting Natural Resource Corruption

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Executive summary

Infrastructure underpins every aspect of human life. From transport systems to power-generation facilities and water and sanitation networks, infrastructure enables society to function and economies to thrive.

The areas in greatest need of infrastructure are often also some of the world's most biodiverse regions. The acceleration of infrastructure networks in the last 50 years also coincides with sharp declines in the earth's biodiversity. In this time period, wildlife populations have declined by 60% on average.

Systemic weaknesses in the way infrastructure is planned, procured, and implemented open up opportunities for corruption and collusion which could have devastating effects on nature. Examples include rewarding companies with poor environmental track records, suppressing or obscuring environmental impact assessment findings, or approving unnecessary and destructive projects for personal or political gain. We need actionable solutions and practical tools so that all stakeholders can make sense of how infrastructure projects and contracts affect nature.

This is where more and better open data can help. This new guide provides clear guidance for a set of indicators that can guide stakeholders to identify infrastructure risks, in particular how they affect nature.

We defined 22 indicators as **red flags for conservation**. A red flag for conservation refers to when something is wrong or missing in the public infrastructure planning, procurement or implementation process, posing risks to nature and the environment. For example, if proposed project locations overlap with conservation areas or if specific conservation requirements have not been explicitly included in tender criteria or are not priced for as part of the tender process. These red flags suggest that nature has not been fully considered in the infrastructure planning or procurement processes.

We also identified 31 indicators from our existing **red flags for integrity** resource – which helps uncover potential corruption risks from public contracts – that can also be applied to conservation. We isolated the red flags that could help shed light on when potential corruption or collusion on infrastructure projects could harm nature. For example, if the winning company is not qualified or accredited to carry out the nature-based elements or has a track record of non-compliance with environmental regulations. Note that these red flags for integrity are intended to help stakeholders identify potential corruption risks and

don’t prove corruption. Rather, they are intended as an aide to target further investigation or follow ups.

Currently, most of these indicators require manual work to collect and transform data into standardized and structured formats to automate analysis. Significant policy changes to the way infrastructure is planned, procured and implemented is needed to operationalise these red flags for conservation indicators. For example, requiring disaggregation of planning documents into specific reports, stipulating detailed spatial planning as a prerequisite for projects, or mandating improved environmental performance as explicit criteria in tenders which are properly priced for.

This guidance is the first step to creating actionable solutions and practical tools for identifying and measuring corruption, and addressing systemic inefficiencies in infrastructure planning, procurement and delivery processes to better safeguard nature. Further work will be needed to test them in different environments to further enrich the guidance.

Who we are and what we are doing together

WWF is a global conservation organization with a presence in over 100 countries. WWF's mission is to protect biodiversity and safeguard resources that people and nature need to thrive. WWF engages governments, communities, businesses, and multilateral institutions to promote open, accountable and sustainable infrastructure. Targeting all facets of the infrastructure lifecycle, WWF works to reduce negative impacts on biodiversity, wildlife, and communities. WWF recognizes that the procurement and contracting stages of the infrastructure lifecycle are particularly critical but often overlooked when considering opportunities to codify safeguards or introduce robust environmental and sustainability criteria into the development of new infrastructure assets.

The Open Contracting Partnership (OCP) works with governments, businesses, civil society, multilateral and bilateral institutions to transform public procurement to deliver better outcomes for people, planet and prosperity. Using the power of open data alongside inclusive and participatory approaches, we drive data-driven decision-making and evidence-based monitoring so that public spending is more efficient and more effective. Over 50 countries around the world are already implementing open contracting.

Open Contracting for Infrastructure (OC4I) is our ambitious strategy for delivering transformational change to infrastructure planning, procurement and delivery. Trillions of dollars will be invested in infrastructure in the coming decades but a third of this will be lost to inefficiency, mismanagement and corruption. Poorly planned infrastructure will affect the environment and ecosystems in disastrous ways so innovative solutions are urgently needed to prevent this from happening.

This is why OCP and WWF have come together to develop this guide to better equip practitioners to plan, procure and implement infrastructure projects in a way that respects the environment and ecosystems. In particular, this project aims to create clear guidance for an accompanying set of indicators that can help stakeholders identify red flags on infrastructure projects and contracts and how they might affect conservation goals.

This guidance constitutes a component of work on natural resource corruption, funded by the Targeting Natural Resource Corruption project, and builds on previous work on the impacts of infrastructure corruption on conservation.

It is not intended as an exhaustive study on the challenges facing infrastructure and conservation – for which there is already extensive literature.

Instead, this practitioner's guide is intended to add something new to the narrative. It introduces an open data solution that can help stakeholders assess whether and to what extent infrastructure projects take environmental needs into account. These indicators span the infrastructure project lifecycle, from the earliest stages to the delivery of the asset, and cover critical ecosystem needs such as wildlife, habitats, and natural capital.

This guide can be used by diverse stakeholders at all stages of the infrastructure life cycle. Government actors can use it to apply data driven decision-making to infrastructure at the design and planning stages. Supervision agencies can use it to improve oversight at the procurement and implementation stages. Civil society actors can use it to monitor infrastructure projects and contracts and hold decision-makers accountable.

What is the problem we are trying to solve?

Why is infrastructure so important?

Infrastructure underpins every aspect of human life. From transport systems to power-generation facilities and water and sanitation networks, infrastructure – and the services provided by infrastructure – enables society to function and economies to thrive.

However, in a world of 8 billion people, we are living with infrastructure designed for a global population of 3 billion. An estimated US$97.5 trillion in infrastructure investment is needed by 2040 to meet the Sustainable Development Goals but will likely fall short by US$18 trillion. Currently, a third of people across the world lack access to constant electricity, safe drinking water and basic sanitation services. Half of the population lacks internet access, with 90% of those people living in the developing world.

By 2030, the world's population will increase by a tenth, the number of urbanites will increase by a third and weather events will become increasingly severe, adding increasing pressures to already urgent infrastructure needs. Over 75% of the infrastructure to be built by 2050 does not yet exist today, with approximately two thirds of this expected in developing economies. In this period, more than 330,000 rail track kilometers will be added across the world. An additional 25 million kilometres of new roads will also be built, roughly circling the world 600 times.

How does infrastructure impact nature?

Infrastructure development adds pressure to land and natural resources which in turn threaten the future wellbeing of people and our planet. For example, the current stock and use of infrastructure is responsible for more than 60% of global emissions. Air and water pollution along with reduced soil productivity are common symptoms. The areas in greatest need of infrastructure are often also some of the world's most biodiverse regions. In Asia alone, new infrastructure projects could impact more than 350 protected areas and up to 20% of Asia's most biodiverse areas. The results could be catastrophic.

In the last 50 years, infrastructure development has dramatically reduced biodiversity stocks, with wildlife populations declining by 60% on average. Poorly planned infrastructure increases the risk of animal mortality or injury, such as animal-vehicle collisions on roads and railways or electrocution by power lines. It also tends to destroy or degrade natural

habitats, creating barriers or hazards that reduce access to food, water or mates. Furthermore, the ecological impacts of infrastructure often expand far beyond the immediate physical boundaries of a project. Known as the “effect zone,” light, noise and air pollution (e.g. as caused by traffic) are likely reducing natural movement of wildlife. Given the permanence of infrastructure decisions, with assets often built to last 30 years or more, these effects are often irreversible.

Why does this happen?

There are many reasons why this occurs including a scalar mismatch, a preference for least-cost pricing, inadequate incorporation of environmental goals at the earliest stages of planning and procurement, and a lack of participatory mechanisms.

Decisions to build large infrastructure occur at the regional or national levels but the inadequately assessed impacts are largely borne locally. Strategic spatial and land use planning is not carried out early enough or at a scale large enough to be meaningful; it is usually viewed through the lens of single projects. This means that the evaluation of potential trade-offs and risks to natural capital and ecosystem is incomplete. Furthermore, when such spatial planning does occur, it is rarely used to inform investment decisions and often ignored altogether.

An exacerbating factor is that lowest-cost, shortest-path designs remain the norm. This means that infrastructure such as roads, rail, pipelines, and transmission lines are often routed directly through protected areas and other important habitats like wildlife migration corridors with devastating effects. Contributing factors include low population densities and government ownership of land, meaning there are fewer landowners who can tie up the project in courts by objecting to the proposed projects.

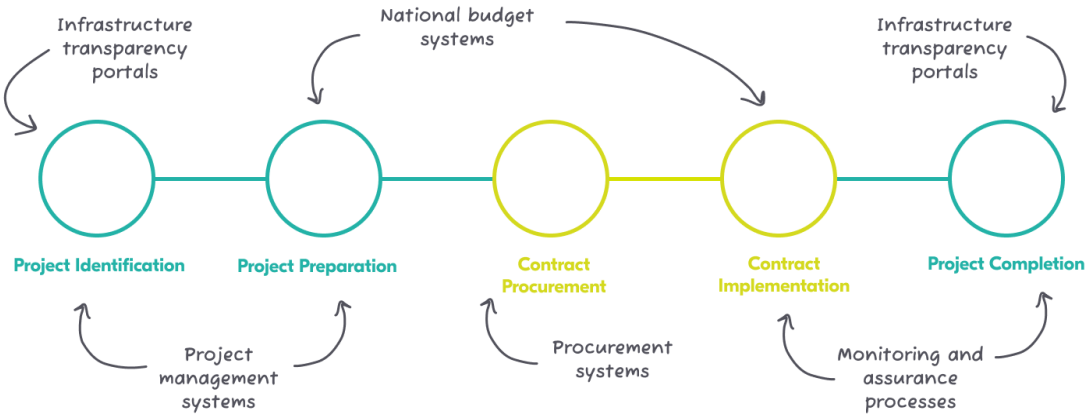
At the procurement stage, environmental goals and priorities are rarely included as part of tender assessments or award criteria. Bids with comprehensive conservation measures or ecological safeguards tend to be more expensive and lose out given the prevalence of lowest price contracting practices. Where environmental criteria are explicitly included, they are often vague and not priced for, making it difficult for contractors to perform to higher standards or understand what is expected of them. Often this means that infrastructure project plans and specifications have to be changed ad hoc, during implementation which in turn causes cost and time overruns.

The lack of effective participatory mechanisms in infrastructure planning and procurement is another contributing factor to the decline of the earth's biodiversity. When stakeholders like civil society organizations or local communities are engaged as part of consultation processes, projects are often already at the final stages of approvals. This means mitigation measures are 'retrofitted' to projects already designed, limiting options and efficacy.

Finally, corrupt actors may take advantage of these systemic weaknesses to enrich themselves. Decision makers may award contracts to companies with poor environmental track records for kickbacks or to benefit friends and family. Developers may obscure environmental impact assessment findings. As a result of corruption and collusion, unnecessary and destructive projects can be approved and implemented for personal or political gain, at the cost of taxpayers and nature.

What is the underlying problem?

Public infrastructure projects are characterized by large sums of money, protracted timeframes and complex supply chains, often with fragmented and siloed information scattered in multiple different systems, locations and formats (see Figure below).



All of this impedes coordination, management, accountability and monitoring, making it difficult for decision-makers and relevant stakeholders to make joined-up, evidence-based, appropriate decisions across the infrastructure project cycle. Often, this results in inefficient processes and policies which lead to leakage of public resources or ad-hoc responses that fail to take into account diverse or competing needs.

How open contracting can help

We need better data and more of it, published openly in a timely fashion across the entire infrastructure lifecycle so that all stakeholders can make sense of how infrastructure projects and contracts affect the environment and ecosystem services. This is where open contracting can help. Our guide provides an overview of the most critical infrastructure project and contract data points needed to improve safeguards for wildlife and nature.

We defined 22 indicators or '**red flags for conservation'**. A red flag for conservation refers to something that is wrong or missing in the public infrastructure planning, procurement or implementation process, creating a risk for the environment. We also identified 31 red flags from our existing "Red flags for integrity: Giving the green light to open data solutions" resource that can also be applied to assess risks that sit at the intersection of infrastructure, conservation and corruption.

You can find the complete list of our new red flags for conservation indicators here along with a section on our existing red flags for integrity and how some of these also affect conservation. These red flags serve various use cases which are detailed below.

What is the use case and why is it important?

The value of open data lies in how it can be used. These 'use cases' are important to help governments, businesses and communities to prioritize reform goals, identify the questions they want to have answered and understand what the data can tell them. In turn, this informs what metrics and indicators should be calculated, which data fields should be collected, and who the key stakeholders involved are.

Working with stakeholders around the globe on procurement reforms, we identified five key use cases. These are improved market opportunities, efficiency, value for money, public integrity and service delivery. In practice, these use cases might intersect. For instance, more transparent processes (public integrity) can not only reduce corruption risks, but also increase competition (market opportunities) and lower prices (value for money). Read more on how we are transforming public procurement around the world with these use cases.

Implementers are increasingly asking for more guidance on sustainable public procurement. In response, we developed open data solutions that can help public

procurement deliver for people, planet and prosperity, including strategies for climate mitigation and adaptation as well as environment and ecosystem protection. This guidance adds something new to our existing use cases, introducing a methodology to measure and monitor conservation risks.

Our starting point for developing this approach lies in our bespoke data standards, which help to structure and standardize data so that it is easier to use and easier to understand. The Open Contracting Data Standard (OCDS) sets a global standard for what detailed contracting data to publish and how to publish it at every stage of the procurement process. Similarly, the Open Contracting for Infrastructure Data Standard (OC4IDS) sets an international standard on what project and contracting summary level information to disclose and, more importantly, how to disclose it at each stage of an infrastructure project. Infrastructure projects are characterized by multiple contracts, and the OC4IDS helps to connect project level data with detailed contracting data published using OCDS to enable a holistic approach to infrastructure governance.

We reviewed the OCDS use cases, OC4IDS use cases and OCDS red flags to assess what data fields and indicators could help improve environmental safeguards on infrastructure projects and contracts. This was carried out in parallel with desk research, focus groups, workshops and interviews with diverse infrastructure, procurement and conservation experts.

How to use this guide

This document is organized according to the different stages involved in planning, procuring and implementing infrastructure. The guide lists the indicators and data needs for each stage: where you will usually find this information, what data currently exists and what doesn't, and how the data could be better structured to calculate the indicators more efficiently, doing more automatically and less manually.

If you are a **data user**, the guide will point you to where you will find the information you need and what you should check. If you are a **data publisher**, the guide will also help you organize your data more effectively and consider the policy changes needed. In the

conservation context, data users will be conservation experts, suppliers, and civil society organizations. Data publishers will often be the government, through their procurement agencies, environmental or public works ministries – see also the section further below on where to find data.

➲ ***Note:*** *The absence of one particular red flag doesn't mean that you don't have to check for other red flags.*

How to operationalize the red flags for conservation

Almost all the proposed indicators require some policy-driven conditions to improve ease of calculation. These include requiring

1. disaggregation of planning documents into specific reports;
2. detailed spatial planning as a prerequisite for projects;
3. conservation criteria and associated milestones to be explicitly included in tenders;
4. conservation criteria to be priced for and budgets allocated for desired goals;
5. due diligence on consultant accreditation (e.g. Environmental Impact Assessments);
6. data to be published in standardized and structured formats and in a timely manner to operationalize these indicators and enable data-driven decision-making.

There are also datasets that should be linked to calculate some of the indicators proposed in this guide. These include:

1. **Protected areas:** to check if infrastructure projects overlap with protected areas.
2. **Suppliers certifications:** to check if winning bidders are accredited.

Currently, most of the indicators require manual work due to the lack of standardized data or insufficient data disaggregation and categorization. We share some guidance below on where you might find infrastructure related information.

Public infrastructure project and contract information

Where to find data

Infrastructure project information is usually found on infrastructure project management institutions' websites, such as the Infrastructure Secretaries and Ministries, and infrastructure transparency portals, such as Indonesia Corruption Watch's Infrastructure Dashboard or Buenos Aires' BAObras portal.

Public infrastructure procurement information usually lives on governments' national or subnational procurement systems or websites. We are also seeing non-government actors publish procurement data in partnership with government actors. If the data is published in OCDS format, you may find that information in OCP's Data Registry.

How to identify relevant projects and contracts

After identifying the infrastructure projects and contracts, you need to check whether it affects nature. For example, there is vast literature confirming that roads, railways, power generation such as hydroelectric dams, and extractives projects pose higher risks for environmental damage. You may also wish to consult a conservation expert.

If there is OC4IDS data, you can use the sector field to identify projects that may affect nature and the status field for identifying at which stage the project is and, therefore, which indicators you can calculate.

If OCDS data is available, you can use the tender/mainProcurementCategory field to filter the tenders whose category is "works". You can also check the tender/items/classification or tender/classification fields to discover if the tender relates to any of these infrastructure types. Another option is to filter the data by procuring entities and looking for entities normally in charge of infrastructure projects, such as the Ministry of Transportation, etc.

If no OCDS data is available, you may need to manually or semi-manually check for the tender title, description, and other text fields to determine if the procurement is related to infrastructure.

Linking projects and contracts

An infrastructure project often has multiple contracting processes spread across the project design, construction, or supervision stages. The OC4IDS and OCDS can be linked; they are designed to work together, helping to link projects with its contracts to make it easier to track performance.

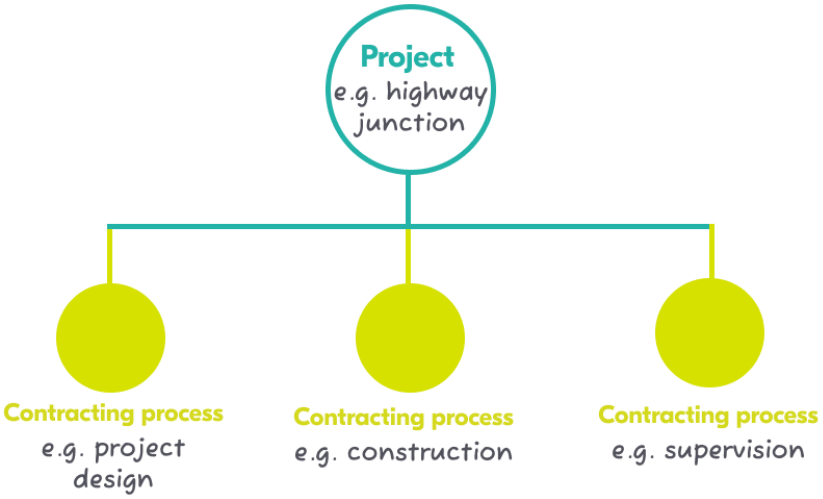


Figure 1. Definition of a project according to the OC4IDS

➲ ***Note:*** *In reality, project and contract information are usually not linked, or the information is available in non-open data formats (such as PDF documents). Manual work is needed to join up the information, which means that a lot of manual work is also expected to calculate the proposed indicators.*

What are the red flags for conservation

Planning and design

The planning indicators include checks for how projects are designed and if conservation aspects are taken into account.

Project without or with poor spatial information

ID	CI001
Description	Measures if a project includes the exact geographical area that the project will affect.
Considerations	Tools can check for the existence of the location, but manual work is required to check how good the information is.
Interpretation	If no georeferenced information exists, or its content is poor, this is a red flag that spatial planning is not taking place. That means that the public, conservation experts, and potential suppliers cannot see the conservation implications of the project.
Data needed	Project location as georeferenced data **OCDS**: **planning/projects/locations** **OC4IDS:** **locations** **No standardized data:** Shapefiles

Project with spatial overlap with conservation areas

ID	CI002
Description	Measures if the project considered conservation at planning and whether there is spatial data - will aid in planning for multiple goals in conservation landscapes.
Considerations	If georeferenced data exists, the project location area must be cross-referenced with protected areas to check if they overlap. Requires policy mandate and having a national/global database identified to use for the overlap check.

Interpretation	Projects without protected area overlap: there is a lower risk that the infrastructure project will affect wildlife and nature, but reviewing the entire project scope is recommended.
Data needed	Project location as georeferenced data **OCDS**: **planning/projects/locations** **OC4IDS:** **locations** **No standardized data:** Shapefiles

Key planning documents are not available or are incomplete

ID	CI003, CI004, CI005, CI006, CI007
Description	Measures if the project has key documents that affect conservation.
Considerations	Ideally, there should be a separate document for each of the relevant document types. However, in reality, **information tends to be in one single document, if any.** If so, manual work is required to check the existing documents' content and see if the proper information is there. Key documents include - Environmental Impact Assessment (EIA) - Cost-benefit Analyses (CBA) - Mitigation Hierarchy - Alternative Locations evaluation - Resettlement, and compensation plan
Interpretation	If one or more of these documents, or their content, are not available, then this is a red flag that not all the conservation planning is taking place. If the project is taking place in a conservation area, then the evaluation of the alternative locations must exist. Similarly, if there is a good justification for using a protected area, then the mitigation plan, CBA, and resettlement and compensation plan must exist.
Data needed	Planning documents **OCDS and OC4IDS**: **planning/documents with documentType = conservationCriteriaEvaluation (new to OCDS), environmentalImpact, valueForMoneyAnalysis, mitigationHierarchyReport (new to OCDS), alternativeLocationsEvaluation (new to OCDS)**

Project with planning documents with later-date amendments

ID	CI008
Description	Dilutions and deletions in key planning documents is a sign of corruption. This red flag identifies when dilutions and deletions occur and if they occur after the planning stage concludes.
Considerations	Ideally, there should be a separate document for each of the relevant document types. However, in reality, **information tends to be in one single document, if any.** If so, manual work is required to check the existing documents' content and see if any dilutions or deletions have occurred. Key documents include - Environmental Impact Assessment (EIA) - Pre-feasibility Cost-benefit Analyses (CBA) - Mitigation Hierarchy - Alternative Locations evaluation - Resettlement, and compensation plan If any of these documents exist, check if their datePublished or dateModified > tender/tenderPeriod/startDate.
Interpretation	If a document was published or modified after the tender opening, this is a red flag that planning findings or considerations were changed after the design. The documents need to be checked again in case essential content was deleted or modified.
Data needed	Planning documents dates, tender dates **OCDS**: **planning/documents/datePublished** **planning/documents/documentType** **tender/tenderPeriod/startDate**

There are no reports of participatory mechanisms during the Environmental Impact Assessment

ID	CI009

Description	This indicator tracks if EIAs utilized mandated participatory mechanisms, a vital step to ensure adequate attention is spent on local social-ecological concerns.
Considerations	Ideally, there should be a list of names and identifiers of those who participated in the EIA development. In reality, if it exists, this information is likely in PDF documents or on paper.
Interpretation	If there is no report or information on participatory mechanisms, there is a higher risk that the EIA is incomplete or incorrect
Data needed	Planning documents **OCDS**: **parties/roles = 'EIAparticipant' (new OCDS code)** **parties/name** **parties/id** **parties/identifier/id OR** **planning/documents/documentType = "'EIAparticipants'** **contracts/implementation/documents/documentType = "'EIAparticipants'**

Conservation milestones required in tender documents make it into the procurement process

ID	CI010
Description	This red flag can help if conservation criteria are not being carried out into procurement even after being formed at planning and included in tender documents.
Considerations	You will need to check what is required as part of the tender. You can check the milestones description to understand if they are conservation related. If there is no structured data about the milestones, you will need to check documents such as progress reports.
Interpretation	If no conservation activities are taking place during the contract implementation, this is a red flag that the project is not what was planned.
Data needed	Tender milestones **OCDS**: **tender/milestones/id** **tender/milestones/description**

Tender

No up-front specification that the project contains conservation aspects

ID	CI011
Description	Titles and tags are very useful to ensure conservation conditions will be considered as part of the procurement process.
Considerations	Ideally, there should be a tag as part of the tender. For example, using the sustainability extension for OCDS data. If there are no tags, then you should check free-text fields such as the tender title or description and check for keywords such as "conservation", "green", "wildlife friendly", etc.
Interpretation	a) If no tags were found, it is a red flag that could indicate the project is not clear or explicit enough on the conservation aspects b) If tags are found, you could check for the other red flags listed in this guide.
Data needed	Tender title, description or tags **OCDS**: **tender/hasSustainability, tender/title, tender/description**

Later Date Amendments to conservation criteria documents

ID	CI012
Description	Changes to tender documents after contract award is a red flag that could signify dilution of explicit criteria as well as preference for a bidder unable to meet these criteria.
Considerations	Check when there are tender/documents/datePublished > awards/date, and then check the document that was changed. If bidders complain that criteria cannot be met, the issues need to go back into planning processes.
Interpretation	If tender documents were changed after the award date, this is a red flag that could signify dilution of explicit criteria as well as preference for a bidder unable to meet these criteria
Data needed	Tender documents and award date

	OCDS: **tender/documents/datePublished** **tender/documents/documentType** **awards/date**

No georeferenced data is presented to bidders

ID	CI013
Description	Check if the tender information contains geospatial data. Spatial plans and extents allow for the proactive use of tools and research by bidders so that they can prepare bids with conservation in mind. However they need to be explicitly told this is required for landscape-wide plans.
Considerations	You need to check if specific tender items (required goods, services, or work) have a deliveryLocation. You will need to check the item's description to know if the item should have a location or not. For example, if the item is about the construction itself, if it is about a mitigation activity, etc.
Interpretation	If there is no georeferenced data as part of the tender items, there is a risk that bidders won't consider the conservation-related activities defined in the planning stage.
Data needed	Tender item descriptions and locations **OCDS**: **tender/items/deliveryLocation**, **tender/items/description**

No georeferenced data or conservation plan is required as part of the bid submission

ID	CI014, CI015
Description	This indicator measures whether spatial planning or conservation plan is required as part of the bidding submission. Spatial planning and conservation plans are essential to ensure public works do not harm the environment
Considerations	If there is structured OCDS data on the tender requirements, the requirements extensions can be used to check if there is any requirement for georeferenced data submission and conservation plans. Otherwise, you

	will need to check documents such as “technicalSpecifications”
Interpretation	If no georeferenced data or conservation plan are required as part of the bid submission, there is a risk that the bidders don’t consider the conservation-related activities defined in the planning stage.
Data needed	Bidding requirements **OCDS**: **tender/criteria or tender/documents where documentType = ‘technicalSpecifications’**

There are no tenders’ items and allocated budget related to conservation activities

ID	CI016
Description	This indicator checks if the tender explicitly includes specific conservation criteria and/or budget line items. Allocating some % of the project budget to conservation activities ensures that bids include activities to avoid and mitigate environmental impacts.
Considerations	You need to check the tender item’s (required goods, service, or work) description to know if the item is about a conservation activity. For example, whether a budget has been allocated for mitigating environmental damage and performing social and environmental assessments. Sometimes this information is not disclosed as structured items, but as part of the technical specifications document, so you need to check this document too.
Interpretation	If the project does not have items that mention conservation activities, this is a red flag that the project will not consider them at all.
Data needed	Tender item descriptions, amounts, or technical specifications document **OCDS**: **tender/items/description OR** **tender/items/classification/scheme** **tender/items/classification/id** **tender/items/unit/value** **tender/documents where documentType = ‘tehcnicalSpecifications’**

Award

Winning or qualifying bids didn’t upload conservation plan document nor spatial plan

ID	CI017, CI018
Description	This indicator checks if contracts are awarded to bidders without conservation plans. If this check is performed against awarded contracts, it can help catch or mitigate inadequate planning processes where conservation was not considered. Spatial planning is crucial to consider conservation concerns ahead of project implementation and during implementation.
Considerations	You need to check the winning bidder's documents submissions and check if a proper conservation plan exists.
Interpretation	If there are no conservation plans as part of the bidder's submission, and it was required, this is a red flag that, in the end, the supplier won’t implement the conservation activities as part of the project.
Data needed	Bidders submission documents, bid status **OCDS**: **bid/details/documents/documentType, where = conservationCriteriaPlan** **bids/details/documents/url** **bids/details/status** **bids/details/id**

Winning or qualifying bids without budgeted conservation activities, including EIAs

ID	CI019
Description	This indicator measures if winning/qualifying bids have budgeted for conservation activities or research, as required in the tender Pricing out the initial cost for conservation activities with the acknowledgment that these are balanced out over the lifecycle of the project is a key shift in business-as-usual to make outcomes aid multiple-landscape goal achievement.

Considerations	If there is OCDS structured data on the bids, you can check each bid item amount and description and compare them with the required tender items. Otherwise, you will need to check documents such as submission documents. If EIA services were required, you should check for a line item for those services.
Interpretation	If there are no conservation plans as part of the bidder's submission, and it was required, this is a red flag that, in the end, the supplier may not implement the conservation activities as part of the project.
Data needed	Bidders item lines description and amounts **OCDS**: **bids/details/items/id** **bids/details/items/description** **bids/details/items/classification/id** **bids/details/items/unit/amount**

Winning or qualifying bids lacking appropriate conservation accreditation or experience

ID	CI020
Description	Tracking how many bidders have undertaken adequate training or have national accreditation is a good indicator of this engagement with the market.
Considerations	There must be an open dataset with the list of suppliers with government accreditation that can be cross-referenced with the suppliers' identifiers
Interpretation	If the supplier is not accredited or has a bad reputational score, it is a red flag that its delivery in this project will be poor.
Data needed	Winning supplier's legal identifiers and additional dataset with suppliers' scores or certificates. **OCDS**: **parties/id** **parties/identifier/id** **parties/identifier/names** **parties/role = supplier**

Contract and Implementation

Project with EIA consultant without recognized accreditation

ID	CI021
Description	This is a red flag and can counter an often reported conflict of interest when EIA consultants are not properly accredited.
Considerations	Check the EIA consultant's legal identifier and cross-reference it with accreditation datasets.
Interpretation	If the EIA consultant doesn't have accreditation, this might result in inadequate EIAs.
Data needed	EIA consultant legal identifier OCDS: **awards/suppliers/id** **parties/id** **parties/identifier/id**

Conservation criteria activities are not carried out through the contract implementation

ID	CI022
Description	This red flag can help if conservation criteria that were part of earlier stages 'fall out' of the project during procurement or implementation.
Considerations	Cross-reference tender requirements with the contract implementation milestones. You can check the milestones description to understand if they are conservation related. If there is no structured data about the milestones, you will need to check documents such as progress reports.
Interpretation	If no planned conservation activities are taking place during the contract implementation, this is a red flag that the project is not what was planned.
Data needed	Tender and contract milestones or progress and delivery reports. OCDS: **tender/milestones/id** **tender/milestones/description** **contract/implementation/milestones/id** **contract/implementation/milestones/description** **contract/implementation/milestones/status**

How do the red flags for integrity relate to conservation

We identified 31 red flags from our existing "Red flags for integrity: Giving the green light to open data solutions" resource that can also be applied to assess risks that sit at the intersection of infrastructure, conservation, and corruption. In this section, we explain why these red flags also affect conservation, but you can refer to the existing guidance to learn more about how to calculate them.

Planning

ID	Red flag	Conservation rationale
NF001	Key planning documents are not provided	Checking if conservation concerns were included in planning is impossible without access to key planning documents (a sign of siloed priorities or corruption by omitting ESIA concerns at planning). Additionally, it becomes difficult to track if conservation-minded criteria that are set in planning for tender, award, contracts, and eventual implementation.

Tender

ID	Red flag	Conservation rationale
NF004	Key tender documents are not available through online platforms during the tender period	Tender documents might include conservation criteria or site-specific/project-specific conservation requirements (EIA, Mitigation Hierarchy application, etc.). Without the availability of these, this could be a sign of corrupt practices limiting information for the wider market and stakeholders as well as trying to allow only preferred bidders into the process.
NF008	Bidding documents are not available on the eProcurement website or have restrictions	Timing and access to bidding documents will allow those with conservation concerns to check if conservation criteria were part of bid requirements and/or budgetary considerations for conservation activities as a requirement for bids in conservation landscapes
NF011	Splitting purchases to	The impacts of split-bids is rampant in conservation landscapes

	avoid procurement thresholds	where split-bids allow for escaping regulatory mechanisms for comprehensive EIAs and mitigation measures for wildlife because under a threshold infrastructure does not require these regulations. For example - a large road split into smaller sections, and bids for each do not need to consider the impacts of the whole road and often get environmental permissions.
NF012	Direct awards in contravention of the provisions of the procurement plan	Direct awards would be a cause for conservation concern due to 2 reasons 1) Preferred bidders who are corrupt and continue to win awards and construct high impact on conservation infrastructure, 2) The lack of opportunity to foster innovation required by more competitive and open bidding.
NF013	Tender is invitation only	Conservation concerns and activities require open and innovative solutions when infrastructure interacts with wildlife areas. Tender by invitation only is in opposition to these two goals for infrastructure in conservation landscapes.
NF014	Length of time between tender advertising and bid opening falls below a threshold value.	If the time bidders have for preparing their bids is short, they won't be able to prepare proper bids, including their conservation plans. This can be a sign of corruption and that there is a preferred bidder selected already.
NF018	Tender featured a single bidder only	A single bid is considered a signal of corruption risk or an output of a fraudulent procedure that affects conservation, as better and expert bidders may not have been applied.
NF020	The procedure has complaints from bidders.	More serious corruption and fraud cases begin with complaints from losing or excluded bidders than from any other source. Corrupt tenders lead to awards and implementation that often lead to many detrimental impacts from infrastructure on conservation. Also, the complaints themselves could be about the lack of a conservation plan.
NF027	Line item bid prices by different bidders are identical, very close, or an exact percentage apart (Price similarities)	This can be a sign of collusion by two or more bidders. Collusion practices can affect conservation efforts, for example, resulting in the selection of a company with a poor environmental record that otherwise would not have been selected under a fully competitive process.
NF035	Only the winning bidder was eligible to have received the contract for this tender	A preferred bidder oftentimes is part of corrupt practices that lead to many impacts on conservation and kick-backs for all involved. Essentially, in many cases, conservation is not considered when corrupt practices drive who bids and who wins

		a contract.
NF037	Poorly Supported Disqualifications	A preferred bidder oftentimes is part of corrupt practices that lead to many impacts on conservation and kickbacks for all involved. Essentially, in many cases, conservation is not considered when corrupt practices drive who bids and who wins a contract.
NF038	High Number of Bid Disqualifications by procuring entity or supplier	A preferred bidder oftentimes is part of corrupt practices that lead to many impacts on conservation and kickbacks for all involved. Essentially, in many cases, conservation is not considered when corrupt practices drive who bids and who wins a contract.
NF039	Unanswered Bidder Questions	If questions are left unanswered, this can signal that a procuring entity is trying to exclude particular suppliers or favor a particular firm. A preferred bidder oftentimes is part of corrupt practices that lead to many impacts on conservation and kickbacks for all involved. Essentially, in many cases, conservation is not considered when corrupt practices drive who bids and who wins a contract.
NF040	Close relationships exist between bidder and buyer	Collusion between officials and project implementers could lead to avoidance of best conservation practices for favoring their own benefit, for example, using the allocated budget for conservation for their own.
NF041	Physical similarities in documents by different bidders	Similarities between bidders may indicate artificial bids or that the companies are connected. If the same bidder is making multiple bids, there is a high risk that the best bidder will lose & the project will be poorly implemented.
NF043	Supplier (or bidder) address is the same as project officials	This can indicate a fictitious contractor where the project or government officials can set up and control companies that purchase goods or services from legitimate companies to avoid conservation activities and impact the project implementation negatively.
NF044	Business similarities between suppliers (or bidders): common addresses, personnel, phone numbers, etc.,	Similarities between bidders may indicate artificial bids or that the companies are connected. If the same bidder is making multiple bids, there is a high risk that the best bidder will lose and the project will be poorly implemented.
NF045	Supplier (or bidder) is not	Untraceability of suppliers is a problem for conservation

	listed in business or telephone directories or business registries	concerns as any missteps in implementation then require costly legal battles to assign responsibility and damage costs to any entity
NF046	Supplier (or bidder) appears on sanction or blacklist by another government agency	A case often seen in contractors and EIA consultants without government accreditation or with previous non-compliance with environmental regulations. If these suppliers continue to win bids and implement infrastructure, there is a higher chance of future missteps as well. At the very least, these need to be tracked on performance.
NF047	Supplier is not traceable through a web search	Untraceability of suppliers is a problem for conservation concerns as any missteps in implementation then require costly legal battles to assign responsibility and damage costs to any entity.

Award

ID	Red flag	Conservation rationale
NF052	Supplier receives two contracts in a discrete time period, the first in a small amount, the second in a large amount from the same Procuring Entity	A supplier that has not historically provided conservation-related project, or is registered to provide other item categories, can be considered riskier since this can indicate that the supplier is unexperienced, that the tender is rigged to favor the supplier, or that they will be unable to deliver the project implementation.
NF055	Multiple direct awards above or just below the direct award threshold	A preferred supplier, reflected by always direct awarding them, oftentimes is part of corrupt practices that lead to many impacts on conservation and kickbacks for all involved. Essentially, in many cases, conservation is not considered when corrupt practices drive who wins a contract. Similar to split bids, unjustified direct awards below a threshold area/value can escape environmental regulatory mechanisms.
NF056	The winning bid does not meet the award criteria	The award criteria can include conservation accreditation, and past performance indicators, therefore, selecting a bidder who doesn't meet the criteria could lead to poorly implemented projects.
NF062	Decision period for submitted bids excessively short	If the decision period is short, it could mean that the supplier is already selected and any of the conservation plan and bidding documents from other bidders won't be evaluated, having a high

		risk that not the best supplier will be selected.

Contract and Implementation

ID	Red flag	Conservation rationale
NF064	Contract information is not available on the procurement website	Checking if conservation concerns were included in planning is impossible without access to key planning documents (a sign of siloed priorities or corruption by omitting ESIA concerns at planning). Additionally, it becomes difficult to track if conservation-minded criteria that are set in planning for tender, award, contracts, and eventual implementation.
NF065	Change orders issued after contract award, reducing or deleting an item	Amendments and modifications to the contract items could include deleting conservation-related activities in the detrimental of the project implementation with conservation concerns.
NF067	Delivery failure	Evidence shows that failure to deliver goods and services, or delivering low-quality goods, is a strong signal of corruption in the contracting process and can significantly impact the conservation activities that were part of the project, risking nature and wildlife.
NF073	Discrepancies between work completed and contract specifications	Low quality or undelivered goods, works, or services can be a strong indicator of fraud and corruption and can significantly impact the conservation activities that were part of the project, risking nature and wildlife.

About World Wildlife Fund

WWF is a global conservation organization with a presence in over 100 countries. WWF's mission is to protect biodiversity and safeguard resources that people and nature need to thrive. WWF engages governments, communities, businesses, and multilateral institutions to promote open, accountable and sustainable infrastructure. Targeting all facets of the infrastructure lifecycle, WWF works to reduce negative impacts on biodiversity, wildlife, and communities.

Contact
www.worldwildlife.org

About the Open Contracting Partnership

The Open Contracting Partnership is an independent not-for-profit, silo-busting organization working to open up and transform government contracting worldwide. We bring open data and open government together to ensure public money is spent openly, fairly and sustainably. We focus on public contracts as they are the single biggest item of spending by most governments. We drive massively improved value for money, public integrity and service delivery by shifting public contracting from closed processes and masses of paperwork to digital services that are fairer and better.

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