

Procurement Processes

Transportation and
Economic Corridors

Report of the Auditor General
December 2023



**Auditor
General**
OF ALBERTA

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Related Reports:

- [Infrastructure—Procurement Processes](#) (June 2022)

Appointed under Alberta's *Auditor General Act*, the Auditor General is the legislated auditor of every provincial ministry, department, and most provincial agencies, boards, commissions, and regulated funds. The audits conducted by the Office of the Auditor General report on how government is managing its responsibilities and the province's resources. Through our audit reports, we provide independent assurance to the 87 Members of the Legislative Assembly of Alberta, and the people of Alberta, that public money is properly accounted for and provides value.

Report Highlights

Transportation and Economic Corridors' procurement processes are guided by the Government of Alberta's Procurement Accountability Framework which is based on the principles of fairness, transparency, and integrity. p. 187

Our audit objective was to assess whether the department has effective processes to ensure fair and competitive procurement of its construction tenders. p. 191



Fair and competitive procurement processes are needed to ensure Albertans get good value from the significant dollars their government spends on construction projects. p. 187



We found that the department had processes to conduct procurements of its construction projects fairly and competitively, but not all of these processes were effective, and improvements can be made. p. 187



Valued at over
\$20 billion,

the department manages over 31,000 km of highways and over 4,000 bridges and culverts throughout the province.

The province's roads, 31,000 km of highways and 4,000 bridges and culverts make up over 90 per cent of total net book value for all assets owned by Transportation. p. 187

What we recommend

The department should improve its procurement of construction projects by strengthening its processes and controls for posting solicitation documents for appropriate timelines and ensuring only appropriate parties have access to its procurement information systems.

The department should also ensure it retains appropriate documentation to support its shortlisting and contract award decisions. p. 188

Summary

Transportation and Economic Corridors' (the department) procurement processes are guided by the Government of Alberta's Procurement Accountability Framework (PAF) which is based on the principles of fairness, transparency and integrity.

The department is also subject to Canadian and international trade agreements designed to reduce trade barriers. These agreements are based on similar principles of openness, non-discrimination, non-circumvention, and transparency.

In addition to requirements under the trade agreements, the department is subject to all of Canada's competitive legal obligations found in the common law, including the duty to conduct a fair procurement process.

Based on these legislative requirements and legal obligations, it is critical that the department has effective processes to ensure fair and competitive procurements. Failure to comply could result in complaint, legal action or judicial review, and reputational damage or loss of value.

Why We Did This Audit

The department manages over 31,000 km of highways and over 4,000 bridges and culverts throughout the province. Valued at over \$20 billion, the province's roads, highways and bridges make up over 90 per cent of total net book value for all assets owned by the department. The majority of the construction and maintenance of this infrastructure is contracted to third parties.

Given the significant dollars the department spends on construction, Albertans should be confident it has effective procurement processes to ensure contracts are awarded appropriately. Proponents, including bidders, suppliers, and subcontractors, also rely on

the department's procurement processes and expect them to be impartial, consistent and transparent. We examined the department's processes to ensure fair and competitive procurement of its construction tenders.

What We Examined

We examined a sample of procurements of construction projects over \$100,000 that the department procured between January 2019 and January 2022. The projects related largely to construction and rehabilitation of roads, highways, bridges, dams, and related infrastructure. Our audit focused on the solicitation stage through to the contract award stage. We also examined the department's processes for developing and posting solicitation documents, receiving and evaluating responses, and ultimately awarding contracts to the lowest compliant bidders.

What We Found

We found that the department had processes to conduct procurements of its construction projects fairly and competitively, but not all of these processes were effective, and improvements can be made.

The department competitively procured its construction contracts, included the necessary and appropriate information in solicitation documents, ensured only compliant bids were considered, and ensured communication with bidders was appropriate and transparent.

However, the department did not always post solicitation documents for appropriate timelines, document support for its shortlisting decisions, have effective document filing or retention processes, and have sufficient controls to ensure appropriate access to its procurement information systems.

What We Recommended

The department should improve its procurement of construction projects by strengthening its processes and controls for posting solicitation documents for appropriate timelines and ensuring only appropriate parties have access to its procurement information systems. The department should also ensure it retains appropriate documentation to support its shortlisting and contract award decisions.

Why This Matters to Albertans

Fair and competitive procurement processes are needed to ensure Albertans get good value from the significant dollars their government spends on construction projects. Fair and competitive processes provide market participants with an equal opportunity to bid and help ensure capital projects are delivered within scope, on budget, and on schedule.

If the department cannot demonstrate that its processes are perceived as fair, it faces increased risk of legal action, financial penalties, or reputational damage. As well, proponents may lose confidence in the department's procurement processes, which could result in decreased competition or inflated contract costs.

Background

The Procurement Accountability Framework, Trade Agreements and Canadian Competitive Bid Law

All Government of Alberta departments must procure goods and services in accordance with the Procurement Accountability Framework (PAF). The PAF provides departments with procurement requirements and guidance. The PAF:

- reinforces fairness, transparency, and integrity
- adds rigor and accountability
- drives consistency and discipline
- includes controls and a shared set of values and ethics
- outlines duties under the common law³⁷

The department must also follow Canadian and international trade agreements when it conducts procurements.³⁸ The agreements are triggered based on the value of the procurement. The agreements are based on the principles of:

- **openness**—all eligible suppliers that meet requirements are given an opportunity to submit a proposal
- **non-discrimination**—the procuring entity does not provide favorable treatment to suppliers in their own or any jurisdiction
- **non-circumvention**—the procurement is not structured in any way to avoid the obligations of the trade agreements
- **transparency**—the procuring entity must post procurements on designated systems, provide procurement policies on request, and provide requested documents in a non-discriminatory manner

Procurement at the Department

The department is focused on building and maintaining a safe and efficient transportation system throughout the province. This horizontal infrastructure system is relied upon by Albertans for the movement of people and goods throughout the province's highway system and to support Alberta's economic growth and recovery. The department engages third parties to build and maintain most of this infrastructure through large and complex contracts.

The department manages over 31,000 km of highways and over 4,000 bridges and culverts throughout the province. Valued at over \$20 billion, the province's roads, highways and bridges make up over 90 per cent of total net book value for all assets owned by the department. From January 2019 to January 2022, the department awarded almost 300 construction contracts for almost \$2.2 billion. Having effective procurement systems is critical for the department in ensuring it conducts procurements fairly, competitively, and openly in accordance with the trade agreements, common law, and other government policies and directives. This reduces the risk of potentially costly legal action, loss of confidence in government, and other reputational damage.

For most construction projects, the department uses one of two solicitation methods—open or limited solicitation, which is driven by requirements of the trade agreements:

- **open solicitation**—any proponent may submit a response
- **limited solicitation**—following an open solicitation, only a pre-determined, pre-qualified or shortlisted group of proponents are invited to submit a response

³⁷ Procuring entities have the duty to disclose material information about the contract that could impact a proponent, reject non-compliant responses, conduct a fair procurement process, award to the winning proponent, and award the contract as tendered.

³⁸ Appendix A includes the procurement thresholds for each trade agreement.

The department may tender its construction projects using a two-stage or one-stage approach:

- **two-stage procurements**—the department uses a qualifications-based approach to shortlist proponents and final bids will only be accepted from those proponents. In the first stage, the department provides a solicitation document, called a request for qualification (RFQ), open to all proponents. The department then evaluates submissions received based on pre-established evaluation criteria stated in the RFQ and determines a final shortlist of proponents who may bid on the tender. In the second stage, the tender solicitation document is provided, including unit price schedules, relevant drawings, specifications and plans, and instructions for bidders to submit their final price. These tenders are to be awarded to the lowest compliant bidder.
- **one-stage procurements**—the department foregoes the qualifications stage and provides a tender solicitation document including unit price schedules, relevant drawings, specifications and plans, and instructions, open for all proponents to submit their final price. These tenders are to be awarded to the lowest compliant bidder.

The department generally uses a one-stage approach for more standard construction projects of lower complexity or risk; however, the department does not have formal rules for when to use one- or two-stage procurements. Each method has advantages and disadvantages. For example, two-stage procurements take longer to complete but have the advantage of giving the department more assurance that bidders are qualified and capable of completing the work as required.

About This Audit

Objective and Scope

Our audit objective was to assess whether the department has effective processes to ensure fair and competitive procurement of its construction tenders.

Our audit focused on the solicitation stage through to the contract award stage and included contracts that the department ultimately awarded to the proponent with the lowest priced compliant bid, using either a one-stage or two-stage method. We focused on contracts awarded based on lowest price because the magnitude of the contract spend is significant. These contracts also have increased risk for ensuring a fair procurement process, such as protecting confidentiality of bid prices before the procurement closes.

To assess the department's process and controls, we sampled contracts awarded from January 2019 to January 2022. The audit included procurements in both the procurement strategy and planning as well as major capital projects groups at the department. These procurements related to construction or rehabilitation of roads, highways, bridges, dams, and related infrastructure. These contracts were awarded using either a one-stage or two-stage approach.

Our audit did not include:

- the decision to acquire or capital planning processes, contract management or contract completion
- consulting, highway maintenance or other service contracts
- contracts less than \$100,000
- public-private partnership contracts

Criteria

We used the following criteria to determine whether the audit objective was met.

The department should:

- ensure the solicitation method is appropriate and solicitation documents are posted for the required time and contain the required information
- ensure all communication to proponents is complete and transparent
- ensure it has adequate controls to receive proponent responses
- ensure it has adequate controls to protect the confidentiality of information received
- ensure its procurement evaluation and contract award processes are clear, consistent, and impartial
- prepare and retain appropriate procurement records and information

We developed our criteria from the PAF and trade agreements. Management of the department acknowledged the suitability of the audit criteria on April 13, 2022.

What We Examined

In assessing the department's procurement systems, we examined:

- relevant legislation, policies, guidelines, manuals, and trade agreements
- the procurement information in the department's systems
- procurement records and supporting information such as solicitation documents, communication to and from proponents, proponent submissions, department evaluation, and support for award decisions including approvals for a sample of procurements

We also interviewed staff involved in procurement at the department.

We conducted our fieldwork from July 2022 to December 2022.

Conclusion

Based on our audit criteria, we conclude that the department has processes to ensure fair and competitive procurement of its construction tenders but not all of these processes are effective, and improvements can be made.



Why This Conclusion Matters to Albertans

Albertans should be confident that the department has effective processes to ensure the significant dollars it spends on construction contracts are procured fairly and competitively.

Construction contracts are often in the millions of dollars and are significant for Albertans, the department and for proponents. Proponents invest time and money in the development of their submissions, including their bids, and they rely on and expect fair and competitive procurement processes.

Summary of Recommendations

NEW Recommendation:
Improve controls for posting periods

We recommend that the Department of Transportation and Economic Corridors improve its controls to ensure solicitation posting periods comply with trade agreement requirements.

NEW Recommendation:
Improve documentation controls

We recommend that the Department of Transportation and Economic Corridors ensure it has adequate controls to document support for its shortlisting and award decisions, including key procurement information.

NEW Recommendation:
Improve access controls for procurement information systems

We recommend that the Department of Transportation and Economic Corridors improve its access controls for its procurement information systems.

Detailed Findings and Recommendations

Solicitation Documents and Posting Periods

Context

Solicitation method

The trade agreements³⁹ require departments to use open solicitation for construction procurements over a threshold amount. For example, the New West Partnership Trade Agreement requires departments to use an open solicitation method for construction services with an estimated value of over \$100,000.

Solicitation documents and posting

The trade agreements have several requirements for posting timelines and content of solicitation documents, including that the procuring entity:

- provide proponents with a reasonable time to submit a response. The time limit should consider the nature and complexity of the procurement, extent of subcontracting anticipated, and the time needed to submit submissions by non-electronic means. When the procuring entity accepts electronic submissions, some trade agreements require a minimum 25-day posting period for construction procurements over \$9.1 million. Trade agreements do allow for a reduction in the posting period to no less than 10 days in certain circumstances and in situations of urgency.
- provide proponents with all necessary evaluation criteria, design specifications, and other information needed to submit a response
- avoid the use of restrictive conditions that would prevent proponents from bidding, such as requiring bidders to be located in Alberta or requiring previous experience with the Government of Alberta

Communicating with proponents

After solicitation documents have been made available, proponents may seek answers, clarifications or additional information on the project or submission requirements. The department communicates with proponents through direct inquiries and in some cases, pre-bid meetings. The department may also extend submission deadlines depending on the extent of clarifications to proponents or potential changes to scope of work. Extensions of submission deadlines would be communicated through addenda.

In line with trade agreement requirements, the department needs to communicate any information relevant to the solicitation fairly and transparently to all prospective bidders. The department balances project requirements, such as the project schedule and expected completion date, with posting timelines. However, the procurement posting time, including addenda, is important because proponents need adequate time to prepare their submissions, factoring in any new or changed information.

Criteria

The department should ensure:

- the solicitation method is appropriate and solicitation documents are posted for the required time and contain required information
- all communication to proponents is complete and transparent

³⁹ The trade agreements allow for certain exceptions.

Our findings

Key findings

The department:

- competitively procured construction contracts over \$100,000 as required by trade agreements
- included necessary and appropriate information in the solicitation documents
- posted some solicitation documents for less time than required per trade agreements and department guidance and did not document rationale for the reduced timelines

Solicitation method

The trade agreements require the department to use open solicitation for construction procurements over \$100,000. We sampled construction projects, all over \$100,000, and found the department used open solicitation for all projects sampled.

The department used standard tender and RFQ templates as starting points in developing solicitation documents. The solicitation documents for the construction projects sampled all contained the required information including the scope of work and instructions to proponents on submissions requirements and deadlines.

The trade agreements do not allow procuring entities to restrict which proponents may be awarded contracts. The department cannot impose restrictions on its solicitations that potential bidders must be located in Alberta or have previously contracted with the department. We did not find any such restrictions in the solicitation documents we examined.

Posting timelines

The trade agreements require construction tenders over \$9.1 million be posted for minimum 25 days if proponents can submit their bids electronically and minimum 30 days if the bids are required in hard copy. In either case, the posting timeline can be reduced to no less than 10 days if a notice of the planned procurement was published in advance of the intended procurement, or a state of urgency duly substantiated by the department renders the time period for tendering impracticable.

We found that almost 30 per cent of construction projects sampled were not initially posted for the minimum timelines per the trade agreements. The department did not provide support in any of these instances for advanced notice of the planned procurement or a duly substantiated state of urgency that would have allowed reduced posting timelines.

After initial posting, the department extended the submission deadline for some of the exceptions above. After submission deadlines were extended, 20 per cent of projects sampled were still not posted for minimum timelines per the trade agreements. The department did not provide evidence that conditions allowing for reduced timelines were present.

NEW Recommendation: Improve controls for posting periods

We recommend that the Department of Transportation and Economic Corridors improve its controls to ensure solicitation posting periods comply with trade agreement requirements.

Consequences of not taking action

The department may not be posting solicitations with a reasonable amount of time for proponents to prepare and submit bids, based on trade agreement requirements. If these requirements are not being met, the department could face financial or other penalties or reputational damage from resulting actions. If proponents do not have adequate time to prepare their submission, they may not submit a proposal resulting in less competition or they may price this risk into their bid.

Receiving, Evaluating and Retaining Submissions and Other Key Procurement Information

Context

Receiving submissions

Solicitation documents are intended to state submission requirements, including closing date and time, schedules and other information required with the submission. The department also requires bid bonds⁴⁰ be submitted with bids or the bid will not be evaluated.

Submissions are to be received by the department and information in those submissions is to be protected, either sealed or unread, until after the submission deadline when tenders are opened and posted publicly.

Evaluating submissions

The following submissions need to be evaluated by the department:

- **qualifications-based (RFQ)**—these submissions are evaluated for shortlisting decisions. For these solicitations, proponents are generally asked to submit details such as qualifications and experience of its construction and project teams, as well as details of its corporate profile, project comprehension and proposed schedule. These and other criteria against which proponents will be scored, and the weightings of each criterion, are to be stated in the solicitation documents. After submissions have been received, the department uses evaluation teams to score submissions and arrive at final shortlisting decisions. Following the RFQ, a tender or request for proposal (RFP) is issued, resulting in the contract being awarded to a shortlisted proponent.
- **tender**—these submissions are evaluated for compliance after the tender closing time. Prior to opening individual tenders, the department is required to disqualify any bid received after the submission deadline. After tender opening, after bids have been read, the department is required to perform a more extensive evaluation of each

bid to ensure all mandatory requirements, such as appropriate bid bonds, are met. If any mandatory requirements are not met, the bid should be disqualified.

Retaining records

The PAF includes a list of solicitation process documentation⁴¹ that should be kept on file. This list includes copies of all responses received from vendors, solicitation and vendor notices and communications, evaluation ratings and scoring sheets or other justifications for scoring and how final scores were determined, recommendations for awards, and other department internal communication documentation where applicable.

Criteria

The department should:

- ensure it has adequate controls to receive proponent responses
- ensure its procurement evaluation and contract award processes are clear, consistent, and impartial
- prepare and retain appropriate procurement records and information

Our findings

Key findings

The department:

- has effective controls to ensure any non-compliant bids are not accepted or evaluated, including any bids received after the submission deadline
- did not adequately document support for its shortlisting decisions for two procurements
- could not locate all procurement information to support award decisions prior to moving to electronic submissions; after the move to electronic submissions, we found no exceptions

⁴⁰ A bid bond provides financial assurance—for the department, generally 10 per cent of the tender amount—that a bid for a project has been submitted in good faith and the bidder intends to enter into the contract at the price tendered.

⁴¹ Section 3.2.5—Solicitation Process Documentation of the Procurement Accountability Framework manual.

Receiving submissions

Prior to July 2021, the department only received bids and bid bonds in hard copy format. After July 2021, the department began accepting bids and bid bonds in electronic format only. The department's processes for receiving electronic submissions differ from processes for receiving hard copy submissions:

- for **hard copy submissions**—proponent submissions were dropped off at the tender deposit counter at the department, where submissions were received in sealed envelopes and time stamped. As submissions were received, the department logged proponent names and time of submission in a bid log form. Bid bonds were included with the bid submission. Submissions remained sealed until tender opening, where bid prices for each proponent were publicly read.
- for **electronic submissions**—proponent submissions and digital bid bonds are emailed to an inbox as stated in the solicitation document, and those submissions remain in the submission inbox, unread, until after the deadline for submission has closed. Submissions are then moved to a shared network and a tender bidder list form is prepared for tender opening, where bid prices for each proponent are publicly posted. The department takes a screenshot of each tender submission inbox just after deadline close to show the time that submissions were received.

Our sample of construction projects included both hard copy and electronic submissions. In all samples tested, we found no deviations of the department accepting or evaluating non-compliant bids, including any bids received after the submission deadline.

Evaluating RFQs

Of the samples we tested, nearly half were two-stage procurements where stage one was an RFQ. In all of these procurements:

- the department composed an evaluation team that scored proponent submissions according to the criteria and weightings listed in the corresponding solicitation documents
- a consensus scoring process was appropriately used to arrive at final scores for submissions, adequately supported by notes and comments for each

For all but two of the department's two-stage procurements, shortlisting decisions were made based on the final rankings from the consensus scoring process. For the other two procurements, due to the size and complexity of the projects, the department used a separate selection committee to make final shortlisting decisions following scoring by a technical committee. In these two procurements, the technical committee consensus scoring was used as a starting point for the shortlisting decision by the selection committees.

In both procurements, the selection committee conducted additional review of proponent submissions and interviewed the proponents. In both procurements, the department could not provide supporting documentation for the results of these additional evaluation processes. For one of these two procurements, the final shortlisting decision by the selection committee did not match the rankings from the initial technical committee. The department did not document the rationale for its final shortlisting decision.

Evaluating tenders

The department evaluates tender submissions to ensure they meet the mandatory requirements, such as whether bid bonds and other supplementary information are appropriate, and tenders are submitted in proper form. In our samples, we found the department appropriately disqualified all submissions that did not meet mandatory requirements.

Retaining records

The department could not locate all key procurement information and records for all samples tested. The records and documentation that could not be located as indicated below related to procurements prior to July 2021 when the department used hard copy submission processes. The department moved to electronic submissions in July 2021, making storing and retaining records easier. The department was able to locate all key records and documentation for procurements after it moved to electronic submissions in July 2021. For procurements prior to July 2021, the department could not locate:

- **proponent submissions**—for four per cent of samples tested, the department could not locate all of the proponent submissions; only the winning bid could be located. Without the original submissions, we could not verify the accuracy of the data in the department's procurement information system and the basis for the award decision.

- **evidence of date and time of submission**—for 20 per cent of the samples tested, the department either could not locate the time-stamped envelopes indicating dates and times of all submissions or did not time-stamp submissions as they were received. Without this evidence of date and time of submission, we could not verify that all submissions were received on time.
- **bid bonds**—for 20 per cent of the samples tested, the department could not locate the bid bonds submitted by proponents with their bids. Without these bid bonds, we could not verify that mandatory requirements were met for corresponding submissions.

NEW Recommendation:
Improve documentation controls

We recommend that the Department of Transportation and Economic Corridors ensure it has adequate controls to document support for its shortlisting and award decisions, including key procurement information.

Consequences of not taking action

Without proper documentation or records, the department may not be able to demonstrate its procurement practices and award decisions are fair. If challenged, the department could face legal, financial or reputational damage if it cannot produce adequate support for its shortlisting or contract award decisions.

Procurement Information Systems

Context

It is essential for a procuring entity to protect the confidentiality of procurement information to ensure it does not provide proponents with an unfair advantage. In accordance with the trade agreements, a procuring entity must “receive, open and treat all tenders under procedures that guarantee the fairness and impartiality of the procurement process, and the confidentiality of tenders”.⁴²

⁴² Guidelines to the Procurement Obligations of Domestic and International Trade Agreements, New West Partnership, December 2021, page 21.

Procurement information systems

The department stores procurement information in three main systems:

- **email accounts**—the department uses email accounts to receive proponent submissions electronically
- **procurement network folders**—the department uses these folders to store procurement records electronically. The information stored includes proponent submissions, submission evaluations, contracts, communications with proponents and other key procurement documents that support the department’s procurement processes and decisions.
- **Program Management Application (PMA)**—this is the department’s primary procurement system. One of the functions of PMA is to track and retain procurement-related information such as successful and unsuccessful proponents, submission evaluation results, bid prices, award recommendations, and approvals

Criteria

The department should ensure it has adequate controls to protect the confidentiality of information received.

Our findings

Key findings

The department does not have sufficient controls to ensure appropriate access to its procurement information systems.

Procurement information system access controls

The department does not periodically review access to its procurement information systems. We found:

- 15 individuals had access to the submission inboxes, and of these 15 individuals, one was no longer with the department
- over 180 individuals had access to the network folders, and 45 of these individuals were currently not listed on the Government of Alberta staff directory

- over 1,100 individuals had access to the PMA application, many of these users are external consultants with various levels of access. The department could not confirm to us that the access of the 1,100 individuals was appropriate.

The department could not provide evidence that all individuals with access to the network folders and PMA application should have this access or that their access was appropriate.

NEW Recommendation:
Improve access controls for procurement information systems

We recommend that the Department of Transportation and Economic Corridors improve its access controls for its procurement information systems.

Consequences of not taking action

Without adequate access controls, there is a risk that confidential information, including bid prices and evaluation information, could be accessed and shared inappropriately with proponents. The inappropriate sharing of confidential information could result in an unfair advantage, undermining the credibility and integrity of the procurement process.

Audit Responsibilities and Quality Assurance Statement

Management of Transportation and Economic Corridors is responsible for the construction procurement systems.

Our responsibility is to express an independent conclusion on whether Transportation and Economic Corridors has effective processes to ensure fair and competitive procurement of its construction tenders.

All work in this audit was performed to a reasonable level of assurance in accordance with the Canadian Standard on Assurance Engagements (CSAE) 3001—Direct Engagements, set out in the CPA Canada Handbook—Assurance. The Office of the Auditor General applies Canadian Standard on Quality Management 1, which requires the office to design, implement and operate a system of quality management, including policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements. The office complies with the independence and other ethical requirements of the Chartered Professional Accountants of Alberta Rules of Professional Conduct, which are founded on fundamental principles of integrity and due care, objectivity, professional competence, confidentiality, and professional behaviour.

Appendix A—Trade Agreement Thresholds for Construction

Trade Agreement	Construction Threshold for Ministries/Departments ⁴³
New West Partnership Trade Agreement	\$100,000
Canadian Free Trade Agreement	\$121,200
World Trade Organization—Agreement on Government Procurement	\$9,100,000
Canada-European Union Comprehensive Economic and Trade Agreement	\$9,100,000
Canada-UK Trade Continuity Agreement	\$9,100,000
Comprehensive and Progressive Agreement for Trans-Pacific Partnership	\$9,100,000

⁴³ Thresholds as of January 2022.