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PARA LA LUCHA CONTRA LA CORRUPCIÓN

COST ASSESSMENT OF PROCUREMENT WITH CONFIRMED VIOLATIONS AT THE NOTICE PUBLICATION AND BID SUBMISSION STAGE

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Objective of the Study

The study sets out to measure the value of the procurement procedures in which an external participant recorded signs of corruption risk, to establish what share of that value a review authority confirms as a violation before the contract is concluded, to separate a confirmed violation from the procedural effect of the challenge, and to propose a method reproducible on any electronic procurement system.

For the purposes of the study, a signal is a sign of restricted competition recorded by an external participant in the documentation or in the design of a procedure before its results are announced. A confirmed violation is a decision of a territorial review authority holding a complaint reviewed on the merits to be well founded in full or in part. A procedure affected by intervention is one suspended or cancelled in connection with a complaint or a request for clarification, whatever the later outcome; this quantity describes the procedural effect of the challenge and is not a measure of violation.

Three tasks serve this objective:

1. To describe the open dataset as a source: the unit of observation, the selection principle, the published fields, the anonymisation policy and the stage at which the review authority takes its decision, and to show how this body of data differs from the data underlying existing estimates of losses to corruption.
2. To measure, on the 427 episodes of the open dataset, the value funnel running from signal to complaint to review to confirmation, to establish the confirmation rate by number and by value, to separate it from the procedural effect of the challenge, and to test its stability across procurement methods, legal regimes, sectors, types of contracting authority and territorial review authorities.
3. To examine the provenance of the international loss rates, to show why they cannot be compared directly with the confirmation rate, and to set out the conditions under which the rate may be transferred to the national population of procedures.

Intended Readership

The study is addressed first of all to researchers of public procurement and corruption risk who work with administrative data, and to the bodies responsible for the integrity of procurement systems: review authorities, internal auditors and the developers of electronic platforms. The method proposed here does not compete with corruption risk indices built on red flags; it adds the link they lack, the testing of a flag against a decision of the state.

To civil society organisations and donors that support procurement monitoring, the study offers a measurable indicator of result: the value of procedures with a violation confirmed before the contract is concluded, rather than the number of complaints filed.

The dataset on which the study rests is published under a CC BY 4.0 licence together with the anonymisation and packaging scripts; every table in the article can be reproduced from it without recourse to the primary register. The comparative material (sections 6 and 7) and the appendix can be used on their own as a reference survey of existing loss estimates and review systems.

Executive Summary

International estimates of losses to corruption in public procurement, the familiar 10 to 25 per cent of contract value, are obtained from the top down: the volume of procurement is multiplied by an expert coefficient. The citation chain behind that coefficient runs from Transparency International to UNODC, from UNODC to the OECD in 2013, and from the OECD to the TI handbook of 2006, where it was an estimate by practitioners with no sample and no method. The few empirical works either classify contracts through the researchers' own judgement or measure statistical red flags rather than violations, none of which has been tested against a decision of a review authority. All of them concern contracts already concluded.

The CILC open dataset yields a quantity of a different nature. It covers 427 procurement procedures under laws 44-FZ and 223-FZ, selected by external complainants on signs of corruption risk and carried through to a decision of a review authority, with a combined initial price of RUB 980.5 million (about USD 11.8 million), in 68 regions of the Russian Federation, with contracting authorities of nine legal forms, over the period from 30 March to 19 August 2026. In 369 procedures the review authority took a decision on the merits. In every case the decision was taken before the contract was concluded. The dataset is anonymised and published under a CC BY 4.0 licence.

Methodology. The study belongs to the genre of value reconstruction from administrative acts. The unit of observation is the procurement procedure; for each one the dataset publishes the notice price, the method, the regime, the category of subject matter, the legal form and level of the contracting authority, the region, the review authority, the bid submission deadline, the outcome of the complaint, the procedural effect and the result of any appeal to the central office. Confirmed violation and the procedural effect of the challenge are measured as two independent quantities. All conclusions concern procedures with a signal.

Principal findings. The total value of procurement with a signal carried through to a decision of a review authority is RUB 980.5 million, about USD 11.8 million (427 procedures). The total value of procurement in which the review authority found a violation in full or in part is RUB 188.0 million, about USD 2.3 million (92 of the 369 procedures reviewed on the merits), which is 24.9 per cent by number, 20.3 per cent by the value of the procedures reviewed and 19.2 per cent of the value of the dataset. The rate is stable across the regulated procurement methods (19 to 26 per cent), across regimes (23.8 per cent under 44-FZ, 27.4 per cent under 223-FZ), across types of contracting authority (20 to 27 per cent for the main legal forms) and across months (20 to 28 per cent), but it differs sharply between territorial review authorities, from 0 to 55 per cent with the same source of signal. Intervention affected 245 procedures worth RUB 669 million, about USD 8.0 million (68 per cent of the value), yet three quarters of that value consists of suspensions pending review of complaints that were ultimately not upheld; this quantity describes the effect of the challenge and not the violation. The categories of media and communications support and of IT and software account for half the value of the dataset. At the second instance (28 applications) none was upheld.

Economic content. The confirmation rate provides the first calibration of a corruption risk signal against administrative acts: it shows what share of the value of procedures with a signal the state recognises as a violation when they are systematically challenged. Transferring the rate to the national scale is not attempted in this version: national statistics on procurements declared unsuccessful are defined by the outcome of the procedure (a single bid) rather than by a feature of the documentation, and without a subsample sharing that feature the two populations are not comparable. The arithmetic of such a transfer is given only as an illustrative scenario.

Proposal. The study introduces a signal to confirmation model with operational criteria and sets out a programme for strengthening it: component-level validation, matching the signal asserted against the violation found by the authority, and enrichment of the dataset with the number of bids, which will open the way to a correct transfer to a national denominator.

1. Introduction

The question of how much money leaks into corruption through public procurement has a settled answer: from 10 to 25 per cent of contract value, sometimes as much as 30. The figure is reproduced in OECD guidance, in Transparency International topic surveys, in UNODC documents and in dozens of national reports. It has not changed in twenty years, and that is the first thing that should give pause: no measured quantity stays constant for two decades as it passes from country to country and from sector to sector.

The stability of the figure is explained by its provenance. It was agreed rather than measured: a sequence of documents cites one another, and at the end of the chain stands not a sample but the opinion of practitioners. Estimates of this kind are useful as an order of magnitude and useless as a basis for policy, because they do not allow one to check where exactly and through what mechanism the money is lost.

This study does not offer a refined coefficient. It offers a different quantity, measurable at the level of the individual procedure and confirmed not by the researcher but by a state review authority: the share of procedures showing signs of corruption risk in which a violation is confirmed before the contract is concluded. The CILC open dataset remains the only body of data known to the authors in which such a check has been carried out systematically, documented at every step and published for independent verification.

The study is arranged as follows. Section 2 introduces three quantities and shows why their denominators are incompatible. Section 3 describes the dataset and the method. Sections 4 and 5 contain the results: the confirmation funnel and the breakdowns by sector, contracting authority and review authority. Section 6 sets out the economic content of the rate and explains why a national estimate does not follow from it in this version; section 7 examines the existing international estimates by provenance and credibility. Section 8 formulates the method as a transferable instrument, and section 9 sums up.

2. Conceptual Framework: Signal, Violation and the Moment of Review

2.1. Three Quantities and Three Denominators

Discussion of corruption in procurement conflates three quantities with different denominators. The first, losses to corruption as a share of all procurement, has an unobservable numerator over a denominator equal to the whole market. The second, the share of procedures showing signs of risk among all procedures, has an observable numerator (a single bid, a short submission period, a closed procedure) over the same denominator. In the third, the share of confirmed violations among procedures showing signs of risk, both numerator and denominator are observable, but the denominator is no longer the market: it is a filtered part of it.

The international coefficients belong to the first quantity. Corruption risk indices measure the second. The CILC dataset measures the third. The third cannot be compared directly with the first: a conditional probability is bound to be higher than an unconditional one. The third can be transferred to a national population only if that population is defined by the same operational feature as the dataset, and section 6 shows that the available national statistics do not yet satisfy that condition.

2.2. Definitions

A signal is a sign of restricted competition recorded by an external participant before the results of a procedure are announced: restrictive admission requirements, immeasurable or disproportionate evaluation criteria, documentation describing the product of one particular supplier, unrealistic deadlines, a notice at odds with the draft contract. It is a property of the documentation and not of the contracting authority, and it asserts nothing about fault.

A confirmed violation is recorded by a decision of a territorial review authority holding a complaint reviewed on the merits to be well founded in full or in part. It is a property of an administrative act: the violation is established by the state and not by the researcher.

Procedures affected by intervention are those suspended pending review of a complaint, or cancelled by decision of the review authority, or cancelled by the contracting authority after records were annulled or after a request for clarification. Suspension under part 7 of article 106 of Law 44-FZ and parts 18 and 19 of article 18.1 of Law 135-FZ follows from the mere fact that a complaint has been accepted for review and precedes any finding on its merits; this quantity therefore measures the procedural effect of the challenge and can serve neither as an estimate of violation nor as its upper bound.

The confirmation rate is calculated as the ratio of the value (or the number) of procedures in which a violation was confirmed to the value (or number) of procedures reviewed on the merits, or to the dataset as a whole; the denominator used is stated at every point in the text.

2.3. A Reply to an Objection

The objection is obvious: the dataset gathers procedures with a signal, selected by complainants, and the share of confirmed violations within it says nothing about the market as a whole. That is true, and the study claims nothing to the contrary. It claims something else: the quantity “share of confirmations among procedures with a signal” stands on its own and has not been measured before. Every risk index in the international literature counts signals and assumes that a violation lies behind the signal; it cannot test that assumption, because it has no act of a review authority for each flag. The CILC dataset does. The confirmation rate calibrates the signal, and the absence of such calibration in the literature means that every estimate built on flags contains an unknown multiplier. Here that multiplier has been measured.

A second objection: the complainants chose the procedures, so the sample is unrepresentative even of procedures with a signal. That too is true, and it sets the limits of transfer: a rate obtained on a sample carrying several types of signal can be applied only to a population selected on the same feature. Since national statistics contain no such population (section 6.4), no transfer is made in this version. The caveat about selection bias is recorded in the dataset documentation.

A third objection concerns the calibration itself: a decision holding a complaint well founded covers a broader variable than the validation of a particular flag. Under part 17 of article 18.1 of Law 135-FZ the commission may take into account other violations that were not the subject of the complaint; under 44-FZ the review of a complaint is accompanied by an unscheduled inspection. Part of the confirmations may therefore relate not to the signal asserted but to a violation the authority found on its own. The present study measures the confirmation rate at the level of the episode; component-level validation, matching the signal asserted against the violation found, requires additional coding of every decision and is placed in the programme of further work (9.4).

2.4. The Moment of Review

All empirical estimates of corruption in procurement concern contracts already concluded: the researcher classifies a contract after the fact, compares reported with actual costs on a completed structure, or measures the overpayment against a reference price on executed contracts. Measurement takes place after the money has gone.

In the dataset the decision of the review authority was taken, in every episode, before the contract was concluded: the challenge was brought against the documentation, against the record of the review of the first parts of bids, against the admission record or, in a smaller number of cases, against the record of the results, within the time limits set by article 105 of Law 44-FZ and article 18.1 of Law 135-FZ, when the contract cannot yet be signed. The stage of filing is not a property of the review procedure (the law allows a complaint after the results are announced as well); in the primary register it is recovered from the triggering record, and in some cases the complaint was filed after the winner had been determined. The stage field is not included in the open dataset, since it belongs to the complainant's trace, so the correct and verifiable formulation is "before the contract was concluded".

This moves a confirmed violation out of the category of damage assessment and into that of prevention: RUB 188.0 million, about USD 2.3 million, is the value of procedures in which a violation was established by the state before any obligation arose. Suspension pending review produces a separate procedural effect, and its value is counted apart.

3. Methodology

3.1. General Design

The study belongs to the genre of value reconstruction from administrative acts. It is neither a review of the literature nor a top-down estimate. The unit of analysis is the procurement episode, and the result is presented as a funnel in which the value of the procedures at every step is confirmed by a document: a notice, a record, a decision of a review authority. Any researcher applying the same funnel to the same type of data will obtain comparable rates, and that is what the reproducibility of the method consists in.

3.2. The Dataset: Unit of Observation and Fields

The primary source, the CILC monitoring register, contained 997 procurement procedures selected by external complainants as at the snapshot date of 1 September 2026. Of these, 427 were carried through to a decision of a review authority; they make up the open dataset "Bid protests before FAS Russia under laws 44-FZ and 223-FZ" (version 2.1.0, snapshot 2026-09-01, DOI 10.5281/zenodo.22236602), on which every table in the study is built. Procedures in which no complaint was filed, or in which no decision has yet been taken, are not included.

Bid submission deadlines fall between 30 March and 19 August 2026. By legal regime there are 296 procedures under 44-FZ and 131 under 223-FZ. The dataset covers 68 regions of the Russian Federation, 69 territorial offices of FAS Russia and 8 federal districts. Contracting authorities are represented by nine legal forms and three levels of government.

Table 1. Fields of the open dataset

Field	Content	How obtained
id	Record number	Assigned when the package is built
law	44-FZ / 223-FZ	Notice
purchase_type	Method of supplier selection	Notice
procurement_category	Category of subject matter, 9 groups	From keywords in the name of the object; the name itself is not published
contract_price_rub	Initial (maximum) contract price	Notice

Field	Content	How obtained
platform	Electronic platform	From the domain
customer_legal_form	Legal form of the contracting authority, 9 groups	By rule, with manual checking of abbreviations; the name itself is not published
customer_level	Federal / regional / municipal / not applicable	As above
region, federal_district	Region and federal district	From the FAS office, normalised
fas_body	Territorial office of FAS	Decision
procedure_date	Bid submission deadline	Notice
fas_outcome	Returned without review / not upheld / upheld in part / upheld	Decision of the territorial FAS office
procedure_effect	Suspended / records annulled by FAS decision / procurement cancelled by FAS decision / cancelled by the contracting authority / no data	FAS notification, unified information system
central_fas_review	Not appealed / returned without review / not upheld	Central office of FAS

3.3. Selection Principle and Anonymisation

The procedures were selected by external complainants on signs of corruption risk in the documentation and in the design of the procurement (see the definition of a signal in 2.2). In some procedures the complainants had submitted bids; in others they sent only a request for clarification or a complaint. For the study the difference is immaterial, since what is observed is the procedure and not the participation. The dataset is a sample with a signal carried through to a decision, not a random sample of the market. All the rates in sections 4 and 5 are conditional: they describe what happens to a procedure when a signal and an external challenge are both present.

Excluded from the dataset are the complainant’s trace (the date a bid was submitted, the outcome of its consideration, requests for clarification, dates of appeal); texts of decisions in which the complainant is named; free-text fields; internal deadlines and statuses; the names of contracting authorities and the exact subject matter of procurements; and the registry numbers of notices. Anonymisation is incomplete: the combination of FAS office, bid submission deadline and exact initial price makes it possible in individual cases to find the procedure in the unified information system. This is a deliberate compromise between verifiability and protection of the complainant, recorded in the dataset documentation; removing the residual risk would require coarsening the date to the month and the price to a range. Verifiability is secured by publishing the transformation scripts.

3.4. The Value Measure and the Classifications

The value measure is the initial (maximum) contract price given in the notice. It is the upper bound of the funds distributed in a procedure; the final contract price and the reduction achieved in the bidding are absent from the dataset (see 9.4). Every figure is given in roubles and in US dollars, converted at the Bank of Russia rate for 25 August 2026 (RUB 83.29 to the dollar); the dollar equivalents are indicative of scale and are not adjusted for changes in the rate over the observation period.

The category of subject matter was assigned from keywords in the name of the object of procurement, in nine groups: media and communications support; information technology and software; sociological research and quality assessment; event organisation; audit and accounting services; consulting, legal and expert services; medical services; printing and promotional products; other services and works. The legal form and level of the contracting authority were assigned by rule, with manual checking of abbreviations.

3.5. Sources

The study draws on four types of source: the CILC open dataset (the article's primary body of data); the decisions of the territorial offices and the central office of FAS Russia, from which the fields fas_outcome, procedure_effect and central_fas_review were extracted (the administrative acts confirming each step of the funnel); the official statistics of the Ministry of Finance and of FAS Russia for 2025 and the first half of 2026 (national context); and international loss estimates together with statistics on the review systems of other countries. For statements about confirmation, priority goes to the first two types; the third is used only for context and the fourth only for comparison.

3.6. Limitations of the Method

The dataset contains neither final contract prices nor the number of bids submitted, so neither the price effect of a challenge nor a single-bid subsample comparable with the national statistics on procurements declared unsuccessful can be measured; this rules out a correct transfer of the rate to a national denominator (6.4). The dataset records the outcome of the review of a complaint but not the grounds of the decision; the match between the signal asserted and the violation found is not coded at the level of the episode (2.3). The procedural effect field is not filled for every record: for 182 procedures the effect is not established, and 126 of those were reviewed on the merits, so the share affected by intervention is a lower bound. The category of subject matter and the legal form of the contracting authority were assigned by rule and have not been checked against OKPD2 codes or the state register of legal entities. The observation period covers five months of a single year. The dataset covers only procedures carried through to a decision; the 570 procedures of the primary register without a decision are not included, and the composition of that part has not been analysed.

4. Results: The Conversion Funnel

4.1. The Value of the Market with a Signal

Table 2. The open dataset: general indicators

Indicator	Value
Procedures with a decision of a review authority	427
Combined initial price	RUB 980.5 million (about USD 11.8 million)
Median price of a procedure	RUB 600,000 (USD 7,200)
Mean price of a procedure	RUB 2.30 million (USD 27,600)
44-FZ / 223-FZ, by number	296 / 131
44-FZ / 223-FZ, by value	RUB 369.7 million / RUB 610.8 million (USD 4.44 million / USD 7.33 million)
Regions of the Russian Federation / territorial FAS offices	68 / 69
Period of bid submission deadlines	30 March to 19 August 2026

The distribution by value is heavily skewed. The 47 procedures above RUB 5 million (USD 60,000) account for 66 per cent of the combined value, while the 124 procedures below RUB 300,000 (USD 3,600) account for 2 per cent. The 223-FZ segment, with a third of the episodes, concentrates 62 per cent of the value: the median price there is RUB 1.6 million (USD 19,200) against RUB 474,000 (USD 5,700) under 44-FZ. Commercial companies (130 procedures) account for 42 per cent of the value; budgetary and autonomous institutions (139) for 27 per cent; and public authorities at all levels (119) for a further 24 per cent. Rates by number and by value describe different segments of the market and are reported separately.

4.2. The Confirmation Rate: Signal to Confirmed Violation

Table 3. The complaint to confirmation funnel, by number and by value

Step of the funnel	Number	Value, RUB million / USD million	Share of the value of the dataset
Procedures with a signal carried through to a decision (the dataset)	427	980.5 / 11.77	100%
Returned without review (procedural grounds)	58	52.8 / 0.63	5%
Reviewed on the merits	369	927.7 / 11.14	95%
of which not upheld	277	739.7 / 8.88	75%
of which upheld in part	66	156.1 / 1.87	16%
of which upheld in full	26	31.9 / 0.38	3%
Violation confirmed (in full or in part)	92	188.0 / 2.26	19% (20% of those reviewed)

The confirmation rate by value is 20.3 per cent: that is the share of the value of the procedures reviewed on the merits in which a violation was found by an act of the review authority; measured against the value of the dataset it is 19.2 per cent. By number it is 24.9 per cent of those reviewed on the merits and 21.5 per cent of all complaints filed. This is the only quantity in the study that characterises violation, and every further calculation rests on it.

Complaints upheld in full (26 cases) fall on cheaper procedures (median RUB 460,000, USD 5,500), while those upheld in part (66 cases) are shifted towards more expensive ones (median RUB 628,000, USD 7,500). By price band the rate by number is 23 per cent for procedures below RUB 300,000 (USD 3,600), 25 per cent for RUB 300,000 to 1 million (USD 3,600 to 12,000), 31 per cent for RUB 1 to 5 million (USD 12,000 to 60,000) and 18 per cent for procedures above RUB 5 million (USD 60,000): in the most expensive segment the review authority confirms a violation less often.

Table 4. Procedures affected by intervention, by type of effect and outcome of the complaint

Procedural effect	Number	Value, RUB million / USD million	Share of the value of the dataset	Of these, complaint upheld (number / RUB million / USD million)
Suspended	177	503.7 / 6.05	51%	22 / 21.9 / 0.26
Records annulled by FAS decision	49	94.3 / 1.13	10%	49 / 94.3 / 1.13

Procedural effect	Number	Value, RUB million / USD million	Share of the value of the dataset	Of these, complaint upheld (number / RUB million / USD million)
Procurement cancelled by FAS decision	16	44.7 / 0.54	5%	14 / 41.1 / 0.49
Cancelled by the contracting authority	3	26.4 / 0.32	3%	2 / 25.4 / 0.30
Total affected by intervention	245	669.0 / 8.03	68%	87 / 182.7 / 2.19
No data on the effect	182	311.5 / 3.74	32%	5 / 5.3 / 0.06

Intervention affected at least 68 per cent of the value of the dataset, but this quantity does not characterise violation. Three quarters of it (RUB 486 million, USD 5.8 million, 156 procedures) consists of suspensions that followed from the acceptance of a complaint for review and where the complaint was ultimately not upheld. Cancellation of a procedure or of its records (65 procedures, RUB 139 million, USD 1.7 million) coincides almost entirely (63 of 65) with the set of upheld complaints and adds no value to it. The procedural effect of the challenge remains an independent indicator of the burden placed on the contracting authority and the complainant, while the measure of violation is the confirmation rate.

4.3. Stability across Procurement Methods, Legal Regimes and Time

Table 5. Share of confirmed violations by procurement method, regime and month (of those reviewed on the merits)

Breakdown	Reviewed on the merits	Confirmed, % by number	Confirmed, % by value
Electronic auction	178	26.4	26.4
Tender	111	26.1	28.1
Request for proposals	26	23.1	24.1
Request for quotations	32	18.8	15.5
Other method (223-FZ)	22	18.2	5.0
44-FZ	252	23.8	13.8
223-FZ	117	27.4	24.1
April 2026	50	20.0	9.7
May	126	27.8	20.4
June	81	23.5	37.3
July	32	21.9	9.4
August	78	25.6	17.7
Total	369	24.9	20.3

The rate by number is stable: across the regulated methods it lies between 19 and 26 per cent, the difference between regimes is 3.6 percentage points, and the spread across months stays within 20 to 28 per cent. It falls below the average in requests for quotations and in the “other method” category, that is, in procedures under 223-FZ whose design is set by the contracting authority's own procurement regulation; there the review authority is bound by that regulation and finds grounds to intervene less often. In the "other method" category only 5 per cent is confirmed by value: these are the most expensive procedures in the dataset (median RUB 6.2 million, USD 74,400), and it is precisely there that external challenge is least effective. The stability of the rate by number tells in favour of its reflecting a property of the signal rather than of a particular method; only component-level validation can settle the point (9.4).

4.4. The Second Instance

Of the 427 procedures, 28 decisions were appealed to the central office of FAS Russia: 23 were returned without review and 5 were refused on the merits; none was upheld. This result agrees with the finding of the earlier CILC study on the weakness of the second level of review [CILC 2026a], but on its own it does not permit a judgement about the institution as a whole: the subsample is small and was formed by a single group of complainants. For the present study it means that the rate in section 4.2 was measured on first-instance decisions and was not revised at the second.

5. Breakdowns: Sectors, Contracting Authorities, Review Authorities

5.1. Categories of Subject Matter

Table 6. Categories of subject matter: volume and confirmation rates

Category	Procedures	Value, RUB million / USD million	Share of value	Reviewed on the merits	Confirmed, % by number	% by value
Media and communications support	117	364.8 / 4.38	37%	109	25.7	19.5
IT and software	64	142.8 / 1.71	15%	61	26.2	27.7
Sociological research and quality assessment	36	142.5 / 1.71	15%	34	11.8	12.2
Event organisation	37	102.8 / 1.23	10%	36	22.2	24.8
Other services and works	45	102.2 / 1.23	10%	41	36.6	22.1
Audit and accounting services	97	68.3 / 0.82	7%	63	22.2	17.9
Consulting, legal and expert services	18	49.4 / 0.59	5%	15	40.0	20.5
Medical services; printing	13	7.6 / 0.09	1%	10	10.0	6.3
Total	427	980.5 / 11.77	100%	369	24.9	20.3

Half the value of the dataset comes from two categories: media and communications support, and IT and software. These are sectors with a result that is hard to measure, where evaluation criteria admit subjective application and technical specifications are easy to write around a particular supplier. Sociological research and quality assessment, though large in volume (15 per cent of the value), gives the lowest confirmation rate, 12 per cent: here the contracting authority has the widest latitude in justifying its methodology, and the review authority intervenes less often in substantive requirements.

Audit comes second by number but remains the cheapest category (median RUB 323,000, USD 3,900) and the only one in which a substantial share of complaints never reaches review: 34 of 97 were rejected on procedural grounds, against 24 in the other eight categories combined. The mechanism restricting competition here is a different one: not the documentation and not the evaluation criteria, but formal exclusion at the admission stage, which is then reproduced at the review stage. Hence a practical conclusion: a single policy for the cheap high-volume segment and for the expensive one will not work, since the cheap segment needs standardised grounds of admission and the expensive one needs limits on the design of evaluation criteria.

5.2. Type of Contracting Authority

Table 7. Legal form of the contracting authority: volume and confirmation rates

Legal form	Procedures	Value, RUB million / USD million	Share of value	Confirmed, % by number	Confirmed, % by value
Commercial company (223-FZ)	130	408.9 / 4.91	42%	24.7	20.7
Budgetary or autonomous institution	139	267.0 / 3.21	27%	23.8	30.8
Regional public authority	58	135.7 / 1.63	14%	19.6	9.0
Federal authority or its territorial office	20	63.5 / 0.76	6%	38.9	7.8
Local self-government body	41	37.7 / 0.45	4%	26.3	30.7
State-financed institution	17	35.4 / 0.43	4%	17.6	4.1
Unitary enterprise; foundation or non-profit; court	22	32.2 / 0.39	3%	38.1	17.4
Total	427	980.5 / 11.77	100%	24.9	20.3

By number the confirmation rate for the main forms of contracting authority lies between 20 and 27 per cent; by value the picture differs. For regional public authorities and state-financed institutions 9 and 4 per cent of the value is confirmed against 20 and 18 per cent by number: confirmations fall on cheap procedures, while the large procurements of these authorities are challenged without result. For budgetary institutions and municipalities the rate by value is higher than by number (31 per cent): violations are confirmed in their large procurements as well. The level of government of the contracting authority, federal, regional or municipal, does not by itself differentiate the rate by number: 27, 23 and 26 per cent respectively.

5.3. Territorial Review Authorities

Table 8. Territorial FAS offices with eight or more decisions on the merits: confirmation rate

Office	Reviewed on the merits	Confirmed	% by number	% by value
Moscow Region FAS office	29	16	55.2	72.9
Tatarstan FAS office	8	4	50.0	35.7
Novosibirsk FAS office	15	6	40.0	38.3
Krasnoyarsk FAS office	9	3	33.3	7.9
Chelyabinsk FAS office	9	3	33.3	72.4
Kemerovo FAS office	8	2	25.0	15.0
Sverdlovsk FAS office	15	3	20.0	11.2

Office	Reviewed on the merits	Confirmed	% by number	% by value
Altai FAS office	10	2	20.0	5.1
Moscow city FAS office	48	9	18.8	18.1
Krasnodar FAS office	17	3	17.6	10.1
St Petersburg FAS office	29	4	13.8	1.1
Voronezh FAS office	11	0	0.0	0.0
Khanty-Mansi FAS office	10	0	0.0	0.0

With the same source of signal, the same complainants and one body of law, the confirmation rate between territorial offices ranges from 0 to 55 per cent by number and from 0 to 73 per cent by value. The difference is explained neither by regime, nor by procurement method, nor by category of subject matter: across those breakdowns the rate is stable (4.3, 5.1). The Moscow city and St Petersburg offices, the two capital authorities with the heaviest caseload, which account for 40 per cent of the value of the dataset, confirm a violation in 19 and 14 per cent of cases by number and in 18 and 1 per cent by value. Across federal districts the rate by value ranges from 5 per cent (Far Eastern) to 30 per cent (Central).

Small numbers call for caution: with 8 to 15 decisions, the difference between 20 and 40 per cent is not statistically significant. But the extreme points, 0 of 21 in two offices against 16 of 29 in a third, lie beyond the range of chance. Two hypotheses fit the observation: a difference in the practice of the offices themselves given the same signal, or a difference in the quality of the signal that complainants produce in different regions. Only component-level validation can separate them (9.4). In either case the dispersion between review authorities forms an independent measurable indicator, and the open dataset makes it observable for the first time.

6. The Economic Content of the Rate

6.1. What Has Been Measured

The confirmation rate serves as a calibration of the signal. Corruption risk indices count flags and assume that a violation lies behind the flag; they cannot test this, since they hold no act of a review authority for each flag. The dataset does: when procedures with a signal are systematically challenged, the state finds a violation in 20 per cent of the value of the procedures reviewed (19 per cent of the value of the dataset). This is the first estimate known to the authors of the positive predictive value of a signal obtained not by a researcher's classification but from administrative acts, and it can be checked at the level of each of the 427 records of the open dataset.

In value terms, confirmed violation amounted to RUB 188.0 million, about USD 2.3 million, over five months in a single services segment. Since every decision was taken before the contract was concluded, this is the value of procedures in which a violation was established before any obligation arose: prevention measured, not damage estimated.

6.2. The Cost of Detection

The 92 confirmations required 369 reviews on the merits and 427 complaints filed. With external legal costs of the order of RUB 75,000 (USD 900) per complaint [CILC 2026b], one confirmed violation costs the complainant roughly RUB 350,000 (USD 4,200), and one rouble of the value of procedures with a confirmed violation costs roughly 17 kopecks in direct challenge costs. Over the period observed these costs are not reimbursed: the second instance produced not a single decision in the complainant's favour, and recovery through the courts requires separate proceedings.

6.3. The Procedural Effect of Challenge

Intervention affected at least RUB 669 million, about USD 8.0 million, that is 68 per cent of the value of the dataset, of which RUB 486 million (USD 5.8 million) relates to complaints that were not upheld. This quantity measures not violation but the burden that external challenge places on the contracting authority and the review system: suspension under part 7 of article 106 of Law 44-FZ and parts 18 and 19 of article 18.1 of Law 135-FZ is automatic. It is useful for assessing the costs of the mechanism and for comparing review systems, but it does not enter into the estimate of violations.

6.4. Why a National Estimate Does Not Follow

The natural next step would be to transfer the rate to a national population of procedures with a signal. A candidate population exists: according to the consolidated report of the Ministry of Finance for 2025, 1.5 million procurements worth RUB 8.35 trillion (about USD 100 billion) were declared unsuccessful, in 72 per cent of cases because only one bid was received, against a total value of notices under 44-FZ of RUB 13.6 trillion (about USD 163 billion) and a mean of 2.44 bids [Ministry of Finance 2026, cited from Guide to Public Procurement 2026]. The single bid occupies the place of the central red flag in corruption risk indices [Fazekas, Tóth, King 2016; Abdou et al. 2022].

The transfer is nonetheless incorrect, for three reasons. A single bid describes the outcome of a procedure, whereas the signal of the dataset relates to properties of the documentation; these are different operational features, and a rate measured on one does not carry over to the other. The figure of RUB 8.35 trillion covers all unsuccessful procurements rather than the 72 per cent with a single bid, and the report does not separate out the value of the latter. The literature, moreover, states expressly that a single bid may be explained by market structure and does not by itself evidence a violation [Fazekas, Kocsis 2020]. A correct transfer would require isolating within the dataset a subsample of procedures with a single bid, measuring the confirmation rate for it and applying that rate to the value of precisely such procedures, separately for 44-FZ and 223-FZ; the study has neither the number of bids nor that value at its disposal (3.6).

To indicate the order of magnitude: if a rate of 20 per cent were applicable to the whole value of unsuccessful procurements, the result would be about RUB 1.7 trillion, some USD 20 billion, a year. That figure is not a result of the study and is given only to show the scale of estimate that becomes possible once the dataset is enriched with the number of bids (9.4).

6.5. Review Systems: Description Rather than Comparison

Table 9. Indicators of review systems: the dataset and national systems

System	Indicator	Value
FAS Russia, 2025	Well founded (including in part) as a share of those reviewed on the merits	38.9% (16,311 / 41,840)
FAS Russia, first half of 2026	The same (7,373 / 21,653)	34%
CILC dataset, 2026	The same (92 / 369)	24.9%

System	Indicator	Value
CILC dataset, 2026	Affected by intervention, as a share of the value of the dataset (lower bound)	68%
GAO, United States, FY 2025	Sustain rate: share of closed protests upheld on the merits	14%
GAO, United States, FY 2025	Effectiveness rate: share of closed protests in which the protester obtained some form of relief, including voluntary corrective action by the agency	52%
AMCU, Ukraine, 2025	Complaints filed	9,750

The indicators describe different mechanisms and are not comparable as effectiveness rates: the GAO denominator is the number of closed protests, and the numerator of the effectiveness rate includes voluntary corrective action by the agency, while in the dataset the share of value affected by intervention is calculated against the value of all procedures and includes automatic suspensions. The one direct comparison available is the share of well-founded complaints among those reviewed on the merits: for an external complainant without inside information it is lower than the average across the FAS system (24.9 per cent against 38.9 and 34 per cent), which is what one would expect of a complainant challenging greyer situations.

7. The International Context: Provenance and Credibility of the Estimates

Estimates of losses to corruption in procurement differ less in magnitude than in the way they were obtained. Below they are grouped by three levels of credibility, the grouping resting on the presence of a sample, the independence of the classification from the researcher, and the moment of measurement.

Table 10. Existing loss estimates: method, validation, moment of measurement

Estimate	Magnitude	Method	Who classifies	Moment
Transparency International; UNODC; OECD	10 to 25% (up to 30%) of contract value	Expert judgement; citation chain leading to the TI handbook of 2006	No one; there is no sample	not applicable
World Bank (Bosio, Djankov et al.)	8%; about USD 880 billion a year	Lower bound across a body of academic work	Various authors, various countries	after the fact
European Commission / PwC-Ecorys 2013	3 to 4.4%; EUR 1.4 to 2.2 billion a year in five sectors	192 contracts in 8 countries	Researchers, on indirect indications	after the fact
RAND Europe 2016, 2023	about EUR 5 billion a year; EUR 29.6 billion over 2016 to 2021	Econometric model on perception indices	Perception surveys	not applicable
Olken 2007	about 24% of costs on road projects	Engineering audit of completed works	Independent engineers	after the fact

Estimate	Magnitude	Method	Who classifies	Moment
Fazekas et al.; IMF 2022	Risk index; premium for the absence of competition	Red flags of the procedure and regression on price	Algorithm; no act of a review authority	after the fact
CILC dataset 2026	20% of the value of reviewed procedures with a signal (19% of the dataset)	Funnel over 427 procedures; 369 acts of a review authority; open data	State review authority	before the contract is concluded

The first level consists of conventional coefficients. The citation chain behind the 10 to 25 per cent figure is closed: from Transparency International it leads to UNODC, from there to the OECD in 2013 and on to earlier surveys going back to the TI handbook of 2006, where the figure was an estimate by practitioners; a dedicated U4 study records the absence of any underlying sample or calculation procedure [U4 2021]. In twenty years no one has validated it, because there is nothing to validate. The credibility here is no higher than that of an order of magnitude adopted by convention.

At the second level stand meta-generalisations. The World Bank's 8 per cent is presented as a lower bound for the empirical literature; it is not a measurement but a minimum across heterogeneous works, applied to the whole world. The RAND estimates are built on perception indices, that is, on surveys.

The third level is occupied by measurements. There are few of them, and all carry limitations. PwC-Ecorys classifies 192 contracts through the researchers' own judgement on indirect indications and extrapolates to the EU market. Olken measures a real difference in costs, but in one country and one sector. Fazekas and the IMF offer the most candid methodology, a risk index validated by its correlation with overpayment, but they measure risk rather than violation and hold no act of a review authority for any flag.

The CILC dataset replaces none of these approaches. It adds to the third level the link that is missing: a rate showing what share of flags is recognised as a violation when challenged, and it does so at a stage when prevention is still possible. Converting that rate into a national estimate remains a task for the next version (6.4, 9.4).

The regional context adds scale without changing the methodological picture. In Latin America procurement averages 8.6 per cent of GDP and about 30 per cent of public expenditure [Open Ownership 2023]; the OECD estimates losses from procurement inefficiency in the region at 1.4 per cent of GDP a year [OECD 2024], and the IDB puts total losses from inefficient spending at 4.4 per cent of GDP [Izquierdo et al. 2018]. All these estimates belong to the first and second levels.

8. Proposal: The Signal to Confirmation Method as a Transferable Instrument

The study proposes a three-level model, from the market with a signal to confirmed violation to a national population defined by the same feature, with operational criteria for each level; in the present version the first two are filled in.

The signal criterion: a procedure enters level I if an external participant recorded a sign of restricted competition before the results were announced and that sign is documented by a request for clarification or a complaint. The signal remains a property of the documentation, and recording it requires no access to the contracting authority's internal information.

The confirmation criterion: a procedure enters level II only where there is an act of a review authority finding a violation in full or in part. Suspension or cancellation of a procedure is counted separately as a procedural effect and does not enter level II. Classification by the researcher is not used as a criterion in its own right: it is precisely that classification which is the source of uncertainty in the existing estimates.

The denominator criterion: transfer to level III is permitted only to a population defined by the same operational feature on which the rate was measured, with separate calculation by legal regime. Transfer to the market as a whole, and to populations defined by the outcome of the procedure, is not permitted until a subsample with the same outcome has been isolated within the dataset.

The model requires only the data held by any electronic procurement system: the notice price, the method, the number of bids, the result of admission, the fact and outcome of any challenge, the stage at which the decision was taken and the grounds of that decision. For the Justicia Compra system of the Consejo de la Magistratura of Buenos Aires it corresponds to OECD recommendations 5 and 13 (data and monitoring) and can be deployed without changing the regulatory framework. The registered CILC software tool (Legajo RL-2026-77263107-APN-DNDA#MJ) implements levels I and II automatically, and the open dataset sets the format for publishing the result: fifteen fields, none of which discloses the complainant.

9. Conclusion

9.1. The Argument in Brief

The study began with a question: what lies behind the coefficients of loss to corruption in procurement, and can a quantity be obtained that is verifiable at the level of the individual procedure.

The international coefficients remain a convention rather than a measurement. The citation chain closes on an expert estimate of 2006; the few empirical works classify contracts through the researchers' own judgement or measure flags without testing them, and all of them concern contracts already concluded.

The CILC open dataset measures a quantity of a different nature: the share of procedures with a signal in which a violation was confirmed by a review authority before the contract was concluded. Over 427 procedures it is 24.9 per cent by number and 20.3 per cent by the value of those reviewed: RUB 188.0 million (USD 2.3 million) of confirmed violation against a total value of procurement with a signal of RUB 980.5 million (USD 11.8 million). The rate is stable across procurement methods, regimes, types of contracting authority and months, but it differs sharply between territorial review authorities. The procedural effect of the challenge (at least 68 per cent of the value) is counted separately and does not characterise violation.

Transferring the rate to the national scale requires a population defined by the same feature. The available statistics on unsuccessful procurements are defined by the outcome of the procedure, whereas the dataset is defined by a feature of the documentation; without isolating a single-bid subsample within the dataset, no national estimate follows, and none is claimed in this version.

9.2. The Result

The total value of procurement with a signal carried through to a decision was RUB 980.5 million, about USD 11.8 million, over five months (427 procedures). The total value of procurement in which the review authority found a violation in full or in part was RUB 188.0 million, about USD 2.3 million (92 procedures), that is 20 per cent of the value of those reviewed on the merits and 19 per cent of the value of the dataset. Intervention affected at least RUB 669 million (USD 8.0 million), of which RUB 486 million (USD 5.8 million) relates to complaints that were not upheld. Half the value falls on media support and IT; in audit a different mechanism operates, exclusion at admission, which is reproduced at the review stage as well. Commercial companies account for 42 per cent of the value at an average rate; for regional authorities and state-financed institutions confirmations fall only on cheap procedures. Between territorial review authorities the rate ranges from 0 to 55 per cent. At the second instance there were 28 applications and none was upheld.

Sources of uncertainty: the rate is measured at the level of the episode and is not broken down by type of signal; part of the confirmations may relate to violations the authority established on its own; rates for groups with fewer than 20 reviews (individual categories, legal forms, review authorities) are unstable; the procedural effect is not established for 182 records, so the share affected by intervention is a lower bound.

9.3. Limitations

Of the limitations listed in 3.6, four bear directly on the boundaries of the conclusions. The dataset remains a sample with a signal carried through to a decision, and no rate transfers to the market as a whole. The number of bids and the final prices are not recorded, so neither a single-bid subsample nor the price effect of a challenge has been measured. The grounds of the review authority’s decision are not coded, so the calibration was performed for the signal as such rather than for its individual types. The dispersion between review authorities is observed on small numbers and has not been separated into the practice of the offices and the quality of the signal.

9.4. Programme of Further Work

The first step is component-level validation. For each of the 369 decisions on the merits the following would be coded: the signal asserted (restrictive requirements, evaluation criteria, description of the object, deadlines, admission), the corresponding ground of complaint, the violation established by the authority, and whether the violation established matches the signal asserted. The result would be the positive predictive value of each type of signal, that is, an answer to the question which red flags actually predict an established violation. Such a check is stronger than an overall rate and closes the objection about “other violations” taken into account by the authority on its own initiative.

The second step is enrichment of the dataset from the unified information system by notice number (in the closed part of the register): the number of bids submitted, the final price and the reduction from the initial price. This would allow a single-bid subsample to be isolated and its confirmation rate measured; only then may the rate be applied to the value of unsuccessful procurements with a single bid, separately for 44-FZ and 223-FZ, with a direct reference to the tables of the primary Ministry of Finance report. The same data would yield the price effect of a challenge: a comparison of the reduction in procedures where the complainant was excluded with procedures where the bidding was rerun after the records were annulled.

The third step extends the observation period to twelve months and adds further snapshots of the open dataset; once 30 or more decisions per office have accumulated, the dispersion between territorial review authorities (5.3) will become testable statistically and will allow the practice of the offices to be distinguished from the quality of the signal. The gaps in the procedural effect field should be filled separately.

The fourth step reproduces the method in a second jurisdiction with an electronic procurement system and a working review procedure. Justicia Compra is the natural candidate: the system carries a public commitment to 20 OECD recommendations, and the model can be deployed on its data without regulatory change.

Appendix. Summary Table of Data Sources

Table A1. Bodies of data used in the study: coverage, access, limitations

Body of data	Holder	Coverage	Form of access	Limitations
Open dataset “Bid protests before FAS Russia under laws 44-FZ and 223-FZ”, v2.1.0, snapshot 2026-09-01	CILC	427 procedures with a decision, 30.03 to 19.08.2026	CSV, JSON, datapackage.json, README, scripts; CC BY 4.0	sample with a signal; no final prices, number of bids or grounds of decisions; effect not established for 182 records
Monitoring register “Bid records” (primary)	CILC	997 procedures as at 01.09.2026	closed; aggregates given in the dataset documentation	contains the complainant’s trace; not published
Decisions of the territorial FAS offices	FAS Russia	369 decisions on the merits; 58 returned without review	register of decisions, br.fas.gov.ru	case numbers are not published in the open dataset
Decisions of the central office of FAS	FAS Russia	28 applications	as above	none
Consolidated analytical report on procurement monitoring for 2025	Ministry of Finance of Russia	44-FZ, calendar year	publication, online	does not cover 223-FZ; the value of unsuccessful procurements is not broken down by cause
Results of enforcement activity for 2025 and the first half of 2026	FAS Russia	all complaints under 44-FZ	publication, online	aggregates; no breakdown by value
Bid Protest Annual Report FY 2025	GAO, United States	United States federal procurement	publication, online	a different procedure; the effectiveness rate includes voluntary corrective action
Public Procurement 2025	TI Ukraine / DOZORRO	Prozorro, AMCU	publication, online	no share of well-founded complaints

Sources

The sources are grouped by section of the study. Ranges of pages and years are given with a hyphen.

Primary bodies of data and administrative acts (sections 3, 4, 5)

Consejo Internacional para la Lucha contra la Corrupción (CILC). Open dataset “Bid protests before FAS Russia under laws 44-FZ and 223-FZ”, version 2.1.0, snapshot 2026-09-01. 427 records, 15 fields; CSV, JSON, datapackage.json, README, scripts anonymize.py, translate.py and make_package.py. Licensed under CC BY 4.0. DOI: 10.5281/zenodo.22236602. Deposited on Zenodo under the title Bid protests before FAS Russia under laws 44-FZ and 223-FZ: decisions and effect on procurement procedures (anonymised dataset, snapshot 2026-09-01); field values are published in English, with the correspondence to the Russian originals given in the README.

Consejo Internacional para la Lucha contra la Corrupción (CILC). Monitoring register “Bid records”, snapshot 01.09.2026: 997 procedures (the closed primary source of the open dataset).

FAS Russia. Decisions of the territorial offices and of the central office on the complaints included in the open dataset, April to August 2026. Register of decisions: br.fas.gov.ru.

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Federal Law No. 223-FZ of 18 July 2011 on the procurement of goods, works and services by certain types of legal entities; Federal Law No. 135-FZ of 26 July 2006 on the protection of competition, article 18.1 parts 4-5, 11, 17-20 (time limits for challenge, suspension of the procedure, prohibition on concluding the contract, account taken of other violations).

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National statistics (section 6)

Ministry of Finance of Russia. Consolidated analytical report on the results of monitoring the procurement of goods, works and services for state and municipal needs for 2025. Moscow, 2026. (Value of notices RUB 13.6 trillion; mean number of bids 2.44; 1.5 million unsuccessful procurements worth RUB 8.35 trillion.) The figures are taken from secondary analysis of the report (Guide to Public Procurement, 2026); the text of the primary report was not available to the authors.

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