

November 1992

PERSIAN GULF

U.S. Business Participation in the Reconstruction of Kuwait

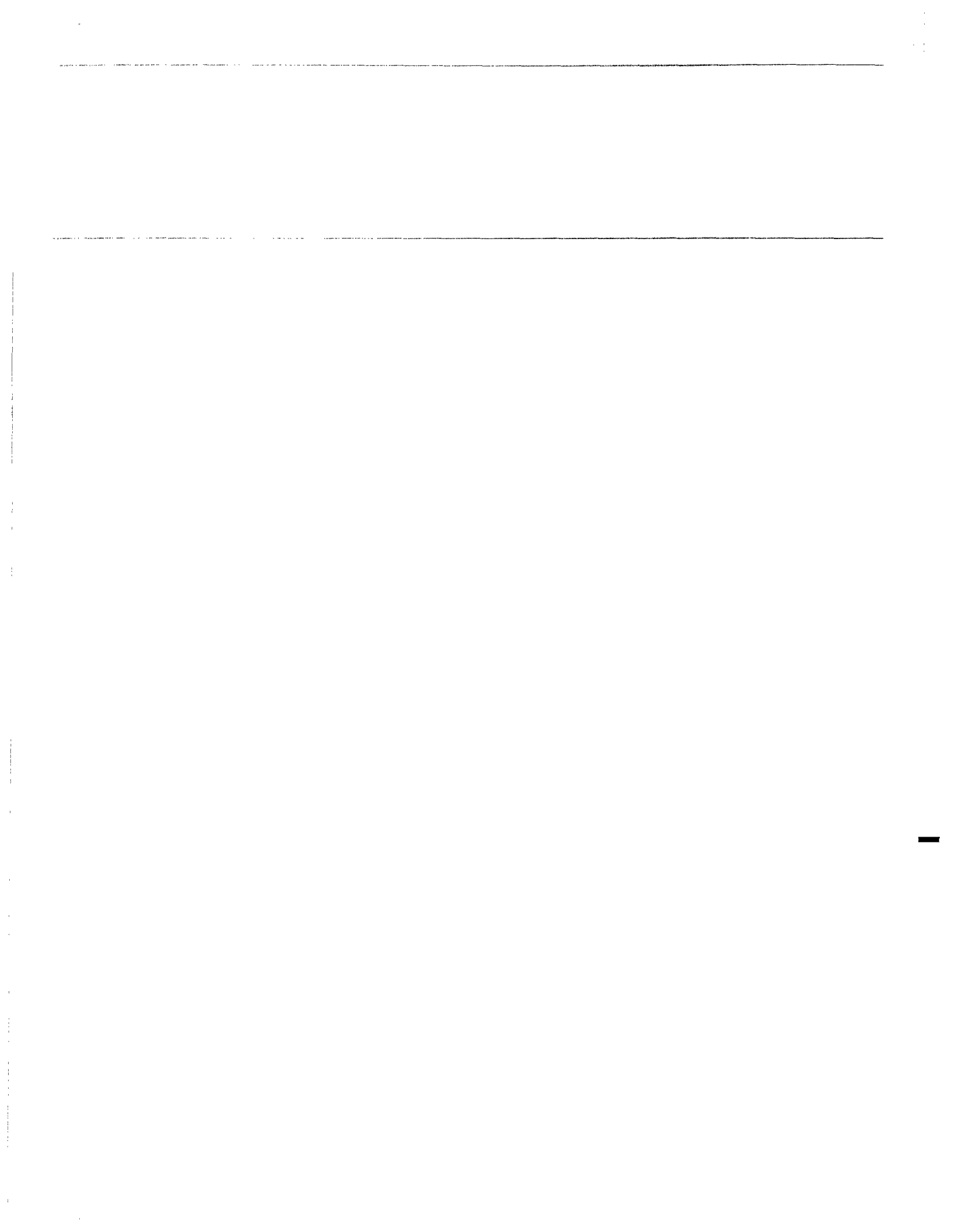


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**National Security and
International Affairs Division**

B-249909

November 18, 1992

The Honorable John Glenn
United States SenateThe Honorable Douglas Applegate
House of RepresentativesThe Honorable Nick J. Rahall, II
House of Representatives

In response to your request, we examined how the U.S. Army Corps of Engineers and the Department of Commerce implemented their responsibilities under the Persian Gulf Conflict Supplemental Authorization and Personnel Benefits Act of 1991 (P.L. 102-25). Specifically, we (1) analyzed Commerce's delay in meeting the reporting date for the U.S. government report on the extent of contracts awarded U.S. companies, (2) assessed the reliability of information used by Commerce in compiling its two reports, dated April 28, 1992, and October 5, 1992, and (3) analyzed the degree of competition used by the Corps of Engineers to award contracts and Corps efforts to encourage contracting for U.S. small and small disadvantaged businesses.¹

Background

Toward the end of the Persian Gulf War, U.S. officials estimated that reconstruction would cost Kuwait \$100 billion. Many U.S. businesses and individuals showed an interest in working on reconstruction projects. However, once the war ended, the Bush Administration discovered that damage was not as extensive as first thought—estimates of reconstruction declined to the \$20-\$25 billion range during the first 5 years following liberation.

The government of Kuwait uses its own funds to pay for the reconstruction effort. It awarded reconstruction contracts to U.S. and foreign firms. The Department of Defense entered into an agreement with the government of Kuwait to provide and contract for services related to reconstruction of the infrastructure and basic services, including restoration of public buildings, roads, airports, power generation and distribution systems, and other non-defense related facilities. The Corps of Engineers was assigned responsibility for obtaining these services.

¹See appendix II for the definition of small disadvantaged business concerns used by the Corps (from Federal Acquisition Regulation 19.001).

Congressional interest about the amount of business U.S. firms would receive resulted in the passage of the Persian Gulf Conflict Supplemental Authorization and Personnel Benefits Act of 1991 (P.L. 102-25). This law required the President to report to the Congress on the number of firms from each country awarded rebuilding contracts, and the value of these contracts, by U.S. government agencies. The law also required that the report include country of origin information, to the extent reasonably available, about contracts awarded by Kuwait, and that the President ask Kuwait to provide such information on an ongoing basis, shown by the number of firms from each country and by contract dollar value. The reports were also to include information on U.S. citizens and veterans employed by U.S. contractors and on contracts awarded U.S. small and minority-owned businesses.² The first report was due June 6, 1991, 2 months after passage of the legislation. The Department of Commerce, assigned responsibility for the reports, issued its first report on April 28, 1992, almost one year after it was due.

Results in Brief

Commerce did not meet the June 6, 1991, reporting deadline for several reasons. First, the President did not assign responsibility for the report until after it was due. Second, after Commerce prepared the report, it took several months to complete the interagency review process which, in turn, required Commerce to update the information, further delaying publication.

According to the first Commerce report, in 1991, the government of Kuwait awarded U.S. businesses over \$2 billion in contracts, or about 50 percent of the total reconstruction business. In its second report, Commerce stated that the U.S. share of reconstruction contracting through July 31, 1992, was over \$4 billion, also about 50 percent of reconstruction contracts. In preparing the reports, Commerce faced several constraints, including (1) incomplete information from the government of Kuwait to identify the dollar values for contracts Kuwait awarded foreign companies, (2) the reluctance of the U.S. and Kuwaiti private sectors to provide information, and (3) the lack of a central source for this information. These constraints made it impossible for Commerce to develop comprehensive reports.

²For reporting purposes under P.L. 102-25, the Corps used the terms minority-owned business and small disadvantaged business interchangeably.

Commerce was able to obtain more complete information from the Corps of Engineers. Our analysis of Corps contracts showed that U.S. prime contractors received 54 percent (\$168.9 million) of the \$312.9 million awarded by the Corps, as of April 30, 1992. However, because U.S. prime contractors awarded \$18.2 million to foreign subcontractors, the net benefit to U.S. businesses, after including \$6.5 million of subcontracts awarded U.S. companies by foreign prime contractors, totaled \$157.2 million, or 50.2 percent of all Corps contracts.

To meet the urgent requirements of the government of Kuwait to provide emergency services and clean-up, the Corps of Engineers awarded restoration contracts without using full and open competition. Also, the government of Kuwait directed the Corps of Engineers to award a number of contracts to preferred firms. As a result, the Corps awarded about 87 percent of its prime contracts, by value, with less than full and open competition .

Delays in Issuing the Required Reports to Congress Caused by Several Factors

Commerce sent the first report to the Congress on April 28, 1992, almost one year after it was due. The delay was, in part, caused by the executive branch's failure to designate a lead agency to prepare the report. Commerce officials did not know the reason for the delay. Although the Corps began preparing input for the report soon after the act was signed by the President, it did not have responsibility for preparing such a report on overall business activity.

Following an inquiry from Congress in October 1991 about why the first report, which was 4 months past due, had not been issued, the President assigned Commerce the responsibility for preparing this report. Commerce collected information from various sources and completed a draft report in November 1991, which was sent to the government agencies that had provided input, including the Departments of State, Defense, and Labor. By the time other agencies cleared the report, the information had become outdated. Commerce updated the information and repeated the clearing process. These steps all contributed to the delay.

Overall Statistics on Reconstruction Business Difficult to Acquire

According to the first Commerce report, Kuwait awarded U.S. businesses over \$2 billion in contracts in 1991, which included contracts awarded by the Corps. In its October 1992 report, Commerce stated that the U.S. share of reconstruction contracting was over \$4 billion (\$2 billion in 1991 and \$2 billion in 1992) through July 31, 1992. This report also predicted that U.S. contractors would receive another \$1 billion in 1992 contracts. Commerce stated in both reports that the estimated U.S. share of the total reconstruction business under contract was about 50 percent, which it concluded made good on the Kuwait government's commitment that American firms would win "the lion's share" of reconstruction work.

These reports contained the number of contracts and subcontracts that the government of Kuwait awarded U.S. and other countries' businesses, but neither included the number of contracts awarded Kuwaiti companies. Commerce compiled this information from its own sources due to the lack of complete data from the government of Kuwait. Commerce added that its information was not complete because many firms would not provide contract information for competitive reasons. According to the second report, Commerce believed the government of Kuwait awarded U.S. companies 501 contracts and subcontracts as of July 31, 1992. This was by far the largest single share of any country accounting for 53 percent of the total 951 reconstruction contracts reported and 57 percent of the 872 contracts reported for companies from coalition countries. Companies from non-coalition countries received 79 contracts, including 22 awarded to Japan (see app. 1).

A Commerce official stated that contracts awarded Kuwaiti companies were not included because this list was to compare contracts awarded U.S. companies to its competitors. Kuwaiti companies were not considered competitors.

Neither of Commerce's reports contained a dollar value estimate of contracts awarded by Kuwait. Both reports stated that

"The dollar value for all contracting is difficult to estimate, due to the incomplete, anecdotal, and often business confidential nature of the data. Other governments are reluctant to share information about business successes of their countries' companies, and the normally secretive Kuwaiti trading companies have at least matched this reticence."

Notwithstanding these limitations, Commerce concluded that U.S. businesses received approximately 50 percent of the dollar value of all reconstruction business.

In response to our inquiry, the U.S. Embassy in Kuwait assured us that the figures available supported the 50 percent estimate of the U.S. share. Its conclusion was based on the following:

- First, it examined the four largest sectors of Kuwait's post-war reconstruction activity. The Embassy reported in July 1992 that the Kuwait Task Force,³ one of the four sectors, awarded 66 percent, by value, of its contracts to U.S. companies. The Embassy also reported that 52 percent of Corps of Engineer construction contracts, 81 percent of contracts awarded for the reconstruction of the upstream oil sector, and 53 percent of automobile sales for 1991 went to U.S. companies.
- Second, the Embassy had knowledge of Kuwait's economic situation, as well as the estimates of industry and other sources, including the Middle East Economic Digest and the Middle East Economic Survey, which made it clear that U.S. companies had received a large portion of reconstruction business. However, the Embassy acknowledged that it did not have final figures for overall reconstruction costs.

More Detailed Information Available on U.S. Businesses

The Department of Commerce collected information directly from the government of Kuwait, the U.S. Embassy, industry sources, the Army Corps of Engineers, and Mideast business publications in an attempt to identify dollar values of individual contracts awarded to U.S. companies. However, because some of this information was business confidential and, in some instances, the companies and the government of Kuwait could not verify some of the figures, this effort was not completed and not included in either report. Commerce workpapers on reconstruction contracts awarded U.S. companies by Kuwait showed that through March 1992, U.S. firms received approximately \$2.7 billion on contracts awarded by the government of Kuwait, including contracts awarded by the Corps of Engineers. This list, in some cases, identified companies that received contracts but in other cases it identified awardees only in groups.

Commerce estimated that over \$4 billion in contracts have been awarded U.S. companies through July 31, 1992, and that another \$1 billion will be awarded through the end of 1992. Commerce attempted but was unable to develop information on small and minority-owned businesses that were awarded contracts by the government of Kuwait or on U.S. citizens and veterans employed by U.S. firms working on Kuwait government contracts.

³The task force was an emergency planning cell organized in December 1990 around the U.S. Army's 352nd Civil Affairs Command. This task force focused on detailed planning for the emergency work necessary for the first 90 days following liberation.

About Half of Corps Business Went to U.S. Firms

Commerce did obtain more complete but not totally accurate information on prime contracts awarded by the Corps of Engineers. This information, as corrected by the Corps, showed that U.S. companies received \$168.9 million in Corps prime construction and service contracts, as of April 30, 1992,⁴—54 percent of the \$312.9 million in prime contracts awarded by the Corps. The Corps awarded 67 prime contracts, 40 of which went to U.S. businesses. However, U.S. prime contractors subcontracted \$18.2 million of this business to foreign firms, while U.S. companies received \$6.5 million in subcontracts from foreign prime contractors. Corps officials stated that information on subcontracts may be incomplete because prime contractors are only required to provide information on subcontracts to small and small disadvantaged businesses. Information on other subcontracts was provided on a voluntary basis. Table 1 shows that net benefits to U.S. companies therefore totaled \$157.2 million.

Table 1. Dollar Value Benefit of Corps Prime Contracts to U.S. Businesses

Dollars in millions		
	U.S. companies	Foreign companies
Prime contracts awarded companies from each country	\$168.9	\$144.0
Subcontracts awarded U.S. companies by foreign prime contractors	6.5	-6.5
Subcontracts awarded foreign companies by U.S. prime contractors	-18.2	18.2
Net benefits	\$157.2	\$155.7
Percent of all U.S. Corps contracts	50.2	49.8

According to Commerce officials, they had no legal basis to force U.S. prime contractors to use U.S. subcontractors. As a result, many U.S. prime contractors awarded subcontracts to foreign firms rather than U.S. companies. Although many U.S. companies subcontracted with foreign firms, Commerce stated that it “has taken and will continue to take every opportunity to encourage U.S. prime contractors to give favorable consideration to qualified American companies when they subcontract in Kuwait.”

⁴Figures reported by the Corps of Engineers to the Department of Commerce were incorrect, according to Corps officials. Based on the information provided to the Commerce Department, Corps figures incorrectly showed that, as of April 30, 1992, U.S. companies received \$172.4 million in Corps prime contracts, or 46 percent of the \$375.9 million in reported prime contracts. After we presented these figures in a draft report to the Corps, the Corps provided us with corrected information.

Many Corps of Engineer Contracts Awarded With Limited Competition

As of April 30, 1992, the Corps awarded 13 percent of its contracts, by value (34 percent of the number of contracts), using full competition and the rest using limited or no competition. The Corps awarded contracts with limited competition in three categories: (1) nine contracts were awarded for urgent and compelling reasons during the emergency phase of reconstruction; (2) 39 contracts were awarded specific companies at the direction of the government of Kuwait; and (3) five contracts were set aside for U.S. small and small disadvantaged businesses (these contracts are discussed in the next section).

Under the first category, the Corps awarded the first eight contracts and one later one for providing emergency services and cleanup. According to Corps officials, milestones dictated by the pace of the war made it impractical to obtain full and open competition for contracts to provide restoration of basic services during the emergency phase of the recovery effort.⁵ Specifically, officials stated that these contracts were urgent and compelling acquisitions for which the health and safety of the civilian population would be seriously jeopardized. Corps officials noted that this action is authorized under 10 U.S.C. 2304 (c)(2) "unusual and compelling urgency." For these first eight contracts, the Corps solicited contractors to apply for emergency work from pre-qualified lists developed during Operations Desert Shield and Desert Storm, and from other lists containing major contractors who had proven capabilities. A joint Kuwaiti-Corps of Engineers pre-qualification board determined that 36 of the responding firms (13 American and 23 foreign, including one Kuwaiti firm) met the minimum qualification standards to perform in the construction areas of buildings, paving, sanitary, and marine survey/dredging. On March 2, 1991, the board awarded the first eight of these nine contracts (four to U.S. companies) to eight of these 36 firms for specific restoration and clean-up related services. According to the Corps of Engineers, the board determined that these eight firms

"were judged as best qualified to have the fast-track ability to marshal physical assets as well as a work force and perform the work for expedient construction tasks in war-ravaged Kuwait."

The ninth contract was awarded to a U.S. company. As of April 30, 1992, the nine prime contracts awarded for urgent and compelling reasons

⁵Corps officials stated that after the transition from the emergency phase to the reconstruction phase in Kuwait (in the August/September 1991 time frame), the Corps has awarded all new contracts using full and open competition. For example, three of five Foreign Military Sales contracts totaling \$50.3 million were awarded to U.S. firms after September 1991 using full and open competition. The other two were awarded earlier using other than full and open competition.

totaled \$208.3 million, or 67 percent of all Corps prime contracts by value. Of these, the 5 contracts awarded to U.S. companies were valued at \$150.1 million. The government of Kuwait directed that another \$4 million in extensions be awarded as part of these contracts, which is included in the second category.

Under the second category, the government of Kuwait also exercised its authority under the Letter of Exchange⁶ between the two countries, which authorizes the Kuwaitis to direct the selection of specific contractors. In these directed cases, the Kuwaitis asked the Corps to negotiate fair and reasonable prices with the designated contractors. The Corps awarded 39 contract actions, valued at \$63.5 million (20 percent of all prime contracts by value), at the direction of the Kuwaiti government. Although 34 U.S. firms received \$17.1 million in designated contracts, Kuwaiti and other foreign firms received \$46.3 million of these contracts. One directed Corps contract, valued at \$45 million, went to a Kuwaiti firm.

The Corps has the legal authority to enter into such agreements under 10 U.S.C. 2304 (c)(4). This law provides that full and open competition need not be used when precluded by the terms of an international agreement or the written directions of a foreign government reimbursing the agency for the cost of the requested supplies or services.

Efforts Made to Award Contracts to Small and Small Disadvantaged Businesses

Our analysis of Corps of Engineers reports to Commerce shows that as of April 30, 1992, 30 of the 67 prime contracts awarded by the Corps, for \$10.2 million (3 percent by value), were to small U.S. businesses. Twenty-five of these prime contracts for \$8.7 million were awarded at the direction of the Kuwaiti government. Also, prime contractors awarded 162 subcontracts to small and small disadvantaged businesses⁷ for \$18.7 million.

In 1991, the Corps took several steps to help small and small disadvantaged businesses receive more business, including

- modifying their contract and incorporating a Small Business Subcontract Plan clause that required prime contractors to develop a plan to use small and small disadvantaged businesses,

⁶The Letter of Exchange describes the type of assistance the U.S. government could provide Kuwait as part of the reconstruction effort.

⁷Another nine subcontracts were awarded to small and small disadvantaged businesses, but the Corps could not assign them a value.

- preparing a listing of small and small disadvantaged businesses that expressed an interest in reconstruction work,
- negotiating with prime contractors small and small disadvantaged business goals,
- assigning a small and small disadvantaged business utilization specialist to Kuwait, and
- amending the proposal for work at the Kuwait International Airport to include a set of source selection evaluation factors for small and small disadvantaged business subcontracting.

The government of Kuwait, in August 1991, agreed to establish a program that would result in the award of prime contracts up to \$2 million to small and small disadvantaged businesses that have entered into a joint venture with Kuwaiti firms. Competition for these contracts would be limited to U.S. small and small disadvantaged businesses that the Corps determined could satisfactorily perform in-country. The Kuwaitis favored U.S. firms that were already operating in Kuwait. The Corps identified five prime contracts it awarded under this program for \$3.7 million, as of April 30, 1992 (these contracts are referred to as category three contracts in the previous section).

In addition, in July 1991, the Corps set a goal that would give small and small disadvantaged businesses 5 percent of the value of all Foreign Military Sales contract awards. This would include work on two Kuwaiti air bases and all future civil reconstruction work authorized under section 607 of the Foreign Assistance Act.

A Corps official noted that small businesses often cannot afford the cost of operating overseas. He added that many small firms complained that they may be forced into bankruptcy because of the severe financial losses suffered in Kuwait. This official believes that some firms spent money in Kuwait that they could not afford given the few such opportunities that existed for small businesses. Commerce officials stated they were not aware of these small business complaints. They added that they advised business officials that operating in Kuwait was very difficult and expensive, generally requiring businesses to send a representative to Kuwait and retain a Kuwaiti agent. To reduce potential risk and cost, Commerce officials encouraged businesses to subcontract with prime contractors doing reconstruction work, and to sell products through catalogues to the Kuwaitis. They also recommended that businesses going into foreign operations for the first time might consider other countries, particularly

Canada and Mexico. Commerce officials added that business representatives were often unreceptive to these alternatives.

Estimating Future Reconstruction Work Will Continue to Be Difficult

The Department of Commerce will not obtain more reliable information unless the government of Kuwait provides it. As noted in its reports, Commerce requested information on Kuwaiti contracts and subcontracts. However, if the government of Kuwait is to supply the information, it will have to be collected from each of the individual ministries, according to Commerce officials. This effort may take time and the completeness of the data may vary from ministry to ministry.

Commerce, as reconstruction winds down, has had problems in determining the contracts that represent reconstruction and those that represent routine business. According to Commerce, most contracts awarded during the emergency period, which lasted through June 30, 1991, were considered reconstruction. After that, as Kuwait started to recover, it became harder to tell the difference. For example, rebuilding oil wells is definitely reconstruction, but routine maintenance of these wells is not. Commerce officials said that with reconstruction work coming to an end and new contracts being awarded for routine operations, they would like to issue only one more report. According to the legislation, Commerce will have to issue a report every 4 months after the first report is issued with the last report being submitted 36 months after the first report. Commerce officials believe that given the reporting constraints identified in this report and the difficulty in distinguishing between reconstruction and routine operations, very little reconstruction information will be included in these follow-on reports.

Scope and Methodology

To evaluate the reliability of Commerce's reports, we reviewed supporting documentation contained in its files, as well as the records maintained by the Corps of Engineers. We analyzed Corps data in depth, because it was the most complete and accurate information Commerce collected. We also reviewed Corps data to determine whether the Corps awarded contracts under full and open competition and what steps were taken to award contracts to small and small disadvantaged businesses.

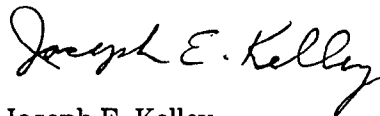
We met with officials at the Commerce's Office of the Near East, who prepared the report to Congress. We also met with officials at Corps of Engineers headquarters in Washington, D.C. who coordinated the Corps reports; and officials at the Corps' Transatlantic Division in Winchester,

Virginia, who prepared their reports. We conducted our review between April and August 1992 in accordance with generally accepted government auditing standards.

As requested, we did not obtain agency comments on this report. However, we discussed the facts in a draft of this report with appropriate officials from the Department of Commerce and the U.S. Army Corps of Engineers, and incorporated their comments where appropriate.

As arranged with your offices, unless you publicly announce this report's contents earlier, we plan no further distribution until 30 days from its issue date. At that time we will send copies to appropriate congressional committees and other interested parties.

Please contact me on (202) 275-4128 if you have any questions concerning this report. Major contributors to this report are Thomas J. Schulz, Associate Director; Louis H. Zanardi, Assistant Director; and Edward D. Kennedy, Evaluator-in-Charge.



Joseph E. Kelley
Director, Security and International
Relations Issues

Countries Whose Companies Were Awarded Reconstruction Contracts by the Government of Kuwait (As of July 31, 1992)

Non-coalition countries	Number
Argentina	1
Australia	5
Bahrain	2
Bangladesh	1
Belgium	1
Canada	5
Czechoslovakia	1
Denmark	4
Egypt	28
France	23
Germany	4
Greece	2
Italy	16
Morocco	2
Netherlands	5
New Zealand	1
Niger	1
Norway	2
Oman	n/a
Pakistan	5
Poland	1
Qatar	5
Saudi Arabia	93
Senegal	n/a
Spain	2
Syria	4
United Arab Emirates	6
United Kingdom	151
United States	501
Subtotal	872
Non-coalition countries	
Austria	3
Brazil	3
China	2
Finland	1
Holland	1
Hungary	2
Iran	3
India	8
Japan	22
Lebanon	1

(continued)

**Appendix I
Countries Whose Companies Were Awarded
Reconstruction Contracts by the Government
of Kuwait (As of July 31, 1992)**

Non-coalition countries	Number
Philippines	1
Republic of Korea	4
Romania	2
Sweden	8
Switzerland	2
Taiwan	1
Turkey	11
Russia	1
Yugoslavia	3
Subtotal	79
Total	951

N/A - not available.

Source: Department of Commerce

Definition of Terms Identifying a Small Disadvantaged Business

According to the Federal Acquisition Regulation (FAR) 19.001 a small disadvantaged business is defined as

“... a small business concern that is at least 51 percent unconditionally owned by one or more individuals who are both socially and economically disadvantaged, or a publicly owned business that has at least 51 percent of its stock unconditionally owned by one or more socially and economically disadvantaged individuals and that has its management and daily business controlled by one or more such individuals. This term also means a small business that is at least 51 percent unconditionally owned by an economically disadvantaged Indian tribe or Native Hawaiian Organization, or a publicly owned business that has at least 51 percent of its stock unconditionally owned by one of these entities, that has its management and daily business controlled by members of an economically disadvantaged Indian tribe or Native Hawaiian Organization and that meets the requirements of 13 CFR 124.”

Socially disadvantaged individuals are defined in the FAR as

“... individuals who have been subjected to racial or ethnic prejudice or cultural bias because of their identity as a member of a group without regard to their qualities as individuals.”

Economically disadvantaged individuals are defined in the FAR as

“... socially disadvantaged individuals whose ability to compete in the free enterprise system is impaired due to diminished opportunities to obtain capital and credit as compared to others in the same line of business and who are not socially disadvantaged. Individuals who certify that they are members of named groups (Black Americans, Hispanic Americans, Native Americans, Asian-Pacific Americans, Subcontinent-Asian Americans) are to be considered socially and economically disadvantaged.”

These groups are defined in the FAR as follows:

“Subcontinent Asian Americans means United States citizens whose origins are in India, Pakistan, Bangladesh, Sri Lanka, Bhutan, or Nepal.

Asian Pacific Americans means United States citizens whose origins are in Japan, China, the Philippines, Vietnam, Korea, Samoa, Guam, the U.S. Trust Territory of the Pacific Islands (Republic of Palau), the Northern Mariana Islands, Laos, Kampuchea (Cambodia), Taiwan, Burma, Thailand, Malaysia, Indonesia, Singapore, Brunei, Republic of the Marshall Islands, or the Federated States of Micronesia.

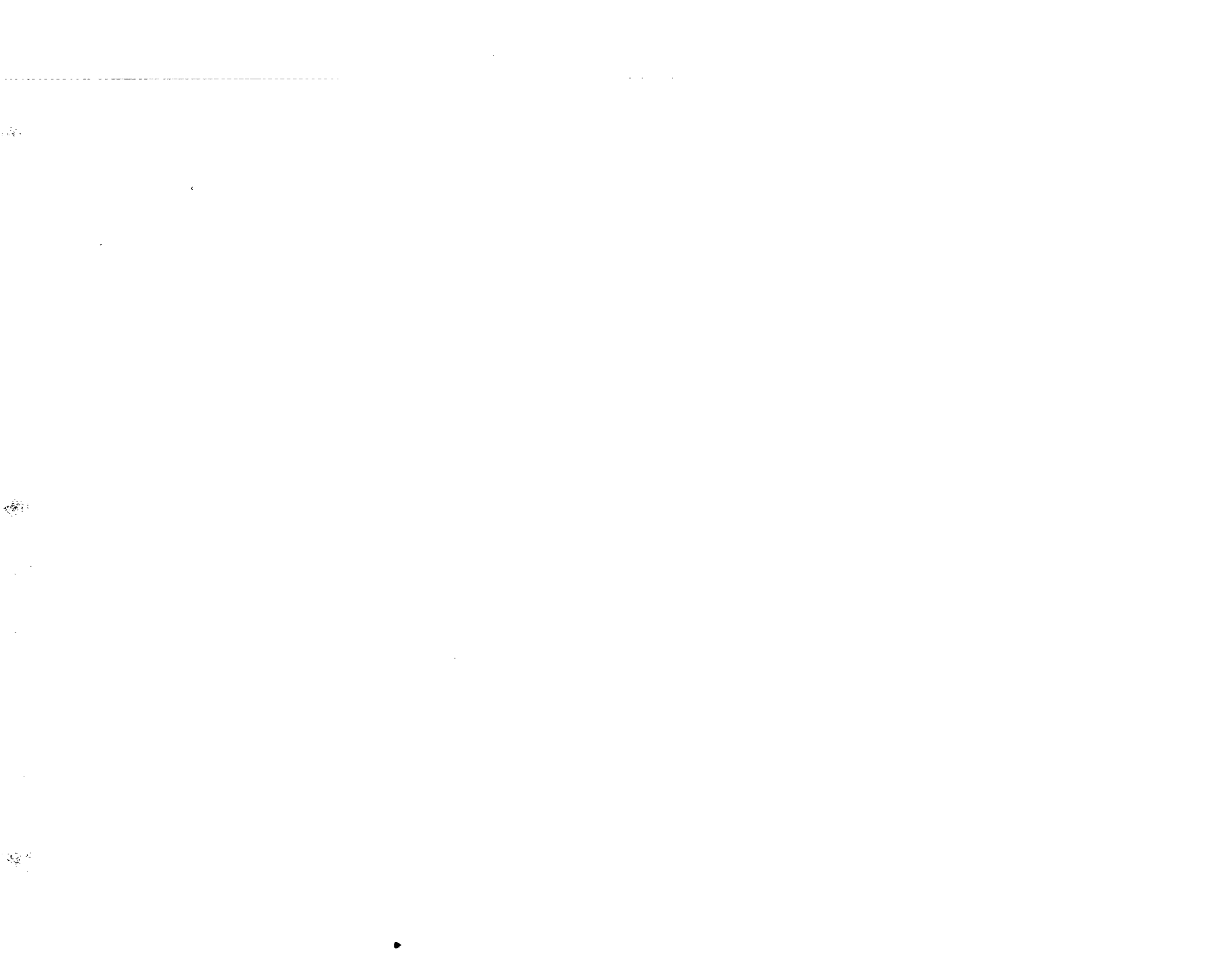
Native Americans means American Indians, Eskimos, Aleuts, and Native Hawaiians.

Native Hawaiian Organization means any community service organization serving Native Hawaiians in, and chartered as a not-for-profit organization by, the State of Hawaii, which is

**Appendix II
Definition of Terms Identifying a Small
Disadvantaged Business**

controlled by Native Hawaiians, and whose business activities will principally benefit such Native Hawaiians.

Indian tribe means any Indian tribe, band, nation, or other organized group or community of Indians, including any Alaska Native Corporation ... which is recognized as eligible for the special programs and services provided by the U.S. to Indians because of their status as Indians, or which is recognized as such by the State in which such tribe, band, nation, group, or community resides.”



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