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## PUBLIC-PRIVATE PARTNERSHIP MANAGEMENT SYSTEMS: ANALYSIS OF FOREIGN EXPERIENCE

#### **Abstract**

The main purpose of this article is to evaluate and analyze foreign experience in the creation and functioning of public-private partnership (PPP) management systems, highlight their country-specific features and present the most successful practices of its development. The article presents foreign experience in the creation and functioning of public-private partnership (hereinafter PPP) project management systems, highlights their country-specific features and presents the most successful practices of its development. The authors touched upon aspects of legislative and regulatory support, principles of the PPP management and development system, long-term planning of infrastructure development, tools and methods, creation and organization of public administration bodies within the framework of PPP. The result of the article is the collection and study of data on the implementation and implementation of the PPP mechanism in foreign countries, based on the collected data, during the study of practical experience accumulated in the field of public-private partnership, to determine the main criteria for the success of public administration systems in the field of PPP. As part of the study methods of analysis, theoretical and logical methods of generalization, comparison and comparison, deduction and induction, methods of formalization, logical interpretation, methods of logical reasoning, the method of tabular representation of the results, analysis and evaluation were used. The main results and practical relevance of the work are systematized foreign practice of regulatory and legal support of the PPP project management system, the organization of the public administration system in the framework of PPP, which allowed to define the main criteria for the success of public administration systems in the field of PPP. The authors have made recommendations for improving the PPP system of the Republic of Kazakhstan.

Key words: public-private partnership, system, management, foreign experience, projects, investments.

#### Introduction

PPP is a unique type of cooperation between the public and private sectors aimed at the implementation of long-term investment projects in the social and infrastructure spheres with the establishment of a "price-quality ratio".

The topic of public-private partnership is extremely relevant due to the fact that this model of cooperation between the state and individuals has great practical potential for socio-economic development. As the experience of many countries has shown, it can be successfully used for the development of public infrastructure, and as a result, it can have a significant impact on the level of country competitiveness.

The scientific novelty of the article lies in the fact that the authors systematized the foreign practice of legal regulation ensuring the functioning of the PPP project management system, the organization of the system of public administration bodies within the framework of PPP, which made it possible to determine the main criteria for the success of public administration systems in the field of PPP; the authors gave recommendations for improving the PPP system of the Republic of Kazakhstan.

The relevance of the research topic is due to the presence of a number of unresolved and debatable issues in the formation of management systems public-private partnership projects in conditions of limited financial resources for the development of the territory of any level.

The object of the research of this article is the foreign experience of management and implementation of the mechanism of public-private partnership, and the subject, in turn, is the management system in the separately considered states.

In Kazakhstan in 2015, this direction was regulated by the adoption of the Law "On Public-Private Partnership" [1], which included an arsenal of state support measures for entrepreneurs and potential investors.

Despite this, the formation and development of the project management system, PPP in Kazakhstan continues to face a number of problems, which include, first of all, the complexity of the clash of interests of two sectors, public and private, as well as the problem of choosing the most effective form of relationship and model of development of the entire mechanism of public-private partnership in the state. In this regard, there is a need to search for the most effective mechanisms for the implementation of interaction between the private and public sectors, in the presence of a well-formed and effectively functioning PPP public administration system abroad.

The current situation in the Republic of Kazakhstan requires comprehensive consideration in order to improve the legislative aspects and approach the forms of PPP common in Western countries. There is a need to build new modern PPP approaches, transform the mechanism into an accessible and transparent source of project implementation for business and the public, and make a strict distinction between public procurement. It is worth noting that the head of state Kassym-Jomart Tokayev himself has repeatedly drawn attention to the fact that the very idea of PPP is discredited and more than 90% of the cost of PPP projects are state obligations. And at a meeting with the largest representatives of the business community in January 2022, he said that "Another direction for attracting investments to the country should be the restart of public-private partnership. Today, this tool has essentially become a tool for bypassing public procurement procedures. All business risks are shifted to the budget. Overbenefits and over-marginalities are unreasonably provided." Accordingly, the topic of PPP is gaining new interest for the state and we consider it necessary for the rebirth of the PPP project management system to analyze the foreign experience of advanced countries.

To conduct a study of the foreign experience of public-private partnership, the most successful countries in this area were selected, among which the United Kingdom, France and Canada stand out, which were able to form and organize a working PPP management system, with the help of which to attract significant private funds, technologies and innovations to infrastructure, and thereby increase their competitiveness, despite the mistakes made in using the PPP model for a number of projects, which is also of interest from the point of view of their possible consideration when projecting this experience on the Kazakh realities of development. During the preparation of the study, all countries were selected for analysis, since at present, according to an independent assessment, various international organizations, they are among the leading countries in terms of infrastructure development, and the infrastructure gap in them tends to zero, which is, among other things, the result of the effective implementation and development of the public-partnership in the last quarter of a century. From this point of view, they are a positive example for the Republic of Kazakhstan.

The proposed changes formed at the expense of foreign best practices can radically change and improve the current state of the PPP project management system in the Republic of Kazakhstan. These measures will make it more attractive for implementation. The state plays a leading role in this process, and state regulation of the PPP project management system should serve as a driver for changes dictated by time and the need to transform this system.

#### Materials and methods

This article examines the problems that have a long history of research abroad and a much shorter period in post-socialist economies. Nevertheless, the problem of the formation of the mechanism of public-private partnership in these countries has been devoted to enough research and a critical array of material continues to be formed.

Then preparing the article, a descriptive methodology was used, as well as an evheuristic method of analysis. In the course of the study, data presented on public resources, including government portals, were analyzed. In the course of the study, legal acts and regulations related to laws on PPP projects were reviewed. In the course of the study, methods of system analysis of existing information, generalization, analysis of the experience of forming a PPP management system of international practices were used, the results of which were the method of tabular presentation of the results of analysis and evaluation.

## Main provisions

The authors came to the conclusion that the need for the formation of public-private partnership is dictated by the realities of the current stage of economic and social development. Cooperation between the state and business presupposes the interest of both sides in this process.

Since the introduction of PPP as part of the Private Finance Initiative (PFI) by the conservative UK government in 1992, the scheme has been adopted by many leading foreign countries, including France, Germany, China, India, Singapore, Thailand, as well as Malaysia.

Despite the increasingly widespread introduction of PPP, the experience of using this mechanism is far from successful in many countries, especially in developing countries. The reason for this is usually: the unstable state of the economy, intersectoral disagreements, delays in the development of the mechanism and the cancellation of the concession agreement, the presence of gaps in legislation.

To do this, the authors of the article resort to the assessment and analysis of foreign practices of the leading world powers, thanks to which the article presents the effectiveness of the functioning of PPP management systems in the country-by-country aspect.

The study of the experience of foreign countries allowed the authors to determine the criteria for the success of the PPP project management system and their features, which were systematized in the form of a table.

Summarizing the material analyzed in the course of the study, the authors identified the basic principles of the successful functioning of the PPP system.

To solve the problems outlined in the introduction, it is necessary to resort to the analysis and evaluation of foreign experience in order to find best practices for the development, formation and management of the PPP system, which in turn will lead to the formation of a theoretical and practical platform with clearly formulated criteria for the success of PPP abroad.

Borrowing and using successfully proven international experience in the formation of the most effective public-private partnership management system, in turn, will lead to the improvement of problems in the processes of interaction between business and government structures in the modern conditions of economic development of the Republic of Kazakhstan now and in the future.

The main hypothesis in the process of preparing the article, the authors cite the possibility of marginal changes in the current state of the public-private partnership project management system in Kazakhstan due to a comprehensive and detailed analysis of the most successful foreign experience of its functioning. In their opinion, by systematizing and combining knowledge about the features and effective principles of the functioning of PPP project management systems, we will come to the regulation and improvement of the current state of PPP in the Republic of Kazakhstan.

#### Literature review

This article examines the problems that have a fairly long history of research abroad and a much shorter period in post-socialist economies. Nevertheless, enough research has been devoted to the problem of public-private partnership in these countries and a critical array of material continues to be formed.

Public-private partnership attracts a lot of interest from the scientific community. To date, there are a number of studies devoted to the analysis of leading scientific publications on PPP (indexed in Scopus, Web of Science, etc.), including a review of scientific publications on PPP in developing countries and developed countries.

The works of the so-called classics of modern economics, whose issues of public-private partnership are considered in great depth and in detail, certainly represent a certain interest in studying

the topic of PPP. Such fundamental research can include the research of J. Delmon "PPP projects in infrastructure" and E. Yescomb "Public-private partnership in the field of infrastructure. The principles of policy and financing" are considered in detail by other modern scientists. The most prolific foreign scientists of the last decade include S. Zhang, China, D. Grimsey, Australia, B. Li, China, G. Hodja (Australia), A. Akintoye (Great Britain), O. Williamson (USA), R. Tiong (Singapore).

A large number of studies on PPP have been conducted by various governmental and international organizations: the Treasury of the United Kingdom, the National Audit Office of the United Kingdom, the World Bank, OECD, EU, UNIDO, the European PPP Center and the European Investment Bank.

In the article, the authors refer to the foreign research of representatives of the scientific community in the field of PPP [8], [9], [10].

An additional source of information was the Report of the World Bank Group on the state of the public-private partnership management system in the Republic of Kazakhstan [15].

A large amount of data on foreign experience in the organization and formation of the PPP system is collected in the works of Russian scientists and researchers A.S. Bednyakov [2], O.A. Yastrebov [3], I.S. Fadyushin [5], E.O. Dmitrieva [7] and other authors.

Additionally, the authors reviewed and analyzed the work of domestic researchers considering and studying PPP in the Republic of Kazakhstan [11], [12], [13], [14].

The authors also turned to foreign sources of information, regulatory legal acts of foreign countries and international databases, including the World Bank PPI database, which contains information on major infrastructure projects: there are projects in it.

#### Results and discussion

To date, there is no universal model of public administration in the field of PPP. Each state develops progressively, choosing an individual path of development, in accordance with the priorities and current programs for the development of the economy of the state and regions. Each country forms its own national PPP management models.

PPP is widely used in the UK, USA, Australia, Canada, Germany, France, China, Spain and Ireland. In these countries, PPP is a basic condition for the effective and stable development of the economic system. For this purpose, a regulatory framework has been prepared, the involvement of the state is ensured through the formation of a national PPP policy, an organizational infrastructure has been created, political and financial well-being is maintained at the macro and micro levels.

The success of public project management systems is the effectiveness of its functioning, which is presented in the country–by-country aspect in Table 1.

Table 1 –	The	effectiveness	of the	PPP	system
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State	The result of the functioning of the PPP system
Great Britain	In the UK, the PFI model, adopted back in the 1980s until its cancellation in 2018, attracted more than 700 PPP projects during its period of operation, with private investments of about 56 billion pounds. The country's Treasury has approved an infrastructure plan until 2028, which provides for investments in the amount of 600 billion pounds, of which 50% should be raised through PPP. In the period from 2017 to 2021, according to the World Bank, the UK is one of the leaders in the European market, which has more than 2000 projects, in terms of the number of projects and the volume of funds raised in infrastructure. During this period, more than 30 projects worth about 7.5 billion have been implemented. euro.
France	In France, the amount of investments only in projects under the "Marché de partenariat" scheme (partnership agreements) exceeds 40 billion euros, and the number of various forms of concessions and similar structures ("Délégations de service public") exceeds 15,000. According to the estimates of the European PPP Development Center, the share of PPP projects in the total volume of infrastructure investments in France reaches 12%. According to the World Bank, over the period from 2017 to 2021, about 80 PPP projects totaling more than 13 billion were implemented in France. euro. Thus, France is the undisputed leader in this indicator.
Germany	Germany ranks 3rd in the market of PPP projects in Europe for the period from 2017 to 2021, second only to France and the UK, during this period 25 projects were implemented in which about 6 billion were attracted. euro.

Table 1 continued

USA	According to the National Council established for the effective development of PPP at all levels, US infrastructure projects through the PPP mechanism are more than 200 years old and about 1,000 projects are currently in operation.			
Russian Federation	The market of PPP projects in Russia as of 2021 is 3,648 completed projects. Since 2006, about 200 projects worth more than 1 billion rubles (approximately \$13 million at the exchange rate on 03.2022) have been successfully launched and signed and launched, by the way, in terms of investment volumes, they occupy about 95% of the PPP project market. The information is taken from the ROSINFRA portal, which plays an important and useful role in generating data on PPP projects [5].			
Canada	PPP in Canada is represented by various schemes, according to which more than 250 large infrastructure projects have been initiated for the current period, totaling about \$ 110 billion, and budget revenues to the state treasury from these projects for each dollar invested in the project are equal to \$ 3.6. B At the current time, a major infrastructure plan «Investing in Canada» is being implemented, according to which investments in social infrastructure will amount to about \$ 187 billion over the next 12 years.			
Note: Compiled	Note: Compiled by the authors based on sources [2], [3], [4], [5], [6], [7].			

Studying the experience of foreign countries allowed us to determine the criteria for the success of the PPP project management system and their features, which we systematized in Table 2.

Table 2 – Criteria for the success of the PPP project management system and their features

State	The presence of a PPP law in the legislation	Availability of a specialized legal entity	Availability of the national PPP development Center	Availability of a decision- making mechanism for an alternative way of implementing the project	Availability of a single data bank for PPP projects	Availability of the evaluation standard, analysis of the value of the partnership (Value For Money)	Features of the PPP management system
Great Britain	No	Yes	Yes	Yes	Yes	Yes	There is no Law on PPP. The project operator is Partnership UK. Mandatory preliminary independent evaluation of VfM.
France	Yes	Yes	Yes	Yes	Yes	Yes	Integration of PPP into the infrastructure complex management system.  Infrastructure centers within the framework of financial and economic executive authorities.  Mandatory preliminary independent evaluation of VfM.  Several management bodies of the PPP system.
Germany	Yes	Yes	Yes	Yes	Yes	Yes	Special public-private companies for PPP management. The addition of national PPP centers by regional structures with a high degree of power.

Table 2 continued

USA	No	Yes	Yes	Yes	Yes	Yes	National PPP Council. The democratic nature of the formation of public-private partnerships at the federal, local, and state levels. The relevant ministries are responsible for the management and development of public-private partnership.
Australia	No	Yes	Yes	Yes	Yes	Yes	Institute for the Development and Improvement of PPP Policy – The Working Group of the National PPP Forum (Forum's National PPP Working Group).
Russian Federation	Yes	No	Yes	No	Yes	No	The platform is an ecosystem of PPP market participants. The use of various legal forms of PPP: the creation of specialized structures, the market of infrastructure projects in the region with the disclosure of the legal structure and sources of financing. Active involvement of regions in the independent management of PPP projects.
Canada	No	Yes	Yes	Yes	Yes	Yes	Maintaining a database of PPP projects – P3 SPECTRUM. PPP management bodies at lower levels of government.  Mandatory preliminary independent evaluation of VfM.
Note: Compi	Note: Compiled by the authors based on sources [2], [3], [4], [5], [6], [7].						

As can be seen from Table 1, in foreign countries, the PPP model is integrated into the management system of the infrastructure complex, infrastructure centers have been created within the framework of financial and economic executive authorities. An example of this is: France – FIN INFRA agency, Great Britain – a division of the IPA Treasury, PPP Canada – a corporation responsible for promoting and facilitating public-private partnerships in Canada at the federal level. All projects are required to undergo a preliminary independent evaluation of the VfM. An effective system of control over the implementation of infrastructure projects has been created, both at the national and regional levels, which are interconnected with each other through national infrastructure plans [2].

Despite the fact that there are differences in legislation regulating PPP in the countries presented in Table 1, the current PPP economic model is independent of those financial instruments that are enshrined in legislative documents.

World practice demonstrates that in order to ensure effective PPP management, it is necessary to create a single management body with a highly qualified staff of employees with experience in the field of management and skills in promoting projects of different levels of complexity. The creation of these bodies is usually initiated by the state executive with full control of management, or formed with the support of business, but with a predominant stake in the charter of these joint ventures. This allows these bodies to perform the following functions:

- state support of PPP at all levels of the organization;
- implementation of the strategy for the development of the PPP institute at all levels of government;
- preparation and equipping of all participants of PPP projects in various fields with project documentation and methodological recommendations;
  - choosing the method of support through the distribution of public financing of PPP;
  - guarantees of all types on PPP projects from the state;

- control and supervision of compliance with the project quality standard;
- consulting of representatives of stakeholders of PPP projects.

In foreign practice, there is no single organizational and legal mechanism of PPP.

In some countries (Canada, Hungary, Australia, USA), it is possible to finance a PPP project from several sources.

In others (France, Ireland, the Netherlands, Greece), it is financing from the PPP center, which is a structural subdivision of state authorities directly subordinated to the Ministry of Economy and Finance.

This contributes to the coordination and management of PPP projects, the promotion of this mechanism as the basis of the state's investment policy. At the same time, the management of the main financial transactions is maintained and controlled, as a rule, by the Ministry of Economy and Finance, which is responsible for coordinating all organizational processes, regardless of whether a single PPP management body is created under the coordinating ministry or as an independent organization.

Third, countries (Great Britain, Czech Republic and Germany) – a separate legal agent or legal entity is being created, which can be both a commercial and non-commercial structure, with both companies with a dominant share of state participation.

This ensures the decentralization of PPP through the transfer of state functions in the field of expert promotion, the choice of expediency and methods of project implementation, analysis and evaluation of project proposals, control to third-party structures, for example, the operator of Partnership UK projects in the UK, which has a 49% share of state ownership. This operator also participates in the development and approval of the PPP regulatory framework [2].

For a visual illustration, we will present various PPP project management systems in several states (Figures 1–3).

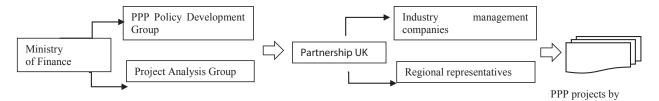


Figure 1 – PPP project management System in the UK [7]

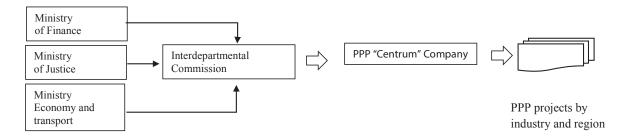


Figure 2 – PPP project management system in Hungary [7]

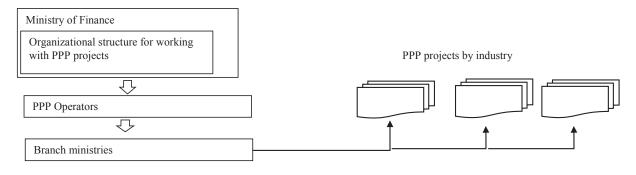


Figure 3 – PPP project management system in Australia [7]

Thus, there is a close relationship with the presence in the countries of a special authorized center or "taskforce", which is based on the institutional, legal and methodological basis for the promotion and dissemination of PPP with a high level of development of the institution of public-private partnership in general.

The experience of Germany is interesting, where the issue of organizing a PPP center is being solved in a similar way with the UK and France – by creating a Consulting Community Partnerschaften Deutschland. Taking into account the peculiarities of the German state structure and its native federal form of government formation, it has a rich history of PPP development. In addition, the peculiarity in this case is that a large share of activities within the framework of public-private sector relations is concentrated at the regional level, and national PPP centers are supplemented by regional structures. The units authorized for public-private partnership are organized and operate under the Federal Ministries of Economy and Finance, Science and Sports, Labor and Social Development, Transport, Construction and Housing and Communal services, etc. [3].

Public-private partnership in Canada (PPP or P3) is a form of alternative service provision that involves a formal agreement on cooperation between the public and private sectors within the framework of several initiatives, usually of a long-term nature. The initial rationale for PPP in Canada was to provide cities with high-quality infrastructure without increasing direct public sector debt. The implementation of PPP projects allowed the government not to make off-balance-sheet investments in infrastructure.

In Canada, the Government has established the PPP Canada State Corporation, whose responsibilities include providing a number of services to the private sector, as well as providing funding at both the federal and provincial levels. To date, PPP Canada Corporation has been dissolved due to the fact that the experience of implementing PPP has become common practice throughout Canada and is no longer needed, so the experience of Canada is also of particular interest to states that are on the path of establishing and developing PPP management systems [4].

Summarizing the material analyzed in the course of the study, the authors identified the basic principles of the successful functioning of the PPP system:

Table 3 – Principles of successful functioning of the PPP system

## From the public sector

- creation and maintenance of equal rights before the law as private and public partners;
- ensuring the achievement of the goals of PPP projects, taking into account the interests of all stakeholders, who are represented not only by representatives of the private and public sectors, but also by the population, consumers, users of the infrastructure facility and other interested parties;
- formation of a transparent and accessible system of rules and all procedures carried out in the management of PPP projects;
- creation of a favorable competitive environment in the process of competitive selection of a private partner in all projects;
- providing free access for business entities to participate in an organized competitive selection and the absence of any kind of discrimination in determining the participants and winners of the competition for the right to conclude a contract for the implementation of a PPP project;
- maintaining a fair distribution between partners of risks, benefits, guarantees and obligations related to the execution of the PPP contract;
- effective public administration of the system of PPP projects in close contact with the business sector, as well as, where necessary, with the involvement of financing organizations in compliance with the balance of their rights and legitimate interests;
- immutability of the legal regime in force at the time of conclusion of contracts on PPP projects.

Table 3 continued

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From the private sector	<ul> <li>conscientious and mutually beneficial cooperation for the implementation of the PPP project;</li> <li>achievement of the criteria and indicators established by the PPP project management system to assess the effectiveness of this system;</li> <li>attraction of all types of resources (including investments, qualified personnel, advanced technologies, etc.) in PPP projects to maintain and stable development of this mechanism and the system as a whole;</li> <li>compliance with the requirements and conditions established by the regulatory legal acts of the current PPP project management system in the state.</li> </ul>			
By other participants and interested parties	<ul> <li>active participation in the stable functioning and proposal of measures to improve the PPP project management system;</li> <li>participation in the competition commission to determine private project partners;</li> <li>monitoring the implementation of PPP projects;</li> <li>participation in the regulatory support of the PPP project management system, in the development and discussion of standard tender documentation of PPP projects.</li> </ul>			
Note: Autorama based	Note: Autorama based Eastern [6], [7], [8], [9], [10], [11].			

Thus, the popularization of the creation of a PPP management system in the designated countries has taken place, and it acts today as one of the key forms of social infrastructure development and investment policy directions. It is also worth noting that in each country, public-private partnership has features determined by various conditions: the degree of economic development, regulatory support, the level of development of financial and economic institutions, the specifics of state investment policy, political factors, the availability of favorable conditions for the private sector, etc.

The criterion we have considered for states with a successfully developed PPP management system indicates that the existence of a PPP law is not always a prerequisite for the successful functioning of a PPP. This can be traced in the practice of forming a PPP system in the UK, Canada, the USA and Australia.

However, the practice of the functioning of the PPP management system in France indicates the opposite, in the presence of a special law on PPP, the state has successfully implemented the majority of projects in comparison with other European countries [5].

Another equally important component, in addition to the presence of specialized management bodies in the development of the entire system, is the level of efficiency of civil servants and their qualifications in project management in general and in the implementation of PPP, in particular.

Summarizing the analyzed material, based on the experience of foreign countries, the creation of a specialized PPP management body and a management model within the framework of the general public administration system are two basic models for the formation of a PPP system.

As noted by the Russian scientist I.S. Fadyushin in his research, most European countries prefer to follow the first path, and this applies to the category of countries in which there is no specialized legislation. It is obvious that the creation of such bodies allows for more effective management of PPP projects, assistance in their implementation, and perform control and monitoring functions [5].

In general, in order to effectively manage the public-private partnership system, it is necessary to combine the efforts of various executive authorities to implement plans to achieve significant results in the use of PPP mechanisms.

The authors also agree with the opinion of the author O. Dolganova, who in her work gives the opinion that coordination of efforts of various state authorities is required. That is why, in many countries, the practice of creating specialized units operating under these structures of state bodies or launching joint ventures based on state capital, whose activities are aimed at ensuring an effective management policy in the field of PPP, is being introduced.

The concentration of all competencies in the field of PPP in such educated structures contributes to the creation of prerequisites for the most effective promotion of public-private partnership, the search for the most successful forms and models of PPP system management. Within the framework of this system, the main centralization of functions will focus on monitoring the projects that are being initiated and selecting the most promising ones for improving the regulatory framework, as well as for choosing the most optimal partnership mechanisms in the field of infrastructure development [6].

#### Conclusion

According to the results of the study, based on the analysis of the selected criteria for the successful functioning of PPP in advanced foreign countries, it seems possible to improve the PPP system of the Republic of Kazakhstan in the following areas:

- 1. Formation of a specialized state body in the PPP management system. In this case, we are talking about a separately created structure, whose activities are limited exclusively by the PPP policy, and accordingly endowed with the authority to implement the functions of managing the PPP system. It is possible to allocate a similar structure in the relevant ministries in the field in which the PPP project itself is being implemented, or to organize the work of the department, which will combine the main work with the activities of the PPP.
- 2. Training of specialists with authority in the field of implementation and management of PPP projects, who have the necessary qualifications in managerial and economic specialties and specialized competencies. Provision of trained professional personnel in the field of project management of state bodies in the regions in relation to projects implemented through the PPP mechanism, able to apply important executive decisions at all stages of management.
- 3. Creation of a system for monitoring the results of the implementation of public-private partnership projects. The purpose of this system is to borrow the best and optimal solutions for projects and to avoid inaccuracies made in implemented projects, to improve work with additional non-predicted risk events that have arisen during the implementation of projects. This system is capable of acting as a single data bank for PPP projects and a system that allows them to be monitored, by the way, there is already a successful experience of such solutions.
- 4. Creation of a unified information access to the main indicators of PPP projects being implemented and planned for implementation.

There are no data and statistical indicators available to analyze and monitor efficiency in order to understand the economic effect on the region.

To solve the problem of corruption and hidden risks, to form the foundations of partnership, it is extremely necessary to create transparency in the PPP project management system.

5. Creation of an effective mechanism for the qualitative selection of PPP projects and a clear differentiation of public-private partnership projects according to all characteristics and criteria directly related to the state order. Such a mechanism will contribute to the improvement of the management system and can serve as a tool for choosing the optimal solution for the implementation of the project through PPP, through public procurement or through the formation of a budget investment project, despite the fact that the best foreign experience in the implementation of such tools is fully represented. When preparing any infrastructure project, it is advisable to compare the effectiveness of various methods of its implementation in order to determine the most optimal.

Since, within the framework of the analyzed criteria for the effectiveness of management systems of foreign states, there was a national center for the development of public-private partnership, it is worth noting that a similar body has been created and operates in the Republic of Kazakhstan, the rights and obligations in the management system of the PPP mechanism of which are prescribed in the main law regulating public-private partnership.

The main activities of the Kazakhstan PPP center are the economic expertise of various investment projects, the implementation of research activities in the field of public-private partnership, including the appeal to foreign experience, the analysis of the effectiveness of the implementation of PPP projects in the Republic of Kazakhstan, training and advanced training of specialists and experts in the field of PPP, as well as the formation of a list of the main implemented and planned for implementation projects.

The proposed system of criteria will make it possible to assess the effectiveness of management in the field of PPP at all stages of projects, while highlighting their characteristic distinguishing features and gaining a more complete understanding of the features of PPP management.

The balanced use of foreign experience for the development of PPP in the Republic of Kazakhstan will increase the effectiveness of this model of interaction between the state and the private sector. This form of cooperation, among other things, will allow the state to reach a new level of country competitiveness, through the effective attraction of private capital into the existing infrastructure complex and significantly increase its level of development.

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## МЕМЛЕКЕТТІК-ЖЕКЕШЕЛІК ӘРІПТЕСТІКТІ БАСҚАРУ ЖҮЙЕЛЕРІ: ШЕТЕЛДІК ТӘЖІРИБЕНІ ТАЛДАУ

#### Аңдатпа

Мақаланың негізгі мақсаты мемлекеттік-жекешелік әріптестік тетігінің (МЖӘ) басқару жүйелерін құру мен жұмыс істеудің шетелдік тәжірибесін бағалау және талдау, олардың елдік ерекшеліктерін бөліп көрсету және оны дамытудың неғұрлым табысты тәжірибелерін ұсыну. Мақалада мемлекеттік-жекешелік әріптестік (бұдан әрі-МЖӘ) жобаларын басқару жүйелерін құру мен жұмыс істеудің шетелдік тәжірибесі ұсынылып,

олардың елдік ерекшеліктері көрсетілген және оны дамытудың неғұрлым табысты тәжірибелері ұсынылған. Авторлар заңнамалық-нормативтік қамтамасыз ету аспектілерін, МЖӘ басқару және дамыту жүйесінің қағидаттарын, инфракұрылымды дамытуды ұзақ мерзімді жоспарлауды, МЖӘ шеңберінде мемлекеттік басқару органдарын құру мен ұйымдастырудың құралдары мен әдістерін қозғады. Мақаланың нәтижесі мемлекеттік-жекешелік әріптестік саласында жинақталған практикалық тәжірибені зерделеу барысында жиналған деректер негізінде шет елдердің МЖӘ тетігін іске асыру және енгізу жөніндегі деректерді жинау және зерттеу, МЖӘ саласындағы мемлекеттік басқару жүйелерінің табыстылығының негізгі өлшемдерін айқындау болып табылады. Зерттеу барысында талдау әдістері, жалпылаудың теориялық және логикалық әдістері, салыстыру және салыстыру, дедукция және индукция, формализация әдістері, логикалық интерпретация, логикалық негізгі әлшемдерін мен бағалаудың нәтижелерін кестелік ұсыну әдісі қолданылды. Жұмыстың негізгі нәтижелері мен практикалық маңыздылығы МЖӘ саласындағы мемлекеттік басқару жүйелерінің табыстылығының негізгі өлшемдерін айқындауға мүмкіндік беретін МЖӘ жобаларын басқару жүйесінің жұмыс істеуін нормативтік-құқықтық қамтамасыз етудің МЖӘ шеңберінде мемлекеттік басқару органдары жүйесін ұйымдастырудың жүйеленген шетелдік практикасы болып табылады. Авторлар Қазақстан Республикасының МЖӘ жүйесін жетілдіруге қатысты ұсыныстарымен бөлісті.

**Тірек сөздер:** мемлекеттік-жекешелік әріптестік, жүйе, басқару, шетелдік тәжірибе, жобалар, инвестициялар.

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# СИСТЕМЫ УПРАВЛЕНИЯ ГОСУДАРСТВЕННО-ЧАСТНОГО ПАРТНЕРСТВА: АНАЛИЗ ЗАРУБЕЖНОГО ОПЫТА

#### Аннотация

Основная цель данной статьи – оценить и проанализировать зарубежный опыт создания и функционирования систем управления механизмом государственно-частного партнерства (ГЧП), выделить их страновые особенности и представить наиболее успешные практики его развития. В статье представлен зарубежный опыт создания и функционирования систем управления проектами государственно-частного партнерства (далее – ГЧП), выделены их страновые особенности и представлены наиболее успешные практики его развития. Авторами затронуты аспекты законодательно-нормативного обеспечения, принципы системы управления и развития ГЧП, долгосрочное планирование развития инфраструктуры, инструменты и методы создания и организации органов государственного управления в рамках ГЧП. Результатом статьи является сбор и изучение данных по реализации и внедрению механизма ГЧП в зарубежных странах на основе собранных данных в ходе изучения накопленного в сфере государственно-частного партнерства практического опыта, определение основных критериев успешности систем государственного управления в сфере ГЧП. В рамках проведенного исследования применялись методы анализа, теоретические и логические методы обобщения, сопоставления и сравнения, дедукция и индукция, методы формализации, логической интерпретации, методы логического обоснования, метод табличного представления полученных результатов, анализа и оценки. Основными результатами и практической значимостью работы являются систематизированная зарубежная практика нормативно-правового обеспечения функционирования системы управления проектами ГЧП, организации системы органов государственного управления в рамках ГЧП, что позволило определить основные критерии успешности систем государственного управления в сфере ГЧП. Авторами даны рекомендации по совершенствованию системы ГЧП Республики Казахстан.

**Ключевые слова:** государственно-частное партнерство, система, управление, зарубежный опыт, проекты, инвестиции.