



**Guidelines for Complaints and
Applications for Accreditation**

August 2001

Confidentiality

Information that is considered by a person to be confidential or commercially sensitive may be protected by the Authority from disclosure. However, the Authority is not exempt from requests for information under the *Freedom of Information Act*.

If the Authority is satisfied that the disclosure of information would not be in the public interest, it will take all reasonable steps to ensure information is not disclosed without the person's consent. All information received is, however, available to the Ministers to whom the Authority reports (the Premier and the Treasurer), the Minister of the affected significant business activity, a member of the Authority or an employee, consultant or agent of the Authority who receives the information in the course of his or her duties.

PREAMBLE

Background to Competitive Neutrality

With the objective of improving the efficiency and productivity of the Australian economy, all Australian governments have agreed to adopt a number of competition initiatives with respect to government business activities, known collectively as National Competition Policy.

Competitive neutrality is a key element of National Competition Policy.

Simply stated, competitive neutrality requires that public sector business activities (whether they are undertaken by certain government departments, government owned corporations, other statutory authorities or local government business entities) which are in competition with the private sector should not have competitive advantages or disadvantages simply by virtue of their government ownership or control.

The advantages which government business activities may have include:

- (i) exemption from all or some taxation;
- (ii) a lack of a requirement to pay dividends to the owner of the business (the State);
- (iii) exemption from various regulatory requirements;
- (iv) cross subsidisation;
- (v) captive or tied markets;
- (vi) the ability to act consistently in a non-commercial manner.

The need for competitive neutrality is reinforced by the growth in competition between the public sector and the private sector, resulting in part, from the commercialisation and corporatisation of public sector activities. Competitive neutrality does not extend to competitive advantages or disadvantages arising from factors such as business size, skills, location or customer loyalty.

Administration of Competitive Neutrality in Queensland

The two agencies with primary responsibility for the administration of competitive neutrality in Queensland are the Queensland Competition Authority and the Queensland Treasury. In addition, under the *Local Government Act 1993*, local governments are required to establish appropriate processes for dealing with competitive neutrality complaints about their relevant business activities. As part of these processes a local government may resolve that the Queensland Competition Authority be the referee for its complaints process for significant business activities and roads business activities. Also, the outcomes from the local authority complaints process may be referred, on grounds specified in the *Local Government Act 1993*, to the Queensland Competition Authority for consideration and report.

The role of the Queensland Competition Authority in the area of competitive neutrality is twofold:

- (i) to accept and, if considered warranted, investigate complaints that the significant business activities of State Government agencies and certain local government business activities enjoy competitive advantage over competitors or potential competitors. In addition, consider and

report on references to it about the outcomes of a local government competitive neutrality complaint process. The results of any investigation or consideration are to be reported to relevant Ministers or local governments for action; and

- (ii) to accredit certain State and local government business activities as complying with the principle of competitive neutrality, for a period of up to 2 years. Provided accredited agencies maintain the terms of their accreditation, they have an effective defence against complaints, provided they continue to comply with the principle of competitive neutrality for the period they have been granted accreditation.

The role of Queensland Treasury is to investigate competitive neutrality complaints made against Queensland Government significant business activities but which are outside the Queensland Competition Authority's jurisdiction. This follows amendments in May 2000 to section 38 of the *Queensland Competition Authority Act 1997*.

The Purpose of These Guidelines

The purpose of these guidelines is to assist those seeking to either lodge a complaint or gain accreditation in accordance with the requirements of the *Queensland Competition Authority Act 1997* and the *Local Government Act 1993*. These guidelines should not be relied upon as a substitute for the detailed legislative requirements as set out in those Acts.

Due to the complementary roles played by Queensland Treasury and the Queensland Competition Authority in the administration of competitive neutrality matters in Queensland, it is recommended that Queensland Treasury's guidelines, *Queensland's Competitive Neutrality Complaints Process, March 2001*, also be consulted when seeking assistance.

Further Information

Further information about the Queensland Government's approach to competitive neutrality reform may be found in the following publications:

- *Competitive Neutrality and Queensland Government Business Activities*, July 1996, Queensland Government.
- *National Competition Policy and Queensland Local Government*, July 1996, Queensland Government.
- *Queensland Legislation Review Timetable*, July 1996, Queensland Government.
- *Corporatisation in Queensland: Policy Guidelines*, March 1992, Queensland Treasury.
- *Government Owned Corporations Act 1993*
- *Local Government Act 1993* (and in particular the *Local Government Legislation Amendment Act (No. 3) 1997*).
- *Commercialisation of Government Service Functions in Queensland: Policy Framework*, October 1994, Queensland Treasury.
- *Full Cost Pricing Policy*, May 1997, Queensland Treasury.

- *Queensland's Competitive Neutrality Complaints Process*, March 2001, Queensland Treasury.

Copies of the Acts are available from Goprint or can be viewed on the Queensland Government's legislation website at www.legislation.qld.gov.au. Copies of the other documents are available from Queensland Treasury.

Further Assistance

- Interpretation and application of competitive neutrality policy and complaints which fall outside the jurisdiction of the *Queensland Competition Authority Act 1997*:

National Competition Policy Unit
Queensland Treasury
GPO Box 611
BRISBANE QLD 4001

Telephone: 07 3225 8717
Facsimile: 07 3221 4071

- Competitive neutrality complaints or applications for accreditation which fall within the jurisdiction of the *Queensland Competition Authority Act 1997*:

Chief Executive
Queensland Competition Authority
GPO Box 2257
BRISBANE QLD 4001

Telephone: 07 3222 0555
Facsimile: 07 3222 0599

It is important to note that it is a requirement of the *Queensland Competition Authority Act 1997* that, before the Queensland Competition Authority will consider a competitive neutrality complaint, the complainant must have made a genuine, but unsuccessful, attempt to resolve the matter with the government agency.

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1. COMPETITIVE NEUTRALITY COMPLAINTS

Who May Lodge a Complaint?

A complaint may only be lodged by:

- (i) a person who competes with, or is hindered from competing with, a State government agency carrying on a significant business activity or a relevant local government business activity in a particular market; and
- (ii) who is, or could be, adversely affected by the government agency's alleged non-compliance with the principle of competitive neutrality.

Against Whom May a Complaint be Lodged?

Complaints may be lodged against State government agencies carrying on business activities declared by the Ministers administering the QCA Act to be significant business activities. Those currently declared are listed in Table 1.

Complaints may also be made against a local government business activity if it is corporatised or commercialised or implements full cost pricing or the code of competitive conduct under the *Local Government Act (1993)*.

With Whom Should the Complaint Be Lodged?

For any State government declared significant business activity, complaints should be lodged with the Queensland Competition Authority.

For local government business activities, complaints may either be handled by a complaint process set up by the relevant local government, or by the Queensland Competition Authority where the Authority has been nominated by the local government concerned as the referee for that activity. However, in either case, local governments should be contacted in the first instance. Local government business activities for which the Queensland Competition Authority has been nominated as referee under the *Local Government Act 1993* are listed in Table 2.

Basis for Lodging a Complaint

Under the *Queensland Competition Authority Act 1997*, complaints can only be lodged on the basis that a government agency carrying on a significant government business activity enjoys a competitive advantage over competitors or potential competitors in a particular market solely because its activities are not subject to 1 or more of the following –

- (i) full Commonwealth or State taxes or tax equivalent systems (eg. exemption from State or Commonwealth taxation);
- (ii) debt guarantee fees directed towards offsetting the competitive advantages of government guarantees;
- (iii) procedural or regulatory requirements of the Commonwealth, the State or a local government on conditions equivalent to the conditions to which a competitor or potential competitor is subject, including for example requirements about the protection of the environment and about planning and approval processes.

Under the *Local Government Act 1993*, the grounds for a complaint must be the failure of a local government business entity to carry on an activity in a way that complies with the competitive neutrality principles applying to the activity as defined in that Act.

When Can a Complaint be Lodged?

A complaint may be lodged at any time.

The Complaint

A complaint must be:

- (i) in writing; and
- (ii) contain details of the alleged non-compliance by the government agency with the principle of competitive neutrality; and
- (iii) include sufficient details to show that the complainant and the government agency are, or could be, in competition in the particular market; and
- (iv) include sufficient details to show how the complainant is, or may be, adversely affected by the government agency's alleged non-compliance with the principle of competitive neutrality; and
- (v) include sufficient details to show that the complainant has made a genuine, but unsuccessful, attempt to resolve the matter with the government agency.

Requirement to Investigate

The Authority must investigate a complaint received by it unless:

- (i) it reasonably believes the complainant is not, or could not be, in competition in a particular market with the relevant State or local government business activity; or
- (ii) it reasonably believes the complainant is unlikely to be adversely affected; or
- (iii) it reasonably believes the complainant has not made a genuine attempt to resolve its complaint; or
- (iv) the complainant has failed, without reasonable excuse, to provide additional information within the time stated in the relevant notice; or
- (v) the government agency or local government business activity has a current accreditation under the QCA Act and continues to comply with the principle of competitive neutrality; or
- (vi) it reasonably believes the complaint is frivolous or vexatious.

In considering whether the competition requirement is met, the Authority will have regard to:

- (i) laws and government policies governing competition in the particular market;

- (ii) whether the complainant is supplying, or could supply, the relevant goods or services in the particular market;
- (iii) the structure of the particular market;
- (iv) any other matter it considers appropriate.

Determination Not to Proceed

If the Authority decides not to investigate a complaint, it must, within 14 days after making the decision, give to the complainant a written notice stating its decision and the reasons for the decision.

Determination to Proceed

Notice to Proceed

Once the Authority decides to investigate a complaint with respect to a State government significant business activity, it will give notice of the investigations to:

- (i) the government agency carrying on the significant business activity; and
- (ii) the responsible Minister for the government agency; and
- (iii) the complainant; and
- (iv) any other person the Authority considers appropriate.

For investigations of local government business activities, the Authority will give notice to:

- (i) the relevant local government; and
- (ii) the complainant; and
- (iii) if the business activity is corporatised - the corporation; and
- (iv) any other person the Authority considers appropriate.

In either case, the notice will:

- (i) state the Authority's intention to conduct the investigation; and
- (ii) state the subject matter of the complaint or be accompanied by a copy of the complaint; and
- (iii) invite the person to whom the notice is given to make written, or, if the Authority decides, oral submissions.

Matters to be Investigated

In assessing the complaint, the Authority will consider:

- (i) the need to ensure compliance with the principles of competitive neutrality;
- (ii) the need for efficient resource allocation;
- (iii) the need to promote competition;
- (iv) any government policies or guidelines about the application of the principle of competitive neutrality, including in the case of local government any local laws and local law policies;
- (v) any directions about the application of the principle of competitive neutrality given to the government agency by the government, or to the business activity by the local government, including any directions provided outside of the scope of a Statement of Corporate Intent;
- (vi) the level of competition and the structure of a particular market;
- (vii) the nature and extent of the disadvantage suffered;
- (viii) any arrangements between the government and the government agency, or between the local government and its business activity;
- (ix) any laws or local government policies about the application of the principle of competitive neutrality;
- (x) any legislation or State or local government policies relating to ecologically sustainable development;
- (xi) social welfare and equity considerations including community service obligations and the availability of goods and services to consumers;
- (xii) any legislation or state or local government policies relating to occupational health and safety or industrial relations;
- (xiii) economic and regional development issues, including employment and investment growth;
- (xiv) the interests of consumers or any class of consumers.

Nature of Investigations

The Authority may hold public seminars and hearings, conduct workshops, call witnesses and establish working groups and task forces for an investigation.

The Authority may also by written notice require the provision of information relevant to the matter.

The investigations to be conducted will depend upon the circumstances of a particular complaint.

Relevant parties will be advised of the nature of the investigation by the Authority when deemed appropriate.

Reporting the Results of the Investigation

Following consideration of the issues, the Authority will report the results of its investigation to the Ministers to whom the Authority reports (the Premier and the Treasurer) or, in the case of a local government business activity, to the relevant local authority. In the report, the Authority will indicate whether the complaint has been substantiated, together with its reasons for the decision as well as any recommendations on how any identified failure to comply with the principle of competitive neutrality could be overcome.

Copies of the report are to be made available at the Authority's office for public inspection within 2 days after the Ministers have received it.

The Authority may recommend in a report that, in the special circumstances of the case, the report, or part of the report, not be made available for public inspection for a stated period.

For local government business activities, the relevant local government must ensure a copy of the report is open to inspection as soon as practicable.

Ministers' Decision

Within 90 days after the Ministers receive a report, they must:

- (i) accept or reject the Authority's decision; and
- (ii) accept (with or without qualification), or reject, any recommendation of the Authority.

Within 2 days after the Authority is notified of the Ministers' decision on a report, a copy of the notice will be available for public inspection at the Authority's office.

Local Government Decision

The local government must decide by resolution whether to implement the recommendations in the report within 1 month after receiving the report, or if the local government does not meet within the month, at the first meeting after the month. The resolution must include reasons for the decision. Within 7 days after making a decision, the local government must give written notice of the resolution to the complainant, the corporation (if the local government business entity concerned is a corporatised corporation), and to the Authority.

Investigations Relating to Competitive Tendering (State Government Declared Significant Business Activities Only)

In respect of complaints relating to competitive tendering, the Authority may decide to:

- (i) investigate, or continue to investigate, the complaint before the tender process has been completed; or
- (ii) defer or suspend investigating the complaint until after the tender process has been completed.

The tender process may be continued and completed despite:

- (i) the making of the complaint; or
- (ii) the Authority making a decision.

The outcome of the tender process is not affected by:

- (i) the results of the investigation; or
- (ii) any decision of the Ministers about the results of the investigation.

Reference to the Queensland Competition Authority (Local Government Only)

Where a complainant has lodged a complaint against a relevant local government business activity to be dealt with by a local government established complaint process, the complainant may on certain grounds refer to the Authority –

- (i) a referee's decision not to investigate a complaint by the applicant; or
- (ii) a local government's decision on a recommendation by a referee in a report on a complaint by the complainant.

The reference must be based on at least one of the following grounds:

- (i) the complaint process is not appropriate;
- (ii) the referee's decision not to investigate a complaint is not in accordance with the relevant facts of the case;
- (iii) the referee's recommendation is not in accordance with the relevant facts or the competitive neutrality principles, or is deficient because the local government business entity did not give the referee relevant information about an activity requested by the referee;
- (iv) the decision of the local government on the referee's recommendation is not in accordance with the competitive neutrality principles.

A reference must be in writing and contain details of the complaint. The powers of the Authority and the matters it is required to consider for such a reference are similar to those for investigating a complaint.

2. ACCREDITATION

Purpose of Accreditation

The purpose of accreditation is to remove doubt for a government agency carrying on a significant business activity or certain local government business activities about whether it carries on the activity in accordance with the principle of competitive neutrality.

Current accreditation provides protection against competitive neutrality complaints, provided the accredited agency continues to comply with the principle of competitive neutrality for the period of accreditation.

Application for Accreditation

Who Can Apply?

- (i) A government agency carrying on a declared significant business activity may apply to the Authority for accreditation for the activity.
- (ii) A local government business entity carrying on a significant business activity (type 1 or 2), or a business activity trading in competition with the private sector, or a roads business activity may apply to the Authority for accreditation for the activity.

Form of the Application

Applications for accreditation must be in writing, in a form approved by the Authority. Information required includes organisational details, a description of the activity, the nature of the market for the activity and details of relevant government policies. Further information on issues relating to compliance with competitive neutrality issues (including financial issues, regulatory issues and procedural issues) will be required in the course of the Authority's investigations. In general, accreditation requires that the applicant :

- (i) demonstrate compliance with the principle of competitive neutrality;
- (ii) establish an appropriate compliance program to assure the Authority of continued adherence; and
- (iii) provide support for the contention that the accreditation is in the public interest.

Further details on the form of the application are available from the Authority on request.

Investigation

Comprehensive Assessment

To ensure the Authority is apprised of all relevant matters, it will conduct open, transparent and consultative processes. These may include public notification of the request for accreditation, invitation of submissions from relevant parties and the issue of draft determinations for public review.

Request for Further Information

The Authority may require the applicant to provide further written information about the application.

Conditions of Accreditation

If the Authority decides to grant the accreditation, it may impose any conditions it considers necessary and reasonable for compliance with the accreditation.

Accreditation will always be subject to:

- (i) continued compliance with the principle of competitive neutrality, and
- (ii) a requirement for the Authority to be advised of any change in the agency's structure or operations that may affect continued compliance.

Fees and Charges

The Authority levies fees and charges for processing applications for accreditation.

Notice of Decision

If the Authority decides to grant accreditation, the applicant must be given a written notice stating:

- (i) the decision;
- (ii) the period of accreditation (not longer than 2 years);
- (iii) the conditions of accreditation; and
- (iv) the reasons for any condition that may be imposed.

If the Authority decides not to grant accreditation, the Authority must give the applicant a written notice stating the decision and the reasons for the decision.

Other Matters

Accreditation may be cancelled as a result of the contravention of a condition of the accreditation.

TABLE 1

DECLARED SIGNIFICANT BUSINESS ACTIVITIES AS AT AUGUST 2001

Significant Business Activity	Relevant Government Agency	Date of Declaration
All the business activities of Queensland Generation Corporation	Queensland Generation Corporation	1 July 1997 Ceased to be a SBA 2 April 1999 (see Note 1)
All the business activities of AUSTA Energy Corporation	AUSTA Energy Corporation	1 July 1997
All the business activities of Stanwell Corporation	Stanwell Corporation	1 July 1997
All the business activities of Tarong Energy Corporation	Tarong Energy Corporation	1 July 1997
All the business activities of C S Energy	C S Energy	1 July 1997
All the business activities of Queensland Transitional Power Trading Corporation	Queensland Transmission and Supply Corporation	1 July 1997
All the business activities of Capricornia Electricity Corporation	Capricornia Electricity Corporation	1 July 1997 Ceased to be a SBA 29 June 1999 (see Note 2)
All the business activities of Far North Queensland Electricity Corporation	Far North Queensland Electricity Corporation	1 July 1997 Ceased to be a SBA 29 June 1999 (see Note 2)
All the business activities of Mackay Electricity Corporation	Mackay Electricity Corporation	1 July 1997 Ceased to be a SBA 29 June 1999 (see Note 2)
All the business activities of Queensland Electricity Transmission Corporation	Queensland Electricity Transmission Corporation	1 July 1997
All the business activities of South East Queensland Electricity Corporation	South East Queensland Electricity Corporation (see Note 3)	1 July 1997
All the business activities of South West Queensland Electricity Corporation	South West Queensland Electricity Corporation	1 July 1997 Ceased to be a SBA 29 June 1999 (see Note 2)
All the business activities of Wide Bay-Burnett Electricity Corporation	Wide Bay-Burnett Electricity Corporation	1 July 1997 Ceased to be a SBA 29 June 1999 (see Note 2)
All the business activities of Southern Electricity Retail Corporation	Southern Electricity Retail Corporation (see Note 3)	1 July 1997
All the business activities of Northern Electricity Retail Corporation	Northern Electricity Retail Corporation	1 July 1997 Ceased to be a SBA 3 April 1998 (see Note 4)
All the business activities of Central Electricity Retail Corporation	Central Electricity Retail Corporation (see Note 4)	1 July 1997
All the business activities of DPI Forestry	Department of Primary Industries	1 July 1997
All the business activities of State Water Projects	Department of Natural Resources	1 July 1997 Ceased to be a SBA 1 October 2000 (see Note 6)
All the business activities of CITEC	Department of Public Works and Housing	1 July 1997
All the business activities of GOPRINT	Department of Public Works and Housing	1 July 1997
All the business activities of Queensland Property Management (QPM)	Department of Public Works and Housing	1 July 1997

All the business activities of Project Services	Department of Public Works and Housing	1 July 1997
All the business activities of Sales and Distribution	Department of Public Works and Housing	1 July 1997
All the business activities of Cairns Port Authority	Cairns Port Authority	1 July 1997
All the business activities of Gladstone Port Authority	Gladstone Port Authority	1 July 1997
All the business activities of Mackay Port Authority	Mackay Port Authority	1 July 1997
All the business activities of Port of Brisbane Corporation	Port of Brisbane Corporation	1 July 1997
All the business activities of Ports Corporation of Queensland	Ports Corporation of Queensland	1 July 1997
All the business activities of Rockhampton Port Authority	Rockhampton Port Authority	1 July 1997
All the business activities of Townsville Port Authority	Townsville Port Authority	1 July 1997
All the business activities of Queensland Rail	Queensland Rail	1 July 1997
All the business activities of Road Transport Construction Service	Department of Main Roads	1 July 1997
All the business activities of Plant Hire Service	Department of Main Roads	1 July 1997
All the business activities of Queensland Investment Corporation	Queensland Investment Corporation	1 July 1997
All the business activities of North Queensland Electricity Corporation Limited	North Queensland Electricity Corporation	19 Sept 1997 Ceased to be a SBA 29 June 1999 (see Note 2)
All the business activities of the Bundaberg Port Authority	Bundaberg Port Authority	19 Sept 1997
All the business activities of Golden Casket Lottery Corporation Limited	Golden Casket Lottery Corporation Limited	19 Sept 1997
All the business activities of Ergon Energy Corporation Limited	Ergon Energy Corporation Limited (see Note 5)	30 June 1999
All the business activities of SunWater	SunWater (see Note 6)	1 October 2000
All the business activities of the Gladstone Area Water Board	Gladstone Area Water Board	1 October 2000
All the business activities of the Mount Isa Water Board	Mt Isa Water Board	1 October 2000

Notes

1. Queensland Generation Corporation was dissolved under the *Government Owned Corporations Legislation Amendment Regulation (No. 1) 1999*, effective on 2 April 1999.
2. These six entities were merged to form Ergon Energy Corporation Limited by a scheme of arrangement, effective on 30 June 1999.
3. Subsequent to these declarations, South East Queensland Electricity Corporation Limited and Southern Electricity Retail Corporation Pty Ltd have changed their names to Energex Limited and Energex Retail Pty Ltd, respectively. Energex Retail Pty Ltd is a wholly-owned subsidiary company of Energex Limited.

4. The business activities of Northern Electricity Retail Corporation Pty Ltd were assumed by Central Electricity Retail Corporation Pty Ltd under the *Government Owned Corporations (CERC and NERC Restructure) Regulation 1998*, effective on 3 April 1998. The name of Central Electricity Retail Corporation Pty Ltd was subsequently changed to Ergon Energy Pty Ltd, which is a wholly-owned subsidiary of Ergon Energy Corporation Limited.
5. Ergon Energy Corporation Limited was declared to be a Government Owned Corporation effective on 30 June 1999 under the *Government Owned Corporations (Ergon Corporatisation) Regulation 1999*.
6. As a result of the corporatisation of State Water Projects on 1 October 2000, the business activities of State Water Projects were transferred to the new corporatised entity called SunWater.

TABLE 2

**APPOINTMENT OF QUEENSLAND COMPETITION AUTHORITY
AS A REFEREE FOR LOCAL GOVERNMENT BUSINESS ENTITIES
AS AT AUGUST 2001**

Local Government Business Activity	Business Entity
Barcaldine Shire Council	Roads
Belyando Shire Council	Roads
Blackall Shire Council	Roads
Broadsound Shire Council	Roads
Caloundra City Council	Water and Sewerage
Cambooya Shire Council	Roads
Chinchilla Shire Council	Roads
Cooloola Shire Council	Roads
Crows Nest Shire Council	Roads
Dalrymple Shire Council	Roads
Duaringa Shire Council	Roads
Gladstone City Council	Roads
Hervey Bay City Council	Roads Water and Sewerage
Livingstone Shire Council	Roads
Logan City Council	Water and Sewerage Waste
Mackay City Council	Roads Water and Sewerage
Mareeba Shire Council	Roads
Mount Isa City Council	Roads
Murilla Shire Council	Roads
Noosa Shire Council	Water and Sewerage
Paroo Shire Council	Roads
Pine Rivers Shire Council	Water and Sewerage
Redland Shire Council	Roads Water and Sewerage Waste
Rockhampton City Council	Roads Water and Sewerage
Rosalie Shire Council	Roads
Thuringowa City Council	Roads Water and Sewerage
Townsville City Council	Roads Water and Sewerage Waste

FIGURE 1

PROCEDURE TO PROGRESS COMPLAINT

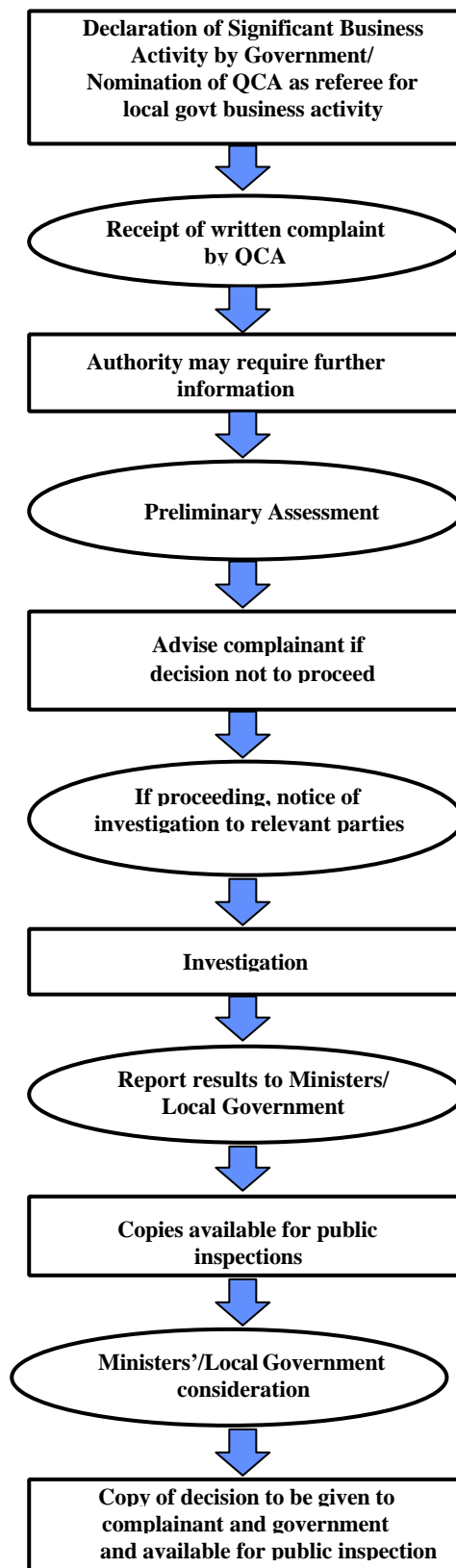


FIGURE 2

PROCEDURE TO PROGRESS ACCREDITATION

