



Department of
**Jobs, Tourism, Science
and Innovation**



Western Australian Buy Local Policy 2022





Table of contents

Foreword	3
Overview	4
Coverage	5
General components/Principles of the WA Buy Local Policy 2022	6
1.0 Policy Intent	6
2.0 Relevant Procurement Rules	6
3.0 Regional Quotations, Tenders and Contract Management.....	8
4.0 Regional Procurement - Regional Price Preferences	10
5.0 Common Use Arrangements.....	18
6.0 Imported Content Impost.....	18
7.0 Private Sector Providers	19
Policy Compliance – Implementation Agreement.....	20
Audit	21
Exemptions	21
Trade Agreements and Section 92 of the Australian Constitution	22
Regional Sourcing Strategy	22
Feedback and Policy Review	23
Assistance.....	23
Contact information	24
Terms used.....	25
Appendices	28
Appendix A	28
Appendix B	30
Appendix C	31
Appendix D	32
Appendix E	35



Foreword

Since coming to office in March 2017, the State Government has worked hard to create more opportunities for local business to compete for Western Australian Government contracts.

We moved quickly to implement the *Western Australian Jobs Act 2017* (WA Jobs Act) and the Western Australian Industry Participation Strategy (WAIPS) is now being utilised by all WA Government agencies, with extremely positive results.

To build on this success, in July 2020, the State Government through the Department of Jobs, Tourism, Science and Innovation (JTSI) as lead agency, released a streamlined and updated WA Buy Local Policy to continue to increase the number of regional Western Australian jobs created from regional WA Government contracts.

The new and improved Western Australian Buy Local Policy (WA BLP) 2020 focused on giving regional businesses every opportunity to participate in government procurement. It ensured WA Government agencies prioritised businesses and workers that are based in the regional location in which the work or service is being delivered.

The review of the policy has led to a range of enhancements including alignment with the Procurement Act, refinement of the regional preferences and modification of the value for money approach. The WA BLP 2022 will play an important role to help create work and business activity in regional WA from the estimated \$30 billion spent annually on goods, services and works.

This is all about ensuring that local regional businesses are given every opportunity to carry out work for the WA Government in their local area.

Our number one focus is to ensure Western Australia recovers strongly from the COVID-19 pandemic, and the WA BLP 2022 will continue to support regional economies and create jobs for local workers.

Hon Roger Cook MLA

Deputy Premier; Minister for State Development,
Jobs and Trade; Tourism; Commerce; Science





Overview

This policy is an updated version of the WA BLP 2020. It clearly reflects the Western Australian (WA) Government's intention of maximising the participation of WA based businesses in supplying to agencies. Application of the various elements of the policy, representing agencies' responsibilities and purchasing patterns, is embedded through the use of Implementation Agreements.

The primary focus of the policy is on small and medium sized enterprises (SMEs), which make up at least 97% of WA businesses. The policy is a combination of general principles along with specific attention on regional procurement.

Government agency purchasing has the capacity to substantially impact the commercial viability of locally based businesses and to support employment and training for Western Australians. In particular, government procurement plays an important role in the continued prosperity of regional WA.

The State Government's aim is to provide WA based businesses with full, fair and reasonable opportunity, and with transparency and accountability in the tendering and contract award process. A further and significant dimension is ensuring that the policy's outcomes are captured and assessed to support ongoing procurement improvements.

The WA BLP 2022 maintains a strong correlation with *Western Australian Jobs Act 2017* (WA Jobs Act) and the Western Australian Industry Participation Strategy (WAIPS). These initiatives have common objectives of ensuring access to the State Government market for WA based businesses and creating jobs. Further, the policy features as one of the Priority focus areas within the WA Recovery Plan.

This policy covers both non-WAIPS and WAIPS supply government procurement items.



Coverage

The policy applies to all State Government public authorities, all State Government Trading Entities (GTEs) and any other State Government authority or entity, unless specifically exempted by the Minister for Jobs. GTEs must work to achieve the intended outcomes of this policy, within their legal circumstances. For the purposes of this document, the term “agency” is used to encompass all these entities.

The policy includes coverage of the procurement of goods, services and works at tender values that are below the threshold values of WAIPS and places particular emphasis on regional WA sourcing.

The policy is not mandatory for universities or local government authorities. However, local government authorities, in particular, are encouraged to adopt and apply the policy.

The policy does not apply to the application process and spend on grants, sponsorship, community services, the disposal of goods, agency to agency transactions or proprietary software.



General components/Principles of the WA Buy Local Policy 2022

1.0 Policy Intent

The policy is a commitment by State Government Agencies to:

- Support SMEs in WA by ensuring opportunity to supply to agencies;
- Require procurement decisions to be based on the value for money principle;
- Link agency procurement to relevant government economic and social policies;
- Buy close to home to support improved government services and enhanced service access particularly in regional WA;
- Provide increased opportunities for regional businesses to bid competitively for agency contracts;
- Foster competition by giving full, fair and reasonable opportunity to WA based businesses;
- Sustain and increase employment and workforce skills in WA; and
- Develop and apply an agency WA BLP Implementation Agreement with the commitment to review the Implementation Agreement in collaboration with JTSI.

2.0 Relevant Procurement Rules

The [Procurement Act 2020](#) and the [Western Australian Procurement Rules](#) provide the framework for goods, services and works procurement by state agencies as defined in section 5 of that Act. Agencies outside the coverage of the *Procurement Act 2020* are encouraged to incorporate this approach into their policies and practices.

In particular, these are:

- Value for money (Rule A);
- Act Ethically – With Integrity and Accountability (Rule B);
- Use the Appropriate Procurement Method (Rule C4.1);
- Exceptions to Procurement Methods (Rule C4.2);
- Procurement planning (Rule C);
- Evaluation Process (Rules D5, D6 & D7); and
- Contract management (Rule E).



An important demonstration of the government's priorities in linking contracting to economic and community benefit is the Social Procurement Framework which provides further guidance on how this linkage can be achieved.

This framework, and additional procurement rules can be downloaded from the Department of Finance's [website](#).

2.1 Value for money and the Broader Benefits to Western Australia

Value for money allows agencies to include in tendering and contracting a range of procurement considerations linked to proximity of supply and risk.

Further, value for money also allows the WA Government and State agencies to focus on the advantages of sourcing from businesses that demonstrate they contribute to community and economic development in WA, and more specifically, in regional WA.

Therefore, when making procurement decisions, agencies should consider the broader benefits to WA and the fulfilment of the government's social and economic objectives (such as delivering stronger regional economies and WA job creation) that are associated with contract award. As with WAIPS, the primary emphasis is on employment, apprenticeships and traineeships and sourcing from Western Australia. For additional information on assessing value for money, where the point of delivery is regional WA, please refer to Appendix D – Regional Procurement Checklist.

The application of value for money is in the large majority of cases, most effectively achieved through the specification of targets, deliverables and / or specific community outcomes to be realised when delivering on the contract, rather than inclusion in a qualitative assessment. In this way, agencies can achieve a more effective balance between price and benefit.

JTSI in consultation with the Department of Finance, the Department of Primary Industries and Regional Development (DPIRD), the Department of Communities (Housing) and the Regional Development Commissions (RDCs), form the working group for this policy. This working group facilitates the application of the policy. The Department of Finance and the Industry Link Advisory Service within JTSI can assist agencies in applying the value for money approach.



3.0 Regional Quotations, Tenders and Contract Management

A key goal of this policy is to realise as much State Government agency sourcing of goods, services and works in regional WA as possible. The State Government expects that all agencies that deliver services and activities in regional WA will support this objective.

Agencies must implement purchasing procedures that demonstrate regional SMEs are given the opportunity to meet their supply requirements. This includes the publishing of 'look-ahead' lists and early tender advice on an agency's website, wherever possible. The purpose of this is to provide prospective suppliers more time to prepare a competitive bid. An agency will also be required to conduct appropriate pre-tender briefings at regional centres to provide details to regional businesses on upcoming contracts. Other forms of early tender advice include use of TendersWA, and contributions to the Pipeline of Work. Agencies must accept this requirement as standard practice.

JTSI hosts regular forums in the regions which offer a means for agencies to provide pre-tender information.

In particular, for quotations and tenders in regional WA, buying practices, procedures and specifications must not disadvantage regional businesses. Agencies must undertake sufficient research to ensure that regional businesses are given full, fair and reasonable opportunity to participate in contracting and supply opportunities. This should include liaison with regionally based Chambers of Commerce and Industry, Local Content Advisers (LCA), positioned within the Regional Development Commissions, and other industry associations representing regional members (eg. Master Builders Association WA, Housing Industry Association, Australian Steel Institute).

The weighting of evaluation criteria in regional tenders must ensure that regional supply considerations are prioritised. For example, evaluation criteria for regional tenders must be structured to recognise "demonstrated regional capacity" and "demonstrated regional experience".

Regional suppliers must also have the same access to tendering information as their metropolitan counterparts. Ideally, pre-tender briefings for regional contracts should occur in major regional centres. Where it is not possible to conduct pre-tender briefings in regional areas, tenders that include briefings held in the metropolitan area should use interactive technology to enable the participation of prospective suppliers that are based in regional WA.

When requested, agencies must provide debriefings to unsuccessful bidders and ensure that contract award details are published on TendersWA or an alternative publicly accessible tender platform.



3.1 Regional Training and Development Opportunities

In order for the regional businesses and regionally based procurement officers to be conversant with policies and processes, training for agencies and regional suppliers must be made available in regional centres. The use of interactive methods for regional supplier training should be encouraged where face-to-face training is not feasible. The use of procurement officer networks should be encouraged to ensure that a relevant skills base exists in the regional centres.

3.2 Aboriginal Businesses

The Aboriginal Procurement Policy (APP) outlines the State Government's approach to increasing contracting opportunities for Aboriginal businesses. The APP can be found on the Department of Finance's website, as the lead agency. The APP must be read in conjunction with the WA BLP.

The majority of Aboriginal businesses are based in regional areas and there is a clear link between the success of regional businesses and the success of Aboriginal business. The effect of large tenders, aggregated panel arrangements, centralisation of procurement functions and the use of qualitative criteria that favours larger businesses also adversely affects Aboriginal businesses. There are a number of agency based initiatives that preference Aboriginal businesses including direct purchasing, agency specific Aboriginal tendering preferences, and employment targets. These initiatives, together with the WA BLP, can greatly improve the economic outcomes for all of regional WA.

3.3 Engagement of Businesses employing people with disability

3.3.1 The WA BLP 2022 requires agencies to consider giving priority to local businesses that employ people with disability. Agencies must give full consideration to this contracting approach, particularly in regional WA.

Implementation agreements will cover agency application of such support.

3.3.2 The WA Procurement Rules permits the direct engagement of a registered Australian Disability Enterprise (ADE) for procurements of any value, in conjunction with establishing value for money.

For more information on engaging ADEs, please refer to the guidelines on WA.gov.au or contact the Department of Finance directly.

3.4 Regional Sourcing

The decentralisation of the procurement function must lead to better procurement outcomes for regional WA and therefore the level of purchasing autonomy within regional areas is important. Accordingly, where practicable all procurement activities for purchases within the regions must be undertaken as near as possible to the point of contract delivery.



Agencies must also ensure that where quotations are being sought for delivery or use in a specific regional town or in a region other than the Perth region, businesses within that region or specific town are invited to submit a competitive bid.

Agencies must be guided by a *Buy Close to Home (BCTH)* approach that prioritises the regional location where the contract is to be delivered, and gives due weighting to businesses or industries based in those regional locations. The BCTH approach applies to an agency's geographical area of responsibility within a region. Therefore, coordination of requirements for smaller communities can be pursued at an agency branch level and liaison with relevant local government authorities must also be considered.

In particular, the State Government acknowledges that smaller regional towns (eg. population less than 4,000 people) can struggle to secure particular skilled services (i.e. trades) to undertake specific job tasks. State Government agencies that service small towns are encouraged to aggregate their job task activities, where possible, to ensure the overall procurement size is of scale to attract and retain skilled businesses and individuals within their community. This may mean liaising with the relevant local government authority to coordinate requirements.

Purchasing through direct negotiation with local regional businesses that reside in smaller regional towns should be encouraged for items less than \$50,000.

When issuing requests for quotation, agencies must consider directing and/or restricting quotations to regional businesses, and should ensure that value for money is obtained from these suppliers.

4.0 Regional Procurement - Regional Price Preferences

A regional price preference is a reduction that is calculated and applied to a prospective supplier's tender price, for evaluation purposes only.

The regional price preferences must be inserted into an agency's request document and applied to the evaluation process in all cases except :

- Where the contract delivery point is in the Perth Metropolitan area; or
- When a tender offer has been received from a business that is located outside of Western Australia (ie. in another Australian state, territory or New Zealand) which is being considered in the final analysis (refer to section 4.8); or
- If the agency issues a tender with a fixed price, then an evaluation criterion based on the level of regional content contained within the bid must be included as part of the tender evaluation.



There are two types of regional price preferences:

- Regional business preference – eligible regional businesses that are tendering or quoting for contracts within the applicable prescribed distance can receive a regional price preference. The maximum reduction that can be applied is \$250,000.
- Regional content preference – regional content is defined as the cost of services or supplies that are provided by regional businesses located within the applicable prescribed distance. These costs can be internal business costs (for businesses located within the prescribed distance), including labour costs, or related to external provision by suppliers or subcontractors within the prescribed distance. The regional content preference will only be applied to the value of the portion of regional content claimed in their tender submission. The maximum reduction that can be applied is \$250,000.

Regional price preferences do not apply to land property rental or leasing, however they do apply to other forms of leasing, renting and hiring of services.

When a business makes a claim, an agency, after verifying the claim, is required to apply the preference reduction to the offered price. This reduction to the offered price is for evaluation purposes only. If the prospective supplier is successful, the price paid by the agency is the original offer price, not the discounted price.

4.1 Application of the Regional Price Preferences

The regional business preference and the regional content preference are applied differently dependent on the type of contract:

Goods and/or Services Contracts:

- The maximum reduction to the evaluation price that can be applied is \$250,000 incl. GST.
- Businesses can claim a regional business preference OR a regional content preference (but not both). (Refer to sections 4.3 and 4.4)
- The price preference is calculated at 10% of the value of the quoted price for a regional business preference OR 10% of the value of the portion of the regional content claim for a regional content preference.
- A business that operates outside the prescribed distance is not an eligible business and therefore can only claim the 10 % regional content preference.
- When applied, this reduces the evaluation price by up to a maximum of \$250,000.



Works Contracts:

- The maximum reduction to the evaluation price that can be applied is \$500,000 incl. GST.
- Eligible regional businesses (refer to section 4.3) can claim a regional business preference AND a regional content preference.
- The price preference is calculated at 5% of the value of the quoted price for a regional business preference AND/OR 5% of the value of the portion of the regional content claim for a regional content preference.
- A business that operates outside the prescribed distance is not an eligible business and therefore can only claim the 5% regional content preference (for eligible content – see section 4.4.).
- When applied, this reduces the evaluation price by up to a maximum of \$500,000.
- The \$500,000 maximum claim is split so that a maximum of \$250,000 can be claimed as the eligible regional business preference and a maximum of \$250,000 can be claimed as the regional content preference.

In specific circumstances, an Accountable Authority can increase the maximum reduction that can be applied to both Goods and/or Services Contracts and Works Contracts to \$1,000,000 for relevant tenders. Please also refer to 4.7 Accountable Authority Discretion.

4.2 Prescribed Distance

A prescribed distance is an allowance in kilometres that is applied in a particular 'zone' (zone 2 or 3). A prospective supplier whose business is located within a zone with a defined prescribed distance (200kms or 400kms), is able to qualify as an eligible regional business. This means they can claim the regional business preference and should also be able to claim the regional content preference. A prospective supplier whose business is located outside of a prescribed distance may be able to claim the regional content preference if the pre-requisites are met (refer to 4.4 Eligible Regional Content).

The prescribed distance is measured as a 200km or 400km radius from the contract point of delivery, depending on which zone the contract point of delivery is located in.

There are three (3) zones, as follows:

Zone 1 – Contract point of delivery is in the Perth Metropolitan Area

- There is no prescribed distance for Zone 1 as regional preferences do not apply in the Perth metropolitan area.
- Businesses located within Zone 1 can claim the regional content preference for regional procurement that occurs within zones 2 and 3 (within the respective prescribed distance).



Zone 2 – Contract point of delivery is in the Peel, Wheatbelt, South West and Great Southern Regions

- The prescribed distance is defined by a circle centred on the contract point of delivery with a radius of 200km, excluding any area falling within Zone 1.

Zone 3 – Contract point of delivery is in the Kimberley, Pilbara, Gascoyne, Mid West and Goldfields-Esperance Regions

- The prescribed distance is defined by a circle centred on the contract point of delivery with a radius of 400km, excluding any area falling within Zone 1.

The boundaries of the above regions are set out in the [Regional Development Commissions Act 1993](#). Please also refer to the zone maps in Appendix E.

Note: In circumstances where a contract covers both the Perth Metropolitan area and elements of Zone 2 and/or 3, the preferences should be applied for that proportion of the contract represented by Zones 2 and/or 3. For example, where a contract is largely delivered within Perth (Zone 1) but also includes Mandurah in its coverage, the Peel region (Zone 2) must be clearly defined in the tender documentation so that the preferences can be applied accordingly.

4.3 Eligible Regional Businesses

In terms of application of the regional business preference, an eligible regional business is one which:

- Maintains a permanent operational office within the prescribed distance that is resourced by at least one person who resides in the region and that the business address aligns with its marketing such as a telephone directory listing or the address listed on its website.
- Has had its office established and has conducted similar business and contracting from the office for at least six months prior to current tender release/request for quotation.
- Proposes to manage/deliver the majority of the contract outcomes from the office.

Where a business has claimed to be an eligible regional business, an agency must be satisfied that it qualifies for the regional business preference. An agency should verify a business's eligibility by requiring proof covering:

- Utility or electricity bills, telephone (landline) bills.
- Lease agreements or local government rates notice.
- Invoices issued to or from that address.
- Documents showing that work of a similar nature has been carried out or managed from that office.
- A list of key staff that would be used on the contract that are based within the prescribed distance.



4.4 Eligible Regional Content

Where a business has claimed to use eligible regional content, the agency must be satisfied that the content qualifies. Eligible regional content is goods, materials or services purchased and used in the delivery of contract outcomes and internal business costs associated with contract delivery.

Eligible costs also include travel, accommodation and meal costs associated with contractors working on a regional contract and all ongoing travel, accommodation and meal costs associated with the delivery of the contract outcome.

4.5 Multiple Points of Delivery and the Application of Regional Price Preferences

When a tender is being issued to service multiple points of delivery, the agency should calculate the regional price preferences based on each nominated points of delivery.

Where an agency determines that this is impractical, the agency can elect to nominate a central point of delivery. This central point of delivery should be clearly indicated in the tender documents and the prescribed distance for eligible regional businesses will be calculated from the nominated central point of delivery. The nominated central point must not be in Zone 1.

4.6 Standing Offer establishment and operation and the Application of Regional Price Preferences

An agency standing offer for the purposes of the WA BLP, is a form of procurement where an agency selects a panel of suppliers for the future provision of an undefined quantity of goods, services or works. Standing offers operate for a defined period with a set of pre-determined buying rules (see “TERMS USED”).

When agency standing offers are established, the regional price preferences must be applied at either, the point the standing offer is established or when quotes are called for from panel members.

It is at the agency's discretion as to when regional price preferences are applied (either at establishment or quotation), however, JTSI can provide agencies with advice on the most suitable approach if required.

Agencies must seek participation of regional businesses on standing offer panels to ensure that there is adequate regional participation on the panel in the respective regional location. If this is impracticable due to a lack of capability then agencies must put in place arrangements for regional businesses that wish to transition onto a panel arrangement. Alternative arrangements could include obtaining quotes from regional providers outside of the panel arrangement or joint ventures between regional businesses.



When issuing requests for quotations in regional WA, appropriate panel members based within the prescribed distance of the contract's point of delivery must be invited to quote. Full value for money considerations must be taken into account when selecting a contractor. Price preferences and the full cost of the service should be reflected in panel arrangements when it is decided to issue an order to a panellist. This must include all travel costs and other disbursements.

Agencies must also refer to Procurement Rule C2.5 *Standing Offer Arrangements with Regional Impact*.

4.7 Accountable Authority Discretion

An Accountable Authority (as defined in Section 3 of the [Financial Management Act 2006](#)) can modify the application of regional price preferences. This modification must only be done when the Accountable Authority is satisfied that modification will not have a negative impact on regional businesses.

The Accountable Authority can:

- Authorise an increase to the maximum value claimable for the regional price preferences, (*for price adjustment during evaluation*) up to a total amount of \$1,000,000 (incl. GST) for goods, services or works contracts as a means of addressing social and economic government priorities. This change must be clearly outlined in the tender documents.
- Nominate a central point of delivery in which the prescribed distance can be calculated from. This might occur when the application of regional price preferences are deemed to be impractical to apply as there are numerous points of delivery.
- Nominate more than one point of delivery in order to effectively apply regional price preferences.
- Extend Zone 3 to include the next nearest town, or towns where there is more than one town of similar distance from the point of delivery.
- Modify the prescribed distance within a zone to better address social and economic government priorities.

4.8 Application of Regional Price Preferences and the Australia and New Zealand Government Procurement Agreement (ANZGPA)

The WA Government, along with the Commonwealth, all State and Territory governments and the New Zealand Government, is currently a signatory to the ANZGPA. The ANZGPA's aim is to maintain a single competitive market for government purchasing, in order to maximise opportunities for competitive suppliers from Australia and New Zealand and reduce costs of doing business for both governments and industry. The ANZGPA currently impacts when the policy can be applied.



At present, when a tender is received from a business in another Australian State, Territory or New Zealand (ANZ) AND the offer is being considered in the final analysis, (see “TERMS USED”) then regional price preferences are not to be applied.

However, if an ANZ offer is received but it is not being considered in the final analysis then the regional price preferences must be applied to eligible regional businesses.

For agencies to remove the application of regional price preferences they must be satisfied that the offer from an ANZ respondent is valid based on the identified location. This may be established by:

- Verifying a business’ out of state address by requesting proof, covering:
 - Utility or electricity bills, telephone (landline) bills
 - Lease agreements or local government rates notice
 - Invoices issued to or from that address
 - Documents showing that work of a similar nature has been carried out or managed from that office for projects in WA over the last five years
 - A list of key staff to be used on the contract that are based in the out of state office
- Confirming the majority of the contract delivery (including project and contract management) will be undertaken from the ANZ site

Additionally, agencies must be convinced that delivery / contract management from outside of WA is feasible and of acceptable risk.

4.9 Contractor Compliance when a Regional Content Preference has Influenced Award

An agency must monitor works contracts over \$1.5 million and goods and services contracts over \$250,000 where a contract award decision has been impacted by a contractor’s claim for the regional content preference. The agency should be satisfied that the contractor is generating the regional content or has used the regional businesses as specified in its tender.

If a contract is subject to progress payments, compliance with the regional content preference could be included as a milestone.

The Agency must ensure that the head contractor is aware of their obligation to notify the agency if they are unable to use the suppliers or subcontractors as agreed in the tender submission.

Where head contractors are unable to contract with agreed suppliers or subcontractors they can contract with another supplier or subcontractor and still meet the requirements of their regional content claim so long as the substitute business uses eligible regional content.



Prospective suppliers must be made aware that JTSl may appoint an independent auditor to confirm whether the supplier met its regional content commitments.

Contact JTSl for advice on incorporating the above reporting requirements, if required.

4.10 Consequences for Non-Compliance by Contractor

Where a head contractor fails to comply with its regional content commitments and the agency, after looking into the reasons for the failure, does not consider the failure to be justifiable, then this failure must be sufficiently documented and communicated with the head contractor and JTSl as required. This information could be made available to agencies.

Agencies could also opt to include the failure to meet regional content commitments as a contract infraction, whereby costs are recovered from the head contractor and / or other remedial action is taken.

4.11 Regional Reporting

Understanding procurement outcomes and the relationship between agency spend and benefits to the broader economy and individual communities is essential in ensuring that policy objectives are being achieved.

Therefore, an agency must collect and maintain contract award data and cooperate with the Department of Finance and JTSl in reporting and analysis.

An agency will also be required on an annual basis to produce a report. A copy of this report will be provided to JTSl.

Reports will include but not be limited to:

- An ongoing record of contract award or estimated contract award values within regional WA
- The number of tenders that are awarded as a consequence of the application of a regional price preference/s
- The fulfilment of regional content outcomes, as committed in the tender
- Their overall Buy Local performance in terms of Western Australian sourcing of goods, services or works (as captured on Tenders WA)
- The number and value of regionally based contracts that were awarded to non regional businesses
- Failure of contractors to comply with claimed regional content preferences.

An agency's responsibilities in this regard will be addressed through their Implementation Agreement. (Refer to *Policy Compliance / Implementation Agreement*)



The agency must also maintain an accessible record of procurement delegations that cover the maximum authorisation monetary values by staff at head office and other sites across the State.

5.0 Common Use Arrangements

A Common Use Arrangement (CUA) is a whole-of-government standing offer administered by the Department of Finance that is awarded to a single supplier or group of suppliers to provide goods or services commonly purchased by agencies.

The majority of CUAs are only mandatory when the point of delivery is in the Metropolitan area. There are some exceptions to this, such as software licences, fuel, and electricity retail which are mandatory state-wide.

If in regional WA, agencies must:

- Maximise the use of a contractor's regional distributor or dealer network when buying from a CUA.
- Use a regional supplier, wherever possible, if that supplier is on the CUA.
- Apply the regional price preferences when obtaining quotations from suppliers on a CUA.
- Purchase outside of a CUA that is non-mandatory in the regions, when there are no regionally based suppliers on the CUA and there is capacity within the region, where practicable.
- Not create a mandatory panel from a non-mandatory CUA.

The full list of CUAs can be found on WA.gov.au under Common Use Arrangements.

<https://www.wa.gov.au/government/cuas/common-use-arrangements-cuas>

6.0 Imported Content Impost

The imported content impost is not mandatory but can be applied on a case by case basis. When procuring goods, services and works, agencies can elect to apply an imported content impost. This is a 20% price impost that applies to the portion of a bid that comprises goods, services or items that the prospective supplier is proposing to import into Australia *directly* from another country (excluding New Zealand) as part of the contract delivery. Imported content does not include items that the prospective supplier will purchase from ANZ based suppliers that have or may have been imported.

If the agency chooses to apply the imported content impost, it must be clearly outlined in the tender request document.



7.0 Private Sector Providers

A private sector provider (provider) is an entity that is engaged by a government agency to undertake work on its behalf. Providers are required to participate with the government in maximising WA business and when appropriate regional business participation in goods, services and works contracts.

7.1 Contracts Provided on a Cost Reimbursable Basis

A provider may be engaged by an agency to contract on its behalf. This can include but is not limited to management advisory services, property management services, business administration services, ICT goods and services, building services, management contracts, construction and general maintenance services. Within the scope of these contracts, the provider makes purchases on behalf of the agency and is reimbursed for these purchases by the agency. In such cases the provider is required to apply all appropriate requirements of the policy when seeking quotations or calling public tenders on behalf of the government agency. Policy requirements must be included into contractual agreements with private sector providers.

When a provider assumes the responsibility for expending public monies, the agency, on an ongoing basis, must ensure that the provider is continuing to achieve value for money.

Agencies, in selecting providers must align their selection to those prospective suppliers who demonstrate, in their bid, that they will maximise WA and regional business participation, in the delivery of the contract. Agencies cannot use other providers to avoid policy obligations. Agencies should ensure that providers meet buy local obligations through a contract management process that includes monitoring, setting performance targets and spot checking of tender processes.

7.2 Appointing a Head Contractor to Undertake Contracts

As part of a tender assessment, agencies appointing head contractors to undertake works projects such as construction of dwellings, construction of a police station, primary school additions, and road resealing etc. must assess the prospective supplier's approach to its subcontracting and supply arrangements in the delivery of the contract. This means head contractors must give subcontractors and suppliers full, fair and reasonable opportunity to participate. This could be achieved by the head contractor advertising supply opportunities on their public website and by subcontractors and suppliers using TendersWA to identify potential head contractors.

Agencies must ensure that contract management includes both monitoring the process the head contractor is using in selecting subcontractors and suppliers, and the approval of the appointment of subcontractors and suppliers.



Agencies must require head contractors that wish to deviate from the arrangements named in their tender or change the process for selecting subcontractors and suppliers, to seek approval before proceeding.

As part of performance monitoring, head contractors must confirm the use of the approved suppliers and subcontractors.

A regional procurement checklist is provided for guidance in considering approaches to value to money when tendering for regional procurements. This can be found in Appendix D.

Policy Compliance – Implementation Agreement

In recognising that agencies' procurement needs and methods can vary, this policy requires JTSI nominated agencies to prepare an initial draft Implementation Agreement for discussion with JTSI as the lead agency of the WA BLP. The focus of the Agreement is on how the agency will achieve the policy objectives. The Implementation Agreement includes coverage of both general and regional aspects of the policy and serves as an important mechanism for individual agency application.

Agencies will respond to the following headings:

1. General Application

- a. Procurement Rules
- b. Regional Price Preferences & Imported Content Impost
- c. Complaint handling
- d. Post tender briefings / Providing feedback to unsuccessful respondents
- e. Early tender advice / Look-ahead Lists (Including possible use of agency website and/or Tenders WA)
- f. Standards and specifications
- g. Managing private sector providers (including relationship with suppliers and subcontractors)
- h. Reporting

2. Regional Application

- a. Accountability
- b. Engagement and Participation
- c. Process and Practice
- d. Regional Reporting



An agency's draft Implementation Agreement is reviewed for endorsement by JTSI prior to becoming a formalised Implementation Agreement between an agency's Accountable Authority and JTSI's Director General.

An agency's Implementation Agreement will be reviewed either annually or when the WA BLP is updated (whichever is preferred by the agency) with a particular focus on outcomes and significant variations from the previous agreement.

Refer to Appendix C for the Implementation Agreement outline.

An Implementation Agreement template can be obtained directly from JTSI by emailing industrylink@jtsi.wa.gov.au.

Once an agency has finalised its implementation agreement with JTSI, a notification is published by JTSI on the Western Australian Buy Local Policy webpage on WA.gov.au.

Audit

An Agency may be subject to audit on the achievements of the outcomes of the commitments made in their Implementation Agreement. For major spending agencies, adherence to their Implementation Agreements can also be discussed with JTSI as required. Audits of any agency may be carried out by an independent auditor to confirm that an agency has adhered to its Implementation Agreement.

Audits may also be undertaken to confirm that successful head contractors have met their regional price preference commitments. Non-compliance by head contractors and major subcontractors could invoke declaration to all agencies of its failure for future reference and appropriate risk management. Consequences for non-compliance by agencies will be determined by the agency's Accountable Authority.

Exemptions

As outlined under Coverage, the authority to provide an agency with an exemption from the application of the policy as a whole or aspects such as the regional price preferences, can only be provided by the Minister for State Development, Jobs and Trade. As such, JTSI has no involvement in the determination or administration of exemptions. An agency that seeks an exemption must apply directly to the Minister under their usual protocols.



Trade Agreements and Section 92 of the Australian Constitution

The WA Government has obligations under the relevant government Procurement chapters within a number of bilateral Trade Agreements, the ANZGPA and the Australian Constitution. The policy meets these obligations in its implementation.

The policy approach to Trade Agreements broadly mirrors that of other States and Territories in exercising the exception based on support (both direct and indirect) for SMEs. SMEs represent at least 97% of businesses in Western Australia.

Regional Sourcing Strategy

The government has strengthened support for regional businesses through its Regional Sourcing Strategy (strategy). The strategy is a recognition that further action is required on issues considered to be impacting on regional businesses and where necessary, approaches have developed to address these.

The strategy includes both immediate and long-term priorities. The initiatives include:

- I. Working with GTEs on their approaches to utilising regional capacity;
- II. Working with the Western Australian Local Government Association (WALGA) to support local government authorities on developing appropriate tendering and contract award processes;
- III. Examining the levels of regional delegation and the impact that agency standing offers have on regional SMEs;
- IV. Focusing on site specific regional works projects for increasing local sourcing opportunities;
- V. Examining the potential for regional SMEs to become competitive lead bidders;
- VI. Identifying capability gaps affecting regional businesses and potential remedial actions;
- VII. Investigating options of support for unsuccessful regional bidders that may increase the effectiveness of future bids;
- VIII. Developing a process for regional procurement related complaints across all agencies;
- IX. Exploring avenues to improve the participation of regional businesses in government grants;
- X. Training for both agencies and suppliers in the application of the regional price preferences and other aspects of tendering and evaluation;
- XI. Considering further measures to ensure only valid interstate bids impact the assessment of regional price preferences;
- XII. Consulting with government with a view to amending the ANZGPA to allow the WA Government to use its spend to support economic and social objectives;



- XIII. Improving how agencies collect information on regional procurement outcomes; and
- XIV. Other initiatives raised by agencies or regional stakeholders that support regional business participation in government procurement.

Feedback and Policy Review

The WA Government is committed to ongoing consultation on the policy and welcomes feedback from both the private sector and agencies. Please refer to the Contact Information section.

The Accountable Authority of the agency is responsible for ensuring that the policy is followed. Complaints should be made to the agency in the first instance. If the supplier is unhappy with the response then they can formally lodge an objection to JTSl.

JTSl will work with the agency on the particulars of their application of the policy.

JTSl plans to undertake a review of the operation and effectiveness of the policy on an annual basis.

Assistance

JTSl is the lead agency responsible for the administration of the policy. JTSl, in regular consultation with the Department of Finance, the Department of Primary Industries and Regional Development (DPIRD), the Department of Communities (Housing) and the Regional Development Commissions (RDCs), form the working group for this policy. This working group facilitates the application of the policy.

Agency Procurement Officers can contact JTSl for advice in applying the policy.

Agencies undertaking procurement for regional locations can also contact LCAs for assistance. LCAs can assist Agency Procurement Officers with identifying local capability, promoting opportunities for regional businesses, presenting a whole of government perspective on procurement policy and practice, and organising and participating in supplier briefings.

LCAs also work with regional businesses to assist with and identifying government assistance programs to develop regional small businesses' capability and capacity to enhance a business's competitiveness.

Agency Procurement Officers should be contacted when businesses are seeking advice regarding individual tender requests, supplier rights and responsibilities, feedback on tender responses and enquires regarding conditions of contract and procurement policy that is specific to the agency.



Contact information

Department of Jobs, Tourism, Science and Innovation

[Industry Link Advisory Service](#)

Email: industrylink@jtsi.wa.gov.au Telephone: (08) 6277 2999

Local Content Advisers (Regional)

- **Gascoyne**
Email: local.content@gdc.wa.gov.au
Telephone: (08) 9941 7000
<https://www.gdc.wa.gov.au/our-focus/local-content.aspx>
- **Goldfields-Esperance**
Email: localcontent@gedc.wa.gov.au
Telephone: (08) 9080 5000
<http://www.gedc.wa.gov.au/our-focus/local-content>
- **Great Southern**
Email: local.content@gsdc.wa.gov.au
Telephone: (08) 9842 4888
<http://www.gsdc.wa.gov.au/our-activities/local-content/>
- **Kimberley**
Email: localcontent@kdc.wa.gov.au
Telephone: (08) 9194 3000
<http://kdc.wa.gov.au/local-content-officer/>
- **Mid West**
Email: local.content@mwdc.wa.gov.au
Telephone: (08) 9956 8555
<http://www.mwdc.wa.gov.au/resources/news/better-opportunities-for-local-businesses.aspx>
- **Peel**
Email: local.content@peel.wa.gov.au
Telephone: (08) 9535 4140
<https://www.peel.wa.gov.au/im-looking-for/local-content-advisor/>
- **Pilbara**
Email: local.content@pdc.wa.gov.au
Telephone: 1800 843 745
<http://www.pdc.wa.gov.au/our-focus/pilbara-blueprint/localcontent>
- **South West**
Email: local.content@swdc.wa.gov.au
Telephone: (08) 9792 2000
<https://www.swdc.wa.gov.au/article/local-content-program/>
- **Wheatbelt**
Email: local.content@wheatbelt.wa.gov.au
Telephone: (08) 9622 7222
<https://www.wheatbelt.wa.gov.au/working-us/local-content/>



Terms used

Accountable Authority: the agency head or delegate (as defined under Part 4 of the *Financial Management Act 2006*) or the head of a government trading entity or delegate.

Agency: encompasses government departments, agencies, statutory authorities and government trading entities.

ANZGPA: the Australia and New Zealand Government Procurement Agreement is a commitment to a single competitive procurement market between Australia and New Zealand. The agreement allows for suppliers to tender for government contracts in either country, regardless of their physical location.

Common Use Arrangement (CUA): a whole-of-government standing offer administered by the Department of Finance, typically for use by all State agencies and other authorised bodies.

Content: the portion of the value of the contract attributed to a jurisdiction or region (including Metropolitan Perth).

Contract: a legal agreement established through a procurement process for the provision of a good, service or work against designated specifications for an agreed upon sum.

Contractor: the prospective supplier appointed to undertake the contract.

Eligible Regional Business: a business that is located within the specified prescribed distance.

Final Analysis: tenders that are being considered in the final analysis are those that are compliant and competitive and have passed any short listing or elimination process. The assessment as to whether a tender is competitive will be based on a qualitative assessment and/or price.

Full, Fair and Reasonable opportunity:

Full: Australian and New Zealand industry is afforded the same opportunity as other global supply chain partners to participate in all aspects of a project. (e.g. design, engineering, project management, professional services, IT and architecture).

Fair: Australian and New Zealand industry is provided the same opportunity as global suppliers to compete on projects on an equal and transparent basis, including being given reasonable time to tender.

Reasonable: Tenders are free from non-market burdens that might rule out Australian and New Zealand industry and are structured in such a way as to provide Australian and New Zealand industries the opportunity to participate in projects.



Goods: includes materials, consumables, components, equipment and finished products.

Implementation Agreement: a document that sets out an agency's specific commitments to achieve the WA BLP's objectives. The agreement must be signed by the agency head and the Director General of JTSI, and is reviewed as to outcomes and future deliverables.

Imported Content Impost: a 20% price increase that is applied to the portion of the bid that comprises goods, services or items that the prospective supplier is proposing to import into Australia directly from another country (excluding New Zealand) as part of the contract delivery.

Industry Link Advisory Service (ILAS): a team within JTSI that has been established to provide a range of services to help WA businesses and State government agencies to understand the requirements of the Buy Local Policy and the WAIPS.

JTSI (Department of Jobs, Tourism, Science and Innovation): the lead agency for the administration of the WA Buy Local Policy and the Western Australian Industry Participation Strategy.

Local Content Advisers (LCAs): provide advisory services to businesses in regional Western Australia.

Local Sourcing: proportion of contract value sourced from within Western Australia, or for regional contracts, within the prescribed distance specified.

Point of Delivery: the place where the majority of the purchase or contract outcomes will be delivered / managed and used, not where the contract was called or where the quotation or tender documents must be submitted. For example, if a contract is called by an agency's Kalgoorlie regional office for goods, services, or works, to be delivered or carried out in Kalgoorlie, then the point of delivery is Kalgoorlie. If the agency's head office in Perth calls a contract to be delivered or carried out in Kalgoorlie then the point of delivery is Kalgoorlie.

Prospective Supplier: a person or body that makes an offer to supply in the course of the procurement process.

Regional: As prescribed in the [Regional Development Commissions Act 1993](#), Schedule 1 – Regions defined by reference to districts.

Regional Development Commissions: The nine bodies established under the *Regional Development Commissions Act 1993*.

Regional Price Preference: A reduction that is applied to a prospective supplier's tender price, for evaluation purposes only.



Request: any form in which a supplier is requested to provide information on supply. This includes a Request for Tender, a Request for Quotation, a Request for Proposal or an Expression of Interest.

Services: the provision of labour, trade or professional tasks to fulfil a specified requirement.

Small and Medium Sized Enterprises (SMEs): a business with less than 200 full time equivalent employees.

Standing Offer: an agreement established by the procuring agency for a panel of suppliers for the future provision of an undefined quantities of goods, services or works.

Tender: an offer to supply goods, services or works. May also be referred to as a 'bid', or a response to a request for quotation (RFQ) or request for proposal (RFP).

WA Industry Link: a portal that provides information in relation to the implementation of the *Western Australian Jobs Act 2017*, WAIPS and the WA Buy Local Policy
www.industrylink.wa.gov.au .

WAIPS: The Western Australian Industry Participation Strategy as developed under the *Western Australian Jobs Act 2017*.

WAIPS Supply/Supplies: applies to a range of procurements (goods, services, works and community services) above designated values.

Works: the creation, modification, maintenance and demolition of a physical asset, either permanent or non-permanent.



Appendices

Appendix A

1. Example of applying the Regional Price Preferences – Works Contract

A tender for a works contract for the refurbishment of a primary school is called in Geraldton (Zone 3, prescribed distance 400 kms). Compliant tenders are received from a regional business located within the prescribed distance and a Western Australian business located outside the prescribed distance.

Tender A of \$5,000,000 is received from an eligible regional business (section 4.3). The 5% regional business preference applies to the total tender as the business is located within the contract prescribed distance (400 kms from Geraldton).

The cost of employing in-house staff in the delivery of the contract and other related expenses is estimated at \$500,000. This regional business will also use subcontractors and suppliers that are located within the prescribed distance in the delivery of the contract to the value at \$4,500,000. The value of this portion of the tender (\$5,000,000) represents regional content. The regional content preference of 5% is applied to this portion of the tender.

Tender B of \$4,900,000 is received from a Western Australian business located outside the prescribed distance (Perth Metropolitan Area).

This business will use regional businesses located within the prescribed distance (400 kms from Geraldton) for a contract price of \$3,000,000, in the delivery of the contract outcomes. The value of this portion of the tender (\$3,000,000) represents regional content. The 5% regional content preference is applied to this portion of the tender.

The preferences are applied as follows:

Tenders Received	Regional Price Preferences	Adjusted Price for Comparative Evaluation Only
Tender A \$5,000,000 Eligible regional business	Regional Business Preference Less 5% of \$5,000,000 = \$250,000 Regional Content Preference Less 5% of \$5,000,000 = \$250,000	Tender Price – Regional Price Preferences = Adjusted Price \$5,000,000 - \$500,000 = \$4,500,000
Tender B \$ 4,900,000 WA business located <u>outside</u> the prescribed distance. (Perth area)	Regional Business Preference Not Applicable Regional Content Preference Less 5% of \$3,000,000= \$150,000	Tender Price – Regional Price Preferences = Adjusted Price \$4,900,000 - \$150,000 = \$4,750,000

Tender A is the lowest adjusted price for comparative evaluation. If successful, the contract award price is \$5,000,000.



2. Example of applying the Regional Price Preferences – Goods and/or Services Contract

A tender for a goods and services contract is called in Albany (Zone 2, prescribed distance 200 kms). Compliant tenders are received from a regional business located within the prescribed distance and a Western Australian business located outside the prescribed distance. One prospective supplier claims regional business preference and the other a regional content preference.

Tender A of \$620,000 is received from an eligible regional business (section 4.3). The 10% regional business preference applies to the total tender as the business is located within the contract prescribed distance (200 kms from Albany).

Tender B of \$590,000 is received from a Western Australian business located outside the prescribed distance (Perth Metropolitan Area).

This business will use a regional business located within the prescribed distance (200 kms from Albany) at a cost of \$380,000, in the delivery of the contract outcomes. The value of this portion of the tender (\$380,000) represents regional content. The 10% regional content preference is applied to this portion of the tender.

The preferences are applied as follows:

Tenders Received	Regional Price Preferences	Adjusted Price for Comparative Evaluation Only
Tender A \$620,000 Eligible regional business	Regional Business Preference Less 10% of \$620,000 = \$62,000 Regional Content Preference <i>(as this is a goods and services contract only one preference can be claimed)</i>	Tender Price – Regional Price Preferences = Adjusted Price \$620,000 - \$62,000 = \$558,000
Tender B \$590,000 WA business located <u>outside</u> the prescribed distance. (Perth Area)	Regional Business Preference Not Applicable Regional Content Preference Less 10% of \$380,000 = \$38,000	Tender Price – Regional Price Preference = Adjusted Price \$590,000 - \$38,000 = \$552,000

Tender B is the lowest adjusted price for comparative evaluation. If successful, the contract award price is \$590,000.



Appendix B

3. Example of applying the Imported Content Impost

A tender is called in Perth and two compliant tenders are received from businesses located in Zone 1 (Perth Metropolitan Area). Both prospective suppliers claim imported content.

Tender A is for \$5,650,000 of which \$300,000 comprises of content directly imported from Vietnam and China. A 20% impost is applied to this portion of the tender and added to the total tender sum (GST inclusive).

Tender B is for \$5,700,000 of which \$40,000 comprises of content directly imported from China. A 20% impost is applied to this portion of the tender and added to the total tender sum (GST inclusive).

The imported content impost is applied as follows:

Tenders Received	Imported Content Impost	Adjusted Price for Comparative Evaluation Only
Tender A \$5,650,000	Imported Content Impost 20% of \$300,000 = \$60,000	Tender Price + Impost = Adjusted Price \$5,650,000 + \$60,000 = \$5,710,000
Tender B \$5,700,000	Imported Content Impost 20% of \$40,000 = \$8,000	Tender Price + Impost = Adjusted Price \$5,700,000 + \$8,000 = \$5,708,000

Tender B is the lowest adjusted price for comparative evaluation. If successful, the contract award price is \$5,700,000.



Appendix C

Western Australian Buy Local Policy 2022

IMPLEMENTATION AGREEMENT

Topics to be considered:

1. General Application

- a. Adherence to / adoption of the Western Australian Procurement Rules
- b. Regional Price Preferences & Imported Content Impost
- c. Agency process for handling procurement related complaints
- d. Agency process for providing feedback to unsuccessful tenderers
- e. Outline of the circumstances in which look-ahead lists and/or early tender advice will be provided to prospective suppliers
- f. Commitment to using Standards and specifications that do not hinder Western Australian supply opportunities
- g. Outline of any intended contractual arrangements where a private sector provider will be appointed to undertake procurement on behalf of the agency (including relationship with suppliers and subcontractors)
- h. Commitment to reporting on overall contract award outcomes

2. Regional Application

- a. Accountability
- b. Engagement and Participation
- c. Process and Practice
- d. Regional Reporting



Appendix D

REGIONAL PROCUREMENT CHECKLIST

Value-for-Money and Industry Sustainability Considerations

This checklist is intended to serve as a basis for consideration and discussion as agencies assess their approach to procurement in the regions.

PROCESS	Y/N
Have potential barriers for regional small to medium enterprises (SMEs) to tender for the works been identified and considered? (<i>Barriers are financial, insurance, operational or other non-regulatory requirements which regional SMEs could not reasonably be expected to meet.</i>)	<input type="checkbox"/>
Do local SMEs facing barriers have adequate and accessible support pathways and the opportunity to overcome identified barriers in order to tender for the works?	<input type="checkbox"/>
Have respondents been provided an opportunity (or example) in the request to demonstrate how they will utilise local supply chains and/or have other positive impacts on local supply chains?	<input type="checkbox"/>
Have local business and Aboriginal business provisions been applied in accordance with the WA Buy Local Policy 2022 and the Aboriginal Procurement Policy (General Procurement Direction 2021/08)?	<input type="checkbox"/>



FULL, FAIR AND REASONABLE OPPORTUNITY	Y/N
Have the specified requirements to be supplied been cross checked for local availability?	<input type="checkbox"/>
In relation to a specified list of equipment, plant or materials, has the procurer considered: <ul style="list-style-type: none">• If regionally based service agents can attend the site and/or provide support?• Local ongoing management / maintenance support, including technical backup, ongoing inspections and support at the location?• After hours callout capability and response times at the location?• Inventory levels of local stock/parts and costs associated with freight if unavailable locally?• Warranty arrangements for regional and remote localities?	<input type="checkbox"/>
Does the <i>Scope of Works</i> foster competition and local opportunity by providing full, fair and reasonable opportunity for regional SMEs to tender?	<input type="checkbox"/>
If the request requires specified items (ie. brand or company), has consideration been given as to how a regional SME could participate in this arrangement?	<input type="checkbox"/>
Are there any request conditions or licensing requirements that are prohibitive to regional respondents, and if so, has consideration been given to possible alternatives?	<input type="checkbox"/>
Are the contract conditions, licensing requirements and other requirements on a scale that is proportionate to the value and scope of the procurement and the scale of the risk?	<input type="checkbox"/>



ASSESSMENT	Y/N
Has the Tender Assessment Panel defined a method for assessing social Value for Money considerations using a consistent set of metrics?	<input type="checkbox"/>
Have respondents been provided access to the benchmarks or targets set under the project which inform their responses to related Value-for-Money and sustainability questions?	<input type="checkbox"/>
Does the Panel have a defined method for assessing either the value add to regional business capability and diversity, or for filling known supply and capability or skills gap in the region when such issues are part of the evaluation process?	<input type="checkbox"/>
Does at least one of the assessment panel members reside in the locality where the supply is being undertaken?	<input type="checkbox"/>

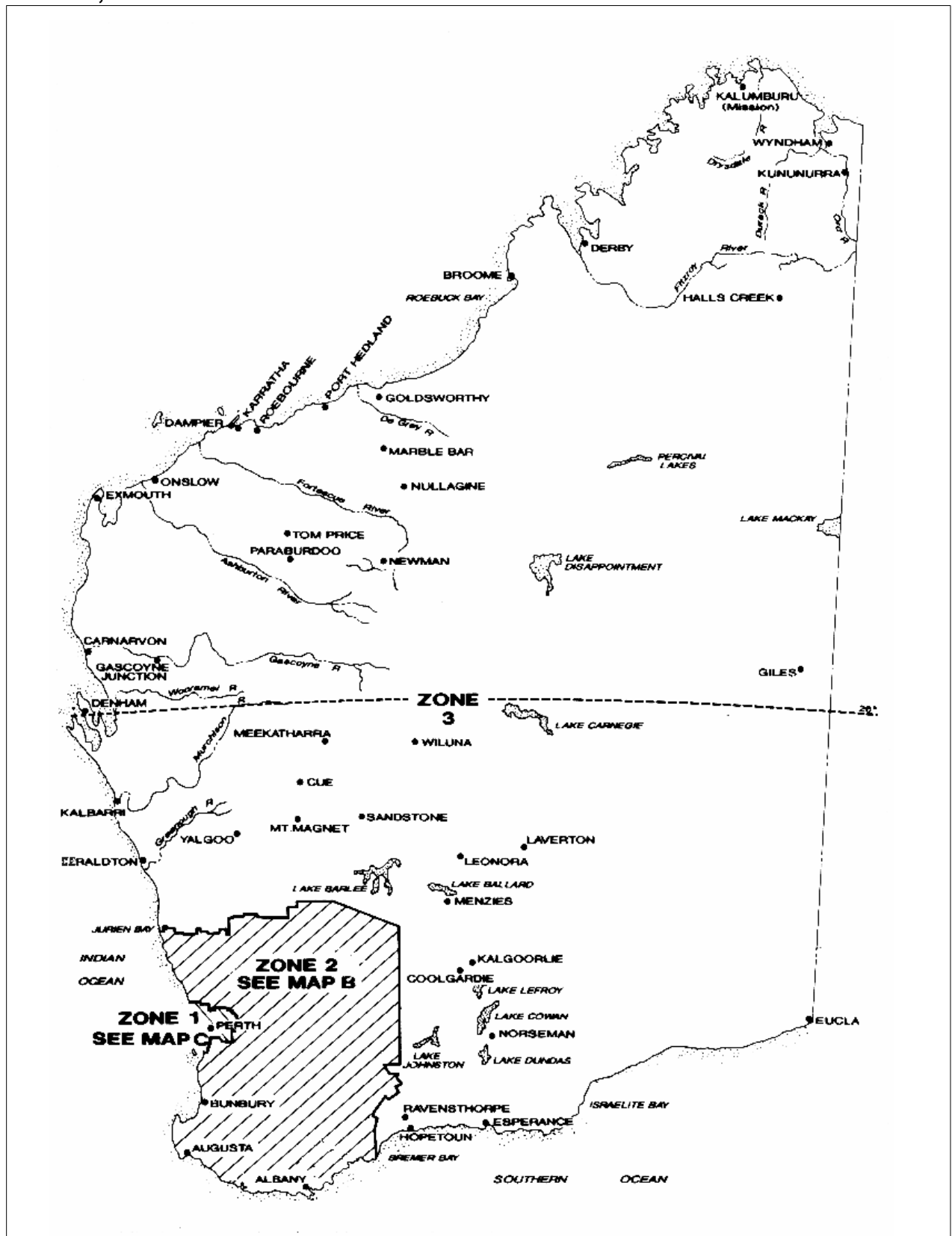
RELEASE
On final review of the process followed to prepare the Request for Tender or Request for Quotation and your assessment methodology, does the request demonstrate regional SMEs have been given full, fair and reasonable opportunity throughout the procurement cycle, to respond to the request and to meet the supply requirements?



Appendix E

Map A

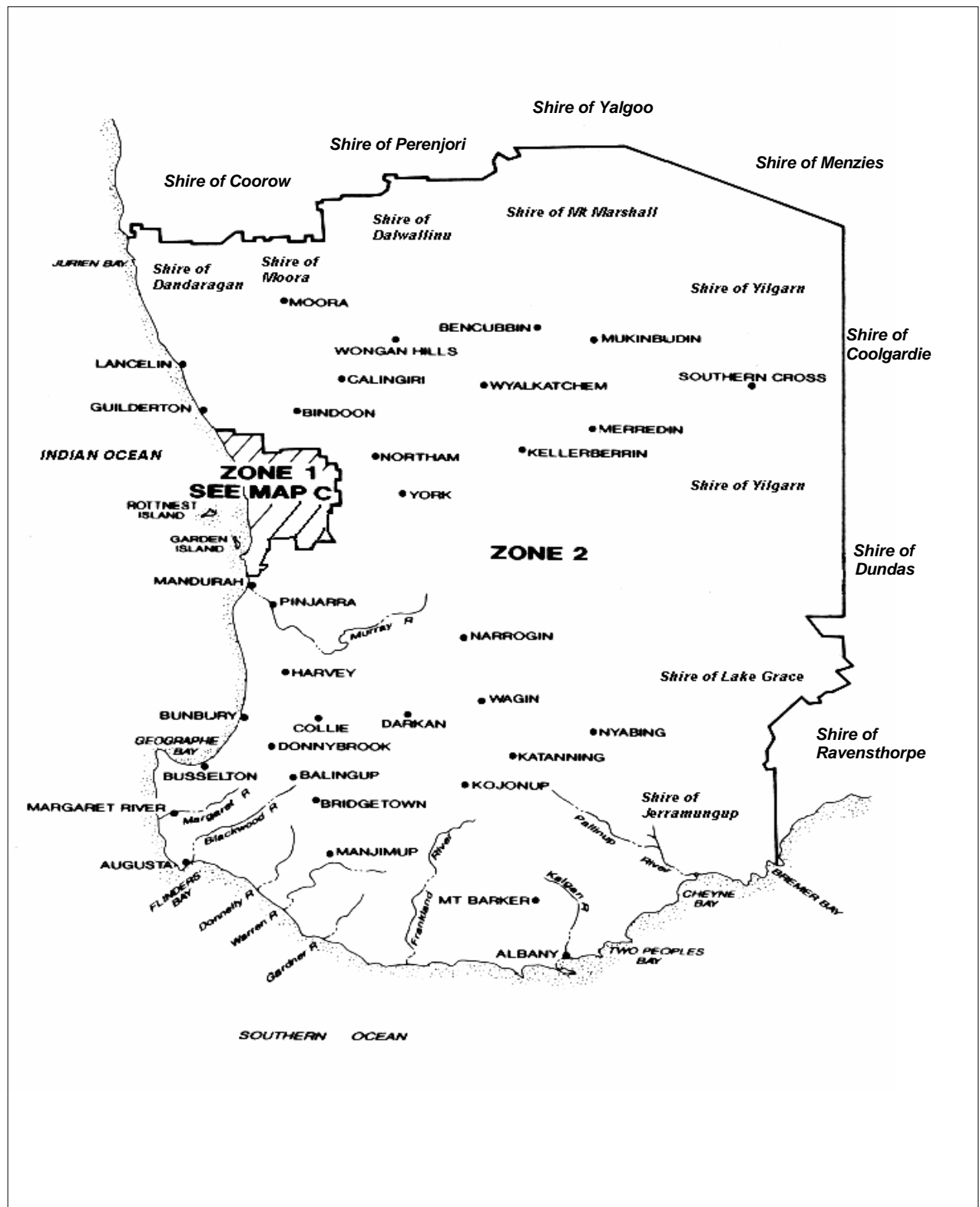
Zones One, Two and Three





Appendix E

Map B Zones One and Two





Appendix E

Map C
Zone One (Perth Region)

