



Environment Protection Authority
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Ref: EPA 05/7263

Mr David Hatfield
Director
Adjudication Branch
ACCC

Sent By Email

Dear Mr Hatfield,

Re: AgStewardship Australia Limited Application for Revocation of Authorisation A91382 and Substitution of New Authorisation AA1000429 – Interested Party Consultation

Thank you for your email of 24 August 2018 inviting comment on the authorisation applications for AgStewardship's drumMUSTER and ChemClear programs (the programs). The South Australian Environment Protection Authority (EPA) has consulted with Green Industries South Australia (GISA) in relation to this submission.

Since inception, these programs have provided a service for the collection of used, unwanted, empty agricultural and veterinary chemical containers and unwanted chemicals. The programs are funded by a voluntary levy of 4 cents per litre/kg container on manufacturers and suppliers of the chemicals. DrumMUSTER collects eligible non-returnable metal or plastic containers above one litre/kg and up to 205 litre/ kg. In 1999, the drumMUSTER program estimated that over four million eligible containers under the program were being used each year in the packaging of crop protection and animal health products. Since then drumMUSTER has collected and diverted over 32 million containers from landfill (36,834 tonnes of material recovered).

The AgStewardship programs align with the goals of South Australia's Waste Strategy 2015-2020 (the Waste Strategy) including the:

- Promotion of extended producer responsibility and related schemes, and
- Development of national solutions to problematic wastes such as packaging and hazardous wastes.

AgStewardship's drumMUSTER and ChemClear programs have proven successful and AgStewardship is seeking to maintain and build on this success.

AgStewardship indicates that the increase in levy from 4 to 6 cents per litre/kg is anticipated to increase collection rates from 48% to 60% and enable investment in research into emerging trends in packaging and the changing market for recycled material, particularly the use of recycled materials. AgStewardship's continued effort to improve the management and outcomes for agricultural and veterinary chemical containers and chemicals are also consistent with the waste management hierarchy and circular economy principles embedded into South Australian legislation and regulation.

The EPA believes that if the ACCC does not provide reauthorisation to the AgStewardship scheme the collection of eligible containers for recycling will cease as there is no alternative collection program currently in place.

Containers and chemicals that are not collected by the AgStewardship schemes are at risk of being disposed by landfilling, on-farm burial or burning, and illegal dumping, resulting in potential significant economic, environmental and social impacts.

The EPA and GISA support the application of AgStewardship's drumMUSTER and ChemClear programs for a further five years including its application to increase the levy from 4 cents to 6 cents per litre/kg.

We recognise the AgStewardship's schemes have a role in environment protection by encouraging the ongoing application of product stewardship.

For further information on this matter, please contact Kerryn Southern, Project Officer on (08) 8204 2682 or kerryn.southern@sa.gov.au.

Yours sincerely



Kathryn Bellette

**DIRECTOR, STRATEGY & ASSESSMENT
ENVIRONMENT PROTECTION AUTHORITY**

Date: 28 September 2018