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15 Nov 2018

Contact Officer: Hannah Ransom
Australian Competition and Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2601

By email only: adjudication@accc.gov.au

Dear Ms Ransom,

Regarding AA1000429 – AgStewardship – submission

I write in support of the draft determination on the application for re-authorisation by AgStewardship Australia to continue the operation of its drumMUSTER and ChemClear programs.

Animal Medicines Australia (AMA) is the peak body representing the leading animal health companies in Australia, and membership of AMA requires companies to participate in the drumMUSTER and ChemClear programs as part of our industry stewardship activities. These programs make a significant contribution to environmental protection, and public health and safety, by addressing the negative consequences associated with the improper disposal of packaging materials and unwanted agricultural chemicals. This, in turn, supports the sustainability of Australia's critically important agricultural sector and its social license to operate.

AMA supports this application for re-authorisation because:

1. the current levy amount of \$0.04c per litre/kilogram is insufficient to support operation of the existing program,
2. the drumMUSTER and ChemClear programs are an important component of industry stewardship and represent our corporate responsibilities for the life cycle of our products,
3. the public health benefits provided by the programs are substantial, valuable and accrue over time,
4. the new levy amount will facilitate the expansion of the drumMUSTER and ChemClear programs,
5. participation in the programs are voluntary and the high rate of industry participation indicates their value to the industry,
6. there are significant adverse consequences if the levy increase is not authorised, and

7. there are significant cost efficiencies associated with maintaining these well-established, self-regulated, voluntary stewardship programs.

We have provided further detail on each of these points in our original submission (dated 18 September 2018).

AMA strongly supports the application for re-authorisation by AgStewardship Australia for a period of 5 years. We further support the proposed levy increase of 2c per litre/kilogram, and that it should take effect from 1 July 2019.

Should you have any questions regarding this submission, please contact AMA's Science and Technical Manager, Dr Charmian Bennett.

Yours sincerely,

Ben Stapley

Executive Director