

4 September 2018

Mr. David Hatfield
Director
Adjudication Branch
Australian Competition and Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

Email: adjudication@acc.gov.au

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 letter of 24 August 2018 concerning the application made by AgStewardship Australia Limited (AgStewardship) for re-authorisation on behalf of participants of the stewardship programs, **drumMUSTER**[®] and ChemClear[®], to impose a six-cent levy per litre/kilogram on manufacturers and suppliers of agricultural and veterinary (agvet) chemicals.

CropLife Australia is the national peak industry organisation representing the agricultural chemical and plant biotechnology sector in Australia. CropLife Australia represents the innovators, developers, manufacturers and formulators of crop protection and agricultural biotechnology products. The plant science industry provides products to protect crops against pests, weeds and diseases, as well as developing crop biotechnology products that are key to the nation's agricultural productivity, sustainability and food security. The plant science industry is worth more than \$20 billion a year to the Australian economy and directly employs thousands of people across the country.

CropLife Australia and its members were the driving force behind, and founding member of the Industry Waste Reduction Scheme, which saw the launch of the **drumMUSTER**[®] program in 1999, as well as the ChemClear[®] program in 2003. These programs have set the global benchmark in industry stewardship programs. Furthermore, Agsafe Limited, which operates the **drumMUSTER**[®] and ChemClear[®] programs, is a wholly-owned subsidiary of CropLife and CropLife is also a member of AgStewardship Australia Limited. Accordingly, CropLife and its members have a significant and long-standing interest in, and commitment to these programs and their ongoing long-term success. In addition, CropLife's Code of Conduct places an obligation upon members to participate in these important industry stewardship programs.

The Board of Directors of CropLife Australia, having given due consideration to the application for re-authorisation made by AgStewardship, is pleased to provide its formal support thereof. Such support follows a significant review and assessment by CropLife of the benefits and operations of the **drumMUSTER**[®] and ChemClear[®] programs. We are confident that the significant benefits the programs deliver to the farming sector, the agriculture industry and the community more broadly, provide a solid basis for the re-authorisation.



Attached for the Commission's information is a list of the **drumMUSTER**[®] and ChemClear[®] program relevant members of CropLife Australia, for which this letter serves as a response on behalf of the membership collectively.

Please do not hesitate to contact me should the Commission require any clarification regarding these comments.

Yours sincerely



Matthew Cossey
Chief Executive Officer

Attach:



CropLife Australia Limited Members

Accensi Pty Ltd
Adama Australia Pty Ltd
AgNova Technologies Pty Ltd
Arysta Life Science Limited
BASF Australia Ltd
Bayer CropScience Pty Ltd
DowDuPont Inc
FMC Australasia Pty Ltd
ISK Biosciences Oceania Pty Ltd
Landmark Operations Limited
Monsanto Australia Limited
Nufarm Australia Limited
Sipcam Pacific Australia Pty Ltd
Sumitomo Chemical Australia Pty Ltd
Syngenta Australia Pty Limited