



drumMUSTER

The Agsafe Container Management Program

Agsafe Limited

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Thursday, July 31, 2003

Mr Tim Grimwade
General Manager
Adjudication Branch
Australian Competition and Consumer Commission
PO Box 1199
DICKSON ACT 2602

Dear Mr Grimwade

**REVOCATION AND SUBSTITUTION OF THE AUTHORISATION NO. A30194
UNWANTED EMPTY AGRICULTURAL AND VETERINARY CHEMICAL
CONTAINERS - SUBMISSIONS**

I wish to confirm that in revoking and substituting Authorisation No A30194 that we would like the replacement authorization to encompass:

The scope of the original determination (2 September 1998);

1. imposition of a levy on non returnable containers; and
2. reduced scope for collection and inspection agencies to negotiate the terms of their contracts with Agsafe,

and the two subsequent minor variations;

1. **1 November 2000** - Allowance for the participation of non-Avcare and VMDA members.
2. **14 August 2002** - Extension of the eligibility to include containers which have held products of a non-hazardous nature. These products include surfactants, wetting agents, stickers, spreaders, spray markers, dye, foam markers, dairy detergents, farm disinfectants, teat dip, udder wash, foliar fertilizer, spray oils and animal nutrition products. Manufacturers of the products for which the program has been widened (products of a non-hazardous nature) can choose whether to include these products on a discretionary basis. This variation also allowed for inclusion of a notice on invoices to show purchasers that they have paid a **drumMUSTER** levy and permitted the program to accept containers of 1 L or less in size.

AUST. COMPETITION &
CONSUMER COMMISSION

- 1 AUG 2003

Further to your letter of 19 June, 2003 enclosing copies of four submissions and a more recent letter enclosing a copy of a letter from EPA New South Wales it is noted that all comments were supportive of the program. EPA New South Wales mentioned that the program needs to be strengthened in urban and remote areas and we respond as follows.

Urban

In June we have signed collection agreements with Envirosolve to cover the Brisbane City Council area and with Simms Plastic to provide a service in Melbourne. We have a collection agency agreement with Australian Plastics Reprocessing, St Marys for the Sydney basin region but recognize that this is not sufficient infrastructure. A company called Top Drums has in the meantime recognized that golf clubs are prepared to pay to have their drums removed in preference to bringing them to a collection centre. We have engaged this company to conduct a survey of amenity horticulture organizations and whilst this survey is not yet complete there is a very strong indication that it will be feasible for Top Drums to collect drums from chemical users and deliver them to the *drumMUSTER* collection agency in St Marys.

We consider that the *drumMUSTER* infrastructure which is in place in Adelaide and Perth is adequate although the number of drums collected in the Perth area has not yet been satisfactory and will need more promotion.

Remote

Two initiatives are currently underway;

1. Western Queensland. The *drumMUSTER* Regional Field Officer for Northern Queensland has just completed a dry run, visiting Councils and grazing properties in Central West Queensland with a view to running a mobile collection service in September/October. His itinerary was as follows:

Day/Date	Location	Organisation	Distance (Km)
Wednesday, July 23	Tambo	Tambo Shire Council	382
	Blackall	Blackall Shire Council	100
Thursday, July 24	Isisford	Isisford Shire Council	110
	Ilfracombe	Ilfracombe Shire Council	88
	Longreach	Longreach Shire Council	27
Friday, July 25	Winton	Winton Shire Council	176
	Kynuna	NAPCo. Kynuna/Dagworth Station	178
	Winton		178
Saturday, July 26	Longreach		176
Monday, July 28	Maneroo	AACo. Maneroo Station	53
	Ilfracombe	Ilfracombe Shire Council	80
	Barcaldine	Barcaldine Shire Council	79
Tuesday, July 29	Aramac	Aramac Shire Council	99
	Alpha	Jericho Shire Council	235
	Emerald		168
Wednesday, July 30	Emerald	2PH, Evergreen, Emerald Shire	30
Thursday, July 31	Charters Towers	Charters Towers/Dalrymple	475
Friday, August 1	Innisfail		388
			3022

Longreach and Winton have agreed to establish *drumMUSTER* compounds which will provide an opportunity to have a number of short mobile runs in October using a trailer to feed into these two compounds.

This service will supplement the run implemented last year which took in Flinders, Richmond, McKinlay, Cloncurry, Burke, Normanton, Croydon, Ethridge and Herberton Shires and Mount Isa City. A total of 612 containers were collected at a cost of \$7.82 each. An estimated 2000 drums are sold annually into the region so apart from the expense this was a reasonably acceptable result for the first attempt. The concept of implementing a dry run with a view to prebooking drums is one of the ideas that resulted from the initial Western Queensland run.

2. Northern Territory, North Eastern WA

drumMUSTER is currently advertising for a Regional Field Officer to service this area on a part time basis.

A *drumMUSTER* service is now offered by Katherine and Alice Springs and a Collection Agency agreement is being negotiated with Wastemaster (a Brambles company) in Darwin. Lichfield Shire have chosen to implement a drum collection program independent of *drumMUSTER*, however some advice has been provided on signage of their compound to avoid dumping problems. Approximately 5,000 drums have been collected in Kununurra and a reasonable quotation obtained to transport them to Wastemaster for further processing.

If you believe there is any further information that we need to supply in support of this application, can you please advise me accordingly by mail or email dmmgr@drummuster.com.au.

3. Remote Western Australia

The *drumMUSTER* regional field officer is also an executive member of the Pastoral and Graziers Association and has good links to growers in this area and has been monitoring a need for *drumMUSTER* in the remote areas of Western Australia. The feedback is that there has not been any call for it. Whilst *drumMUSTER* owes any purchaser of a levied farm chemical a service at the *drumMUSTER* staff conference in February it was decided that it would prudent from a cost/drum return perspective to treat this area re-actively rather than pro-actively.

Yours sincerely

Vernon Keighley
Program Manager