



FAXED

11 April 2005

Mr Scott Gregson  
A/g General Manager  
Adjudications Branch  
Australian Competition and Consumer Commission  
PO BOX 1199  
DICKSON ACT 2602

Dear Mr Gregson,

I am writing in response to your letter of 31 March 2005 in relation to the Application for revocation of authorisation and substitution by Replacement authorisation lodged by Agsafe Ltd.

National Farmers' Federation (NFF) as a signatory to the current Industry Waste Reduction Agreement (IWRA), and an organisation represented on the Agsafe Board, has considered in detail the future directions for the Industry Waste Reduction Scheme (IWRS). NFF is supportive of the approach outlined in Agsafe Ltd application to the Australian Competition and Consumer Commission (ACCC) and offers the following comments in support of the application for an interim authorisation.

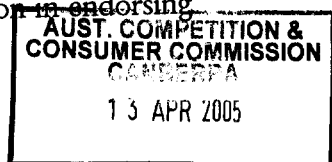
NFF believes that the proposed refinements to the IWRS will deliver Australian farmers, and the general public considerable benefits, through:

- Providing farmers and other users of agricultural and veterinary chemicals with a more integrated stewardship program, providing a collection system for both clean, triple-rinsed unwanted chemical drums, as well as unwanted agricultural and veterinary chemicals.
- Implementing a transparent, concrete and consolidated funding arrangement for both the drumMUSTER and Chemclear programs, ensuring farmers and other chemical users have increased certainty and accountability over the ultimate use of their levy funds.
- Ensuring that levy funds are used efficiently, through a more streamlined and cost effective management structure.
- Ensuring the funding principles reflected in the original IWRA are reinforced, while minimising the ultimate cost to farmers and chemical users of delivering these programs.
- Delivering an enhanced chemical stewardship program capable of achieving improved service delivery and environmental outcomes for levy contributors and the Australian public.

On the basis of the clear and demonstrable benefits that will flow to farmers and the Australian public under the proposed new arrangements, NFF has no hesitation in endorsing

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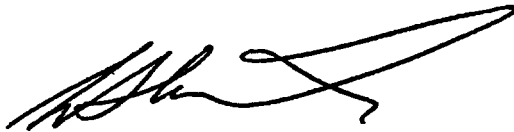
Agsafe Ltd's proposal for an interim authorisation. NFF is of the view that the decision to grant Agsafe Ltd an interim authorisation will allow the prompt commencement of the new IWRS arrangements, *"without permanently altering the competitive dynamics of the market or inhibiting the market from returning to its pre-interim state if authorisation is subsequently denied"*.

While the position outlined above has the endorsement of the NFF Policy Council, in response to your request, NFF has sought additional comments from its member organisations in relation to the revocation and substitution authorisation. NFF intends to present these perspectives to the ACCC by the stated deadline of 27 April 2005.

Thank you for the opportunity to provide comments on this important issue, and I trust the ACCC will deliver a timely and favourable decision for Australian farmers on this matter.

If you have any further questions please do not hesitate to contact Peter Arkle (Policy Manager - Rural Affairs) at NFF.

Yours sincerely



WAYNE CORNISH  
Chair - NFF Farm Chemical Sub-Committee