



21 April 2005

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The General Manager
Adjudication Branch
Australian Competition & Consumer Commission
PO Box 1199
DICKSON ACT 2602

Dear Sir/Madam

Reference: A90871 Application by Agsafe Limited for revocation of authorisation and substitution by replacement authorisation

I refer to the application lodged by Agsafe Limited for a proposed substitution authorisation, whereby Agsafe seeks to establish an Industry Waste Reduction Scheme (IWRS) funded through the existing drum muster levy arrangements, which would involve the amalgamation of the drumMUSTER and ChemClear programs.

Schering-Plough Animal Health supports the application made by Agsafe Limited.

Schering-Plough Animal Health contends that the primary purpose of the new arrangements sought by Agsafe is to ensure that industry and farmers will gain from the efficiencies of amalgamating the two waste reduction programs, which are least cost to manufacturers and suppliers of Ag/Vet chemicals and least cost to farmers and ultimately to the consumers of agricultural products.

Schering-Plough Animal Health maintains that the merging of the two programs will provide the additional benefits of:

- Streamlining the administration processes of the two programs
- Optimising the utilisation of resources in carrying out the programs objectives
- Providing a solution for both the recycling of single trip containers and the collection and disposal of obsolete rural chemicals
- Assisting in the maintenance of quality assurance and in meeting International best practice guidelines, and
- Fulfilling extended producer responsibilities and in meeting the industry's social and environmental responsibilities.

Schering-Plough Animal Health contends that the granting of the authorisation by the ACCC to Agsafe's application will bring about efficiencies that otherwise would not be provided in the market for the safe collection and disposal of Ag/Vet chemicals and containers.

We ask that you consider our company's response when considering Agsafe's application for authorisation.

Sincerely

Stuart Towers
Country Director
Schering-Plough Animal Health