



Tasmania

DEPARTMENT of
PRIMARY INDUSTRIES,
WATER and ENVIRONMENT

22 April 2005

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

FILE No
MARSA

Dear Sir/Madam

APPLICATION FOR REVOCATION OF AUTHORISATION AND SUBSTITUTION BY REPLACEMENT AUTHORISATION LODGED BY AGSAFE LTD

I refer to your letter of 31 March 2005 seeking comments on the above Agsafe proposal.

I broadly support the establishment of an Industry Waste Reduction Scheme (IWRS), funded through the existing *drumMUSTER* levy arrangements, as proposed by Agsafe. The *drumMUSTER* program has developed into a useful and successful industry initiative, though acceptance by some growers has been slow due to some logistical and operational difficulties of the program. The addition of ChemClear into the IWRS will provide a more complete and useful product stewardship process whilst allowing industry to build on the success of the *drumMUSTER* program. It is appropriate, and a logical progression, that the ChemClear program be considered as a necessary component of any Industry Waste Reduction Scheme proposed.

In terms of likely benefits to the public the inclusion of ChemClear into the IWRS means the Scheme will be able to minimise the amounts of unwanted agricultural and veterinary chemicals held on farms, which can be a significant problem for growers. Provision of a simple, well-structured disposal mechanism will help ensure these products are not disposed of inappropriately in such a way that would result in risk to either the environment or public health. I would also concur with the public benefits submitted by Agsafe and included in your letter.

Thank you for the opportunity to provide comment on this matter.

Yours sincerely

John Mollison
REGISTRAR OF CHEMICAL PRODUCTS

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GENERAL ENQUIRIES (Statewide): Telephone: 1300 368 550

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