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Enquiries
Telephone
Your reference
Our reference

Stuart Cameron (07) 3225 1932 A90871 Agsafe BNE2005/5327

Environmental Protection Agency

Incorporating the

Queensland Parks and Wildlife Service

19 April 2005

Mr Scott Gregson
Acting General Manager
Adjudications Branch
Australian Competition and Consumer Commission
PO Box 1199
DICKSON ACT 2602

Dear Mr Gregson

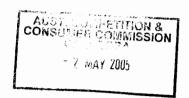
Authorisation Application lodged by Agsafe Ltd for drumMuster and ChemClear

I am writing in response to your letter of 31 March 2005 concerning an application by Agsafe Ltd to revoke authorisation A90871 and substitute a new authorisation. The new authorisation would allow the operation of the drumMuster program to collect and recycle empty agricultural and veterinary chemical containers, and the commencement of the ChemClear program, which would allow the collection and disposal of unwanted chemical waste.

The Environmental Protection Agency (EPA) strongly supports industry initiatives to reduce waste and accept responsibility for the collection, recycling and disposal of wastes produced by the industry. The Industry Waste Reduction Scheme (IWRS) operated by the agricultural and veterinary chemical industry through Agsafe, has already led to a reduction in the use of disposable chemical containers and the recovery of 9000 tonnes of recyclable plastic. The EPA supports the continuation of the drumMuster program as an integral component of the IWRS.

Between 2000 and 2002, the EPA spent \$5M of public funds to collect unwanted rural chemicals from throughout Queensland as part of the ChemCollect scheme. This collection was undertaken on the understanding that the agricultural and veterinary chemicals industry would establish, fund and operate an ongoing scheme (ChemClear) to collect unwanted chemicals. ChemClear would remove and safely dispose of chemicals that might otherwise impact on the health of the environment, rural communities or the State's export primary industries. These impacts have the potential to be costly to the community and the program has the EPA's full support.

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Level 17 160 Ann Street Brisbane Queensland 4000 Australia PO Box 15155 City East Brisbane Queensland 4002 Australia Telephone (07) 3227 8827 Facsimile (07) 3227 6485 Website www.epa.qld.gov.au ABN 87 221 158 786 In addition to the public benefits referred to above, the IWRS accords with the three principles of the *Environmental Protection (Waste Management) Policy 2000*. These principles include the "polluter pays principle", in which costs associated with management of a waste should be borne by the persons generating the waste; the "user pays principle", in which costs associated with use of a resource should be included in the costs of goods and services; and the "product stewardship principle", in which the producer of a product should plan its design and production to minimise environmental harm that might arise from the production, use or disposal of the product.

Should you require any further information from the EPA, please contact Stuart Cameron, telephone (07) 3225 1932 or email Stuart.Cameron@epa.qld.gov.au.

Yours sincerely

James Purtill

Director-General