

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

March 10<sup>th</sup> 2006

Dear Sir/Madam

Thank you for the opportunity to comment on the proposed changes involved in the minor variation application submitted by Agsafe.

Let me say at the outset, I have been a positive supporter of the Agsafe program for many years having served for 9 years as an Assessor in South Australia and a Trainer for 8 years. Furthermore, I served on the State Agsafe committee in South Australia almost from its inception until its demise 4 years later due to lack of interest on the part of industry personnel. During this time I provided "free" advice to store managers on a regular basis. My decision not to renew my contract as an assessor at the time of the introduction of the Guardian program, was based on the need to commit to additional time. I continue to provide Agsafe training.

My concerns regarding the Agsafe submission relate to 2 of the proposed changes under the heading of "Accreditation program" on page 2 of your letter dated 9th February 2006, these being,

- a) "Amending the fees etc." and
- b) "Phasing out face to face re-accreditation training".

Ref a) When the Guardian program was announced to the industry it was done by means of a high quality booklet (Guardian Handbook) in which a comparison was made between costs under the Guardian program and those under the previous program. (attachement 1)  
This comparison indicated a cost saving on premises. However, the figures quoted under the previous program were based partly on the costs associated with travel, accommodation and meals whilst attending a face to face course. These costs were not always relevant. In the case of South Australia, I have conducted 42 training courses at 13 locations in country areas and consequently travel was minimal and no accommodation or meals involved. Where courses are held in Adelaide, for majority of participants it is a day trip, and some elect to stay with friends or relatives. I estimate, 75% of course my participants don't have a need to pay accommodation etc. costs. Furthermore, Agsafe advises an amount of \$200.00 was included in the previous program figures to cover cost of replacement person whilst the staff member was away for the day attending face to face training. In reality, this doesn't occur but is quite a reasonable accounting allowance. Surely, if an amount of \$200.00 is added to the previous program calculation, an amount of \$100.00 should be added to costs under Guardian to allow for a replacement person whilst the staff member is away from their normal duties completing the 4 hour on line training.

Under the previous program, allowance was made for smaller premises under the Minor Storage classification. Such premises paid an annual fee of \$200.00. The fee for the premises above Minor Storage was \$400.00. Training costs were additional, and in my case were \$380.00 per person for a full day face to face course (Agsafe recommended fee is \$400.00), and provided accreditation for 3 years. The figures quoted in the Guardian booklet, indicate the cost under the previous program for a premises with 1 accredited staff member, to be \$1333.33. Majority of these premises would be Minor Storage, where the annual fee was \$200.00, ie \$400.00 for the 2 years. Allowing for \$270.00 for face to face training and accreditation (2 thirds of \$400.00), a difference of \$633.00 is evident. Even if travel, meals etc was involved, it would never equate to this amount. A similar situation exists with premises who have more than one accredited staff member.

Ref. b) Many in the industry is completely confused regarding training options.

In a Rural Business publication outlining Project value Add, the lead up to Guardian, it was clearly stated that there would be no more face to face training. Letter from Agsafe dated July 2005, was confusing to say the least. It stated that "Guardian heralds the gradual replacement of face to face training" then later in the same letter "face to face training will continue for personnel who are unable to access web portals or wish to attend face to face courses".

The original Guardian Program Handbook carries the following statement. "Note: If internet access is unavailable, face to face training will also need to be arranged for re-accreditation." (attachment 2)

Many personnel interpreted this to mean face to face training was only an option if internet access is unavailable. This interpretation is valid. Furthermore, I recently received a communication from a member of the Accreditation Advisory Committee stating that "the committee believes face to face training will provide a higher level of competency for most individuals.... as opposed to an online learning module".

Agsafe have prepared a document clearly indicating face to face training will continue (attachment 3) It is obvious this is the preferred method for most personnel. This being the case, why would Agsafe seek to phase out this method.

Since the publication of the Guardian Program Handbook, Agsafe have made a number of amendments. However, I am not aware that premises who received the original Booklet have been made aware of these changes. Many personnel who show a preference for face to face training are undertaking on line training on the understanding it is their only option. Similarly, many premises accept that the Guardian program will save them money based on the original information.

A further matter of concern relates to the application submitted by Agsafe in support of their request for a minor variation of authorization.

The figures quoted on page 15 under "Fee Structure" differ from those presented to the industry when the Guardian program was announced. The amended figures serve to indicate

an even greater saving under the new program. To my knowledge, industry has not been advised of these changes or on what they are based.

I apologise for such a lengthy “epistle”, however, I couldn’t see how the issues of concern could be simplified.

In Summary:

- a) Figures provided to industry in the Guardian Handbook require verification
- b) If face to face training is to be phased out, industry needs to be advised of the time frame.
- c) Explanation for variance in figures presented to ACCC and those provided to industry in the Program Booklet.

Agsafe has such a vital role to fill, it needs full support from the industry personnel. The issues addressed in this communication are of concern to many in the industry.

Yours truly,

David F Jesse

**Personnel who are currently trained and who choose to reaccredit face to face at this point require no change.**

Those who choose the option of synchronising their reaccreditation training through work place assessment with the premises assessment need to follow the following procedure.

Completion of a 4 hour on-line module plus a 1 hour workplace competency assessment. To enable those stores who choose this reaccreditation route the following guidance options are set out below. This process is determined when the facilitator contacts the Store Manager to determine their preference.

If they were trained less than 12 months ago	No action or charge
If they were last trained/ reaccredited between 12 months and 18 months ago	They need to complete a workplace assessment
If they were last trained/reaccredited over 18 months and less than 36 months ago	They are required to complete both the on-line module and workplace assessment.
If they are now due for training/reaccreditation and choose to synchronise with their store that is coming due within 12 months	They need to receive an exemption from Agsafe for extension to their non current personnel accreditation

# Guardian

## What is Guardian?

Guardian is a risk management program that provides your business with professional services, training and advice that helps you comply with government regulation. Guardian works on behalf of industry to maintain a sustainable future for the Agricultural and Veterinary chemical distribution Industry.

Guardian is the result of Project Value Add, representing two years work under the guidance of the Accreditation Advisory Committee to develop Accreditation into a valuable service for industry.

## Guardian is:

- Customised advice to improve safety in your business
- Online access to information on your business' performance and staff training records
- Cost effective training
- Job specific training courses
- A tangible link between safety performance and training

Guardian benefits your business and your industry by providing vital guidance on safety management as well as real cost savings that will help grow your business safely.

## How much will I save under Guardian?

Number of Accredited staff at premises	Total cost every two years under Guardian program*	Total cost every two years under previous accreditation structure	Resultant cost saving per premises
1	\$1,200.00	\$1,333.33	\$133.33
2	\$1,470.00	\$1,866.67	\$396.76
3	\$1,740.00	\$2,400.00	\$660.00
4	\$2,010.00	\$2,933.33	\$923.33
5	\$2,420.00	\$3,466.67	\$1,046.67

Costs are GST exclusive

\*does not include any additional face to face training costs

\*costs under Guardian includes up to four hours consultation & online training

## **Personnel Re-accreditation**

Re-accreditation training is now due every two years, but is only four hours online instead of eight to sixteen hours spent out of the workplace in a classroom. Because the training and consultation process is now more closely aligned, under the Guardian program, your Accreditation Facilitator will now advise when you and your staff are due for re-accreditation training.

From the time that your Accreditation Facilitator informs you that you are due for re-accreditation, there is a 60 day timeframe to complete online training – Guardian staff will provide you with all the details to enable you to complete this part of the accreditation process.

To help you to complete your personnel re-accreditation, the new Guardian website has discussion boards where you can post queries as well as technical support during business hours.

Basic training will continue to be run in a face to face format. Check the Agsafe website for further information on where your nearest course is running.

Note: If internet access is unavailable, face to face training will also need to be arranged for re-accreditation.