



Australian Government

Department of the Environment and Water Resources

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

FILE No:
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MARS/PRISM:

Dear Mr Gregson

Thank you for your letter of 5 January 2007 to the Secretary, Mr David Borthwick, inviting comments on Agsafe Limited's application for revocation and substitution of new authorisations. I have been asked to respond to your request.

In regards to the first six of your questions in Attachment A of your letter, the Department does not administer legislation that regulates the storage, handling, transport or sale of agricultural and veterinary chemicals (agvet chemicals).

The Department does, however, provide expert scientific advice to the Australian Pesticides and Veterinary Medicines Authority (APVMA) regarding the environmental risks posed by manufacture, handling and use of agvet chemicals, in order to assist the APVMA fulfil its statutory requirements regarding protection of the environment.

With regard to your final three questions, the Department believes it is in the public interest that businesses comply with appropriate risk mitigation measures for agvet chemicals, for safeguarding human health and the environment.

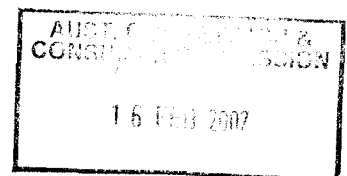
While the Department does not have close involvement with the Guardian Program, we note that it appears to have been effective in ensuring that consistent safety standards are met. The Department is not in a position to determine whether alternative mechanisms might be equally or more appropriate. To this extent, the Department supports Agsafe Limited's application for revocation and substitution.

I trust this information is of assistance to you in reviewing the Agsafe Limited submission.

Yours sincerely

Mary Harwood
First Assistant Secretary
Environment Quality Division

14 February 2007



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