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23 April 2007

RE: Agsafe's application for revocation and substitution A91027 – A91030

Thank you for the opportunity to comment on your recent decision.

Your conclusion affirms the advances made by the agricultural chemical industry and its interaction with federal, state and local governments. Government agricultural manufacturers and distributors/resellers are aware of their duties to the wider community. Very few of the government agencies that replied to your questions were actually aware of Agsafe. Manufacturers have steadily provided the industry with products that are not classified as Dangerous Goods. The response from only two independent distributors (the third was a director of Agsafe) may reflect a lack of knowledge of the renewal application rather than a feeling of well being of the current system.

Garrards are specialist suppliers to the urban pest management industry.

Two proposed changes.

- 1) Agsafe Code of Practice Scope of the Agsafe Program (pp6-7)
insert – *urban and turf pest management products*
with the exclusions on page 7.**

Francis Cameron, Accreditation Co-ordinator, Agsafe stated in an e-mail on 15th January 2007 that urban pest management is outside the scope of Agsafe. (Full text next page). Another urban activity, turf pest management also fits this criteria. Of all areas of agricultural and veterinary type products, those used near people are required to be less hazardous than those used in fields. Less than 2% (probably about 0.5%) of our chemical store is Dangerous Goods (and most of these are DG because they are aerosols). Customers order as required, so orders are normally one or several mixed carton lots compared to agriculture's pallet lots.

There are only a handful of distributors specializing in urban and turf pest management. These distributors sell to licensed customers and there are specific courses available in these industries that are far more detailed than those offered by Agsafe.

e-mail from Phil Sayer on 10th January 2007 and reply from Frances Cameron, Accreditation Co-ordinator Agsafe on 15th January 2007.
Question and answer copied in full.

Question

Agsafe is aimed at its major market – ag and vet. Can our management access on-line courses to check their suitability for Urban Pest Management? Our sales staff should be trained in “job specific training courses” that enable them to provide correct advice to our customers rather than agricultural store based topics. The days of a warehouse full of DGs is gone, they now constitute less than 2% of storage. Training is very important and we often have in-house training on products and pests applicable to our industry.

Answer from Agsafe

Agsafe is continually updating its online training options, **however we do not have a course that deals specifically with urban pest management as Agsafe’s scope does not cover pest control.** We do however provide OHS for both Managers and general staff as well as Chemical Warehousing & Application Technology (Crop). We have two courses in the wings awaiting release in the first few months of 2007 – Application Technology (Animal) & Emergency Response. All online courses are accompanied by a Workplace Assessment that ensures staff have retained the information learnt online. I am happy to provide you with a link to the courses so that you can ascertain their value to your staff. Staff can be exempt from training if they do not handle, sell, transport or provide advice on Dangerous Goods, Hazardous substances or Scheduled Poisons. Please let me know if you would like to review our online courses

COMMENT

“Agsafe’s scope does not cover pest control” In fact, I became an Agsafe trainer when I joined Garrards to develop my own courses that mirror Agsafe courses because Garrards staff learning about ‘smut in wheat’ is irrelevant and of no interest therefore results in poor adult learning. Our company training would be more relevant if staff worked toward the nationally recognised competency units in pest management (these are very comprehensive including far more depth than required by Agsafe).

2) Agsafe Code of Conduct Scope of the Agsafe Program (pp6-7) insert a new paragraph on page 7

The accreditation program does not cover storages where the quantity of agricultural and veterinary chemical products (as defined above) held in the store does not at any time exceed 500L or 500kg.

The cost of the Guardian program has greatly increased, especially for minor storage, over the previous program. This has increased the Agsafe store accreditation cost of a minor storage from \$200+GST pa to \$465+GST pa (\$930+GST every two years). Including training of one staff in a small store the cost increases from \$333 pa previously to \$600 pa under Guardian. This is in contrast to the Agsafe brochure introducing the Guardian program that costs would decrease. Agsafe claim all stores storing Ag and Vet chemical come under their requirements, regardless of amount of storage.

Agsafe allocate a four hour inspection regardless of the time taken to inspect a store – even when the inspection takes less than one hour. The Agsafe Code of Practice should include a reasonable maximum storage limit for exemption from Agsafe.

e-mail from Phil Sayer on 10th January 2007 and reply from Frances Cameron, Accreditation Co-ordinator Agsafe on 15th January 2007.
Question and answer copied in full.

QUESTION

The Guardian Program Handbook promoted ‘real cost savings’ of the new system, including a chart showing the savings. However our costs for the Guardian Program in Queensland / Northern Territory will **rise by 25%** (not including the lower costs of re-accreditation in-house but allowing for normal staff re-accreditation fees of \$400 every three years or \$270 every two years). How is this justified against the claims in the Handbook?

Answer

Costs quoted in the handbook included soft costs such as travel and accomodation associated with training. Unfortunately, this was not made clear in the table. The Guardian program does provide more cost effective training – an online course and workplace assessment is charged at a total of \$270, as opposed to face to face training which is charged at \$400 or above (depending on the trainer).

The fee for the premises consultation is based on the amount of time that the Facilitator spends at the store. Agsafe allows up to four hours for this part of the process. Stores maintaining a good level of compliance (that meets with the Agsafe Code of Practice) will pay less than a store that has an unacceptable level of compliance. Guardian Facilitators are able to provide practical help onsite, rather than leave the store owner with a confusing list to complete. Stores are also able to continue to seek advice from the Facilitator until they have gained compliance. Overall, Agsafe has received positive feedback towards the new program format.

Agsafe is a not for profit organisation and any fees generated by the business are put directly back into the program. Members have not experienced an increase in fees in over four years.

COMMENT

A cost increase from \$200 to \$465 for minor store accreditation is not compensated by a decrease in the cost of training. On-line training is required every two years compared to face-to-face which is every three years so both costs are about \$135 pa – on-line training may be more convenient but is not cheaper and loses the interaction with others. Four hours is an excessive time allocation for inspection of most stores, especially minor stores that were compliant with Agsafe requirements just two years previously. Last year a facilitator completed his inspection of our Darwin store in less than one hour.

Thank you for consideration of our comments

Yours sincerely

**Phil Sayer BScAgr
Technical and Training Manager**