



Australian Government

Comcare

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Mr Scott Gregson  
General Manager  
Adjudication Branch  
Australian Competition & Consumer Commission  
PO Box 1199  
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FILE No:
DOC:
MARS/PRISM:

Dear Mr Gregson

**Agsafe's application for authorisation A91027 – A91030**

Thank you for your letters of 28 March 2007 and 10 April 2007 regarding the abovementioned application.

Comcare and the Safety, Rehabilitation and Compensation Commission are the Commonwealth regulatory bodies responsible for the operation of the *Occupational Health and Safety Act 1991* (the Act). The Commonwealth regulates the safe use and storage of workplace chemicals under the Act. The regulations are based in the National Standard issued by the Australian Safety and Compensation Council (ASCC), and require employers to identify hazards and eliminate and/or control risks related to the use, storage and handling of workplace chemicals.

You would be aware that the Department of Employment and Workplace Relations (DEWR), on behalf of the ASCC, lodged a submission on the Agsafe's application on 1 February 2007. Comcare supports DEWR's view that the imposition of trading sanctions should not be allowed, unless there is clear evidence that safety performance would be improved by such mechanism.

Comcare does not intend to participate in the pre-decision conference on this matter. If you require any further clarification, please contact Mr Steve Kibble, General Manager, Research and Policy Branch, on (02) 6275 0657 or via e-mail [kibble.steve@comcare.gov.au](mailto:kibble.steve@comcare.gov.au).

Yours sincerely

  
Barbara Bennett

23 April 2007

