



Government of South Australia  
Primary Industries and Resources SA

Our reference: eA47284  
Please refer to: C2007/106  
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7 May 2007

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

Dear Mr Gregson

**Re: Agsafe's Application for Revocation and Substitution A91027 - A91030  
- draft determination**

Thank you for your letter dated 10 April 2007 on this matter inviting comment.

The Agsafe industry initiative has been very successful in South Australia in training those responsible for the management of storage and transport risks associated with hazardous pesticides.

The existing sanctions power has been valuable in assisting businesses making improvements to their practices even though it has been rarely used. The ACCC's draft determination to revoke the power to impose trading sanctions after 18 months is a cause for concern.

While the program has been successful in significantly improving the storage and transport of hazardous pesticides, now is not the time to modify (potentially weaken) its powers. In the near future, industry programs such as Agsafe are expected to play a major role managing risks posed by chemicals of security concern.

Consequently, it is our view that Agsafe's ability to impose trading sanctions should remain, pending development of suitable national arrangements for chemicals of security concern.

Yours sincerely

Geoff Knight  
ACTING CHIEF EXECUTIVE

