

Our Ref: 61658-1

11 May 2007

The General Manager  
Adjudication Branch  
Australian Competition and Consumer Commission  
P.O BOX 1199  
Dickson ACT 2602

Dear Mr Gregson,

EPA Victoria thanks ACCC for the opportunity to comment on the draft determination issued on March 28 2007.

EPA Victoria does not regulate the storage or handling or Dangerous Goods, Hazardous Substances or Scheduled Poisons; however, it does regulate the Environmental Protection Act and as such acknowledges the role that the Guardian program plays in providing environmental protection.

EPA supports the general intent of Agsafe's application and the assistance that the code of conduct provides in ensuring the manufacturing and distribution of agricultural and veterinary chemicals is maintained to a high standard.

EPA Victoria notes that the ACCC wish to reduce the ability of Agsafe's ability to impose sanctions to the next 18 months. EPA is concerned that this may not be a sufficient transition time to establish alternate controls.

If you have any questions or queries, please contact myself on (03) 9695 2521 or Paul Randell on (03) 9695 2525.

Yours sincerely,



Melinda Barker  
Manager Waste Management Unit



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