AUST. COMPETITION & CONSUMER COMMISSION
CANBERRA
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SUMITOMO CHEMICAL

19 November, 2008

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Mr Darrell Channing,
Director - Adjudication Branch
Australian Competition and Consumer Commission
23 Marcus Clarke Street
CANBERRA ACT 2600

Dear Mr Channing

Re: AgStewardship Australia Limited application for authorisation A91105 – interested party consultation

I refer to the application for authorisation lodged by AgStewardship Australia Limited in respect to a new governance arrangement to be put in place for the Industry Waste Reduction Scheme, incorporating the ***drumMUSTER*** and ChemClear® programs.

Sumitomo Chemical Australia acknowledges the strong history that both the ***drumMUSTER*** and ChemClear® programs have in providing environmental stewardship for agvet chemicals and containers, and therefore has no hesitation in offering its support of the application made by AgStewardship Australia Limited, including a continuation of the imposition of a four cent levy per litre/kilogram on manufacturers and suppliers of agvet chemical containers.

Our support is offered in recognition of the level of success achieved to date, and subsequent benefits accruing to both the environment and community in general by these environmental stewardship programs through their facilitation of the safe removal of both containers and chemicals from the waste stream.

We acknowledge and support the contention that the new governance arrangements will afford the opportunity for a separate organisation to develop clear strategies and strong liaison with all tiers of government and regulatory authorities in further promoting uptake of the programs, while at the same time remaining closely aligned with Agsafe Limited and the strength that it has as a successful program manager.

We contend that significant among the benefits to be offered under such an arrangement will, in our view, include:

- A continuation of the promotion of issues of public safety and national uniformity through the avoidance, reduction, recycling and responsible disposal of unwanted crop protection and on-farm animal health products and their containers;
- The encouragement of users of agvet chemical products to buy resealable, water soluble, cardboard or paper containers and in turn, the encouragement of manufacturers to sell their products in such containers, and more importantly, the use of returnable agvet chemical containers;
- A continuation of the reduction of stock piles of agvet chemicals and containers; and
- Most importantly, the continuation of an industry stewardship initiative that has, to date, been highly successful in improving the environment through providing for appropriate disposal mechanisms for agvet chemicals and containers.

We ask that you consider our company's response when considering AgStewardship Australia's application for authorisation.

Yours faithfully,

Scott N. Mitchell
Managing Director
Sumitomo Chemical Australia Pty Ltd

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