

20 November 2008

Mr Darrell Channing
Director
Adjudication Branch
Australian Competition and Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

Dear Mr Channing

Re: AgStewardship Australia Limited - Application for Authorisation A91105

I refer to your letter dated 6 November 2008 regarding application A91105 by AgStewardship Australia Limited seeking authorisation to impose a levy of four cents per litre/kilogram on manufacturers and suppliers of agricultural and veterinary chemical containers.

The National Farmers' Federation (NFF) is Australia's peak agricultural representative group representing farmers, and more broadly, agriculture, since its inception in 1979. The NFF is one of four original signatories to the Industry Waste Reduction Scheme (IWRS) Agreement. The IWRS comprises the *drumMUSTER* and ChemClear® programs and is the single biggest environmental stewardship program undertaken jointly by end chemical users (farmers), local governments and the crop protection and animal health industries.

Both IWRS programs have grown in reach and importance to farmers and other participants over the last ten years. An independent review of the IWRS was commissioned in 2007 which made several recommendations regarding the best means of strategically growing and enhancing these programs. All parties to the IWRS agreed to pursue new governance arrangements for the *drumMUSTER* and ChemClear® programs in the form of a new entity, AgStewardship Australia Limited. This company is to be governed by a Board of Directors under the guidance of an independent chairperson.

The NFF considers that the programs have addressed the concerns raised by the ACCC at the time of the previous authorisation, with more suppliers and containers now covered by the programs. The continued growth in participation by manufacturers, suppliers and farmers is testament to the continued and growing need for programs such as these. The scope of the new Board to enhance these outcomes in the future will only add to the efficacy of the *drumMUSTER* and ChemClear® programs.

NFF therefore extends its full support and endorsement of the application lodged by AgStewardship Australia Limited and asks that the Commission authorise the imposition of the levy as requested.

Should you require further information, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ben Fargher', is written over a light grey rectangular background.

BEN FARGHER
Chief Executive Officer