

8 June 2010

Dr Richard Chadwick
General Manager – Adjudication Branch
Australian Competition and Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

Dear Dr Chadwick

**Re: Agsafe Limited application for revocation and substitution of authorisations
- Interested party consultation**

CropLife Australia (CropLife) welcomes the opportunity to make a submission in support of Agsafe Limited's application for revocation and substitution of authorisations. CropLife is the peak industry association representing registrants of agricultural chemical products. Our members innovate, develop, research, register and manufacture agricultural chemical products for use by farmers to control pests, weeds and diseases.

Our industry is committed to the responsible management and lifecycle stewardship of agricultural chemical products. As a result, we strongly support measures that reduce the risk to worker safety, human health, the environment and trade from agricultural chemicals. The Agsafe Accreditation and Training stewardship program, supported by the current ACCC authorisation, represents an important component of our industry's commitment to stewardship.

The Agsafe Accreditation and Training program has been critical in increasing the level of training and awareness of persons involved in the handling, storage and transport of hazardous agricultural chemicals. Participants in the program have significantly increased their compliance with all federal and state requirements for the transport, handling, storage and sale of agricultural chemical products. This provides benefit to:

- Users, who can be assured that they are being provided with product that has been properly stored and handled to minimise the risk of product degradation and of damage to packaging;
- Workers, who through training, are provided with the skills and knowledge to properly transport, handle and store hazardous agricultural chemicals to minimise occupational health and safety risks; and
- Governments, that have a reduced compliance burden from effective industry self-regulation.

CropLife believes that these benefits significantly outweigh the small anti-competitive cost associated with the Agsafe Code of Conduct. On this basis, CropLife supports Agsafe's request for an interim authorisation (that would allow Agsafe to continue to enforce its Code of Conduct) until the ACCC makes a final decision on whether to grant Agsafe's application for revocation and substitution.

If you have any questions with respect to this letter please feel free to call CropLife's Policy Director for Crop Protection and Stewardship, Mr Ben Stapley on 6230 6399.

Yours sincerely,



Paula Matthewson
Chief Executive Officer