



Animal Health Alliance  
SOLUTIONS FOR THE FUTURE

Animal Health Alliance (Australia) Ltd  
ABN: 76 116 948 344  
Address: Level 2 AMP Building  
1 Hobart Place  
Canberra ACT 2601  
Locked Bag 916  
Phone: 02 6257 9022 Fax: 02 6257 9055  
www.animalhealthalliance.org.au

10 June 2010

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

Dear Dr Chadwick

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

Animal Health Alliance (Australia) Ltd [the Alliance] is the voice of the animal health industry in Australia. It represents registrants, manufacturers and formulators of animal health products. The association's member companies represent in excess of 85 per cent of all animal health product sales in Australia (ex factory gate). The Alliance manages both national and state issues with the objective of ensuring its members can operate within a viable regulatory environment. The Alliance also contributes to sustainable industry risk reduction practices that provide business opportunities to members and add value to the broader Australian community. The Alliance welcomes the opportunity to make a submission in support of Agsafe Limited's application for revocation and substitution of authorisations.

Our industry is committed to the responsible management and lifecycle stewardship of veterinary chemical products. As a result, we strongly support measures that reduce the risk to worker safety, human health, the environment and trade from dealings with our members' veterinary chemical products. 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 veterinary chemical products. Participants in the program have significantly increased their compliance with all federal and state requirements for the transport, handling, storage and sale of veterinary 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 veterinary chemical products to minimise occupational health and safety risks; and
- governments that have a reduced compliance burden from effective industry self-regulation.

The Alliance believes that these benefits significantly outweigh the small anti-competitive cost associated with the Agsafe Code of Conduct. On this basis the Alliance 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 me on 02 6257 9022.

Yours sincerely,

Dr Peter A Holdsworth AM FAICD  
Chief Executive Officer