



VMDA
The Veterinary Manufacturers and Distributors Association Ltd
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9 June 2010

your ref: 42241

Dr Richard Chadwick
General Manager
Adjudication Branch
ACCC
GPO Box 3131
CANBERRA ACT 2601

Attention: Mr Ben Davis

Dear Dr Chadwick

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

We thank you for the opportunity to respond to the letter from Dr. Richard Chadwick dated 1st June 2010 ref 42241 regarding the Agsafe Limited application for revocation and substitution of authorisations.

The Veterinary Manufacturers and Distributors Association (VMDA) is a specialist organisation representing the interests of Australian manufacturers and distributors of veterinary medicines and animal health products.

VMDA has considered the Agsafe application and wishes to register support for this proposal subject to the affected chemicals being clearly defined as agricultural and veterinary FARM chemicals.

VMDA wishes to commend Agsafe for the success of their programs in lifting the standards of storage of rural industry products and in the training of staff who handle and recommend these products. Much of this success is due to the ability of Agsafe to impose sanctions on those who are slower to comply.

VMDA commends Agsafe for development of the new model however, as the first aspects are being implemented, Agsafe needs time to fully introduce the new scheme. Until the incentive scheme is operational, understood and refined, there are still some farm chemical retailers who need the threat of sanctions to lift their standards.

In summary VMDA supports the Agsafe application to ACCC for the interim authorisation. Furthermore VMDA supports Agsafe as it seeks to substitute its current authorisations with new authorisations that would allow it to continue to enforce the Agsafe Code of Conduct for a further three years subject to the defined products being Agricultural and Veterinary "farm" chemicals.

Should you require further elaboration we are prepared to respond or participate in any consultation process.

Yours sincerely

Ian Saunders
President