



Government of **Western Australia**  
Department of **Health**  
Office of the Director General

FILE No:
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PARS/PRISM:

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**

I refer to your letter dated 1 June 2010 inviting comments on the above application from Agsafe Limited.

The Western Australian Department of Health supports the Agsafe Limited application for authorisation to enforce the Code of Conduct for a further three years. It is, however, important that Agsafe uses the next three years of enforcing the Code as time to ensure that the new incentive-based scheme is founded on evidence of effectiveness and best practice, and is in a position to take over seamlessly from the existing scheme.

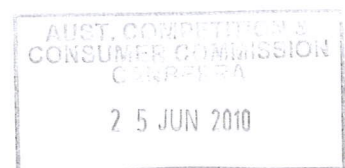
The Department acknowledges that the Agsafe Code is a good example of industry self-regulation. The Code requires complying retail businesses to implement a high level of staff training, as well as ensuring compliance with the Code's standards for the storage, handling and transporting of agvet chemicals. In most cases, compliance with the Code is consistent with compliance with the relevant State regulations. The Agsafe Code also provides a nationally uniform standard throughout the industry.

The Department believes that the program leads to public benefits, in the form of increased knowledge about the product range within the business, which leads to more informed advice to the purchaser. This should in turn result in better compliance with control-of-use regulations by the agvet chemical user.

Thank you for the opportunity to provide comments on this application.

Yours sincerely

Kim Snowball  
**ACTING DIRECTOR GENERAL**



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