



# Department of Primary Industries

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Our Ref:

Dear Dr Chadwick,

## **AGSAFE LIMITED APPLICATION FOR REVOCATION AND SUBSTITUTION OF AUTHORISATIONS - INTERESTED PARTY CONSULTATION**

Thank you for your letter of 1 June 2010, regarding Agsafe's application for revocation of existing authorisations A910027 - A910030 and substitution of new authorisations regarding its code of conduct.

The Department of Primary Industries (DPI) is responsible for managing the use only of agricultural and veterinary chemicals in Victoria.

DPI supports the Agsafe Accreditation and Training Program and the ability for Agsafe and its members to impose trading sanctions on those businesses who have not obtained the appropriate accreditation. These types of sanctions ensure a high level of compliance and best practice management in the handling, distribution and transportation of agricultural and veterinary chemicals.

In response to your specific questions regarding the Agsafe Program, I can advise that the training and accreditation provided from manufacturer to point of sale, coincide with the principles of good agricultural practice and can be expected to influence the performance of farmers when handling and storing agricultural chemicals.

In particular, they assist by ensuring that advice received by farmers from agricultural chemical retailers, is appropriate and in accordance with the *Agricultural and Veterinary Chemicals (Control of Use) Act 1992* and the *Agricultural and Veterinary Chemicals (Control of Use) Regulations 2007*. This is supported by the minimal number of complaints that are received regarding incorrect advice received from rural retailers and also by their regular contact with our field staff.

If Agsafe was no longer able to impose trading sanctions, it is likely that the current high standards demonstrated by the industry would suffer and the safe use and handling of agricultural chemicals would decline. Furthermore, while trading sanctions appear to be somewhat anti-competitive, the advantages clearly outweigh the disadvantages. It is unlikely that an incentive based scheme that did not involve sanctioning non-accredited users, would achieve the same result.

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Thank you for the opportunity to provide input into this application.

Yours sincerely,



**Richard Bolt**  
**Secretary**

22/6 / 2010