



**Australian
Competition &
Consumer
Commission**

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Our Ref: C2010/709 534
Contact Officer: David Hatfield
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13 September 2010

Ms Sue White
General Manager
Agsafe Limited

By email: sue.white@agsafe.com.au

Dear Ms White

**Re: Agsafe Limited applications for authorisation A91234, A91242 - A91244
- interested party submissions**

I refer to the above application for authorisation lodged with the Australian Competition and Consumer Commission (the ACCC) on 28 May 2010.

As you are aware, on 20 August 2010 the ACCC wrote to interested parties seeking submissions in relation to the Draft Determination.

The ACCC has received submissions from the following interested parties:

- Animal Health Alliance
- Bowa Organics Pty Ltd
- ChemCert Training Group Pty Ltd (ChemCert).

A copy of each of these submissions is attached. All publicly available submissions are also posted on the ACCC's internet site at www.accc.gov.au/AuthorisationsRegister.

The ACCC seeks Agsafe's response to any issues raised in the above submissions. In particular, the ACCC seeks your response to the following concerns raised by ChemCert:

- Agsafe's Accreditation and Training Program may not be cost effective and competitively priced (pages 3 and 5 of ChemCert's submission)

Agsafe was established to create a national Code of Conduct and to facilitate training and assessment of personnel at the wholesale and retail levels but not to exclusively provide training and assessment (page 4)

Agsafe has not specified the units of competency for which it issues statements of attainment (page 4)

the Agsafe Code of Conduct unreasonably does not provide for other registered training organisations to deliver the same units of competency under the Agsafe Accreditation and Training Program (page 4)

Agsafe does not recognise statements of attainment issued by other registered training organisations, despite the Australian Quality Training Framework (AQTF) requirement to do so (page 5)

- Agsafe has stated that the price of its face to face training is negotiable with clients, despite the AQTF requirement to provide a clear fee structure for clients and fee protection measures from its registering body (page 5).

I also note that ChemCert has requested a meeting with the ACCC and Agsafe to discuss its concerns regarding Agsafe's authorisation application. Please indicate whether you are available to attend such a meeting.

To assist the ACCC to progress this matter on a timely basis, please provide your response by **close of business on Wednesday 22 September 2010**.

This letter has been placed on the ACCC's public register. If you wish to discuss any aspect of this matter, please do not hesitate to contact me on (02) 6243 1266 or by email to david.hatfield@accc.gov.au.

Yours sincerely



David Hatfield
Director
Adjudication Branch