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17 September 2010

Dr Richard Chadwick
General Manager
Adjudication Branch
Australian Competition & Consumer Commission
GPO Box 3131
Canberra ACT 2601

Dear Dr Chadwick

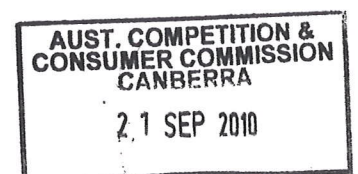
Re: Agsafe Limited (Agsafe) applications for authorisation A91234, A91242-91244

The draft determination to authorise Agsafe to continue to operate and enforce the Agsafe Code of Conduct for a further three years is supported.

The Council of Australian Governments (COAG) has asked Primary Industries Ministerial Council (PIMC) to develop a proposal for a single, national framework to improve the efficiency and effectiveness of the regulation of agricultural and veterinary chemicals. This is a complex area and the reforms are expected to take several years to implement. However it is reasonable to expect that the framework will recognise industry co-regulation efforts such as the Agsafe Program where it is effective and efficient to do so.

Compliance with the Agsafe Code covers over 100 often complex Federal, State and Territory Acts and Regulations. Individual business that seek to gain the necessary understanding to undertake an assessment of their requirements, comply with the relevant legislation and remain up to date can be expected to take more time and deliver a more uncertain result compared to those participating in the Agsafe Program. Time that could be better spent growing the business.

The Agsafe Program has achieved considerable success in improving the behaviour of businesses and individuals dealing with agricultural and veterinary chemicals. The threat of sanction has been a critical component in achieving that success. While the move to an incentive focussed scheme is supported, the threat of sanction may still be necessary further into the future for a minority in the industry who might otherwise risk letting standards slip.



Thank you for the opportunity to make a submission.

Yours sincerely

A handwritten signature in black ink, appearing to read "Geoff Knight". The signature is fluid and cursive, with a large initial 'G'.

Geoff Knight
CHIEF EXECUTIVE