

23 September 2013

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

Australian Dairy Farmers Limited
Level 2, Swann House
22 William Street
Melbourne Victoria 3000

Phone +61 3 8621 4200
Fax +61 3 8621 4280

www.australiandairyfarmers.com.au

ABN 76 060 549 653

Dear Dr Chadwick

RE: Submission in support of AgStewardship Australia Limited application for revocation of A91105 and new authorisation A91382

Your letter dated 4 September inviting submissions on the AgStewardship Australia Limited application has been passed on to Australian Dairy Farmers as an interested party. I am pleased to be able to provide this letter of support for the application.

Australian Dairy Farmers Limited (ADF) is a not-for-profit organisation representing the interests of Australian dairy farmers. We are a strong collective voice to Government and the community on national issues affecting dairy farmers and their profitability. The organisation has a history of more than seventy years in working for dairy farmers on many fronts.

It is an objective of ADF that dairy farmers adopt best practice methods in farm, natural resource and environmental management practice, and for ADF to support initiatives which improve the use of natural resources in productive farming systems.

The *drumMUSTER* and ChemClear programs run by AgStewardship Australia are the most significant environmental stewardship programs available for the farming sector. The levy imposed is fundamental to the design and success of the programs.

Chemical container waste and chemical waste pose a high environmental risk in rural areas. The AgStewardship programs provide the only opportunity to safely collect and dispose of this waste. The collection and disposal infrastructure and arrangements for the programs is now well established. Without the levy, we expect the programs would fail and this would be a big step backwards for both farm practice and environmental outcomes.

Farmers are the end users of the products under the program so are ultimately subject to payment of the 4c/litre levy on chemical products. The growth in the programs in terms of both coverage and participation is evidence of both the overwhelming support for the programs and that the approach of levying to support these programs is appropriate.

We take this opportunity to signal our support for the AgStewardship Australia programs and fully endorse the application made to you. We ask the Commission to authorise the levy as requested in the application before you so that these programs can continue to build on their existing success.

Yours sincerely,



Natalie Collard
Chief Executive Officer