

24 September 2013

Dr Richard Chadwick
General Manager, Adjudication Branch
Australian Competition and Consumer Commission
23 Marcus Clarke Street
CANBERRA ACT 2600
adjudication@accc.gov.au

Dear Dr Chadwick,

AgStewardship Australia Application for Revocation of A91105 and substitution with a new authorisation

As the leading voice for Queensland fruit and vegetable growers, Growcom champions the profitable and sustainable future of the Queensland horticulture industry through effective agri-political representation and service delivery.

Our grower members are regular users of agrichemical products in their production systems. Growcom promotes responsible chemical use. We firmly believe that this extends to responsible disposal of waste chemical material and packaging.

AgStewardship Australia develops and implements stewardship programs that reduce and manage waste for Australia's agricultural sector. Growcom supports AgStewardship's submission for the ongoing immunity of their programs, drumMUSTER and ChemClear, from revocation of A91105 and extension of a further Authorisation with a duration of five years.

Growcom concurs with AgStewardship's submission that public benefits generated by the programs are substantial and necessary, outweighing any public detriment.

Public Benefit

Public benefits of the programs include:

- Improved environmental, health and safety outcomes by reduction of the amount of hazardous agvet chemical and container waste which would otherwise become landfill, be buried, burned or stockpiled across rural, regional and peri-urban Australia;
- Provision of services and infrastructure that allow farm chemical users to safely and responsibly dispose of their unwanted agvet chemicals and containers;

- Outcomes that further the objectives of Australia's National Waste Policy and are consistent with Australia's international obligations for the management of hazardous waste;
- The demonstration that successful voluntary industry-led and consumer driven stewardship can operate on a user pays basis that provides efficiency benefits compared to a regulated approach, which would require considerable additional overheads and hence costs;
- A positive contribution to Australian agriculture and associated industries through productivity and market gains which follow the recognition of good environmental practices.

Growcom's grower members recognise the importance of these programs and make regular use of them. As such we believe that there is great benefit in maintaining the 4 cents per litre / kilogram levy as recommended by AgStewardship.

Yours sincerely,

Janine Clark
Pest Management Officer