



AgForce Queensland Farmers Limited

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MG/MV/GG102

25 September 2018

Mr David Hatfield, Director - Adjudication
Australian Competition and Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

By Post & by Email: adjudication@accc.gov.au

Dear Mr Hatfield

Re: Agforce Submission to AA1000429 – AgStewardship Australia Limited Authorisation Application

AgForce Queensland Farmers (AgForce) is the peak rural group representing beef, sheep & wool and grain producers in Queensland. The broadacre beef, sheep & wool and grains industries in Queensland generated around \$7.2 billion in gross farm-gate value of production in 2016-17. AgForce exists to facilitate the long-term growth, viability, competitiveness and profitability of these industries. Producers who support AgForce provide high-quality food and fibre to Australian and overseas consumers, manage around 40% of the Queensland agricultural landscape and contribute significantly to the social fabric of rural and remote communities.

In summary, AgForce Queensland Farmers supports the two cents per litre increase in levy for agvet chemicals participating in AgStewardship Australia Limited drumMUSTER and ChemClear programs. This pesticide drum recycling program and clearance of expired agvet chemicals has been successful. An excellent example of voluntary best practice throughout industry supply chains and end-users.

Ideally, an ongoing AgStewardship program with a six cents per litre levy should continue and consider additional efficiencies such as:

- Improved accessibility to drum collection centres across regions and the feasibility of bulk pick up from agricultural properties.
- Continue with ChemClear. Landholders still occasionally find de-registered products, particularly after property sale transfers. If future APVMA reviews deem existing agvet chem to be de-registered, there will be an ongoing need for the ChemClear program.
- Continue public awareness and social licence communication about industry-led stewardship programs, ensuring safe storage and recycling of pesticide containers which also reduces the incidence of plastics and microplastics in the environment.
- Continue to promote the recycling service for Intermediate Bulk Containers - IBCs, offered through proprietary programs such as Tank Management Services across eastern Australia. Consider the feasibility of including the IBC recycling within the AgStewardship program.

- To date, there are 117 manufacturers and suppliers of agvet chemicals in Australia participating in drumMUSTER and ChemClear programs¹. Any additional Australian manufacturers or direct suppliers from overseas should also be persuaded to join this excellent stewardship recycling program.

AgForce these additional efficiencies were discussed with Dominique Doyle, General Manager, Agsafe, during a recent briefing of the AgStewardship program, which was conducted in Brisbane.

Please contact AgForce on (07) 3236 3100 or agforce@agforceqld.org.au, if you require clarification or further discussion on this submission to ACCC recommending the two cents per litre increase in AgStewardship levies on agvet chemical containers.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. Guerin', with a stylized flourish extending from the end.

Michael Guerin
Chief Executive Officer

¹ AgSafe DrumMUSTER <http://www.drummuster.org.au/whos-involved/manufacturers/>