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

Email: adjudication@accc.gov.au

Dear Mr Hatfield

AA1000429 - AgStewardship - Submission

Thank you for the opportunity to provide comment on the reauthorisation application from AgStewardship relating to the operation of the drumMUSTER and ChemClear programs.

The NSW Environment Protection Authority (EPA) would like to express its support for the reauthorisation, including the increase in the levy. The collection of used, unwanted and empty agricultural and veterinary chemical containers and chemicals supports the legislated requirement to dispose of these items in a responsible manner.

The ChemClear and drumMUSTER programs run by Agsafe complement the EPA's CleanOut and Community Recycling Centres (CRC) programs. The EPA and Agsafe programs share the common aim to protect the environment and human health. Together they provide NSW businesses, farmers and householders with safe recycling and disposal services for chemicals and deliver both environmental and public benefits. An increase in the levy will enable the programs to continue meeting the demand for the collection services.

The EPA has run CleanOut since 2003, a mobile event service for NSW residents to safely dispose of household chemicals. The continued growth of the CleanOut program has resulted in the need to look at alternative systems and solutions. The EPA launched the CRC program in 2014. To date 87 CRCs have been established across NSW to provide householders with a convenient service for recycling and disposal of common household problem wastes.

Unfortunately a number of rural CRCs are experiencing unsolicited deposits of agricultural chemicals which is adding significant costs to particular CRC services. This may suggest there is inadequate service provision to farmers and commercial operators or lack of awareness of the correct disposal method. There is therefore a continued need for ChemClear and drumMUSTER in rural regional NSW to assist farmers to dispose of agricultural chemicals safely and responsibly. The EPA hopes that the Agsafe programs are further strengthened to deliver more frequent collections of farm chemicals to meet the sustained demand and alleviate the pressure placed on CRCs.

The EPA intends to work with Agsafe to develop new systems and procedures to more equitably meet the costs of agricultural chemicals and better communicate the various disposal services available to different stakeholders.

If you have any questions, please do not hesitate to contact Mr Peter Lawson, Manager Chemical Reform on 9995 5903.

4-8.2018

Yours sincerely

STEVE BEAMAN PSM

Executive Director Hazardous Incidents and Environmental Health

Environment Protection Authority