



28 September 2018

Mr David Hatfield
Director
Adjudication
Australian Competition and Consumer Commission
adjudication@acc.gov.au

Dear Mr Hatfield

Re: AA1000429 – AgStewardship – submission

The National Farmers' Federation (NFF) thanks the Australian Competition and Consumer Commission (ACCC) for the opportunity to comment on AgStewardship Australia's application for re-authorisation of levy collection arrangements, including an increase from 4 cents per litre/kg to 6 cents per litre/kg.

The NFF is the voice of Australian farmers and was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

The NFF is also a member of AgStewardship alongside Croplife Australia, Animal Medicines Australia and the Veterinary Manufacturers and Distributors Association. NFF President, Fiona Simson is a director on the AgStewardship Board.

As an organisation we are very supportive of the drumMUSTER and ChemClear programs and take the responsibility of industry stewardship very seriously.

However, in consulting with our membership we note that there is significant appetite for the programs to be improved and expanded. Some suggestions include:

- A commitment the recycling of Immediate Bulk Container shuttles and other containers such as chemical bags;
- An increase in collection rate and frequency including additional collection points for ease of access by farmers;
- Greater interaction between the programs and state and local regulatory jurisdictions to ease regulatory anomalies that may hamper collection.

Our members have also expressed a desire to understand the strategic direction for the program over the next 5 years. In line with this I have written to the Agstewardship Board

seeking advice about the development of a strategic plan. I believe that such a plan would provide confidence in supporting the levy increase which is necessary for the ongoing operation of the program.

For further information, or if you would like to discuss this submission further, please contact Mark Harvey-Sutton, General Manager for Rural Affairs on 02 6269 5666 or at mharveysutton@nff.org.au.

Yours sincerely

A handwritten signature in black ink that reads "C. J. Groves". The signature is written in a cursive style with a large, looping "G" at the end.

Chris Groves
Chair
NFF Farming Systems Committee