



Animal Health Alliance
SOLUTIONS FOR THE FUTURE

Animal Health Alliance (Australia) Ltd
ABN: 76 116 948 344
Address: Level 2 AMP Building
1 Hobart Place
Canberra ACT 2601
Locked Bag 916
Phone: 02 6257 9022
Fax: 02 6257 9055
www.animalhealthalliance.org.au

24 September 2013

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

Email: adjudication@accc.gov.au

Dear Dr Chadwick

Re: AgStewardship Australia Limited application for revocation of authorisation A91105 and substitution of new authorisation A91382 – interested party consultation

Thank you for your letter of 4 September 2013 concerning the application made by AgStewardship Australia Limited (AgStewardship) for re-authorisation on behalf of participants of the stewardship programs, drumMUSTER® and ChemClear®, to impose a four cent levy per litre/kilogram on manufacturers and suppliers of agricultural and veterinary (agvet) chemicals.

The Animal Health Alliance is the Australian peak animal health industry organisation representing the interests of registrants, manufacturers and formulators of animal health products.

The Animal Health Alliance is also a member of the International Federation for Animal Health, and provide a Director to its Board.

The Animal Health Alliance member companies significantly invest every year on industry stewardship activities to ensure the safe use of their products on the environment, animal and human health.

The Animal Health Alliance and its members were a founding member of the Industry Waste Reduction Scheme (IWRS), which saw the launch of the drumMUSTER® program more than 10 years ago, as well as the ChemClear® program in 2003.

These programs have set the global benchmark in industry stewardship programs.

The Animal Health Alliance is a member of AgStewardship Australia Limited, the company which facilitates and funds Agsafe Limited, the implementer of the programs for the IWRS.

Accordingly, the Animal Health Alliance and its members have a significant and long-standing interest in and commitment to these programs and their ongoing long-term success.

The Board of Directors of the Animal Health Alliance, having given due consideration to the application for re-authorisation made by AgStewardship, is pleased to provide its support thereof.

Such support follows a significant review and assessment by the Animal Health Alliance over the last 12-18 months of the benefits and operations of the drumMUSTER® and ChemClear® programs.

We are confident that the significant benefits the programs deliver to the livestock and companion animal industry and the community more broadly provide a solid basis for the re-authorisation.

Attached for the Commission's information is a list of the IWRS relevant members of the Animal Health Alliance, for which this letter serves as a response on behalf of the membership collectively.

Please do not hesitate to contact me should the Commission require any clarification regarding these comments.

Yours sincerely



Duncan Bremner
Chief Executive Officer
Animal Health Alliance (Australia) Ltd

Attach: **Animal Health Alliance members**

Bayer Australia Ltd (Animal Health)

Boehringer-Ingelheim Pty Ltd

Elanco Animal Health

Jurox Pty Ltd

Merial Australia Pty Ltd

MSD Animal Health

Novartis Animal Health Australasia Pty Ltd

Virbac (Australia) Pty Ltd

Zoetis Australia Pty Ltd