



Representing the Plant Science Industry

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Inquiry into Waste Generation and Resource Efficiency  
Productivity Commission  
Locked Bag 2, Collins Street East  
MELBOURNE VIC 8003

[waste@pc.gov.au](mailto:waste@pc.gov.au)

Dear Sir/Madam

**Re: Submission on Draft report on the  
Inquiry into waste generation and resource efficiency**

Thank you for inviting CropLife Australia to provide comment on the Draft report from the Inquiry.

CropLife Australia has grown out of Avcare, the National Association for Crop Production and Animal Health, and commenced operations on 1 January 2006.

Member companies invent, develop, manufacturer and market 85 per cent of the crop protection and 100 per cent of the crop biotechnology products used by Australia's primary producers. Crop protection products are also used to protect public health and the environment by controlling weeds and pests.

As the industry's peak representative body, CropLife Australia works with its members to foster the safe and responsible use and management of industry products throughout their life-cycle.

We support the use of voluntary action by industry to achieve government policy objectives and have successfully implemented a number of voluntary stewardship programs that demonstrate our industry's commitment to life cycle responsibility for industry products. These are: **drumMUSTER**, ChemClear<sup>®</sup>, Guardian accreditation for personnel and premises, container design and performance guidelines and resistance management strategies.

CropLife supports the implementation of voluntary product stewardship initiatives that share responsibility for the development, use and disposal of products appropriately along the supply chain. Voluntary mechanisms are usually more efficient and are likely to drive innovation within the industry. For example, CropLife member companies: have introduced a variety of different kinds of returnable and refillable containers as well as deliver product in bulk. They have also improved container designs which have reduced the weight of containers by 55 per cent over the past 15 years.

**drumMUSTER** and ChemClear® are funded via a levy on end users, the imposition of such a levy being subject to a current authorisation from the Australian Competition and Consumer Commission.

CropLife believes that industry should be given the opportunity to develop voluntary mechanisms to reduce their environmental footprint before any government intervention is considered. Approaches to provide a safety net or address 'free riders' should only be considered if the majority of the industry requests it.

The success of voluntary and industry led approaches is demonstrated by the fact that the recovery and recycling rate for **drumMUSTER** is better than that for most other 'wastes of concern' identified by State Governments.

The Commonwealth and State Governments can support voluntary stewardship initiatives by promoting the programs to relevant user groups. They can also assist by enforcing existing regulations that prevent burying, burning or long term storage of containers.

Please do not hesitate to contact me for further information about CropLife or our commitment to and involvement in stewardship initiatives.

Yours sincerely



Paula Matthewson  
Chief Executive Officer