

National Wool Declaration – 2021

NWD Review

Introduction

WoolProducers Australia (WoolProducers) are the peak national wool body representing wool growers. Our membership is comprised of the industry's commercial, superfine and stud breeding sectors. WoolProducers is nationally representative through our State Farming Organisation members and three democratically elected Independent Directors.

WoolProducers works closely with the Department of Agriculture, Water and Environment on key issues such as animal health and welfare, biosecurity, pest management control, natural resource management, drought preparedness, emergency animal disease outbreak preparedness, and industry development, including research and trade.

WoolProducers' work also includes the provision of advice to Animal Health Australia and State and Federal Governments on behalf of the wool industry on a day-to-day basis through representation on national animal health and welfare committees.

WoolProducers appreciates the opportunity to comment on the 2021 Review of the National Wool Declaration.

Firstly, it is of great frustration and disappointment to the WoolProducers Board that this review has been called before receiving completed findings of the pain assessment trials of Sheep Freeze Branding, this was a recommendation from our last submission in to the NWD Review.

Unfortunately, we as an industry again find ourselves in the position of industry infighting over incomplete science based solely on vested interests, which does nothing for the image or confidence of the Australian wool industry.

WoolProducers again urge AWEX to refrain from determining changes to the mulesing categories on the NWD until all relevant information is known.

With respect, it is outside of AWEX's remit and expertise to be dictating definitions of on-farm animal husbandry procedures, particularly with the weighted voting that AWEX has in regards to the post-farm gate sectors.

It is clear that the AWEX Board do not understand the potential ramifications of creating an additional status for breech modification, which has implications for the longstanding and accepted definition of mulesing which was endorsed by all state and territory jurisdiction in 2016 through the Australian Animal Welfare Standards & Guidelines (AAWS&Gs).

Under the AAWS&Gs the definition of mulesing is:

'The removal of skin from the breech and/or tail of a sheep using mulesing shears.'

The AAWS&Gs are also explicit on what mulesing is not:

'Mulesing does not include nonsurgical approaches that deliver analogous outcomes for the sheep such as clips, intra-dermal injections of chemicals or other future, non-cutting technologies.'

If AWEX resolves to include Sheep Freeze Branding or other forms of breech modification on the NWD, it will be incumbent on AWEX to lobby all state and territory jurisdictions to change their stance on their previously endorsed position of supporting the AAWS&Gs, as outlined above. WoolProducers would strongly and publicly oppose any such move.

According to AWEX's Frequently Asked Questions document, August, 2020, the NWD only relates to Mulesing Status and Dark and Medullated Fibre Risk (DMFR):

'1. What is the National Wool Declaration?

*The National Wool Declaration (NWD) was introduced in 2008 to provide information to the marketplace in response to inquiry from the buyers & users of Australian wool. The NWD is a voluntary Declaration from the wool grower about information that cannot be objectively measured, namely Mulesing Status & Dark & Medullated Fibre Risk (DMFR).'*¹

It is unacceptable to woolgrowers for breech modification to be considered as a negative husbandry procedure, for the following reasons:

- Australian growers and government, through AWI have invested tens of millions of dollars looking into alternatives for mulesing under the premise that breech modification is acceptable.
- Under the current definition of mulesing, which includes the 'tail', tail docking could become unacceptable as it is a form of breech modification. This would have serious ramifications for both wool and sheep meat industries.

Unless AWEX is going to change the objectives of the NWD, which would require a further industry wide review, it is outside of the remit and scope of the NWD to include any further classification to encompass other forms of breech modification. WoolProducers therefore requests that AWEX call for this wide-ranging review of the objectives of the NWD before any changes are made to the document.

Whilst WoolProducers acknowledge that some participants further down the supply chain have requested that wool from Sheep Freeze Branding be identified, this can be done through other quality assurance mechanisms. Generally speaking, those within the domestic industry that are calling for breech modification, whether they are growers, brokers or traders, all have a commercial or vested interest in this issue rather than for the greater good of the industry, which AWEX must not yield to.

WoolProducers has always been a very strong supporter and advocate of all growers completing the NWD, regardless of sheep breed or mulesing status, and has had policy for the document to be made mandatory since 2015. If the NWD is changed to include the requirement of growers to declare anything outside of mulesing status or the

¹ <https://www.awex.com.au/media/1983/awex-nwd-fags-august-2020.pdf>

DMFR, the WoolProducers will reconsider our ongoing support of the document. This would be an unfortunate and detrimental outcome for industry.

WOOLPRODUCERS RECOMMENDATIONS

1. Retain status quo of NWD categories until at least the completion of the pain assessment trials being undertaken on Sheep Freeze Branding technique
2. If the AWEX Board is going to change the scope of the NWD additional to the current requirements of mulesing status and the DMFR, that an industry wide consultation on the objectives of the NWD must be conducted
3. Exclusion of other breech modification or animal welfare procedures on the NWD as the focus of this document is on mulesing only

