National Wool Declaration – 2026 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 federal Department of Agriculture 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 2026 Review of the National Wool Declaration. As in recent Reviews of the NWD, we will be advocating that the document returns to the original intent of being a declaration regarding only mulesing status and Dark and Medullated Fibre Risk (DMFR).

The relevance of the current mulesing status declarations

According to AWEX's *National Wool Declaration (NWD) & Integrity Program (NWD-IP) – General Information* document, February, 2026, the NWD only relates to Mulesing Status and Dark and Medullated Fibre Risk (DMFR):

'The National Wool Declaration (NWD) is a voluntary declaration that enables wool growers to supply important information about their wool clip. While this information cannot be physically measured, it is of value to buyers, processors and retailers seeking to understand the mulesing status and the risk of dark or medullated fibres in the wool they purchase.'.[1]

Therefore, the LN category continues to have no place on the NWD. WoolProducers strongly advocated this position in the 2019, 2021 and 2023 NWD Reviews, however, unfortunately were not listened to.

The declaration rates of LN also demonstrate that the use of the LN procedure is statistically insignificant and has no place on the document going forward. WoolProducers warned AWEX that the integrity of the document may be compromised by including LN on the NWD, given the procedure was never going to be adopted on a commercial scale due to costs and the fact that the practice had already been derided by the trade.

The declared rates of prove that this the inclusion of LN on the document was

[1] NWD-General-Information.pdf

premature[2]:

: Declaration Rate by Mulesing Status (Bales)

		2023/24		2024/25		2025/26	
Declared	1.Non M.	316,746	21.5%	287,446	22.8%	240,288	25.1%
	2.Ceased M.	43,857	3.0%	32,312	2.6%	31,634	3.3%
	3.Liq Nit	2,060	0.1%	3,157	0.2%	810	0.1%
	4.AA	634,352	43.0%	562,579	44.5%	433,006	45.3%
	5.Mulesed	116,649	7.9%	85,353	6.8%	57,091	6.0%
		1,113,664	**75.5%**	**970,847**	**76.9%**	**762,829**	**79.7%**

Figure 1 NWD declaration rates 2023/24-2025/26

During the last NWD review, AWEX clarified that at the time there was only one remaining contractor Australia-wide that conducted LN. WoolProducers seeks clarification as to what the number of contractors and/or enterprises that undertake the application of LN for breech modification.

As stated in previous NWD reviews, it appears that AWEX and many in the post-farm gate supply chain failed to understand the potential ramifications that creating an additional status for breech modification, such as LN imposed, 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.'

While AWEX argued during previous reviews that the definition of mulesing was not changed on the current NWD, the definition of non-mulesed did.

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.'

The current NM definition as per the current NWD states *"Sheep in this mob have not been mulesed or treated with liquid nitrogen," which* is in clear contravention of the existing AAWS&Gs. This was not AWEX's role to make this determination.

The associated business rules for mob level declaration, has also seen AWEX, through the NWD, make judgement calls on what is determined to be 'better' on-farm animal husbandry procedures through the establishment of a 'hierarchy' of procedures which currently states *"The MMS values from highest to lowest are: NM > LN > AA > M > ND."*

[2] NWD_Statistics_Mulesing_Status_Report.pdf, 31 March, 2026

Again, it is not the role of AWEX nor the NWD to pass judgement on on-farm practices, and there is absolutely no science or evidence to support the claims that this hierarchy demonstrates certain statuses as being 'higher' or 'lower' when compared to other statuses.

WoolProducers also seeks investigation into the removal of the CM category, given the wool supply chain is more interested with the mulesing status of the wool on offer rather than what is or is not, occurring on-farm.

The CM declaration rates of around 3% nationally indicates that this is not a significant category of wool and WoolProducers believes that this status is now redundant and adds unnecessary confusion amongst growers.

Whether the NWD continues to meet evolving market and supply chain information requirements

While there has been a clear shift in demand by the trade for 'certified' wool since the last NWD review, the low volume of wool currently produced under certification schemes (around 8% of wool sold at auction between October 2024 and October 2025[3]) means that the NWD still has a valuable role to play in informing the supply chain of the mulesing status of Australian wool.

The user-friendliness of the NWD

Whilst WoolProducers understands the rationale behind the initial inclusion of CM as a way of encouraging those growers that were working towards the then proposed 2010 phase out of mulesing and to send market signals along the supply-chain, WoolProducers has argued for a number of years that this status is redundant and adds confusion amongst growers, impacting the integrity of the document.

However, in previous reviews the Australian Council of Wool Exporters and Processors (ACWEP) have maintained that there is a market for this category of wool, WoolProducers supports all markets for Australian wool, so would like to be confident that removing this category doesn't disadvantage any woolgrowers.

WoolProducers would like to see investigation into the implications to the trade if CM was removed as a category.

NWD declaration and compliance rates, and overall industry adoption

While it is pleasing to see the upward trend in NWD adoption over the past three years, there are still some states that need to lift their usage rates.

WoolProducers have current policy 'supporting an education program leading to the

[3] AWEX-update-q2-202526.pdf

mandated use of the NWD'.

WoolProducers again seeks AWEX to implement the NWD as a 'condition of sale'. This currently occurs with the Livestock Production Assurance (LPA) National Vendor Declaration (NVD) for the sale of livestock, whilst it is not compulsory to participate in LPA, most livestock markets in Australia require stock to be accompanied by an LPA NVD in order to attract bids. Discussions with the ACCC has reaffirmed, that while there would be a process that would have to be undertaken to achieve this, there would be no competition issues that would prohibit this being pursued.

The operation and effectiveness of the NWD Integrity Program

While the targets of the Desktop Audits, Verifications and On Farm Inspections seem to be appropriate, it is hard to ascertain the adequateness of compliance rates given this is unknown.

Generally speaking, WoolProducers seeks that sufficient numbers of audits are undertaken to ensure that the NWD-IP is robust. Consideration should be given to increasing the number of audits, verifications and on-farm inspections in line with the increasing declaration rates.

Consideration also needs to be given to the audit process regarding AA verification with an increasing number of states regulating mandatory pain relief for mulesing. There are two ways this could be viewed:

1) As states regulate pain relief for mulesing, there is no longer a requirement for the NWD to have an AA audit in those jurisdictions as it assumed that people are adhering to the law; or
2) The NWD-IP plays a verification role in state regulation. To be clear this is not about AWEX enforcing AA but providing data to regulators on compliance rates. This provides states with an industry-led auditing system, verifying compliance and therefore removing the need for increased government inspections, while also enshrining AWEX and the NWD's role in industry.

Communications relating to the NWD

WoolProducers believes that communication of the NWD should be done wherever possible, including utilising other industry participants.

WoolProducers also notes range of 'supporting materials' that have been developed and are available on the AWEX website, relating the NWD.

WOOLPRODUCERS RECOMMENDATIONS

1. That the NWD remains only as a declaration for Mulesing Status (MS) and Dark and Medullated Fibre Risk (DMFR), and does not include status for breech modification

2. Remove the LN category from the NWD.
3. Investigate the removal of the CM category from the NWD, with the view of making the document more user friendly.
4. For the NWD to be made a ‘condition of sale’.
5. That AWEX undertakes sufficient numbers of audits to ensure the integrity of the NWD-IP Scheme.
6. Investigate the auditing requirements for AA in the context of an increasing number of jurisdictions mandating pain relief for mulesing