Dear Kerry,

AWH Pty Ltd is responding to AWEX's recent request for submissions to the National Wool Declaration (NWD)

AWH administer approx. 55-60% of wool classer specifications in Australia, we have a wide view, substantial experience and knowledge of the NWD in its administrative use for the preparation of wool for sale.

We find the NWD a complex and complicated document, that has an extremely high variation of scenarios, coupled with out of date versions.

As a third party observation, AWH in preparation for OCR & other electronic data communications the IT company that AWH have partnered with have never seen the level of complexity in their programming requirements, to the many varying industries they consult to, over many years – it is truly a unique document.

- AWH are very supportive of simplifying the NWD document.
- Wool from mobs of sheep are either mulesed or not Period.
- The property eligibility question for CM status should be removed
- In our view, the statistics/volumes do not support the use of LN or CM (we are aware of future contracts requiring CM status)
- We suspect that M & ND can be combined, as they would likely have a similar commercial value, although we understand the need for a ND value/statistic
- On many occasions the NWD is only part completed and signed, leaving ambiguity on how to address.
- AWTA make many pre-sale amendments to the mulesing status and it may be worth seeking any potential statistics that the AWTA would keep on these amendments, this may support the level difficulty and cost in administering this system.
- Broker stationery has been known to be printed incorrectly or use of out of date stationery and we recommend AWEX approve all Broker artwork (prior to printing), or better still the use of WoolClip eSpeci which would remove a lot of the frustration in the administration of this document.
- AWH strongly recommend that the NWD remain part of the Classer Specification as <u>one document</u> (suggestions have been made to separate into two documents)

Finally, AWH would require a sufficient notice period to implement any IT changes especially if wholesale - as such we recommend that amendments be advised no later than 30<sup>th</sup> March '24. This notice period would subject to the volume of programming required.

Kerry, I trust these comments are taken into your consideration for the review of the National Wool Declaration.

Thank you for the opportunity to participate - Kindest Regards



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From: Australian Wool Exchange Ltd <awex@awex.com.au>
Sent: Monday, 23 January 2023 12:42 PM
Subject: Members' Update - 2023 Review of the National Wool Declarations (Updated)

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## AWH Pty Ltd

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