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Dr Kerry Hansford
Secretary, NWD ICC.

By email; khansford@awex.com.au

13th March 2023

Dear Kerry,

The National Wool Declaration (NWD) is currently the most important document we have as an industry.

Considering EAD risks, Mulesing status and the current emphasis on commercial traceability the importance of finding a document that satisfies all sectors of the industry is critically important for the future of the Australian wool industry.

Whether a Grower is mulesed, non-mulesed or using liquid nitrogen the document exists to show customers of Australian wool that the industry is transparent.

It is also of utmost importance to have a simple and clean document.

There are several suggestions I would like to make to the NWD ICC for discussion.

Breech modification

The NWD does not define mulesing but rather provides information and transparency. With this in mind, could the NWD not ask the question of non-mulesed via 'no sheep have been breech modified'?

This method would eliminate the need for the extra status of LN (liquid nitrogen) and would also cover alternative methods in the future.

It is also worth noting many end users of Australian wool also define their purchase requirements this way.

Ceased Mulesing status

The question of ceased mulesed (CM) could be more direct.

'To qualify for ceased mulesed have any lambs on the property been mulesed in the last 12 months'

Yes – M

No – CM

Another alternative, CM could be treated as a Mob Status thereby simplifying the document further.

Remove question 2 around bought sheep.

Should a Grower who has spent several years moving to NM be penalised if he or she has to buy in sheep that have been mulesed? This question creates a barrier for Growers to move to NM.

CM is an important tool for Growers to transition their flock to NM. Exporters and Processors also trade CM commercially and this advantage should not be taken away from Growers.

I'd also like to acknowledge the time and effort AWEX put into managing this document nationally and thank you for the opportunity to make a submission.

Kind regards,

A handwritten signature in black ink, appearing to read "Josh Lamb", is written over a circular stamp.

Josh Lamb
Managing Director



Pure Australian Wool