

National Wool Declaration – 2023 Review

WOOLPRODUCERS
AUSTRALIA

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 2023 Review of the National Wool Declaration. As in recent Reviews of the NWD, we will be advocating that the document returns to the original (and still claimed) intent of being a declaration regarding only mulesing status and Dark and Medullated Fibre Risk (DMFR).

In correspondence to AWEX on 28 February, 2022, WoolProducers stated that we did not support the proposed (now current) version of the NWD (V9.3). This position has not changed.

The relevance of the current mulesing status declarations, viz. Non Mulesed (NM), Ceased Mulesing (CM), mulesed with Analgesic &/or Anaesthetic products (AA), treated with Liquid Nitrogen (LN) and Mulesed (M).

Note, for consistency across the Australian wool industry, the definition of Mulesing is sourced from the Australian Animal Welfare Standards and Guidelines.

According to AWEX's Frequently Asked Questions document, March, 2022, the NWD only relates to Mulesing Status and Dark and Medullated Fibre Risk (DMFR):

*'The National Wool Declaration (NWD) assists buyers & their clients to access credible information on issues that can influence purchasing decisions but cannot be objectively measured; that is, Mulesing Status (MS) & Dark & Medullated Fibre Risk (DMFR).'*¹

Therefore, the LN category has no place on the NWD. WoolProducers strongly advocated this position in the 2019 and 2021 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,

¹ <https://www.awex.com.au/media/2149/awex-nwd-ip-v93-declaring-what-the-worlds-demanding-brochure-march-2022.pdf>

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 fall in the overall declaration rate suggests that WoolProducers were correct in that assumption.

As stated in previous NWD reviews, it appears that AWEX and the post-farm gate supply chain fail to understand the potential ramifications that creating an additional status for breech modification, such as LN may impose, 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 the last review that the definition of mulesing was not changed, the definition of non-mulesed did, which is in clear contravention of the existing AAWS&Gs. This was not AWEX’s role to do so.

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 decision made during the last NWD review to identify LN, has effectively destroyed any chance of future investment into alternatives to mulesing.

The associated business rules for mob level declaration, has seen AWEX (and subsequent post-farm supply chain) making judgement calls on what is determined to be ‘better’ on-farm animal husbandry procedures through the establishment of a ‘hierarchy’. Again, it is not the role of AWEX to pass judgement on what on-farm practices.

WoolProducers also seeks the removal of the CM category as 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 decline in CM declaration rates to below 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.

The potential inclusion of “other” breech modification alternatives or animal welfare declarations within the NWD.

It is disappointing to see that AWEX have included this as a consideration as a part of this review. The declaration of on-farm husbandry practices is completely outside of

AWEX's and the NWD's remit and should not form any part of this or future NWD reviews.

There are numerous Quality Assurance Certification Schemes in place whereby producers can declare animal welfare practices and provide assurance to the trade.

The user-friendliness of the NWD with respect to its correct completion by the owner/manager and data entry by wool broking staff.

The overall declaration rates of the NWD have declined in the top 4 wool producing states of Australia, since the implementation of the more convoluted document – something that was foreshadowed by WoolProducers.

The NWD needs to be simplified to ensure that it remains relevant to the trade.

The NWD declaration and compliance rates, and Premiums and Discounts, and how it is being received by industry.

The NWD-IP, involving desktop audits, verification of the use of AA and LN and on farm inspections for NM and CM.

It is hard to ascertain the adequateness of compliance rates for the 2021 and 2022 seasons, given the lower number of audits across the three categories (2021) and the fact that the data is incomplete for the 2022 season.

WoolProducers seeks that sufficient numbers of audits are undertaken to ensure that the NWD-IP is robust.

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

Communication plans for the release of NWD Version 10.

WoolProducers believes that this can be determined towards the finalisation of the review.

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. Remove the CM category from the NWD.
4. That AWEX does not consider, nor seek in future reviews, the inclusion of other animal welfare declarations.
5. The NWD needs to be simplified to ensure that it remains relevant to the trade.
6. That AWEX undertakes sufficient numbers of audits to ensure the integrity of the NWD-IP Scheme.
7. That AWEX pursues making the NWD a condition of sale.