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Dr Kerry Hansford
Secretary, NWD ICC
AWEX
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Email: khansford@awex.com.au

7 March 2023

Dear Dr Hansford,

Re: 2023 Review of the National Wool Declaration

FOUR PAWS International is keen to provide feedback to the review of the National Wool Declaration (NWD). We appreciate the energy given to the consultation process and understand that there has been an increased interest in this review process. This interest is likely a reflection of the greater international demand for non-mulesed wool, backed by strong transparency mechanisms. Our submission further outlines how the NWD could better fulfil this demand and ensure enhanced animal welfare practices are encouraged

FOUR PAWS supports the Ceased Mulesing (CM) category which is incentivising woolgrowers in their journey away from mulesing and it assists wool buyers to support these journeys.

FOUR PAWS is opposed to any type of breech modification being classified as Non Mulesed (NM). Wool buyers who are seeking to source wool with good animal welfare credentials should be able to easily identify wool with or without breech modification. For that reason, any breech modification method must be declared. Therefore, we support the inclusion of “other” breech modifications within the NWD. The NWD provides information to wool buyers and the more transparency it ensures the higher is the value of that wool.

FOUR PAWS also strongly suggests a revision of the AA (mulesed with Analgesic &/or Anaesthetic products) category. Currently, the category AA falsely gives the impression that the lamb is anaesthetised during mulesing, which is misleading to wool buyers. Ideally there are two categories for the application of pain relief. One which indicates the provision of pre-operative pain relief and one which indicates the



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application of anaesthetics after the procedure (i.e., Trisolfen). These categories require clear definitions of what each category entails and the applied pain products have to be indicated.

FOUR PAWS again recommends for the NDW to be made mandatory, allowing woolgrowers to demonstrate that the Australian wool industry is committed to full transparency and integrity. The low completion rates in some states such as Western Australia (only 50.1% in 2022) remain a concern. This highlights a need for further explanations about the benefits of transparency and premiums by declaring wool.

FOUR PAWS strongly suggests that AWEX provides annual statistics in an easily accessible way to highlight the progress on mulesing, the progress on the use of pain relief and the premiums provided.

AWEX must take responsibility for properly and clearly communicating the data they manage in an accessible way so that growers can see the trends more clearly and act accordingly.

FOUR PAWS urges AWEX to provide more resources to both your internal and external monitoring teams, so that significantly more frequent audits and oversight can be achieved. Please see more detailed recommendations on this in our previous submission.

Mulesing is a key concern across the international animal protection community, and the NWD is an important initiative for monitoring progress away from this practice and strengthening confidence to both buyers and retailers. Thus, FOUR PAWS considers this review process as crucial to ensure maximum transparency for wool brokers, buyers and retailers. Thank you again for the opportunity to provide feedback. We continue to support the development and strengthening of the NWD initiative, and we stand by our recommendations presented in our previous submissions.

Kind regards,

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