



AgForce Queensland Farmers Limited

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14/03/2023

Dr Kerry Hansford
Secretary,
National Wool Declaration, Industry Consultative Committee
Australian Wool Exchange Ltd
Gate 4, Frederick Road
TOTTENHAM VIC 3012

By Email: khansford@awex.com.au

Dear Dr Hansford,

AgForce is a peak organisation representing Queensland's cane, cattle, grain and sheep, wool and goat producers. The cane, beef, broadacre cropping and sheep, wool & goat industries in Queensland generated around \$10.4 billion in on-farm value of production in 2021-22. AgForce's purpose is to advance sustainable agribusiness and strives to ensure the long-term growth, viability, competitiveness and profitability of these industries. Over 6,500 farmers, individuals and businesses provide support to AgForce through membership. Our members own and manage around 55 million hectares, or a third of the state's land area. Queensland producers provide high-quality food and fibre to Australian and overseas consumers, contribute significantly to the social fabric of regional, rural and remote communities, as well as deliver stewardship of the state's natural environment.

The AgForce Sheep, Wool and Goats Board (the Board) appreciates the opportunity to provide comment into the 2023 review of the National Wool Declaration.

The Board brings to the NWD ICC's attention the previous review submissions/letters from AgForce dated July 1, 2019, January 31, 2020 and February 28, 2020 (Board President Mr Alan Rae); and March 24, 2021 (Board President Mr Mike Pratt). These letters are attached for ease of reference, with the Board officially including them within the current 2023 review.

The Board's position on the National Wool Declaration remains exactly the same as per the previous review letters, being:

- a) The Board are of a firm opinion that Ceased Mulesing (CM) should be removed from the NWD;
- b) The Board are of the firm opinion that the "Ceased Mulesing status" (formerly "Property status") section be removed from the NWD; and
- c) The Board are of the firm opinion that alternative mulesing or breech modification methods be removed from the NWD, e.g. Liquid Nitrogen.

ADVANCING SUSTAINABLE AGRIBUSINESS

“Ceased Mulesing” and “Ceased Mulesing status”

The Board feels that this requirement adds significant confusion among woolgrowers, and that by removing both the CM definition (pg. 2) and the related status questions (pg. 1) will create a more straightforward and user-friendly declaration from a woolgrower’s and woolclasser’s perspective.

The Board believe that the “Mob status” declaration of the NWD is critical to informing the supply-chain of an individual wool clip’s mulesing status, with this being the first item a wool buyer checks when appraising a wool clip. But equally important, is that it allows for ease of understanding for woolgrowers and woolclassers alike, ensuring the accurate completion of the NWD, where the actual mob in the shearing shed can be easily identified as either “mulesed” or “non-mulesed”.

Additionally, the decline in CM declaration rates to below 3% nationally indicates that this is not a significant category of wool and the Board believes that this status is now redundant and adds unnecessary confusion amongst growers.

The Board recommends keeping the NWD simple with the use of the following categories for “Mob status”:

NM - No sheep in this mob have been mulesed.

AA - Sheep in this mob have been mulesed with the use of an analgesic &/or anaesthetic product registered by APVMA.

M - Sheep in this mob have been mulesed without the use of an analgesic &/or anaesthetic product registered by APVMA.

Alternative breech modification methods

The Board feels very strongly that the NWD remain a declaration on Mulesing Status and Dark and Medullated Fibre Risk, where the declaration definition of mulesing should align identically to the Australian Animal Welfare Standards & Guidelines being:

‘The removal of skin from the breech and/or tail of a sheep using mulesing shears.’

Therefore, the LN category or any breech modification alternative(s), has no place on the NWD. Furthermore, the declaration rates of LN demonstrate that the use of the LN procedure is statistically insignificant, with minimal commercial uptake. The Board reiterates prior written opinion that LN has no place on the NWD.

The AgForce Sheep, Wool and Goats Board is very supportive of the NWD and its use by Australian woolgrowers. It is an important tool for the industry as it provides supply-chain partners with an understanding of the quality wools actually being produced by Australian woolgrowers; and therefore, the Board believes that the whole of industry should take greater ownership of the NWD and the value it represents. Industry needs to continue discussions on how best to improve uptake and use of the NWD.

Should you wish to discuss these matters further, do not hesitate to contact me on 0400 252 058 or alternatively, AgForce Sheep, Wool and Goats Policy Director Michael Allpass on 0427 250 045 or email allpassm@agforceqld.org.au.

Yours sincerely,



Mr Stephen Tully
President,
AgForce Sheep, Wool and Goats

cc: WoolProducers Australia



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24 March 2021

Mr Mark Grave
Chief Executive Officer
Australian Wool Exchange Ltd
PO Box 651
NORTH RYDE NSW 1670
email: mgrave@awex.com.au

Dear Mark,

RE: 2021 Review of the National Wool Declaration (NWD)

AgForce is a peak organisation representing Queensland's cane, cattle, grain, and sheep and wool producers. The cane, beef, grain, sheep and wool industries in Queensland generated around \$7.3 billion in on-farm value of production in 2018-19. AgForce's purpose is to advance sustainable agribusiness and strives to ensure the long-term growth, viability, competitiveness and profitability of these industries. Almost 5,400 farmers, individuals and businesses provide support to AgForce through membership. Queensland producers provide high-quality food and fibre to Australian and overseas consumers, and contribute significantly to the social fabric of regional, rural and remote communities.

The AgForce Sheep & Wool Board (the Board) appreciates the opportunity to provide comment into the 2021 review of the National Wool Declaration, acknowledging AWEX's previous March 2020 commitment to further review the NWD with respect to mulesing status, with particular focus on the identification of wool from sheep treated with liquid nitrogen (freeze branding). The Board also appreciates AWEX's wishes that comment be only made to new or changed issues.

With respect to the use of freeze branding for alternative mulesing purposes, the Board do not believe there to have been adequate and thorough peer-reviewed research trailed since March 2020 to allow any consideration to including freeze branding within the NWD.

Changes to the NWD, relating to freeze branding, should not occur until all research and facts are known to all stakeholders.

ADVANCING RURAL QUEENSLAND

The Board takes this opportunity to highlight to AWEX once again that woolgrower feedback suggests that much confusion still exists around the CM status, particularly with Property Status, which is leading to inaccurate completion of woolclasser reports.

The Board's opinions raised in letters to the 2019/2020 NWD review remain the same, these being:

- Remove Property Status section and identify individual Mob Status only, being either NM, AA or M; and
- Remove reference to Ceased Mulesing (CM) (page 2).

In addition (new), the Board also considers that the Property Status section could be replaced with a section that allows woolgrowers to voluntarily categorise any property certification under an accepted accreditation scheme, for example SustainaWool, Authentico Integrity Scheme or Responsible Wool Standard etc., hence simplifying the line of questioning for the woolgrower/woolclasser and providing additional confidence to wool buyers; and further helps to tell the positive story to the end consumer on the great lengths the woolgrower has gone to, to produce high quality wool whilst adhering to regulated animal welfare standards and environmental care and stewardship.

There remains a clear need for clarity on how to accurately complete the NWD, which can be achieved with improved communication to woolgrowers and woolclassers, in conjunction with wool brokers; and training, both in-shed and formally through completion of woolclasser qualifications.

The AgForce Sheep & Wool Board is very supportive of the NWD and its use by Australian woolgrowers. It is an important tool for the industry as it provides supply-chain partners with an understanding of the quality wools actually being produced by Australian woolgrowers; and therefore, the Board believes that the whole of industry should take greater ownership of the NWD and the value it represents. Industry needs to continue discussions on how best to improve uptake and use of the NWD.

Should you wish to discuss these matters further, do not hesitate to contact me on 0427 585 939 or alternatively, AgForce Sheep & Wool Policy Director Michael Allpass on 0427 250 045 or email allpassm@agforceqld.org.au.

Yours sincerely,



Mr Mike Pratt
President,
AgForce Sheep & Wool Board

Cc: WoolProducers Australia



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28 February 2020

Mr Mark Grave
Chief Executive Officer
Australian Wool Exchange Ltd
PO Box 651
NORTH RYDE NSW 1670
email: mgrave@awex.com.au

Dear Mark,

RE: National Wool Declaration (NWD) v8.0 – 18 Feb 2020

AgForce Queensland Farmers is the peak rural group representing the majority of beef, sheep & wool and grain producers in Queensland. The broadacre beef, sheep and grains industries in Queensland generated around \$7.2 billion in gross farm-gate value of production in 2016/17. AgForce exists to facilitate the long-term growth, viability, competitiveness and profitability of these industries. Our members provide high-quality food and fibre products to Australian and overseas consumers, manage around 40% of the Queensland agricultural landscape and contribute significantly to the social fabric of rural and remote communities.

The AgForce Sheep & Wool Board (the Board) appreciates the opportunity to provide comment into the National Wool Declaration version 8.0 – 18 Feb 2020, acknowledging that AWEX is listening to industry stakeholders given the changes made to the January 2020 version.

The Board strongly recommends that the proposed AM (alternative method) definition and all reference to “alternative method” within the NWD is removed, citing the practice of mulesing is clearly defined by the Australian Animal Welfare Standards and Guidelines, which does not include non-surgical approaches.

The Board are already aware of discussions at grass-roots, woolgrower level where the proposed AM definition is being publicly referred to as “alternative mulesing”, thus creating even further confusion.

If it is the agreement by stakeholders that this definition is to remain, the Board recommends another acronym to remove any confusion, AP (alternative practice/process/ procedure) or AT (alternative technique), as examples.

ADVANCING RURAL QUEENSLAND

In addition, and to re-iterate previous letters from the Board, the NWD becomes confusing when answering the questions to the “Property status” declaration. The Board are of the opinion that this section can be removed.

Once again, however, if wider-industry considers that the “Property status” section is to remain, then the Board recommends that this section is one, simple question, being:

- Has any mulesing been completed on any sheep on this property in the last 12 months?

The AgForce Sheep & Wool Board is very supportive of the NWD and its use by Australian woolgrowers. It is an important tool for the industry as it provides supply-chain partners with an understanding of the quality of wool that is being produced around the country.

Given such importance, the Board feel that greater education and promotion of the NWD is required to inform woolgrowers and wool classers of the necessity to accurately complete the NWD to optimise the price paid to a woolgrower’s clip.

The Board, therefore, would like AWEX to provide an understanding of the communication strategy to promote the finalised draft; and offers assistance to disseminate and promote the final NWD through-out Queensland.

Similarly, the Board would like AWEX to clarify who is the responsible party in filling out a NWD; and how much time is spent during Wool Classer training courses on “how to complete” the NWD?

Should you wish to discuss these matters further, do not hesitate to contact me on 0428 771 176 or alternatively, AgForce Sheep & Wool Policy Director Michael Allpass on 07 3236 3100 or email allpassm@agforceqld.org.au.

Yours sincerely,



Mr Alan Rae
President,
AgForce Sheep & Wool Board



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31 January 2020

Mr Mark Grave
Chief Executive Officer
Australian Wool Exchange Ltd
PO Box 651
NORTH RYDE NSW 1670
email: mgrave@awex.com.au

Dear Mr Grave,

RE: National Wool Declaration (NWD) v8.0

AgForce Queensland Farmers is the peak rural group representing the majority of beef, sheep & wool and grain producers in Queensland. The broadacre beef, sheep and grains industries in Queensland generated around \$7.2 billion in gross farm-gate value of production in 2016/17. AgForce exists to facilitate the long-term growth, viability, competitiveness and profitability of these industries. Our members provide high-quality food and fibre products to Australian and overseas consumers, manage around 40% of the Queensland agricultural landscape and contribute significantly to the social fabric of rural and remote communities.

The AgForce Sheep & Wool Board (the Board) appreciates the opportunity to provide comment into the National Wool Declaration version 8.0.

The Board's primary advice to AWEX regarding the NWD is to "KEEP IT SIMPLE".

The latest draft circulated to stakeholders is anything but simple, with the proposed status' of NM1 and NM2 to undoubtedly lead to additional confusion for woolgrowers and the supply-chain.

The Board rejects and recommends the removal of:

NM1 - All sheep in this mob are not mulesed, and an alternative method to mulesing has not been used.

NM2 - All sheep in this mob are not mulesed, and an alternative method to mulesing has been used.

The Board recommends keeping the NWD simple with the use of the following categories for “Mob mulesing status”:

NM - *All sheep in this mob are not mulesed.*

AA - *All sheep in this mob were treated with a registered Analgesic and/or Anaesthetic product at mulesing.*

M - *Some/all sheep in this mob have been mulesed.*

The Board believe that the “Mob mulesing status” declaration of the NWD is critical to informing the supply-chain of an individual wool clip’s mulesing status, with this being the first item a wool buyer checks when appraising a wool clip. But equally important, is that it allows for ease of understanding for woolgrowers and wool classers alike, ensuring the accurate completion of the NWD, where the actual mob in the shearing shed can be easily identified as either “mulesed” or “not mulesed”.

From a woolgrowers’ perspective, where the NWD becomes confusing relates to the “Property status” declaration. The Board are of the opinion that removal of this section from the NWD is achievable and will eliminate confusion. However, if wider-industry considers that the “Property status” section is to remain, then the AgForce Sheep & Wool Board recommend that this section is one, simple question, being:

- Has any mulesing been completed on any sheep on this property in the last 12 months?

The AgForce Sheep & Wool Board is very supportive of the NWD and its use by Australian woolgrowers. It is an important tool for the industry as it provides supply-chain partners with an understanding of what wool is actually being produced, in terms of both mulesing status and dark and medullated fibres. Given such importance, the Board feel that greater education and promotion of the NWD is required to inform woolgrowers and wool classers of the differing wool sale catalogues and wool selling rooms, with particular attention paid to the potential for sale discounts when an accurate and fully completed NWD is not provided.

Should you wish to discuss these matters further, do not hesitate to contact me on 0428 771 176 or alternatively, AgForce Sheep & Wool Policy Director Michael Allpass on 07 3236 3100 or email allpassm@agforceqld.org.au.

Yours sincerely,



Mr Alan Rae
President,
AgForce Sheep & Wool Board



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1 July 2019

Dr Kerry Hansford
Secretary,
Industry Services Advisory Committee
Australian Wool Exchange Ltd
Gate 4, Frederick Road
TOTTENHAM VIC 3012
email: khansford@awex.com.au

Dear Dr Hansford,

RE: 2019 Review of the National Wool Declaration (NWD)

AgForce Queensland Farmers is the peak rural group representing the majority of beef, sheep & wool and grain producers in Queensland. The broadacre beef, sheep and grains industries in Queensland generated around \$7.2 billion in gross farm-gate value of production in 2016/17. AgForce exists to facilitate the long-term growth, viability, competitiveness and profitability of these industries. Our members provide high-quality food and fibre products to Australian and overseas consumers, manage around 40% of the Queensland agricultural landscape and contribute significantly to the social fabric of rural and remote communities.

The AgForce Sheep & Wool Board (the Board) appreciates the opportunity to provide comment into the 2019 review of the National Wool Declaration.

The Board are of a firm belief that Ceased Mulesing (CM) should be removed from the NWD, with the section that seeks confirmation from the Owner/ Manager to the question "Has Mulesing Ceased on this Property?" should be removed entirely.

The Board feels that this requirement adds significant confusion among woolgrowers, where AWEX's own evidence highlights that only 2.8% of wool sold during 2018 was declared as CM via a completed NWD.

By removing CM as an option, the Board believes that this will make the document more straightforward, hence more user-friendly from a producer's perspective.

The Board suggests that the void on the NWD left by removing this section/ "question" would be best replaced with more emphasis on Quality Assurance (QA) schemes. Greater detail of a woolgrower's QA scheme could be included within the NWD compared to the small area currently allowed for at the top right-hand corner of the existing NWD form.

The Board is of the opinion that greater emphasis on declaring QA accreditation would add more value along the supply-chain compared to the CM status; where a greater number of woolgrowers are more likely to complete such a section, with improved confidence.

The AgForce Sheep & Wool Board would therefore like to see only three statuses of wool available for declaration on the NWD, namely Non Mulesed (NM), Pain Relief (PR) and Mulesed (M).

The Board do not see the need for other breech modification alternatives or animal welfare declarations to be included in the NWD. The NWD relates specifically to the status of the mulesing procedure as defined by the Australian Animal Welfare Standards and Guidelines.

Other breech modification alternatives to combat breech flystrike, if they do not fit the current definition of "the removal of skin from the breech and/or tail of a sheep using mulesing shears", does not constitute mulesing and would therefore meet the Non Mulesed status requirements.

The Board also considered the "Proceed Instructions" section within the NWD, citing a potential breach of privacy in completing this section where any person in the shearing shed could have access to these details. The Board considered that the relationship between the woolgrower and the grower's Wool Broker was best placed to document bank account details for the deposit of wool sale proceeds.

The AgForce Sheep & Wool Board is very supportive of the NWD and its use by Australian woolgrowers. It is an important tool for the industry as it provides supply-chain partners with an understanding of what wool is actually being produced, in terms of both mulesing status and dark and medullated fibres.

However, whilst uptake of the NWD has increased, with around 70% of wool sold being accompanied by a completed NWD, greater education and promotion of the NWD is required to inform woolgrowers and wool classers of the differing wool sale catalogues and wool selling rooms, with particular attention paid to the potential for sale discounts when an accurate and fully completed NWD is not provided.

It has been suggested that a market-based incentive would be for the trade to view 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.

The AgForce Sheep & Wool Board feel that it is important that efforts are renewed to highlight the value of the NWD to the industry.

Should you wish to discuss these matters further, do not hesitate to contact me on 0428 771 176 or alternatively, AgForce Sheep & Wool Policy Director Michael Allpass on 07 3236 3100 or email allpassm@agforceqld.org.au.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'A Rae', written in a cursive style.

Mr Alan Rae
President,
AgForce Sheep & Wool Board