

From: [Stuart Clayton](#)
To: [Kerry Hansford](#)
Subject: 2023 Review of the National Wool Declaration
Date: Friday, 10 March 2023 7:26:37 AM
Attachments: [Outlook-a0t1mqo1.png](#)

Dear Kerry

I am writing on behalf of Modiano to provide our views on the National Wool Declaration for the 2023 review.

Our biggest disappointment from the previous review was the proposal to discontinue the use of the Ceased Mulesing (**CM**) status on the NWD. I would also like to note that our objection to its removal is not only shared by all exporters but also our clients, who are the spinners and weavers that are the end users of Australian wool.

With regard to the sale of wool tops, **CM** wool is accepted by all our European customers and is seen to be in line with the same ethical practices as Non Mulesed. As such there is no distinction between **CM** and **NM** and are both acceptable components in the production and sale of Non Mulesed certified tops.

The removal of **CM** from the NWD would deeply affect our business and further reduce our ability to buy Australian wool. While it may only seem a small portion of the Australian clip it is in fact a large portion of the overall world supply of Non Mulesed wool. For Modiano, this short-fall in supply would need to be filled from origins other than Australia, such as South Africa and New Zealand where we freely buy Non Mulesed wool.

The **CM** status on the NWD is also accepted by RWS certified orders. The loss of **CM** would reduce both grower's and processor's ability to access this scheme. We have found that the rise in demand for RWS certified tops over the past 18 months has also increased general demand for **NM/CM** certified tops.

While we do understand AWEX has some difficulties auditing the **CM** category we believe its benefit and support from topmakers, spinners and weavers far outweighs any detractions. We also propose if there is a need to simplify the NWD document then discontinue the **AA** status. Over the past 15 years we have not had one single customer ask for pain relief certified wool tops.

We also acknowledge that during the last review the exporter representative, Matt Hand, voted to discontinue **CM**, much to the dismay of all other exporters. It should be noted that at the time Matt was also working for New Zealand merino, a company that would greatly benefit from Australia's discontinuation of the **CM** category. This may have clouded his judgment.

Kind regards,
Stuart Clayton

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