

# DECLARING WHAT THE WORLD'S DEMANDING



**NWD** Integrity Program



The National Wool Declaration (NWD) is an initiative; developed in consultation with the Australian wool industry, to assist buyers & their clients gain access to credible information on issues such as Mulesing Status & Dark & Medullated Fibre Risk (DMFR). The NWD is a voluntary Declaration, developed so wool growers can communicate directly with their prospective buyers, processors, manufacturers & retailers about issues that can influence purchasing decisions but cannot be objectively measured.

The NWD Integrity Program (NWD-IP) is an extensive program of Desktop Audits & On Farm Inspections for a single purpose: to build wool pipeline & consumer confidence in Australian wool. Non Compliant Declarations can seriously reduce the credibility of the program & confidence in the Australian wool industry.

## NWD-INTEGRITY PROGRAM (NWD-IP)

### Components of the NWD-IP

The NWD-IP comprises the following components as they relate to Mulesing Status:

#### **Desktop Audit**

Validate that the correct Mulesing Status is published  
~1,000 Declarations p/a.

#### **On Farm Inspection**

Inspect Ceased Mulesing properties & Non Mulesed mob(s) ~225 Inspections p/a.

#### **Desktop Verification of use of Analgesic &/or Anaesthetic Product(s) at Mulesing**

Validate mob(s) declared as mulesed with Analgesic &/or Anaesthetic product(s) ~350 Verifications p/a.

### Key Objectives of the NWD-IP

1. To establish the accuracy of the NWD with respect to Declarations of Non Mulesed (NM), Ceased Mulesing (CM) & mulesed with Analgesic &/or Anaesthetic (AA).
2. To provide an independent monitoring & reporting service to the wool industry pipeline, &
3. In the event of Non Compliance, establish & implement corrective actions to prevent recurrence.

### Audits or Inspections in Successive Years

A property is eligible for another Desktop Audit, Desktop Verification or On Farm Inspection in successive shearings/years for any Declaration, regardless of the outcome of any previous Audit(s) or Inspection(s).

### 3rd Party Requests for NWD-IP Inspections or Verifications

Inspections or Verifications may be conducted on behalf of a client (e.g. a wool buyer) at their cost. In these circumstances, the Owner/Manager would be informed of this request & their permission to undertake the Inspection sought.

### Publication of NWD-IP Results

Only the Owner/Manager will receive a copy of the NWD-IP On Farm Inspection Report. While the individual results of an Inspection will remain confidential (AWEX will only produce & report to industry aggregated statistics on Compliance); if an appeal process proceeds, some aspects may be made public.

### Extension & Education

The NWD-IP also comprises on-going extension & education aimed at improving woolgrower, broker, buyer, processor & retailer awareness & understanding of the NWD.

### PROCEDURE FOR A DESKTOP AUDIT OF NON MULESED (NM), MULESED WITH ANALGESIC &/OR ANAESTHETIC (AA) OR CEASED MULESING (CM)

#### Document Request

Copies of the NWD & Wool Classer's Specification are requested (pre-sale) from the wool selling broker or private treaty merchant. These documents are checked against the published Mulesing Status - this is the Desktop Audit.

Any errors detected in this process are corrected pre-sale, with the broker(s) & buyers notified.

## PROCEDURE FOR A MOB DECLARATION OF MULESED WITH ANALGESIC &/OR ANAESTHETIC (AA)

Analgesic &/or Anaesthetic (AA) refers to Analgesic &/or Anaesthetic product(s) registered by APVMA for use on sheep. Evidence of the use of AA at mulesing on the entire mob must be provided by the Owner/Manager to AWEX on request. For this Desktop Verification, the Owner/Manager supplies a copy of one of the following:

### ***Analgesic &/or Anaesthetic Product(s) purchased from Veterinarian or other Supply Company***

Tax Invoice for the purchase of the Analgesic &/or Anaesthetic product(s), including the amount of product purchased & the number of lambs treated.

### ***Analgesic &/or Anaesthetic Product(s) supplied by Mulesing Contractor***

Tax Invoice for contract mulesing citing the use of the Analgesic &/or Anaesthetic product(s), including the amount of product(s) used & the number of lambs treated.

### ***Analgesic &/or Anaesthetic Product(s) supplied by Other Source***

Either a Tax Invoice or a Statutory Declaration from the source (e.g. neighbour, relative), including the amount of product(s) supplied & the number of lambs treated.

### ***Analgesic &/or Anaesthetic Product(s) used by Vendor***

Where sheep have been purchased, either a Tax Invoice, a Statutory Declaration or an Animal Health Statement from the Vendor, including the amount of product(s) used & the number of lambs treated.

## PROCEDURE FOR A MOB DECLARATION OF NON MULESED (NM)

### **On Farm Inspection - Initial Contact**

The Owner/Manager of a property to be inspected shall be contacted by the AWEX Inspector, who will discuss the Inspection & arrange the timing for it, usually within 1 - 2 weeks of this initial call. A letter detailing the arrangements for the Inspection, contact details for the Inspector, a copy of the NWD/Classer's Speci & these NWD-IP procedures will be provided to the Owner/Manager.

### **On Farm Inspection - Secondary Contact**

The Owner/Manager shall be contacted by the Inspector to remind them of the Inspection date/time & answer any queries. This usually occurs a few days before the Inspection.

### **Presentation & Number of Mobs**

The Owner/Manager will be asked to present sheep from nominated declared mob(s) in a set of yards with a race. If the original Non Mulesed mob has been combined with other sheep & presented as a mixed mob, the Non Mulesed sheep must be clearly identifiable (e.g. by ear tag or ear mark).

## Number of Sheep to be Inspected in a Mob

In most cases, it is not necessary to examine all sheep in a mob, a "wing" of sheep may be presented instead of the entire mob. Based on a statistical calculation, the Inspection protocol requires that a minimum of 200 sheep are inspected, or the entire mob if it is less than 200 head. The Inspector will randomly draft into the race the sheep from each mob to be examined.

### **Inspection Processes**

#### ***Where the Declared Sheep have been Sold***

If the mob of Non Mulesed sheep has been sold, then proof of sale (e.g. National Vendor Declaration or Account Sale) must be provided to the Inspector or to AWEX. If there are no Non Mulesed sheep remaining on the property, this will be finalised by telephone &/or letter.

#### ***Where the Declared Sheep are Mulesed***

If some, or all of a mob of sheep declared as Non Mulesed is actually mulesed or mulesed with Analgesic &/or Anaesthetic, or the property is not eligible for Ceased Mulesing status, the Inspector will seek an explanation surrounding the incorrect Declaration. If further information is necessary to form a conclusion regarding Compliance, this will be arranged by letter.

#### ***Failure to Submit to an Inspection***

Should an Owner/Manager decide not to submit to an Inspection, AWEX will make a fair & reasonable attempt to arrange an Inspection on another date/time. If no Inspection can be arranged, Non Compliance may then be determined. In this case, the actual mulesing status of the sheep has no bearing on the outcome since the Inspector has not been able to verify the mulesing status of the mob(s). No future Declarations will be accepted for that property (until an inspection is undertaken & the Mulesing Status verified) & any Declaration of NM, CM or AA will be invalidated prior to sale.

#### ***Where the Declared Sheep are Sold, Mulesed, or a Failure to Submit to an Inspection***

In these cases, based on receipt of the applicable information (e.g. National Vendor Declaration or Account Sale, the report from the Inspector, or a written response from the Owner/Manager), AWEX will determine if the Brand/Property is Compliant or not.

*Note:* the brokers & buyers will be advised of any change in Mulesing Status.

### **Owner Statement**

Prior to the Inspection, the Owner/Manager is to complete Part 1 of the NWD Mulesing Status Inspection Report where he or she affirms that the sheep/mob(s) presented are those declared, or are representative of those declared, on the NWD.

### **Sheep Inspection**

For each sheep inspected, the breech & tail region shall be physically examined for evidence of mulesing.

## Reporting

The NWD Mulesing Status Inspection Report (Part 2) shall be completed by the AWEX Inspector & will include a detailed description of the mob(s) inspected, any observations including scarring patterns & information provided to the Inspector during the Inspection.

In the event of Non Compliance, the exact nature of the Non Compliance shall be documented. This shall include the number of sheep observed of each mulesing status, the age & ear tag &/or ear mark of the sheep considered by the Inspector to be mulesed, & a description of the scar pattern(s) etc. Photographs may be taken, if necessary.

This information is detailed in a formal NWD-IP On Farm Inspection Report (that confers Compliance, Conditional Compliance or Non Compliance) provided to the Owner/Manager by AWEX after the Inspection.

## Non Compliance

Where evidence inconsistent with the Declaration is discovered (i.e. the Declaration is Non Compliant), the Inspector will work with the Owner/Manager to establish the likely cause of the Non Compliance.

## Corrective Action(s) for Non Compliance

### *Owner Agrees with the Inspector's Findings*

- If the Owner/Manager agrees with the Inspector regarding Non Compliance, possible corrective actions will be discussed (e.g. changing ear tags of mulesed sheep, moving them to a mulesed mob or commitment to selling off mulesed sheep prior to the next shearing), & this shall be recorded by the Inspector. The Owner/Manager may then submit subsequent Declarations.
- *Note:* Any subsequent NWD declaring Non Mulesed or Ceased Mulesing will be compared to previous Non Compliance Reports to determine if additional information is required from the Owner/Manager. The Declaration may then be accepted, invalidated prior to sale, or mob(s) may be inspected again.

### *Owner Disagrees with the Inspector's Findings*

- If the Owner/Manager disagrees with the Inspector regarding Non Compliance & the matter cannot be resolved to the satisfaction of AWEX, future NWD Declarations for that property will not be accepted or will be invalidated prior to sale.
- *Note:* A second opinion from a different Inspector may be conducted prior to any corrective action being undertaken. If a second Inspection provides a different result to the first Inspection, the Owner/Manager may be able to submit further Declarations. However, if a second Inspection provides the same result as the first Inspection, no future Declarations will be accepted for that property & they will be invalidated prior to sale (other mob(s) may be inspected to confer Compliance).

## Appeal

AWEX will afford an Owner/Manager the same appeal rights to a review committee of AWEX as would apply to an AWEX member responding to a complaint, notwithstanding the Owner/Manager may not be a member. To the extent AWEX considers a NWD may be misleading or deceptive, it will treat the matter as it would an issue with a member.

## PROCEDURE FOR A PROPERTY DECLARATION OF CEASED MULESING

The procedures for an On Farm Inspection of Ceased Mulesing status are the same as those applied to a Declaration for Non Mulesed, with the exception that the mob(s) chosen relate to proving the Ceased Mulesing status of the property. These mobs are described below:

### *Declaration of Ceased Mulesing (Sheep born on the Property)*

The Owner/Manager will be asked to present in a set of yards with a race, sheep from a maximum of 2 mob(s) of younger Non Mulesed sheep that have been born on the property in the previous 12 months. If the younger Non Mulesed mob has been combined with other mulesed sheep (e.g. another drop) & are presented as a mixed mob, the Non Mulesed sheep must be clearly identifiable (e.g. by ear tag or ear mark).

### *Declaration of Ceased Mulesing (Sheep brought onto the Property)*

If mulesing is not undertaken on the property but Non Mulesed sheep are purchased & brought onto it, the Owner/Manager will be asked to present in a set of yards with a race, sheep from a maximum of 2 mob(s) of any purchased sheep.

## DEFINITIONS/TERMINOLOGY

### National Wool Declaration (NWD)

The National Wool Declaration is a voluntary Declaration made by the Owner/Manager of the wool growing enterprise.

By completing & signing the Declaration, the Owner/Manager agrees to participate in the NWD-IP, viz. Desktop Audits/Verifications & On Farm Inspections.

### Eligible Declarations

A Declaration is deemed to be eligible for an NWD-IP Desktop Audit, Verification or On Farm Inspection if it contains one of the following: a mob that is Non Mulesed (NM), &/or a mob that is mulesed with Analgesic &/or Anaesthetic (AA), &/or the property has declared Ceased Mulesing status (CM).

### Mulesing

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

*Source:* Australian Animal Welfare Standards & Guidelines for Sheep.

### Ceased Mulesing (CM), Property Declaration

Wool from sheep where mulesing has ceased on the property.

- a. No lambs born on this property in the last 12 months have been mulesed\*.
- b. No mulesed (or mulesed with Analgesic &/or Anaesthetic) ewes or wethers have been purchased.

\*At the time of shearing, lambs must be marked but not mulesed before Ceased Mulesing is declared for a property.

### Non Mulesed (NM), Mob Declaration

No sheep in this mob has been mulesed.

### Mulesed with Analgesic &/or Anaesthetic (AA), Mob Declaration

All sheep in this mob were mulesed & treated with a pre- &/or post-Analgesic &/or Anaesthetic product(s) registered by APVMA for use on sheep.

*Note:* Analgesic &/or Anaesthetic (AA) must be declared separately for each mob (it is not a property Declaration).

### Mulesed (M), Mob Declaration

Some/all sheep in this mob have been mulesed.

## OUTCOMES FOR AA VERIFICATIONS

#### Compliant

- Evidence of the use of Analgesic &/or Anaesthetic product(s) (AA) at mulesing provided for the youngest mob, or the most recent purchase or sourcing of AA.

#### Non Compliance

Two levels of Non Compliance may be determined as indicated below:

##### Non Compliance Level 1

- a misunderstanding of Mulesing Status.
- incorrect completion of NWD.

*Note 1:* Subsequent Declarations will be checked prior to sale & may be accepted or invalidated. Property/mob(s) to be verified again.

##### Non Compliance Level 2

- a deliberate false Declaration.
- failing to respond to a Verification (after a fair & reasonable attempt has been made to arrange it).

*Note 1:* No future Declarations will be accepted for the property until a Verification is undertaken & is Compliant. Declarations will be invalidated prior to sale.

## OUTCOMES FOR NM/CM INSPECTIONS

#### Compliant

- The inspected mob(s) contains no mulesed sheep, or less than 1% of incorrectly declared sheep in the declared mob (with an adequate explanation for their presence).

### Conditional Compliance

- a misunderstanding of Mulesing Status.
- incorrect completion of NWD.
- greater than 1% of incorrectly declared sheep in the declared mob (with an adequate explanation for their presence).

*Note 1:* Where Ceased Mulesing is declared, younger mobs of sheep must be Non Mulesed & all purchased sheep must be Non Mulesed.

*Note 2:* Subsequent Declarations will be checked prior to sale & may be accepted or invalidated. Property/mob(s) to be inspected again.

### Non Compliance

Two levels of Non Compliance may be determined as indicated below:

##### Non Compliance Level 1

- a misunderstanding of Mulesing Status.
- incorrect completion of NWD.
- a drop (age group) of incorrectly declared sheep in the declared mob (with an adequate explanation for their presence).

*Note 1:* Where Ceased Mulesing is declared, younger mob(s) of sheep & all purchased sheep must be Non Mulesed.

*Note 2:* Subsequent Declarations will be checked prior to sale & may be accepted or invalidated. Property/mob(s) to be inspected again.

##### Non Compliance Level 2

- a deliberate false Declaration.
- greater than 1% of incorrectly declared sheep in the declared mob (without an adequate explanation for their presence).
- failing to submit to an Inspection/Verification (after a fair & reasonable attempt has been made to arrange it).

*Note 1:* No future Declarations will be accepted for the property until an Inspection is undertaken & is Compliant. Declarations will be invalidated prior to sale.

## ACTION BY BUYERS & THEIR CLIENTS

If a Declaration (regardless of type) is found to be Non Compliant, the buyers (& the brokers) of the incorrectly declared wool are informed & advised of the correct mulesing status. They & their wool processing clients will consider their position.

### FOR MORE INFORMATION CONTACT:

Dr Kerry Hansford, p. 03 9318 0277

e. [khansford@awex.com.au](mailto:khansford@awex.com.au)

Mr Mark Grave, p. 02 9428 6100

e. [mgrave@awex.com.au](mailto:mgrave@awex.com.au)

Or visit: [www.awex.com.au](http://www.awex.com.au)