

# FREQUENTLY ASKED QUESTIONS



## NATIONAL WOOL DECLARATION – INTEGRITY PROGRAM (NWD-IP)

### 1. **What is the National Wool Declaration?**

The National Wool Declaration (NWD) was introduced in 2008 to provide information to the marketplace in response to inquiry from the buyers & users of Australian wool. The NWD is a voluntary Declaration from the wool grower about information that cannot be objectively measured, namely Mulesing Status & Dark & Medullated Fibre Risk (DMFR). The information from the NWD is transferrable along the pipeline & is used by buyers of Australian wool in their purchasing decisions.

### 2. **Why do I have to sign the NWD?**

The signature of the Owner or Manager is critical in having a valid, legal Declaration as they have knowledge of the history of each mob & they are responsible for the information provided. Shearers, wool classers or brokers cannot sign on behalf of the Owner/Manager.

### 3. **What does the NWD - IP involve?**

The NWD - Integrity Program is an independent verification of the accuracy of Declarations made by growers through cross-checking documentation (i.e. NWD, Classer's Specification & sale catalogue data), verifying the use of Analgesic &/or Anaesthetic at mulesing (AA), & On Farm Inspections of properties declaring Ceased Mulesing status and mob(s) of sheep declared as Non Mulesed (NM).

Approximately, 1000 Desktop Audits for NM, CM & AA Declarations & 350 Verifications of the use of AA are conducted each year. On Farm Inspections for Declarations of NM/CM are undertaken on approximately 225 properties around Australia annually.

### 4. **Why inspect properties for NM/CM status or verify the use of AA product(s) at mulesing?**

The NWD-IP is a critical factor in buyers, processors, manufacturers & retailers having confidence in the Declaration. The Integrity Program supports the NWD by ensuring that buyers can rely on the accuracy of the Declarations made.

### 5. **Who is conducting & who is paying for the NWD-IP?**

The Australian Wool Exchange (AWEX) conducts the Integrity Program. AWEX is an independent, not-for-profit company, which develops standards, compliance programs & information systems on behalf of the Australian wool industry. The Inspections are paid for by AWEX. Buyers or processors may contract AWEX to conduct on farm Inspections on a fee-for-service basis.

### 6. **How long is the NWD-IP going for & will it change?**

The NWD-IP is an on-going program. The NWD-IP changes in response to the requirements of industry. Changes are made based on regular reviews conducted by AWEX in consultation with all industry stakeholders.

### 7. **How did I get selected for AA Verification or an Inspection?**

From the ~1000 properties randomly selected each year for a desktop audit, all Declarations of AA undergo an AA Verification, with Declarations of NM/CM placed on a register for an On Farm Inspection. The Mulesing Status of properties of any size & in any location around Australia may be verified or inspected.

### 8. **When will I be inspected again?**

Even if an Inspection/Verification was Compliant, it is possible that you will be inspected/verified in subsequent years.

## ON FARM INSPECTION PROCESSES

### 9. *Who are the AWEX Inspectors?*

The AWEX Inspectors are regionally based & all have an agricultural background with a strong emphasis on sheep & wool production. They understand farm management practices as well as the various issues that can impact on when an Inspection may or may not be possible.

### 10. *When is the initial contact made with the Owner/Manager?*

The Inspector will telephone an Owner/Manager a few weeks before a visit, which will allow the Inspector & the grower to arrange a suitable date & time. Occasionally, a phone call may be made at short notice; this may happen when a property is in an area where several Inspections are being carried out.

Once the arrangements are in place, the Owner/Manager will receive a letter (by email if available) from AWEX that details the Inspection & provides a copy of the relevant NWD/Classer's Specification & a brochure explaining the NWD-IP.

### 11. *What issues are discussed during this initial phone call?*

The Inspector will give the background to the NWD-IP & the timeframe that he/she would like to carry out the Inspection. The mob(s) that could be inspected are discussed to see if they are available. For example, Inspections will be scheduled to avoid inspecting ewes during late pregnancy or at lambing, or if the yards are too muddy.

### 12. *What happens if circumstances prevent an immediate Inspection?*

If an Inspection cannot be arranged for a planned Inspection Run, the Inspector will record this & plan to undertake the Inspection at a later date.

### 13. *What happens if the sheep have been sold?*

In these circumstances, the Inspector will ask for proof of the sale of these sheep (i.e. National Vendor Declaration or Account Sale). This evidence must be sent to AWEX by post, fax or email.

## WHAT HAPPENS DURING AN ON FARM INSPECTION?

### 14. *Why is a signature required to say that the mob is the one declared on the NWD?*

All audit processes require checks & balances to ensure that the data collected is true & correct. This simple step signifies to the Inspector that the Owner/Manager is willing to go through the Inspection process.

### 15. *What is required to prepare the sheep for Inspection?*

The mob(s) needs to be brought to sheep yards with a race. The Inspector will run the sheep into the race to physically inspect the tail & breech regions for scars consistent with Mulesing. For mobs greater than 200, 200 sheep (e.g. "wing" from a large mob) will be examined & for mobs less than 200, the entire mob will be examined.

### 16. *What are the Inspectors looking for during the Inspection?*

The Inspectors will closely examine the sheep for distinctive scars on the breech &/or the tail region of a sheep that result from the Mulesing operation. Therefore, the sheep need to be in a race & not in a paddock or yards. This unique scarring can be differentiated from shearing cuts or other breech modification techniques.

If any alternative method to mulesing is used, (i.e. a method that results in the removal or loss of skin from the breech &/or tail of a sheep), the Owner/Manager must be able to provide evidence of the use of the alternative method on the entire mob(s), such as Tax Invoice from the contractor who performed the method. If the sheep are purchased, the same trace-back to the alternative method must be sourced from the vendor.

### 17. *How long will an Inspection take?*

Depending on the length of the wool & the cleanliness of the sheep, the Inspection takes from ½ to 1 hour. Time is also available for the Owner/Manager to discuss the NWD & its Integrity Program with the Inspector.

### 18. *How many Mulesed sheep are allowed in a mob of Non Mulesed sheep?*

There is no "allowable" number of Mulesed sheep in a Non Mulesed mob. To clarify, prior to shearing every effort must be made to draft off all Mulesed sheep from Non Mulesed sheep. The intention is that a Non Mulesed mob is just that, Non Mulesed. Only at an Inspection may the issue of Compliance take into consideration sheep from another mob or strays that may have joined the mob post-shearing. Sheep from other mob(s) & strays must be easily differentiated from the declared mob (e.g. by ear-tags or ear-marks).

### 19. *Why would my Declaration be Incorrect?*

There can be several reasons why a Declaration might be wrong or incorrect, ranging from an honest mistake, a mistake in understanding the question(s) asked, or a deliberate & misleading error. The Inspector will discuss circumstances surrounding an incorrect declaration with the Owner/Manager. In all circumstances, the broker & the buyer must be notified as the wool has been purchased with the understanding that the Declaration was correct.

**20. Does the Owner/Manager get to see a report on the Inspection?**

After completing the Inspection, the observations will be written down by the Inspector. At this time, the Owner/Manager is able to discuss any aspect of these observations & add comment for inclusion in the report.

**21. Does AWEX provide any other feedback on the Inspection?**

The Inspectors send their Inspection Report to AWEX. Based on the written observations, AWEX sends a formal report back to the Owner/Manager listing the outcomes of the Inspection in terms of Compliance.

**22. Is the result of the Inspection going to be publicised to anyone?**

When an Inspection is Compliant (the Mulesing Status of the sheep complied with the Declaration), the information recorded during an Inspection & the formal report will be confidential between AWEX & the Owner/Manager. However, in cases of Non Compliance, both the broker(s) & the buyer(s) of the wool will be informed.

In cases of Non-Compliance, AWEX will not take any legal action. However, the buyer(s) of the wool may choose to use the Trade Practices Act to take legal recourse for a false Declaration.

**23. Will I be fined if my sheep are Non Compliant?**

No fines will be applied to the outcomes of an Inspection (see Question 22 above).

**24. Who else has been inspected?**

The list of properties to be inspected & the results of each inspection is confidential. The Inspectors will not report on the outcomes of any Inspection to other growers, classers, brokers etc.

**25. What are the results of the Inspections so far?**

The outcomes of the Inspections are confidential & specific cases will not be publicised. To prevent the results of the Inspections being taken out of context, industry statistics on Compliance will only be reported when sufficient Inspections have been conducted.

## ANALGESIC &/OR ANAESTHETIC (AA) VERIFICATION PROCESS

**26. How is the use of Analgesic &/or Anaesthetic Product(s) at Mulesing Verified?**

AWEX sends a letter to the Owner/Manager of the mob(s) declared as mulesed with AA requesting evidence of the use of an APVMA registered Analgesic &/or Anaesthetic product(s) on the entire mob(s). This request usually refers to the youngest mob on the NWD (or the most recent purchase of AA products.).

**27. What form does this Evidence take?**

For this Desktop Verification, the Owner/Manager must supply a copy of one of the following:

- Tax Invoice for the purchase of the AA product(s) from a Veterinarian or other supply company.
- Tax Invoice from the mulesing contractor citing the use of the AA product(s).
- Tax Invoice or a Statutory Declaration from the source of the AA product(s) (e.g. from a neighbour, relative).
- Where sheep have been purchased, either a Tax Invoice, a Statutory Declaration or an Animal Health Statement citing the use of the AA product(s) from the Vendor.

Note, the Verification document should list the amount of AA product(s) used & the number of lambs treated.

## OUTCOMES FROM AN ANALGESIC &/OR ANAESTHETIC (AA) VERIFICATION

**28. Does the Owner/Manager receive any feedback on the AA Verification?**

AWEX sends a formal report back to the Owner/Manager listing the outcome of the AA Verification in terms of Compliance.

**29. Is the result of the AA Verification going to be publicised to anyone?**

When a Verification is Compliant, the information received during the AA Verification & the formal report will be confidential between AWEX & the Owner/Manager. However, in cases of Non Compliance, both the broker(s) & the buyer(s) of the wool will be informed.

**30. Is the result of the Verification going to be publicised to anyone?**

When a Verification is Compliant (the Mulesing Status of the sheep complied with the Declaration), the information recorded during an Inspection & the formal report will be confidential between AWEX & the Owner/Manager. However, in cases of Non Compliance, both the broker(s) & the buyer(s) of the wool will be informed.

In cases of Non-Compliance, AWEX will not take any legal action. However, the buyer(s) of the wool may choose to use the Trade Practices Act to take legal recourse for a false Declaration.

**31. Will I be fined if my Analgesic &/or Anaesthetic (AA) Verification is Non Compliant?**

No fines will be applied to the outcomes of a AA Verification (see Question 30 above).

## GENERAL QUERIES RELATED TO MULESING & THE NWD

### 32. *Will the National Wool Declaration become compulsory?*

While some organisations have requested for the NWD to be compulsory, the NWD is currently voluntary.

### 33. *When will Mulesing be banned?*

The Australian & State governments along with wool industry bodies do not intend to ban Mulesing.

### 34. *Can I go back to Mulesing?*

The welfare of the Australian sheep population is paramount; therefore, Owners/Managers must ensure that all precautions are taken to protect their animals. If changed environmental/seasonal conditions result in higher than expected levels of fly-strike, then it is the responsibility of the Owner/Manager to implement appropriate flystrike prevention &/or treatment. This may include a return to Mulesing; with the use of Analgesic &/or Anaesthetic product(s) strongly recommended. The Australian Animal Welfare Standards & Guidelines for Sheep must be adhered to (see [www.animalwelfarestandards.net.au/sheep/](http://www.animalwelfarestandards.net.au/sheep/)).

### 35. *Is there a price advantage for wool from Non Mulesed sheep?*

The volume of NM wool is still quite low & between & within sale price fluctuations can make it difficult to pick up price signals. However, within the current market, price premiums of 50 – 100 c/kg clean are being detected.

### 36. *Are the buyers of Australian wool interested in the NWD?*

Buyers, processors, manufacturers & retailers perceive that other wool producing countries, such as South Africa & New Zealand, have better animal welfare practices compared to Australia. In some circumstances, this has resulted in buyer preference for wool from these countries.

The introduction of the NWD has allowed Australia to declare information that can influence purchasing decisions. Following its inception, there has been increased interest from the wool pipeline in the NWD as well as the outcomes of Mulesing Status Verifications & Inspections.

### 37. *What other information do the buyers/processors of Australian wool request?*

It is the responsibility of the processor of the wool to seek documentation related to the Mulesing Status of wool they have purchased. Buyers may request a copy of the NWD for wool they have purchased for a processor.

In addition, buyers are now requesting Mulesing Status Certificates from AWEX to provide certainty to their customers on the Mulesing Status of declared wool. AWEX produces a Mulesing Status Certificate by checking all the sale lots in a consignment against the results of On Farm Inspections &/or Verifications. If a sale lot is found to be Non Compliant, the buyer will remove that lot from the consignment prior to delivery & may take legal recourse or submit a claim through the broker to the grower.

### 38. *Is there a source of up-to-date information on all aspects of flystrike?*

The State Departments of Agriculture or Primary Industries as well as other industry organisations (e.g. Sheep CRC, Australian Wool Innovation & Meat & Livestock Australia) will have information on their websites. The web-site: [www.flyboss.org.au](http://www.flyboss.org.au) has a wide range of information on this topic.

### 39. *Where do I find the NWD so I can make a Declaration?*

NWD Version 8.0 was released in March 2020 & is available in different formats. Brokers may provide their clients with a Classer's Spec with an NWD included, or a separate NWD page for those who prefer to keep it separate or when "out-dated" shearing stationery is in use. Go to [www.awex.com.au](http://www.awex.com.au) for copies of each format.

### 40. *Where do I find other information related to the NWD?*

Additional information can be found at [www.awex.com.au](http://www.awex.com.au). This website includes brochures: Declaring What the World's Demanding, How to Complete the NWD Correctly & NWD V8.0 Release Notes & Business Rules.

### 41. *Will there be any changes to the NWD?*

The NWD is reviewed regularly & this can result in changes to definitions, codes, instructions or formatting.

These FAQs refers to NWD V8.0. It is expected that the next review will be undertaken at the end of 2020 or early 2021. The results of Animal Welfare trials on alternative methods to mulesing are currently being undertaken, with the outcomes from these trials to be considered.

## FOR MORE INFORMATION CONTACT:

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