



# The National Council of Wool Selling Brokers of Australia Inc

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NCWSBA-23-011

Dr Kerry Hansford  
AWEX

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

Dear Kerry,

## **Submission to the 2023 Review of the National Wool Declaration (NWD)**

In response to the call for submissions for the 2023 Review of the National Wool Declaration (NWD), the NCWSBA board support the use of the current version of NWD and for the completion of the National Wool Declaration by all wool producers. More detailed points on behalf of NCWSBA are:

### **1. Support for the existing National Wool Declaration**

Our members support the continuation of the existing NWD with the need for stability in the industry rather than continual change. For example, the definition of Ceased Mulesed (CM) has changed on many occasions as a result of each NWD review process. NCWSBA preference is for CM to continue as an available option and for the current definition of CM to remain. The price premiums for CM justify the continuation of this category for a wool lot at auction.

### **2. Mandatory completion of the National Wool Declaration**

The trend in NWD completion rates in recent years would indicate adoption rates have plateaued. More concerning is the decline in 2022 completion rates compared with 2020 and 2021 given in appendix 2. If the industry's aim is to achieve 100% compliance of NWD declarations, then it will only be achieved through some mechanism to make the NWD mandatory. As with past submissions, the Board of NCWSBA supports 100% adoption of NWD on all P and D certificate wool. One of the tasks of the Industry Consultative Committee should be to explore the options to make the NWD mandatory. For example, should the wool industry be working with government on making the NWD and 100% PIC capture a requirement for biosecurity or another mechanism.

### **3. Ensure the National Wool Declaration remains low cost**

The NWD needs to provide a low cost mechanism for the capture of critical information needed by downstream users such as processors (DMFR), brands (mulesing status) and government (PIC/biosecurity). Brokers incur significant costs in addressing errors and/or incomplete NWDs. The increased adoption of e-speci will improve efficiencies and accuracy and ultimately reduce the costs to the industry of NWD. The Industry Consultative Committee should consider how a more rapid adoption of e-speci can occur.

### **4. All submissions are made available to industry participants**

In the interest of transparency and understanding of different industry positions on the NWD, it is requested that a process is put in place where industry stakeholders who make a submission are granted access to all other submissions as part of the 2023 NWD review.

I hope that these points help in the current Review of the NWD.

Kind Regards,

Rowan Woods  
President

cc Board of NCWSBA