



**HUMANE SOCIETY  
INTERNATIONAL**  
AUSTRALIA

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Dr Kerry Hansford  
Secretary, NWD ICC  
AWEX  
Gate 4, Frederick Rd  
TOTTENHAM VIC 3012

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

2 March 2023

Dear Dr Hansford,

Humane Society International (HSI) is keen to reiterate our position and recommendations in relation to the review of the National Wool Declaration (NWD) and appreciates the opportunity to provide comments. HSI believes this review process represents a crucial opportunity to ensure maximum transparency for wool brokers, buyers and retailers, and we continue to stand by our recommendations presented in our previous submissions.

**HSI continues to support the Ceased Mulesing (CM) category** which greatly assists wool buyers as well as acting as an incentive for woolgrowers.

**HSI also strongly supports the inclusion of both the AA (mulesed with Analgesic &/or Anaesthetic products) and LN (treated with Liquid Nitrogen) categories.** These categories help ensure that the NM (Non-Mulesed) category is easily identifiable, and wool from growers who have taken the initiative to use genetics to transition their flocks to plain-bodied non-mulesed sheep is easy to distinguish for wool buyers.

**HSI supports the inclusion of “other” breech modification alternatives or animal welfare declarations within the NWD** because animal welfare is of growing importance to Australian consumers. The Department of Agriculture commissioned a report called *'Australia's Shifting Mindset on Farm Animal Welfare'* by consultancy firm Futureye in 2018 and found 95% of Australians view farm animal welfare to be a concern. The report said that the public has a clear expectation for effective regulation to uphold these freedoms and expect highly transparent practices, regulation and enforcement. It follows that by offering more clarity on the practices used allows further transparency and ultimately enhances the integrity of the wool industry.

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**HSI again recommends for the NWD to be made mandatory** which would demonstrate that the Australian wool industry is fully committed to full transparency and integrity. The completion rate in some states still remains a concern, particularly in Western Australia at just 50.1% in 2022, so there is a real need for improvement. Better declaration rates would also offer more confidence to both buyers and retailers, supporting the vision of a NWD that is trusted and recognised globally.

Please forward any correspondence in relation to this submission by email to [gdolphin@hsi.org.au](mailto:gdolphin@hsi.org.au). Thank you again for the opportunity to provide our recommendations.

Yours sincerely,

A handwritten signature in black ink that reads "G. Dolphin". The signature is written in a cursive, slightly slanted style.

Georgie Dolphin  
Animal Welfare Campaigner  
Humane Society International