

# G. Schneider Australia Pty Limited

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Dr Kerry Hansford  
Secretary, NWD ICC, AWEX

email: khansford@awex.com.a

6th February, 2023

**reference: 2023 review of the National Wool Declaration**

Dear Kerry,

The NWD is the most important document for the Australian industry for proof of mulesing status to our customers. As the Australian wool clip is still widely recognised as a mulesed one, we must support all initiatives that promote and encourage the transition to NM status. We support the current NWD document and in particular the retention of CM as a status. It's recognised both commercially by the trade and as a sustainable animal welfare outcome supported by welfare groups and QA programs.

The change in the current document that reflects that no lamb has been mulesed on farm in the past 12 months and no mulesed sheep have been purchased in the last 12 months is very clear. At the same time, it's consistent with standards requested of other QA programs that are recognised globally. This ensures a consistent message across the industry.

As a suggestion, we recommend to offer CM as an option under 'mob status' on the NWD V9.3. This would be clearer. We often see farms with NM lambs but older mobs as AA. Whilst not guaranteed, we would expect that some of these could be CM for the older sheep. The fact that CM is not offered as an option to circle, would likely be the reason for this confusion.

CM is consistently around 3% of the declaration rates and this is encouraging the increase in NM rates over time. As a farm transitions from CM to NM, the volume of CM in their flock will reduce each year. Hence, the consistent figures are encouraging. Meaning that more growers are transitioning to NM. This should be promoted actively to increase awareness of this trend. Every option available to us must be used to promote Australian wool.

The greater percentage of NM/CM in the merino category finer than 18.6 is important to our business commercially. CM is recognised as being produced by a sustainable wool grower who no longer practices mulesing. It's important that these growers are recognised for making this change. The premiums and discounts table (table 6) in the accompanying document, whilst incomplete for 2022 selling season, are encouraging for growers who are transitioning to NM. The premium for CM is not always related to the fact that the lot is CM, rather that the QA program that the lot may be linked to, supports CM within it's standard. Therefore, CM must be identified.

Historical concerns relating to high noncompliance rates for CM appear to be improving as shown in Appendix 2 in the circulated document. Compliance issues with CM status in the past were high compared to other compliance issues. However, in Appendix 2, noncompliance on CM is now in line with data entry

noncompliance percentages. Year on year, the compliance issues are reducing thanks to the efforts of AWEX and industry recognition of the importance of this document. As growers are increasingly aware of the importance to complete this document correctly, and data entry staff are better trained, we will see full compliance rates improve. E-Speci options must also help considerably, given time. We must promote best practice and CM is a significant management decision that should be encouraged.

We request that the PIC number be included in the pre sale data transmission to the industry so that buyers can record and identify growers identified in the various QA programs. While this is not a function of the NWD, it is recorded on the NWD and should be made available to those buying and selling Australian wool. We would like this discussion to be had during this review.

We'd like to thank AWEX and the industry participants that worked hard to arrive at this document last year, and we'd like to see a continuance of this document, or a slight variation if necessary. We believe that any change in the mulesing status declaration will only set us back and could potentially create further confusion at farm level.

A handwritten signature in dark ink, appearing to read 'T Marwedel', written in a cursive style.

Tim Marwedel

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