



David Young  
Chair

Ref: 23009POC

13 March 2023

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

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

Dear Dr Hansford

*Re: 2023 National Wool Declaration Review*

NSW Farmers welcomes the opportunity to provide this submission to the 2023 National Wool Declaration (NWD) Review.

The NSW Farmers' Association is Australia's largest state farming organisation (SFO) representing the interests of its farmer members. Our purpose is to build a profitable and sustainable New South Wales farming sector through promoting productivity, risk management and business continuity in individual farm enterprises.

*Mandating use of the NWD & receipt of the NWD by industry*

NSW Farmers supports the NWD being made mandatory. The NSW Farmers Wool Committee has discussed the importance of integrity programmes not superseding the NWD and the need to maintain the value of the NWD for buyers.

*Inclusion of "other" breech modification alternatives or animal welfare declarations made within the NWD*

NSW Farmers supports alternatives to mulesing. While NSW Farmers supports WoolProducers Australia's submission to the 2023 NWD Review, we diverge on policy as NSW Farmers supports the NWD including a status for alternative breech modification methods, such as sheep freeze branding and clips. To this point, it should be noted that NSW Farmers supports:

- A definition of mulesing being the surgical removal of skin from the tail and the breech or the surgical removal of skin from just the breech alone for the purposes of AWEX auditing and declarations and within the standards and guideline, and
- The mandating of local anaesthetic or analgesic during mulesing through an industry led initiative.

*User-friendliness of the NWD*

NSW Farmers notes increasing detail included in the NWD throughout consecutive versions risks increasing its complexity. In discussing NSW Farmers submission, it was evident that there is some confusion around completion of the Ceased Mulesing (CM), Non-Mulesed (NM), mulesed with Analgesic &/or Anaesthetic Products (AA), and Mulesed (M) declarations.

**NSW Farmers' Association**

ABN 31 000 004 651 PO Box 459 St Leonards NSW 1590 Level 4 154 Pacific Highway St Leonards NSW 2065  
Member Service Centre 1300 794 000 T 02 9478 1000 F 02 8282 4500 [www.nswfarmers.org.au](http://www.nswfarmers.org.au)

Complexity in the NWD may impact accurate completion of the NWD in full. Therefore, we seek the NWD remains user-friendly through a simplified document. The explanatory notes on mulesing, husbandry practices and pain relief are helpful compared to previous versions, including the simplified mob status.

Should you wish to discuss NSW Farmers submission to the 2023 NWD Review, please contact Ash Cooper, Policy Director – Agricultural Industries via email ([coopera@nswfarmers.org.au](mailto:coopera@nswfarmers.org.au)) or phone (0403 409 378).

Yours sincerely

A handwritten signature in black ink, appearing to read 'D Young', written in a cursive style.

David Young  
Chair – NSW Farmers Wool Committee