



Dr Kerry Hansford  
Secretary, NWD ICC  
AWEX  
Gate 4, Frederick Rd  
TOTTENHAM VIC 3012  
email: [khansford@awex.com.au](mailto:khansford@awex.com.au)

**Re: National Wool Declaration 2023 NWD Review**

WAFarmers is the peak body for Western Australian sheep and grain farmers with representatives on national peak bodies including WoolProducers Australia (WPA) and Sheep Producers Australia (SPA).

These representatives provide WPA and SPA with input on livestock farming practices in developing industry policies on but not limited to animal health and welfare, biosecurity, emergency animal disease outbreak and pest management.

WAFarmers welcomes the opportunity to put forward the following comments on the 2023 Review of the National Wool Declaration.

**The relevance of the current mulesing status declarations, viz. Non Mulesed (NM), Ceased Mulesing (CM), mulesed with Analgesic &/ Anaesthetic products (AA), treated with Liquid Nitrogen (LN) and Mulesed (M).**

WAFarmers endorses the position put forward by WPA in that the NWD document should return to the original intent of being a declaration regarding only mulesing status and Dark and Medullated Fibre Risk (DMFR).

Further in line with WPA, WAFarmers does not support the current version of the NWD (V9.3) that singles out activities like Liquid Nitrogen (LN) treatment nor do we support making judgment calls on what on-farm practises are considered superior ie detailing of farms that are Ceased Mulesing (CM).

WAFarmers understands that NWD is used to assist buyers and customers outlining the below from the AWEX's Frequently Asked Questions document (March 2022)

*"The National Wool Declaration (NWD) assists buyers and their clients to access credible information on issues that can influence purchasing decisions but cannot be objectively measured; that is, Mulesing Status (MS) & Dark & Medullated Fibre Risk (DMFR)."*

Therefore, WAFarmers maintains a position that there is no need for LN to be stipulated on the NWD.

**The potential inclusion of “other” breech modification alternatives or animal welfare declarations within the NVD.**

WAFarmers acknowledges that there are numerous Quality Assurance Certifications Schemes that enable livestock producers with the opportunity to declare assurances to buyers and consumers around adopted best animal welfare practices.

**The user-friendliness of the NWD with respect to its correct completion by the owner/manager and data entry by wool broking staff.**

Data evidence demonstrates a decline in the declaration rates for NWD’s in the top 4 wool producing states in Australia since the introduction of new version on the NVD, which is more complexed and detailed.

To drive higher rates of declaration, WAFarmers supports a simplified NWD that is easy to use and remains relevant to the wool trade.

**In summary WAFarmers supports:**

1. That the NWD remains only as a declaration for Mulesing Status (MS) and Dark Medullated Fibre Risk and does not include breech modification.
2. Removal of the LN category from the NWD
3. Removal of the CM category from the NWD
4. That AWEX does not consider, nor seek in future reviews, the inclusion of other animal welfare declarations.
5. The NWD needs to be simplified to ensure that it remains relevant to the trade.

Regards



Geoff Pearson  
President  
WAFarmers Livestock Section