

9 March 2023

Dr Kerry Hansford
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Via email: khansford@awex.com.au

Dear Dr Hansford

2023 Review of the National Wool Declaration

Thank you for the opportunity to provide a submission to the review of the National Wool Declaration (NWD).

This review is a chance to ensure the NWD is more transparent and provides wool buyers with the ability to make fully informed choices about the wool they seek to purchase. It is important that wool buyers who are seeking to source wool with good animal welfare credentials can easily identify that product.

We continue to urge that AWEX address the need to mandate the NWD.

Please do not hesitate to contact us should you have any questions or require further information.

Yours sincerely



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2023 Review of the National Wool Declaration RSPCA Australia submission

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

For the NWD to be fully transparent and provide wool buyers with the ability to make fully informed choices about the wool they seek to purchase, the mulesing status declarations should be further refined.

Non Mulesed (NM): RSPCA Australia believes the current definition should be expanded to include other breech modification alternatives in addition to liquid nitrogen (LN). See comment under point 2 below.

Ceased Mulesing (CM): RSPCA Australia supports the retention of this category as it allows woolgrowers to demonstrate their move away from mulesing while at the same time providing wool buyers with assurance that the property no longer mules their sheep. With regard to the definition referencing the purchase of mulesed or AA ewes or wethers, in the interest of breeding flystrike-resistant sheep without delay, it would be preferable to purchase non-mulesed rams as well. Rams should therefore be included in the definition of CM, i.e. 'No mulesed (or AA) ewes, wethers or rams have been purchased in the last 12 months.' This could be an added incentive for stud breeders to focus on breeding for flystrike resistance.

Mulesed with analgesic &/or anaesthetic products (AA): As there is currently no anaesthetic being used (or available) to remove the pain of the mulesing procedure (i.e. *while* it is being performed), the category is misleading in that wool buyers could interpret the declaration of AA to indicate that pre-procedure anaesthetic AND post-procedure analgesia were used. The definition of this category does not provide information on when the 'analgesic' and/or 'anaesthetic' was provided. Clearly, these products have different aims: the former referring to products that aim to *reduce* the pain and the latter intending to *remove* the pain of a procedure. A definition of the two would be helpful to avoid misunderstanding of either term. The declaration of use of analgesia and anaesthesia needs to be separated out so that it is clear when (pre or post) either one or the other or both were used.

Liquid nitrogen (LN): RSPCA Australia supports the retention of this category. The NWD mulesing status auction data (e.g. <https://www.awex.com.au/media/2222/nwd-test-auction-data-dec-2022.pdf>) provides useful information about current wool grower practice. For increased accuracy, the data should include percentages to two decimal places.

Mulesed (M): RSPCA Australia supports the retention of this category.

2. **The potential inclusion of "other" breech modification alternatives or animal welfare declarations within the NWD.**

RSPCA Australia supports the addition of a new category which allows wool from sheep that have had their breech modified through a method other than mulesing or liquid nitrogen to be

identified. For example, the use of rubber rings as an alternative to mulesing (see e.g. <https://www.sheepcentral.com/breech-ring-method-lacks-industry-research-support/>) is a method that appears to have been adopted by a number of wool growers and yet there is no means of declaring this breech modification method on the NWD. Again, declaring this method as NM or CM would be misleading particularly for wool buyers who are intent on purchasing wool from sheep that have not been subjected to any form of breech modification.

The review of the NWD presents an opportunity to consider including other animal welfare-related declarations. For example, the inclusion of categories that identify any painful procedure that has been carried out and if and what type of analgesia and/or anesthesia was provided. This type of declaration would be entirely feasible for an electronic NWD where space limitation is not a concern. The recent producer survey commissioned by Sheep Producers Australia and WoolProducers Australia (see <https://www.sheepsustainabilityframework.com.au/globalassets/sheep-sustainability/media/ssf-on-farm-insights-report-web-25oct2022.pdf>) identified a significant lack of awareness regarding appropriate pain management for castration and tail docking. Including questions around the type of castration and tail docking procedures and respective use/type of pain management in the NWD would provide AWEX with a valuable educational opportunity. It would also allow regular reporting through AWEX' mulesing status auction data - a clear sign that the wool industry is serious about promoting use of best practice pain relief and increasing transparency and trust in Australian wool.

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

The potential for developing an electronic NWD should be investigated.

4. The NWD declaration and compliance rates, and Premiums and Discounts, and how it is being received by industry (see Appendix 2).

It is RSPCA Australia's view that the NWD must be mandatory. Despite steady uptake since the NWD was introduced in 2008, the voluntary nature of the document means that it is difficult to accurately track progress towards an end to mulesing and, in the interim, the extent to which mulesing is carried out with pain relief, across the entire wool industry. Mandating the NWD will allow the wool industry to demonstrate their commitment to improving animal welfare, it will provide transparency to the market (particularly with the addition of further animal welfare declarations), and it will give wool buyers the opportunity to make an informed choice about the wool they purchase.

The information presented in the tables in Appendix 2 should be made publicly available on the AWEX website at the end of each season.

The premiums for NM and, more recently, for CM are a clear sign that the market is demanding wool from non-mulesed lambs. Not declaring mulesing status is clearly not appreciated by the market and wool growers who believe mulesing plus pain relief will be acceptable in the long term are will miss out on the growing demand for non-mulesed wool.

5. The NWD-IP, involving desktop audits, verification of the use of AA and LN and on farm inspections for NM and CM.

There continues to be a discrepancy between industry surveys (e.g. the producer survey mentioned under point 2) and AWEX auction data. For example, the producer survey found 92% of producers use pain relief for mulesing. The AWEX data for 2021 (the year the producer survey was conducted) shows 40.5% of bales accompanied by an NWD had declared use of analgesic and/or anaesthetic. Even accounting for the fact that 75.3% of bales declared mulesing status, if the producer survey is reliable, then one would expect a higher percentage of bales declared AA. Similarly, the discrepancy with declaration of NM status. It is incumbent on AWEX/industry to explain and resolve this ongoing discrepancy.

6. Communication plans for the release of NWD Version 10.

Communication of any changes to the NWD resulting from ongoing reviews should be clearly communicated to wool growers and those expected to complete the form - the robustness of the data reported by AWEX relies on it.

SUBMISSION ENDS