

22 March 2021

Mark Grave  
Chief Executive Officer  
Australian Wool Exchange Ltd  
PO Box 651  
NORTH RYDE NSW 1670

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

Dear Mark

### 2021 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 an opportunity to ensure the NWD is transparent and provides wool buyers with the ability to make fully informed choices about the wool they seek to purchase.

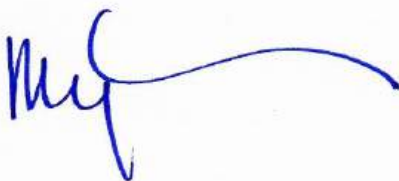
The previous NWD review failed to address the identification of wool from animals that had not been mulesed (as per the definition of mulesing) but had been subjected to an alternative breech modification procedure. It is now time to introduce an 'alternative method' (AM) category (as proposed in AWEX 'members' update' of 18 February 2020).

It is important that wool buyers who are seeking to source wool with good animal welfare credentials can easily identify that product. As such, any breech modification method must be declared. Preliminary [results](#) into the impact of sheep freeze branding, for example, found that the procedure is more painful than tail docking and castration, and similarly painful to mulesing (noting that animals were provided with meloxicam pain relief). Without an AM category, wool from animals that have undergone sheep freeze branding cannot be identified. This is not consistent with an industry that seeks to engender trust in Australian wool.

We refer to our three submissions provided in the 2019 review of the NWD for our views on other issues relevant to the current review.

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

Yours sincerely



Melina Tensen  
Senior Scientific Officer (Farm Animals)  
RSPCA Australia

RSPCA Australia

ABN 99 668 654 249  
ACN 163 614 668

P 02 6282 8300  
F 02 6282 8311  
E [rspca@rspca.org.au](mailto:rspca@rspca.org.au)  
W [rspca.org.au](http://rspca.org.au)

PO Box 265  
Deakin West ACT 2600

