

RSPCA Australia submission
**2019 Review of the
National Wool
Declaration**

18 June 2019

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Dr Kerry Hansford
Secretary, Industry Services Advisory Committee
Australian Wool Exchange Ltd
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Via email: khansford@awex.com.au

Dear Dr Hansford

2019 Review of the National Wool Declaration

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

The introduction of the NWD has allowed woolgrowers to declare their mulesing status and demonstrate their animal welfare credentials to wool buyers - particularly those that are interested in buying wool from sheep that have not been mulesed. The review of the NWD represents an opportunity to make important changes that will allow the industry to be more transparent about on-farm practices and thereby maintain consumer trust.

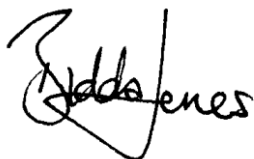
Please find attached our response to the specific topics on which you are seeking feedback.

A key consideration – the need to mandate the NWD – is outlined below and we urge AWEX to implement this important change.

More information on the RSPCA's views on mulesing and flystrike prevention is provided in our recently updated [Research Report](#).

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

Yours sincerely



Bidda Jones
Chief Executive Officer A/g

2019 REVIEW OF THE NATIONAL WOOL DECLARATION RSPCA AUSTRALIA SUBMISSION

The following submission addresses the key topics on which AWEX seeks feedback. The most significant change we believe is required – mandating the National Wool Declaration (NWD) – is addressed first.

Any other aspect of the NWD and its Integrity Program - Mandating the NWD

The introduction of the NWD has allowed woolgrowers to declare their mulesing status and demonstrate their animal welfare credentials to wool buyers - particularly those that are interested in buying wool from sheep that have not been mulesed.

Despite steady uptake in the decade since the NWD was introduced, 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.

It is RSPCA Australia's view that declaring mulesing status on the NWD must be mandatory. This will allow the wool industry to demonstrate their commitment to improving animal welfare, it will provide transparency to the market and it will give customers the opportunity to make an informed choice about the wool they purchase. Our understanding is that mandating the NWD has wider industry support.

The relevance of the current mulesing status declarations, viz. Ceased Mulesing (CM), Non Mulesed (NM), Mulesed with Pain Relief (PR) and Mulesed (M)

The current mulesing status declaration, in terms of the inclusion of the categories listed, should remain. The CM and NM categories should remain in order to distinguish mob-based status versus property-based status. Without the CM category, for example, there would be no way of telling whether a NM-declared mob came from a property where all sheep were no longer mulesed or whether it was just that particular mob that had not been mulesed.

Also worth considering under the NM and CM category is requiring a short description of what preventative measures, if any, to prevent flystrike have been taken and what certifier (for example, Responsible Wool Standard, New Merino, etc.), if any, was used to verify NM or CM status.

Under the PR category, it would be useful to specify the type of analgesic applied and whether it was provided before or after the procedure or both.

With regard to the definition of 'mulesing' as applied in the NWD, RSPCA Australia supports a review of the definition to be in line with the New Zealand regulation which defines mulesing as the removal, by any method, of the breech, tail, skins folds or tail wrinkles of a sheep. The Australian definition limits the procedure to the use of shears.

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

As mentioned above, the NWD definition of mulesing limits the procedure to the use of shears. This effectively means that the 'NM' category on the NWD applies where other breech modification methods have been used. For example, the use of liquid nitrogen ('steining') would be categorised as

'NM'. Earlier work looking at the animal welfare impact of 'steining' showed the method is painful. Although the technology/device has been adapted since the initial research was conducted, while ever liquid nitrogen is applied directly to the skin, the process will still be painful to the lamb. It is therefore important that wool buyers who are seeking to source wool with good animal welfare credentials are able to easily identify that product. This means introducing an additional status category, e.g. 'other breech modification', to the NWD. An additional status category is particularly important if, an alternative definition for mulesing is not adopted. Regardless, we believe the wool industry should be transparent about their current practices and we believe wool buyers should be able to make fully informed choices. As such, it would be important for the NWD to include information about the specific breech modification that has occurred.

The adoption of other breech modification methods as an alternative to mulesing does nothing to promote a breeding strategy aimed at flystrike resistance. The RSPCA believes that it is unacceptable to continue to breed sheep that are susceptible to flystrike and therefore require an on-going need for mulesing (or other breech modification procedure) to manage flystrike risk.

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

It is acknowledged that the NWD is a very 'busy' form and perhaps further thought could be given to how best to make it more user-friendly. For example, an electronic format (app) would allow for a greater number of drop-down options from which the user can select - an attribute that is limited when working within the confines of an A4-size piece of paper. Perhaps this could be considered for inclusion in the eBale identification pilot trials.

An important message for woolgrowers (and agents) is that accurate completion of the NWD will give buyers greater confidence in the wool they are purchasing.

The NWD adoption rate and compliance, and how it is being received by industry

There is need for improvement in adoption/declaration rate, hence the call that the NWD be mandatory rather than voluntary (see above).

With regard to compliance, we understand compliance rates have not improved over time, i.e. since the introduction of the NWD in 2008. Whether this non-compliance is related to the user-friendliness of the document (although most woolgrowers should be familiar with it by now), is deliberate, or has some other cause, non-compliance is an issue that needs to be addressed.

The NWD - Integrity Program (NWD-IP), involving desktop audits, verification of the use of PR, and on farm inspections for NM and CM

Of all the clips declared, there are only 1,000 desktop audits validating mulesing status, 225 on-farm inspections (for NM and CM statuses), and 200 desktop audits validating pain relief use that take place each year. We believe the Integrity Program could include significantly more audits, particularly on farm. Consideration should be given to providing full traceability along the supply chain to help ensure a chain of custody from the farm through to the retailer.

In terms of full supply chain integrity and transparency, consideration should be given to including mulesing status declaration on wool-based products (e.g. shoes, clothing and blankets) sold directly to consumers. This would encourage both producers of these products as well as consumers to make informed choices based on the wool product's animal welfare credentials.

SUBMISSION ENDS



The RSPCA is Australia's leading animal welfare organisation and one of Australia's most trusted charities. The RSPCA works to prevent cruelty to animals by actively promoting their care and protection.

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