



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

31 January 2020

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Mark Grave
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Via email: mgrave@awex.com.au

Dear Mark

2019 Review of the National Wool Declaration

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

We appreciate the AWEX Board's consideration of the declaration of alternatives methods to mulesing.

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

A key consideration – the need to mandate the NWD – does not seem to have been addressed and we urge AWEX to implement this important change.

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

Yours sincerely



Richard Mussell
Chief Executive Officer
RSPCA Australia

2019 REVIEW OF THE NATIONAL WOOL DECLARATION

2ND CONSULTATION

RSPCA AUSTRALIA SUBMISSION

The following submission addresses the key topics on which AWEX seeks feedback in this second consultation round.

The Mulesing Status code “PR” is to be replaced with “AA”

The proposed refinement of the pain relief category to acknowledge use of both analgesics and anaesthetics is a good step forward. However, the reference to ‘Anaesthetic’ needs to be further refined in order to distinguish between an anaesthetic applied pre-procedure or post-procedure. Simply declaring AA without any further definition could give the impression that a lamb was mulesed using a pre-operative anaesthetic, and therefore felt little pain, when in fact only an analgesic was given.

The declaration of use of these products needs to be separated out so that it is clear that either one or the other or both were used. Without this distinction, wool buyers are not able to make fully informed choices, particularly if seeking wool from producers applying best practice pain management. For example, the use of pain relief and/or anaesthetic can be distinguished as follows (note use of ‘P’ for pain relief):

- PA+ = pain relief and pre-procedure anaesthetic
- PA+ = pain relief and post-procedure anaesthetic
- PA+ = pre-procedure anaesthetic only
- PA+ = post-procedure anaesthetic only
- PA = pain relief only
- PA = no pain relief and no anaesthetic

Given that currently there are no pre-operative anaesthetics being used, at the very least, the NWD categorisation (e.g. category ‘PA’) of pain relief and/or anaesthetic used should include the ability to declare:

- PA = pain relief and anaesthetic
- PA = anaesthetic only
- PA = pain relief only
- PA = no pain relief and no anaesthetic

To ensure these categories are clearly understood, the NWD would need to provide a definition for both ‘pain relief’ and ‘anaesthetic’, with the former referring to products that aim to *reduce* the pain and the latter intending to *remove* the pain of a procedure.

The Ceased Mulesing (CM) declaration is to be reformatted into two questions

RSPCA Australia is pleased to see this category remain in the NWD.

The current definition of CM is:

Wool from sheep where mulesing has ceased on the property. No lambs born on this property in the last 12 months have been mulesed. No purchased sheep are mulesed.

The proposed two questions to replace the current definition of CM are:

Have any lambs born on this property been mulesed in the last 12 months?
Have any purchased ewes/wethers been mulesed?

The current definition requires that no purchased 'sheep' are mulesed in order to satisfy the requirement for the CM category. The proposed question above refers only to 'ewes and wethers', meaning that any lamb or ram or other class of sheep purchased in the last 12 months could have been mulesed.

RSPCA Australia proposes that the second question continue to refer to 'sheep' as per the current definition to ensure it is all-inclusive.

The definition of CM is included in the definitions section on page 2 of the NWD, without there being any reference to CM on the form. Perhaps address this by amending the question on the form, e.g.:

To determine property Ceased Mulesing status, please answer the following two property questions (circle answers)

Identification of alternative methods to mulesing

RSPCA Australia supports the proposed inclusion of a category that allows alternative breech modification methods to be declared. However, we believe that the proposed naming of the alternative category – NM2 – has the potential to create confusion, particularly among wool buyers seeking to purchase a product from sheep that have not been mulesed and that have not had the breech modified. The intent of the NM category was always to identify wool from sheep that had not been mulesed (using shears) and many wool growers have adopted breeding strategies that have resulted in plainer-bodied flystrike-resistant sheep. Wool from these sheep attracts a well-deserved premium and should be clearly distinguishable from wool sourced from sheep subjected to mulesing or other breech modification (which fails to address flystrike in other body areas). As such, the NM category should remain and apply solely to wool from sheep not subjected to any form of breech modification (the proposed definition for NM1 would become the definition for NM).

The alternative breech modification category – currently proposed as NM2 – should be clearly differentiated from NM, e.g. using an acronym such as BM. We also believe that, in the interest of transparency, it is important for the NWD to include information about the specific breech modification that has occurred. The BM category and associated definition could be, e.g.:

No sheep in this mob has been mulesed, and an alternative* method to mulesing has been used (BM-N = liquid nitrogen, BM-C = clips, BM-I = intradermals).

The NWD form, instead of listing NM2, would need to list 'BM-N C I' thus allowing the wool grower to select the appropriate procedure.

It is recognised that an alternative procedure not currently identified may be applied in future or a current procedure may eventually be phased out, and this would have to be taken into account in forthcoming reviews of the NWD. Regardless, information about all current procedures should be declared. The wool industry should be transparent about their current practices and wool buyers should be able to make fully informed choices.

This additional information about alternative breech modification methods used should also be included in AWEX's monthly mulesing status statistics.

With the changes proposed in the sections above, the NWD form would include the following options under 'Mob Mulesing Status (circle answer)':

NM BM-N C I P A + M

Other aspects 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 (particularly with the proposed requirement to also declare alternative methods to mulesing) and it will give customers the opportunity to make an informed choice about the wool they purchase.

Integrity Program

RSPCA Australia is of the view that the Integrity Program could include significantly more desktop and on-farm audits. 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.

AWEX mulesing status statistics should ensure monthly and YTD information is available for all categories included in the NWD. Preferably, these statistics should be available through a database that is searchable across years, categories, micron, etc.

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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