



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

27 February 2020

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

Dear Mark

**2019 Review of the National Wool Declaration**

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

Please find attached our response to the specific changes proposed.

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

## 3<sup>RD</sup> CONSULTATION

### RSPCA AUSTRALIA SUBMISSION

The following submission provides RSPCA Australia's response to the changes proposed in the AWEX 'member's update' dated 18 February 2020.

#### NM and AM

RSPCA Australia supports the distinction being made between these two categories.

#### NM

RSPCA Australia supports the addition of 'and no alternative method to mulesing has been used' to the NM definition.

#### AM

RSPCA Australia supports the addition of this new category, which allows wool from sheep that have had their breech modified through a method other than mulesing to be identified.

#### AA

The proposed definition of this category does not provide information on when the 'analgesic' and/or 'anaesthetic' was used. 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.

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 pre-procedure anaesthetic AND post-procedure analgesia were used. 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.

If it is not intended to differentiate analgesia and anaesthetic, then the category is best left as it was, i.e. PR, which reflects current practice, avoids confusion and is not misleading.

#### CM

RSPCA Australia understands that the intent of the CM category is to demonstrate a commitment to moving away from mulesing. We understand that the change from 'sheep' to 'ewes/wethers' in question 2 is to provide more clarity to growers. We acknowledge that larger mobs of ewes/wethers may be purchased compared to the number of rams, however, 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 question 2.

### 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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