

## **SUBMISSION REVIEW OF THE NATIONAL WOOL DECLARATION**

### **Introduction**

WoolProducers Australia (WPA) is the peak national body for the wool growing industry in Australia. We are the national voice on behalf of producers, advocating their interests to the Commonwealth and industry stakeholders in Australia and abroad.

WPA develops and advocates policy and represents the industry on issues as diverse as trade, animal health and welfare, research and development, marketing, accountability of grower funds, taxation and compulsory levies, climate change and industrial relations.

WoolProducers appreciates the opportunity to comment on the review of the National Wool Declaration (NWD) and thanks the Industry Standards Advisory Committee for considering our recommendation.

### **National Wool Declaration**

WPA is very supportive of the NWD and played an instrumental role in its development. WPA currently has policy of supporting an education program leading to the mandated use of the NWD.

The NWD is an important tool for the industry as it provides supply chain partners with an understanding of what wool is actually being produced, both in terms of mulesing status and the risk of dark and medullated fibre.

With a global push for transparency in the wool supply chain the NWD is well positioned to provide what our customers are calling for.

Whilst the uptake of the NWD has increased over the past 12 months, with around 69.8% of first-hand bales of wool sold in 2018 being accompanied by a completed NWD, it has been suggested that in order to increase uptake that the document needs to be further simplified.

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

WPA would like to see investigation into the removal of Ceased Mulesing on the NWD as the wool supply chain seems most interested with the mulesing status of the wool on offer rather than what is or is not, occurring on-farm.

Whilst WPA understands the rationale behind the initial inclusion of CM as a way of encouraging those growers that were working towards the then proposed 2010 phase out of mulesing and to send market signals along the supply-chain, WPA now feels that this status is redundant and may add confusion amongst growers and other

supply-chain partners.

In 2018 only 2.3% of the wool sold accompanied by a completed NWD was declared as CM<sup>1</sup>. By removing CM as an option WoolProducers believes that this will make the document more straightforward, hence more user-friendly from a producer perspective.

WoolProducers would therefore believe that there may only be a need for three statuses of wool available for declaration on the NWD – NM, PR and M.

WoolProducers would like to see further technical investigation regarding the term 'pain relief'. There is currently discussion within industry regarding 'pain relief' and the negative connotations that that term may imply. It has been suggested that pain relief should be changed to 'analgesia'. Although, WoolProducers has received informal advice from the AVA that analgesia means 'absence of pain' and the products currently registered for sheep do not abolish pain completely, we would like investigation into what is acceptable to the trade.

WoolProducers also requests that ISAC investigates the need for pre and post pain relief usage to be identified through the NWD, or if this is better suited in other commercial wool quality assurance schemes.

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

WoolProducers do not see the need for other breech modification alternatives or animal welfare declarations to be included in the NWD.

The NWD relates specifically to the status of the mulesing procedure as defined by the Australian Animal Welfare Standards and Guidelines.

Other breech modification alternatives to combat breech flystrike, if they do not fit the current definition of 'the removal of skin from the breech and/or tail of a sheep using mulesing shears,' does not constitute mulesing and would therefore meet the Non-Mulesed status requirements.

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

WoolProducers would like to see investigation into the development of a mechanism whereby the owner/manager can make a declaration of the status of the wool from their property as being either NM, PR or M.

This status would be then attributed to the property ad infinitum until there is a change in on-farm practice. When/if there is a change in status i.e. from M to PR, the onus is on the owner/manager to declare this change in status.

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<sup>1</sup> AWEX

If applicable, the owner/manager would be required to prove their declared status through the auditing process of the NWD-IP, regardless of how long since the declaration was made.

Whilst acknowledging that this could mean significant changes to the current format of the document, i.e. that it may only be a standalone document decoupled from the Classer Specifications and that some properties may have different declarations for different classes of wool i.e. crossbred v's Merino, WPA believes that this should be further investigated as it could mean a reduction in paperwork for the owner/manager that could increase the level of declared wool.

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

In 2016, WoolProducers in recognition of the importance that we view the use of the NWD by the trade, amended policy regarding the NWD from 'strongly encouraging the use' to 'supporting an education program leading to the mandated use of the NWD'.

WPA acknowledges that it is highly unlikely that any state government will regulate the NWD, we therefore believe that market forces can play a larger role in the uptake of the NWD.

A suggestion for a market-based incentive would be for the trade to view the NWD as a 'condition of sale'. This currently occurs with the Livestock Production Assurance (LPA) National Vendor Declaration (NVD) for the sale of livestock, whilst it is not compulsory to participate in LPA, most livestock markets in Australia require stock to be accompanied by an LPA NVD in order to attract bids.

WoolProducers noted with interest the recent move by the Schneider Group, New England Wools and Modiano Australia in Western Australia, to not bid on lots that were not accompanied by a completed NWD, as the '*wool cannot be on-sold to a growing number of clients who demand a transparent supply chain for marketing or ethical reasons.*'

WPA feels that it is important that efforts are renewed to highlight the value of the NWD to the industry through all channels along the supply chain.

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

In terms of meeting the key objectives of the NWD-IP the system appears to be working, however do have concerns that the target numbers for inspections, verifications and audits over the past 12 months have not been met in some of the compliance performance categories.

It is important that the NWD-IP is seen by the entire supply-chain as robust therefore the audit, verifications and on-farm inspection targets must be met each year.

## ***RECOMMENDATIONS***

1. Investigation of the removal of Ceased Mulesed as a status to simplify the NWD
  2. Investigation of the need to replace the term 'pain relief', focussing on what is acceptable to the trade
  3. If replacement of the term 'pain relief' is warranted, there needs to be agreement on the correct technical term for the currently available pain relief products
  4. Investigation of the need and/or benefit of identifying pre and post pain relief usage on the NWD
  5. Exclusion of other breech modification or animal welfare procedures on the NWD as the focus of this document is on mulesing only
  6. Investigation into the development of 'perpetual' declaration for individual properties
  7. Introduction of market-based incentives to drive the uptake of NWD, including but not limited to making the NWD a condition of sale through the auction system
  8. Ensure that the audit and verification targets are being met under the NWD-IP
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