



Livestock SA Limited

ACN: 681 162 667 | ABN: 53 681 162 667

PO Box 211, Goodwood SA 5034

Adelaide Showground, Leader Street, Wayville SA 5034

P: 08 8297 2299 | E: admin@livestocksa.com.au | W: livestocksa.com.au

SUBMISSION

29 May 2026

Australian Wool Exchange Ltd (AWEX)
Unit 12A, 2 Eden Park Drive
Macquarie Park, NSW 1670
Via email: info@awex.com.au

To NWD ICC

Re: Submission to 2026 National Wool Declaration Review

Livestock SA is the peak industry organisation for South Australia's red meat and wool producers. Representing over 5,200 sheep producers, 2,700 beef cattle producers and several hundred goat producers across the state, we work to secure a strong and sustainable livestock industry. South Australia's \$4.3 billion livestock industry is a key economic contributor to the state and supports 21,000 South Australian jobs across the red meat and wool supply chains.

South Australia produces 57 million kilograms of wool every year. We welcome and appreciate this opportunity to contribute to the 2026 National Wool Declaration (NWD) Review consultation. The ability for woolgrowers to have input into this review to ensure that the NWD not only remains fit for purpose but also derives benefits for the industry in an already competitive marketplace.

1. The relevance of current mulesing status declarations

Consistent with our previous submission to the 2023 NWD Review, Livestock SA continues to oppose the expansion of the NWD beyond its original intent and purpose. Declaration documents are designed for specific purposes and functions. While the addition of further categories may appear reasonable, it can ultimately change the purpose, relevance and usability of the document.

Under the current definition and purpose of the NWD, Livestock SA does not consider the liquid nitrogen (LN) category has a place on the declaration. The inclusion LN has added unnecessary complexity to the declaration without clear evidence of broad commercial adoption or industry benefit.

This position is reinforced by the NWD Statistics Mulesing Status Report, which demonstrates LN declaration rates between 2023–24 and 2025–26 remained statistically insignificant at between 0.1% and 0.2% nationally.¹ It is for these reasons that Livestock SA does not support the LN category being included on the NWD.

¹ AWEX NWD Statistics Mulesing Status Report, https://www.awex.com.au/NWD_Statistics_Mulesing_Status_Report.pdf

Livestock SA also shares WoolProducers Australia’s concerns regarding the implications associated with altering accepted definitions of mulesing through the NWD process. Definitions relating to mulesing and non-surgical alternatives are already clearly established under the Australian Animal Welfare Standards and Guidelines (S&Gs), and it is important these nationally agreed definitions remain consistent. The S&Gs were developed under the previous Australian Animal Welfare Strategy (AAWS) to harmonise and streamline livestock welfare legislation in Australia, ensuring that it results in improved welfare outcomes and is practical for industry. The current Non Mulesed definition as per the current NWD states “*Sheep in this mob have not been mulesed or treated with liquid nitrogen,*” which is in clear contravention of the definition provided in the existing S&Gs.

Livestock SA also supports WoolProducers recommendation of an investigation into the removal of the ceased mulesing (CM) category from the NWD, noting the limited declaration rate of approximately 3% nationally and the confusion it can create for woolgrowers and the supply chain.²

Recommendation 1: AWEX remove the LN category from the NWD.

Recommendation 2: AWEX investigate the removal of the Ceased Mulesing (CM) category from the NWD.

2. Whether the NWD continues to meet evolving market and supply chain information requirements

Livestock SA acknowledges that supply chain expectations continue to evolve, particularly through the increasing use of certification programs and traceability systems. The NWD continues to serve an important role in providing a practical and nationally reporting mechanism for Mulesing Status and Dark and Medulated Fibre Risk, and as such, is best placed to meet market and supply chain information requirements.

3. The user friendliness of the NWD

Simplification of the NWD is critical to maintaining industry participation and ensuring the document remains relevant and easy to complete. The inclusion of additional categories over time has increased complexity and contributed to confusion among growers regarding declaration requirements and terminology. This concern is particularly relevant for categories with very low adoption rates, such as LN and CM.

Livestock SA supports calls for a review into the continued need for these categories with the objective of improving user friendliness and strengthening confidence in the declaration process. A simplified NWD that clearly focuses on Mulesing Status (in alignment with the S&Gs) and Dark and Medulated Fibre Risk would improve consistency, reduce ambiguity, and assist in encouraging greater industry participation.

Livestock SA does not support the continued expansion of the NWD into additional animal welfare declarations or husbandry practice declarations. There are already a range of assurance and certification schemes available to communicate broader welfare and sustainability claims to the market. Expanding the NWD beyond its original purpose risks duplicating existing programs and reducing the clarity and effectiveness of the declaration.

² AWEX NWD Statistics Mulesing Status Report, https://www.awex.com.au/NWD_Statistics_Mulesing_Status_Report.pdf

Recommendation 3: AWEX review the NWD to ensure the document remains only as a declaration for Mulesing Status (as defined by the Australian Animal Welfare S&Gs and Dark and Medullated Fibre Risk).

Recommendation 4: AWEX simplify the NWD to ensure that it remains relevant to the trade.

Recommendation 5: AWEX should not expand the NWD to include additional animal welfare declarations or alternative husbandry practice declarations beyond its existing scope.

4. NWD declaration and compliance rates, and overall industry adoption

Livestock SA notes the positive increase in NWD declaration rates for the state in recent years but believes there remains significant opportunity to improve overall adoption and consistency across all jurisdictions.

While debate continues around individual declaration categories, approximately one-fifth of auction wool remains undeclared. Improving declaration rates should remain a higher priority than expanding declaration categories. Increased participation would deliver greater transparency and confidence throughout the supply chain than the introduction or retention of additional niche categories.

Livestock SA supports WoolProducers recommendation for an investigation into making the NWD a condition of sale, similar to the operation of the Livestock Production Assurance (LPA) National Vendor Declaration (NVD) system in the meat side of the sheep industry. Such an approach may assist in driving greater industry participation while improving confidence and transparency throughout the supply chain.

Recommendation 6: AWEX investigate pathways to progressively implement the NWD as a condition of sale, subject to appropriate industry consultation and transition arrangements.

5. The operation and effectiveness of the NWD Integrity Program

The ongoing operation of a robust and credible NWD Integrity Program is paramount to maintain confidence in the declaration system across both domestic and international markets. Appropriate levels of desktop audits, verifications, and on-farm inspections are important to ensuring the integrity of the program.

As declaration rates increase, consideration should be given to scaling audit and compliance activities accordingly, along with transparency around compliance outcomes and program performance metrics so industry participants can have confidence that the integrity system is operating effectively and consistently.

Livestock SA encourages AWEX to publish regular aggregated reporting on audit activity, compliance outcomes and corrective actions arising from the Integrity Program. Increased transparency would strengthen confidence among growers, brokers, exporters and downstream customers that declarations are being consistently verified.

Recommendation 7: AWEX undertake a sufficient number of audits and publish regular integrity program reporting to ensure ongoing confidence in the NWD Integrity Program.

6. Communications relating to the NWD

Clear and practical communication regarding the NWD is essential to supporting grower understanding and increasing adoption. Livestock SA encourages AWEX to continue reviewing guidance materials and supporting documentation to ensure terminology and requirements remain clear, accessible, and aligned with the original purpose of the NWD.

Conclusion

Ultimately, the success of the National Wool Declaration depends on its relevance, simplicity and credibility. The priority of this review should be increasing participation and confidence in the declaration system, rather than expanding its scope.

Livestock SA considers a simplified NWD, focused on Mulesing Status as defined under the Australian Animal Welfare Standards and Guidelines and Dark and Medullated Fibre Risk, will deliver the greatest long-term value to woolgrowers, processors and the broader wool supply chain.

Livestock SA encourages AWEX to use this review as an opportunity to simplify the declaration, improve confidence in the system, and ensure the NWD continues to deliver practical value for woolgrowers, processors and customers. We thank AWEX for the opportunity to provide a submission and welcome continued engagement on this important matter.

Please contact the Livestock SA office on (08) 8297 2299 or via email at admin@livestocksa.com.au if you would like to discuss this submission further.

Yours sincerely



Travis Tobin
Chief Executive Officer