



## SUBMISSION

10 March 2023

Dr. Kerry Hansford  
Secretary, NWD ICC  
AWEX  
Gate 4, Frederick Rd,  
TOTTENHAM VIC 3012  
Email: [khansford@awex.com.au](mailto:khansford@awex.com.au)

Dear Dr. Hansford

### Re: 2023 Review of the National Wool Declaration (NWD)

Livestock SA is the peak industry organisation for South Australia's red meat and wool industries. There are over 5,200 sheep producers and more than 2,700 beef cattle producers in the state. With a membership of over 3,500 sheep, beef cattle and goat production businesses, we work to secure a strong and sustainable livestock sector in South Australia.

The red meat and wool industries are the backbone of South Australia's livestock and meat processing sectors, which contribute \$5.4 billion annually to the state.

Livestock SA is a member of Primary Producers SA (PPSA) and is the South Australian representative member of four national peak industry councils: Sheep Producers Australia, WoolProducers Australia (WoolProducers), Cattle Australia and Goat Industry Council of Australia. Through PPSA and the Peak Councils, Livestock SA is also a member of the National Farmers' Federation.

As the South Australian representative member of WoolProducers, we support the positions and recommendations detailed in their submission to the 2023 Review of the National Wool Declaration (NWD).

1. That the NWD remains only as a declaration for Mulesing Status (MS) and Dark and Medullated Fibre Risk (DMFR), and does not include status for breech modification.
2. Remove the LN category from the NWD.
3. Remove the CM category from the NWD.
4. That AWEX does not consider, nor seek in future reviews, the inclusion of other animal welfare declarations.
5. The NWD needs to be simplified to ensure that it remains relevant to the trade.

More generally, Livestock SA share WoolProducers' concerns that the use of the NWD has decreased in the top four wool producing states, including South Australia. This should be a clear indicator that the NWD needs to be simplified and remain consistent with its purpose. We continually experience this issue with voluntary declaration documents such as the NWD, and mandatory declaration

documents such as the National Vendor Declaration (NVD). Livestock SA encourages and supports continual improvement in our industry, but in our experience often the parties wanting to make changes to declaration documents fail to grasp that certain documents were designed for certain functions. So, while it may seem innocuous or like a good idea to add more elements to specifically designed forms, it is not that simple as it can change the purpose and relevance of the document.

We also share WoolProducers' concerns that there would appear to be a lack of understanding and/or acknowledgement about the potential ramifications creating an additional status for breech modification will have on the longstanding and accepted definition of mulesing under the Australian Animal Welfare Standards & Guidelines (S&Gs). 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.

National and state frameworks of welfare are informed by the S&Gs. They are the result of considerable collaboration, compromise and commitment to improved animal welfare outcomes by all jurisdictions and industry. They also underpin access to domestic and overseas markets and reinforce Australia's commitment to advancing meaningful and effective animal welfare outcomes. The S&Gs for sheep were agreed by state and territory governments in 2016 and came into operation through South Australian legislation on 15 April 2017.

We thank AWEX for the opportunity to provide a submission to this review process and welcome continued engagement. Please contact the Livestock SA office on (08) 8297 2299 or via email at [admin@livestocksa.org.au](mailto:admin@livestocksa.org.au) if you would like to discuss this submission further.

Yours sincerely

Travis Tobin  
Chief Executive Officer