



## AgForce Queensland Farmers Limited

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1 July 2019

Dr Kerry Hansford  
Secretary,  
Industry Services Advisory Committee  
Australian Wool Exchange Ltd  
Gate 4, Frederick Road  
TOTTENHAM VIC 3012  
email: [khansford@awex.com.au](mailto:khansford@awex.com.au)

Dear Dr Hansford,

***RE: 2019 Review of the National Wool Declaration (NWD)***

AgForce Queensland Farmers is the peak rural group representing the majority of beef, sheep & wool and grain producers in Queensland. The broadacre beef, sheep and grains industries in Queensland generated around \$7.2 billion in gross farm-gate value of production in 2016/17. AgForce exists to facilitate the long-term growth, viability, competitiveness and profitability of these industries. Our members provide high-quality food and fibre products to Australian and overseas consumers, manage around 40% of the Queensland agricultural landscape and contribute significantly to the social fabric of rural and remote communities.

The AgForce Sheep & Wool Board (the Board) appreciates the opportunity to provide comment into the 2019 review of the National Wool Declaration.

The Board are of a firm belief that Ceased Mulesing (CM) should be removed from the NWD, with the section that seeks confirmation from the Owner/ Manager to the question "Has Mulesing Ceased on this Property?" should be removed entirely.

The Board feels that this requirement adds significant confusion among woolgrowers, where AWEX's own evidence highlights that only 2.8% of wool sold during 2018 was declared as CM via a completed NWD.

By removing CM as an option, the Board believes that this will make the document more straightforward, hence more user-friendly from a producer's perspective.

The Board suggests that the void on the NWD left by removing this section/ “question” would be best replaced with more emphasis on Quality Assurance (QA) schemes. Greater detail of a woolgrower’s QA scheme could be included within the NWD compared to the small area currently allowed for at the top right-hand corner of the existing NWD form.

The Board is of the opinion that greater emphasis on declaring QA accreditation would add more value along the supply-chain compared to the CM status; where a greater number of woolgrowers are more likely to complete such a section, with improved confidence.

The AgForce Sheep & Wool Board would therefore like to see only three statuses of wool available for declaration on the NWD, namely Non Mulesed (NM), Pain Relief (PR) and Mulesed (M).

The Board 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 Board also considered the “Proceed Instructions” section within the NWD, citing a potential breach of privacy in completing this section where any person in the shearing shed could have access to these details. The Board considered that the relationship between the woolgrower and the grower’s Wool Broker was best placed to document bank account details for the deposit of wool sale proceeds.

The AgForce Sheep & Wool Board is very supportive of the NWD and its use by Australian woolgrowers. It is an important tool for the industry as it provides supply-chain partners with an understanding of what wool is actually being produced, in terms of both mulesing status and dark and medullated fibres.

However, whilst uptake of the NWD has increased, with around 70% of wool sold being accompanied by a completed NWD, greater education and promotion of the NWD is required to inform woolgrowers and wool classers of the differing wool sale catalogues and wool selling rooms, with particular attention paid to the potential for sale discounts when an accurate and fully completed NWD is not provided.

It has been suggested that 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.

The AgForce Sheep & Wool Board feel that it is important that efforts are renewed to highlight the value of the NWD to the industry.

Should you wish to discuss these matters further, do not hesitate to contact me on 0428 771 176 or alternatively, AgForce Sheep & Wool Policy Director Michael Allpass on 07 3236 3100 or email [allpassm@agforceqld.org.au](mailto:allpassm@agforceqld.org.au).

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'A Rae', written in a cursive style.

Mr Alan Rae  
President,  
AgForce Sheep & Wool Board