

Identification of Alternative Methods to Mulesing

Introduction

WoolProducers Australia (WoolProducers) are the peak national wool body representing wool growers. Our membership is comprised of the industry's commercial, superfine and stud breeding sectors. WoolProducers is nationally representative through our State Farming Organisation members and three democratically elected Independent Directors.

WoolProducers works closely with the Department of Agriculture on key issues such as animal health and welfare, biosecurity, pest management control, natural resource management, drought preparedness, emergency animal disease outbreak preparedness, and industry development, including research and trade.

WoolProducers' work also includes the provision of advice to Animal Health Australia and State and Federal Governments on behalf of the wool industry on a day-to-day basis through representation on national animal health and welfare committees.

WoolProducers appreciates the opportunity to comment on the 'Identification of Alternative Methods to Mulesing'.

WoolProducers reiterates our position outlined in the initial 2019 NWD consultation on this issue:

'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.'

To further expand on that position WoolProducers make the following points:

- The Australian Animal Welfare Standards & Guidelines (AAWS&Gs) are explicit on what mulesing is not:
 - 'Mulesing does not include nonsurgical approaches that deliver analogous outcomes for the sheep such as clips, intra-dermal injections of chemicals or other future, non-cutting technologies.'
- This was a very deliberate decision during the development of the AAWS&Gs to ensure that the practice of mulesing remained definitive and to enable the

development, and more importantly the acceptance of future alternatives.

- These other types of procedures are categorised as breech modification, which the Australian wool industry has considered to be acceptable given that mulesing is the issue that some customers find unacceptable.
- A precedent on this issue has already been set with wool from sheep that had ‘clips’ applied was classified as ‘non-mulesed’, in accordance with the above definitions from the AAWS&Gs.
- It is unacceptable to woolgrowers for breech modification to be considered as a negative husbandry procedure, for the following reasons:
 - Australian growers and government, through AWI have invested tens of millions of dollars looking into alternatives for mulesing under the premise that breech modification is acceptable.
 - Under the current definition of mulesing, which includes the ‘tail’, tail docking could become unacceptable as it is a form of breech modification. This would have serious ramifications for both wool and sheep meat industries.

WoolProducers, therefore strongly rejects the proposal put forward in this secondary consultation proposing the inclusion of the following definitions:

NM1 *No sheep in this mob has been mulesed, and an alternative* method to mulesing has not been used.*

NM2 *No sheep in this mob has been mulesed, and an alternative* method to mulesing has been used.*

**Methods using any of the following: Liquid Nitrogen, Clips, Intradermal Injections.*

WoolProducers believes that the addition of these categories will cause immense confusion amongst not only growers, but also along the supply chain.

The review of the NWD had a focus on ‘*the user-friendliness of the NWD form with respect to its correct completion by the owner/manager and data entry by wool broking staff*’. The addition of these new categories goes against simplifying and making the document more user-friendly and could well see a decrease in the voluntary usage of the NWD due to the nuanced and ambiguous nature of these definitions.

The addition of these categories would have to be supported by a thorough domestic and international communication and education program to inform the trade. WoolProducers questions whose responsibility and who would fund this communications program?

WoolProducers supports the ‘approved for implementation’ amendments that feature in the 10 January, 2020 NWD Communique, but strongly recommends that the mulesing status categories of NM (as per Version 7.0 of the NWD), AA and M are the only mulesing status’

on the NWD, at least until the pain assessment trials for Sheep Freeze Branding (SFB) are complete.

WoolProducers' initial submission into the 2019 NWD Review sought investigation into the removal of the Ceased Mulesed (CM) category due to the number of errors associated with this status. It is WoolProducers' understanding that as per Version 8.0 of the NWD that this status will now be assigned through woolgrowers' response to the two questions in the Property Status section (rather than self-assessment of this status). WoolProducers still has fundamental concerns regarding the CM status as we believe that wool is either from mulesed or non-mulesed sheep but acknowledges that this issue has been considered by ISAC and AWEX.

The current usage rates for SFB are very low and therefore the volume of SFB wool that may be declared through the NWD would be immaterial. Further to this point, if the SFB pain assessment trials demonstrate an unreasonable level of pain is caused from this procedure, it is very unlikely that there would uptake of SFB and therefore the confusion within the trade from an amended NWD will be for no reason.

WOOLPRODUCERS RECOMMENDATIONS

1. Exclusion of other breech modification or animal welfare procedures on the NWD as the focus of this document is on mulesing only
 2. Complete rejection of the proposed NM1 and NM2 categories
 3. Retain status quo of NWD categories until at least until the completion of the pain assessment trials being undertaken on Sheep Freeze Branding technique
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