

**INQUIRY INTO PREVENTION OF CRUELTY TO ANIMALS  
AMENDMENT (RESTRICTIONS ON STOCK ANIMAL  
PROCEDURES) BILL 2019**

**Organisation:** The Australian Council of Wool Exporters and Processors  
(ACWEP) and the Private Treaty Wool Merchants of Australia  
(PTWMA)

**Date Received:** 31 July 2020

---

# AUSTRALIAN COUNCIL of WOOL EXPORTERS & PROCESSORS INC



## PRIVATE TREATY WOOL MERCHANTS OF AUSTRALIA INC



30 July 2020

Ms Helen Hong  
Select Committee  
NSW Legislative Council  
Parliament House  
Macquarie Street  
SYDNEY NSW 2000

By Email: [portfoliocommittee4@parliament.nsw.gov.au](mailto:portfoliocommittee4@parliament.nsw.gov.au)

Dear Ms Hong,

### Prevention of Cruelty to Animals Amendment (Restrictions on Stock Animal Procedures) Bill 2019

#### **ACWEP and PTWMA**

The Australian Council of Wool Exporters and Processors (ACWEP) and the Private Treaty Wool Merchants of Australia (PTWMA) respectively represent:

- \* Australian wool buyers and exporters and early stage processors. The former buy wool offered for sale at auction in Sydney, Melbourne and Fremantle; and from private treaty merchants. Wool processor Members scour (clean) the greasy wool; and may also *carbonise* it - i.e. further treat the freshly scoured wool to make the grass seeds and sticks etc that are caught in the wool easier to remove at later stages in processing.
- \* PTWMA Members buy wool directly from wool growers on the farm on a one-to-one basis, rather than at auction.

Members of both organisations are well aware of the wool growing operations as they happen on farm; and may have a wool growing background, and / or a current investment in the wool growing industry.

They are also well aware of the animal welfare issues associated with wool growing; and have been / are represented on wool industry committees charged with investigating various issues associated with animal welfare; and mulesing, in particular.

They appreciate the opportunity to make a Submission to this Inquiry

#### **Animal Justice Party's Proposed Amendments to New South Wales Legislation**

ACWEP and PTWMA's Members are well aware of the Animal Justice Party's proposed changes to the Legislation that would result in banning the process of mulesing in New South Wales from January 2022.

The Objects of the proposed changes are:

- “(a) to prohibit the performance of the Mules operation on sheep, and*
- (b) to require the administration of pain relief in certain procedures involving stock animals.”*

ACWEP and PTWMA are supportive of the use of pain relief products with mulesing, but are opposed to banning mulesing, as it:

1. Would create a sudden increase in the susceptibility of sheep to Blow Fly-Strike which is recognised as a cruel and debilitating condition,
2. Would not recognise the wool industry's investment in RD&E towards an environment where mulesing is not necessary, or is only done when accompanied by the use of an analgesic/anaesthetic (AA) product.

## **Wool Industry Investment in Technology for Moving to a Mules-Free Environment**

ACWEP and PTWMA believe that a more constructive approach is to recognise the past and ongoing work that is being done to progressively reduce the industry's need for mulesing by the use of genetic and management practices such as:

1. Breeding sheep that are inherently less susceptible to fly strike.

Considerable research and observation that have established that such sheep do exist; and that they are recognised primarily by having less skin wrinkle (particularly in the higher risk areas such as the breech), less wool cover in the breech and less dag material on the breech.

Wool grower funded research has developed objective scoring systems for these traits and has also determined their heritability.

The success of this work and its adoption by the wool growing industry is most easily seen in the changes in the physical appearance of sheep that are exhibited in show competitions.

2. The strategic timing of on-farm management practices that further minimise the risk of fly-strike. This can include the timeliness of shearing, crutching (removal of wool in the breech, while leaving the rest of fleece on the sheep); and of internal parasite control.
3. The use of an analgesic/anaesthetic (AA) product when mulesing.

The industry has come a long way since the mid-2000's when the first such suitable product, "TriSolfen" was registered "for use on lambs to provide pain relief following mulesing" by the Australian Pesticides and Veterinary Medicines Authority (APVMA).

*TriSolfen* is in wide use and has been joined by the more recent registration of two additional AA products, "Metacam" and "Buccalgesic", for use with sheep. We understand that the R&D continues.

It is understood that the acceptance and use of AA products has grown significantly since the release of *TriSolfen*.

Australian Wool Innovation has reported the results of a 2017 survey which showed that "83% of Merino lambs mulesed received analgesics and/or anaesthetics." Since then, the President of the Victorian Farmers Federation (VFF) Livestock Council, Leonard Vallance, was quoted in the rural Media as follows "Over 90 per cent of the industry uses pain relief when Mulesing," earlier in July.

## **Recognition of the Need for Mulesing**

The need for the use of mulesing is recognised (and defined) at the national level on page 22 of the:

*"Australian Animal Welfare Standards and Guidelines for Sheep"*

Published by Animal Health Australia, ([www.animalwelfarestandards.net.au/sheep/](http://www.animalwelfarestandards.net.au/sheep/))

It states:

*"In circumstances where mulesing is necessary for the long-term welfare of the sheep, it is done in a manner that minimises the impact of the procedure.*

*S7.1 A person performing mulesing must have the relevant knowledge, experience and skills, or be under the direct supervision of a person who has the relevant knowledge, experience and skills.*

*S7.2 A person must not mules sheep that are less than 24 hours old or more than 12 months old.*

*S7.3 A person must not mules sheep that are 6–12 months old without using appropriate pain relief.*

*S7.4 A person must not mules sheep showing signs of debilitating disease, weakness or illthrift.*

*S7.5 A person mulesing sheep must only remove wool-bearing skin"*

## **Management of Mulesing**

Advice from Members who grow wool themselves and / or live in rural areas advise that most mulesing is done by contractors who are well trained and invariably use an AA product when mulesing.

## **Post Farm Monitoring**

It is well known that that the growing and export of wool is an important source of economic benefit to Australia and to the regional areas where it is grown.

The post farm sector of the Australian wool industry supports the progress made at the on-farm level to progressively reduce the need for mulesing; and has worked with the on-farm sector to develop procedures for the recording and reporting the Mulesing Status of growers' wool when it is offered for sale.

This occurs by

1. The use of industry standards for definition of the various forms of Mulesing Status, namely for:
  - \* Wool from sheep that not been mulesed (NM).
  - \* Wool from farms where mulesing has ceased (CM).
  - \* Wool from sheep that were mulesed and were treated with an AA product at the time of mulesing.

Mulesing Status data is made available to buyers by its inclusion in sale catalogues when wool is offered for sale.

2. The use of an industry standard document for recording on-farm Mulesing Status information. This document is known as the National Wool Declaration (NWD). Its use is monitored via an Integrity Program conducted by the independent wool industry organisation, the Australian Wool Exchange (AWEX).

#### **Australia's International Customers**

Australia's international customers are well aware of the work being done in Australia to progressively reduce the need to mules. This is reflected in the technical limits that they increasingly prescribe in their purchase contracts with Australian wool exporters, e.g. whether the wool must qualify for an NM or an AA Mulesing Status. This increasing demand reaches the stage where demand and competition in the auction room combine to create premiums.

This in turn, adds to the natural motivation for wool growers to ensure that their wool growing practises meet the highest of standards of animal welfare.

#### **Summary**

The above Submission highlights that although there has considerable progress:

1. In the breeding of sheep that are less susceptible to fly-strike; and.
2. In the use of management strategies to minimise the risk of fly-strike.

There is still a need for wool growers to have the legal right to mules their sheep, provided that it is done in accordance with the standards defined in "*Australian Animal Welfare Standards and Guidelines for Sheep*"; and an appropriate AA product is used at mulesing.

In fact, the animal welfare outcome would be worse in numerous instances if mulesing was banned.

ACWEP and PTWMA believe that the proposal should not be proceeded with.

I can be contacted as below should there be any queries or requests for further information.

Peter Morgan  
Executive Director