

Wool

Risk Assessment



Content

Animal welfare issues.....	3
Five Freedoms.....	3
Mulesing.....	5
Due Diligence.....	7

Imprint

Publisher

Partnership for Sustainable Textiles
c/o Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH
Friedrich-Ebert-Allee 36
53113 Bonn
T +49 228 4460 3560
E mail@textilbuendnis.com
I www.textilbuendnis.com/en

Editing

Secretariat of the Partnership for Sustainable Textiles

Design

FINE GERMAN DESIGN, Frankfurt am Main
yellow too, Berlin

As at

October 2019

Animal welfare issues

Identifying and knowing risks and potential harms is an essential part of businesses' due diligence as set forward in the OECD Guidance on Multinational Enterprises and reflected in the targets of the Partnership for Sustainable Textiles. With respect to animal welfare in fibre production, the Partnership for Sustainable Textiles has identified two focal points for virgin wool: adherence to the Five Freedoms and non-mulesing.



The **Partnership for Sustainable Textiles** recognises virgin wool as sustainable if breeders follow the 'Five Freedoms' and if its status is 'non-mulesed' or 'ceased mulesing'.

Five Freedoms

Background

Based on the Brambell Report (1965), the Five Freedoms are a framework for the analysis of animal welfare. In order to provide an internationally recognized basis for animal welfare in farming, the Farm Animal Welfare Council (FAWC) published five basic requirements, known as the 'Five Freedoms' (1993/94). These requirements serve today as an important basis, independently of country specific legislation. The Five Freedoms spell out ideals of animal welfare that should be read to mean 'as free as possible from'. Their aim is to minimize negative experiences for animals and to promote positive ones. The Partnership for Sustainable Textiles recognizes wool as sustainable if it is produced according to the Five Freedoms.

Five Freedoms

1. Freedom from Hunger and Thirst – by ready access to fresh water and a diet to maintain full health and vigour.
2. Freedom from Discomfort – by providing an appropriate environment including shelter and a comfortable resting area.
3. Freedom from Pain, Injury or Disease – by prevention or rapid diagnosis and treatment.
4. Freedom to Express Normal Behaviour – by providing sufficient space, proper facilities and company of the animal's own kind.
5. Freedom from Fear and Distress – by ensuring conditions and treatment which avoid mental suffering.

Five Freedoms in the context of sheep

The Five Freedoms apply to animal welfare in general; as such, they should be specified for the context of wool production. The [Responsible Wool Standards Farmer Guidebook](#) and the [IWTO Specifications for wool sheep welfare](#) (Chapter 3) are two examples for applying the Five Freedoms to sheep.

Violations of Five Freedoms in the wool production and sheep farming include:

- Suffering due to overheating
- Suffering due to hasty and careless shearing
- Painful castration methods
- Suffering due to unregulated transport (live export)



How to improve

The following areas of animal welfare should be covered during wool production in order to ensure the Five Freedoms:

- **Nutrition:** A maximum of pasture grazing is provided and food and water are accessible at all times.
- **Health:** A sheep's health and physical fitness need to be ensured.
- **Environment:** Sheep are held in an environment with appropriate shade, shelter and reasonable prevention of predation.
- **Handling (incl. shearing, transport and slaughter):** Sheep should be kept to avoid pain, fear and distress during any handling.
- **Conservation of ecosystems** should also be considered in ethical husbandry. Sustainable land management includes avoiding soil degradation due to overgrazing or agrochemicals.

Mulesing

Overview

Mulesing	Removal of skin from breech and/or tail of sheep
Prevalence	86 % of new wool from Australia ¹

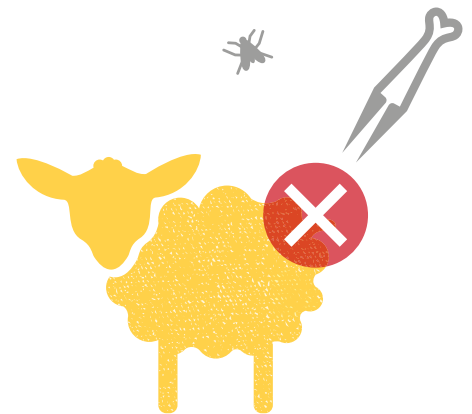


The **Partnership for Sustainable Textiles** has a clear position against mulesing. All members using new wool are required to publish a written policy on procurement of responsible new wool, including a position against mulesing.

Background

Australia is the biggest producer of finer wool destined for clothing and fashion, making up approx. 75%² of global production. The percentage of non-mulesed and ceased mulesing wool increased by 1% to 14% in Australia in season 2017/2018¹.

Since the accidental introduction of the blowfly (*Lucilia cuprina*) to Australia in the 20th century the so called flystrike has been a serious risk to the health and welfare of sheep. The blowfly lays eggs, usually around the tail of sheep. The maggots that hatch from the eggs feed on the underlying skin tissue beneath the wool. The larvae create an open wound causing severe suffering. The infestation can quickly become fatal. Blowflies affect Australia and New Zealand. In particular the fine wool merino sheep are concerned, as they are more susceptible to flystrike because they have more wrinkles due to the breeding.



Mulesing

To control the flystrike a surgical procedure called 'Mulesing'³ was introduced about ninety years ago. In this operation, the skin from each side of the sheep's breech and tail is removed, often without pain relief or anaesthetization. The wound forms stretched skin, minimising the opportunity for flies to lay their eggs. Mulesing is heavily criticized by animal welfare organizations⁴. The practice became illegal in New Zealand in 2018⁵. The Australian wool industry had initially aimed at phasing out the praxis by 2010⁶, but it is still common practice today. The alternative requires constant scrutiny and frequent controls for flystrike and treatment of flystrike, which is much more labor-intensive (see further alternatives below).

¹ 86% of Australian new wool in season 2017/2018 was being either mulesed or mulesed using pain relief or no declaration has been submitted according to figures from the national wool declaration. www.sheepcentral.com/wp-content/uploads/2018/07/NWD-stats-comparison-2016-2018-Source-AWEX.jpg

² IWTO, Specifications for Wool Sheep Welfare, 2017

³ Surgical procedure first invented in 1929 by John H.W. Mules and enlarged subsequently.

⁴ PETA (n.a.): Unbeschreibliches Leid – Mulesing www.wolle.peta.de/mulesing, (retrieval date: 04.10.18)

⁵ www.legislation.govt.nz/regulation/public/2018/0050/latest/whole.html#LMS22932, eff: Nov 1st 2018

⁶ www.wool.com/about-aw/mediareleases/industry-agreement-on-mulesing/?category=On%20Farm%20R&year=2004&month=0&page=3

How to improve

Alternatives to mulesing include

- Working with sheep farmers who may have exerted mulesing in the past but do not intend to exert it in the future
- Breeding of flystrike-resistant, clean breech or covered-breech sheep varieties⁷
- Non-surgical technique for achieving less wrinkles such as clipping/shearing
- Adequate monitoring of sheep, especially in high risk seasons
- Combination with optimized nutrition and wellbeing or treatment during transition⁸
- Vaccines to prevent flystrike are under development and research activities are ongoing

Sourcing of non-mulesed wool

The National Wool Declaration (NWD) creates transparency and choice for retailers and suppliers by providing information on the mulesing status of Australian wool sold in auctions. Sustainable wool, as defined by the Partnership for Sustainable Textiles, can be:

- Wool declared Non-Mulesed (NM)
- Wool declared Ceased Mulesing (CM)

Alternatives for sourcing are

- Wool certified by the Responsible Wool Standard (RWS)
- Wool certified as organic plus non-mulesing certificate
- Sourcing from non-affected countries as an alternative, when Five Freedoms are guaranteed
- Wool from South Africa certified by Cape Wools indicates non-mulesing

Useful links

- **AWI:** Australian Wool Innovation Limited; Australian wool growers interest and research organisation www.wool.com/on-farm-research-and-development/sheep-health-welfare-and-productivity/sheep-health/breech-flystrike/latest-publications
- **NWD:** National Wool Declaration: www.awex.com.au/publication/national-wool-declaration-nwd
- **IWTO-Certificate:** www.iwto.org/test-certificates
- **Non-mulesed wool statistics:** www.newmerino.com.au/mulesing-statistics
- **Figures and Statistics:** www.awex.com.au/market-information/mulesing-status
- **RWS:** Responsible Wool Standard: www.responsiblewool.org
- **Vier Pfoten:** www.vier-pfoten.de/kampagnen-themen/themen/woll-industrie/mulesing

⁷ www.dpi.nsw.gov.au/__data/assets/pdf_file/0006/285873/Breeding-merinos-for-less-breech-strike.pdf

⁸ www.agric.wa.gov.au/livestock-parasites/managing-flystrike-sheep?page=0%2C3

Due Diligence

Due Diligence is a key element of responsible business conduct, that expects companies to take due care regarding the compliance with social and environmental standards⁹. Companies are requested to identify, assess and address actual and potential risks and adverse impacts of business conduct in their own operations and within their supply chain. In the area of virgin wool, attention must be paid to the following three steps:

1. Identify risks

In order to identify actual and potential risks and adverse impacts on animal welfare, companies can build on known sectoral risks as well as risk factors specific to virgin wool. These include¹⁰:

- **Sectoral risks** include human rights and labour risks, as well as environmental risks.
 - Sectoral risks can include general animal welfare concerns.
- **Country risk factors** are conditions in a particular country, which may make a sectoral risk more likely.
 - For virgin wool, the country of origin is closely linked to the risk of mulesing.
- **Sourcing model risk factors**: The enterprises sourcing models may increase the risk of harm in its supply chain, e.g. the nature of its contractual relationships.
 - For virgin wool indirect sourcing or buying at auctions is common. This can decrease transparency and control over the supplier.

⁹ As defined in the OECD Guidelines for Multinational Enterprises (2011).

¹⁰ Based on OECD Due Diligence Guidance Garment and Footwear, p. 47.

What to do?

Knowledge is fundamental to accurately identify risks specific to the company's sourcing of virgin wool. For an informed risk analysis, companies should collect the following information:

- Country of origin of the virgin wool
- Amount of wool sourced and/or which and how many products contain virgin wool
- Information about individual bales, e.g. mulesing status and/or certificates for adherence to the Five Freedoms
- Increase supply chain transparency

2. Assess risks

Based on all known information, the company should assess the risk of harm in relation to the **likelihood** and **severity of harm** in their own operations and in its supply chain¹¹. Relevant stakeholders should be given the opportunity to participate in the assessment.

Examples

- The likelihood of actual adverse impacts of mulesing in a company's supply chain can be described as a function of the amount of virgin wool procured per country of origin and the prevalence of mulesing in said countries.
- If it comes to the attention of a company that a producer or supplier did not conform to the Five Freedoms, enhanced due diligence might be needed¹².



3. Address risks

Establishing traceability and assessing 'choke points' (key points in the supply chain) can be beneficial in addressing risks. As fibre production is at the very first stage of every supply chain, transparency can help track materials and identify 'choke points'. Enterprises operat-

ing at 'choke points' tend to have more transparency and control over suppliers deeper in the chain. They can also help in addressing risks due to their greater control over suppliers¹³.

¹¹ OECD Due Diligence Guidance Garment and Footwear, p. 51.

¹² *OECD-FAO Guidance of responsible agricultural supply chains*, box 3.1. Examples of situations that warrant enhanced due diligence: Red flags, p. 35.

¹³ OECD Due Diligence Guidance Garment and Footwear, p. 60.