BRC Statement on Mulesing

The British Retail Consortium (BRC) is the lead trade association for the UK retail sector and the authoritative voice of the industry. We represent about 80% of UK retailing by value, from large multiples and department stores through to independents, selling a wide selection of products through centre of town, out of town, rural and virtual stores.

Introduction
Animal welfare issues have long been of concern to the British public with campaigns leading to statutory requirements on improved standards in keeping animals for food and other products over many years. These campaigns have been driven by an active NGO community and supported by the broader public for a number of years. For many BRC members, this means that assurance of animal welfare standards within supply chains is a key issue within the wider sustainability agenda that includes ethical, social and environmental issues. In regards to wool sourcing, BRC members use such sourcing criteria to improve the welfare of wool producing animals and they are committed to supporting products from farms where the highest animal welfare practices have been adopted to protect sheep from blowfly strike.

Although the BRC recognises the very real threat that blowfly strike poses to sheep in countries like Australia, the use of surgical mulesing, which causes pain and suffering to animals, is not acceptable to British retailers or their customers. After consulting with the RSPCA (UK), the body most trusted by UK consumers on animal welfare issues, the only acceptable long-term solution to surgical mulesing is through selective breeding. However, until such time as breeding programmes take full effect, interim strategies such as integrated farm management practices and the use of intradermals must be adopted to reduce risk of flystrike. Some retailers may, as a transitional arrangement, also accept wool from flocks where clips have been used.

National Wool Declaration
Retailers and brands operating in the UK need to ensure that any sourcing claims regarding sustainability can be substantiated both for reputational and brand value reasons, and to meet increasing UK Government requirements on green claims\(^1\). For these reasons, we maintain our support for the use of a fully transparent National Wool Declaration (NWD) as a standardized method to state mulesing status and to ensure the accurate tracking of progress towards the elimination of mulesing. As the BRC we encourage the use of the NWD by farmers as a means of traceability/ transparency in the supply chain and would welcome the mandatory use of the NWD in Australia.

Although we have seen great progress in the development of the NWD, in order to maximize value across the supply chain, the BRC requests the following changes and improvements in the NWD:

1. *Include use of ‘clips’ in the NWD, along with provision for inclusion of intradermals*

The BRC recommends that the NWD support all procurement policies by providing information for all categories of mulesing, allowing individual retailers to limit procurement to certain aspects within this hierarchy. As such, we re-iterate the request for the visibility of clips that was made last year. We would also like to ascertain where intradermals will be indicated, once approved and available on the market. Would it be under definition 4 (record of chemical use) or would it be added in as a specific definition at the appropriate time?

\(^1\) [http://www.defra.gov.uk/environment/business/marketing/gl/c/code.htm](http://www.defra.gov.uk/environment/business/marketing/gl/c/code.htm)
2. Retain mulesing status with each lot as it moves from farm to retailer
For the NWD to be of value for farmers through to retailers, the mulesing status should remain with each lot as it is processed and made into finished garments and products. Therefore, the BRC requests that the status of mulesing continues to be clearly listed on Australian Wool Testing Authority (AWTA) documents and recommends that this declaration remains with the consignment of wool and products derived from it throughout the supply chain. Methods for achieving this must be clearly set out and publicly available, including the responsibilities of partner organisations in delivering farm-to-retailer assurance systems. Possible incentives would be to incorporate enforceable requirements (statutory or contractual) for the inclusion of NWD status with the consignment throughout the supply chain.

3. Simplify the NWD where possible
The BRC recommends that the NWD questionnaire be as clear and simple as possible to prevent any confusion. For example, the question of mulesing could be made clearer by offering only one option. Current - Does this property qualify for Ceased (1) Mulesing (2) status? (circle answer) YES or NO. Proposed - Does this property qualify for Ceased Mulesing (1) status? (circle answer) YES or NO.

4. Provide independent verification of mulesing status
The BRC was very pleased to hear that AWEX had secured funding to continue verification of mulesing status as well as its quality assurance programs. In order to provide further assurances and add credibility to the system, however, we would recommend using an independent verification body for at least 3% of the total holdings on an annual basis. We believe this is the minimum necessary to ensure statistical robustness. This would secure greater transparency about the audit procedures, the frequency and intensity of audits, farms being audited (including name and holding of grower) and penalties applied to those making false or unverifiable claims. These records should be available for retailers and all those operating in the supply chain to examine.

5. Publication of CM/NM register
For ease of sourcing CM/NM wool, it would be of great help if AWEX could use NWDs to collate a register of holdings where mulesing has ceased (and the year in which this happened) or where non-surgical methods are employed. Similarly, we would welcome the cross-referencing of NWD returns of holdings that continue to practice mulesing (or that fail to make a declaration on mulesing status) with the accreditation system that is used to ensure all operators who carry out mulesing have been trained under the national programme. This will ensure that the necessary minimum welfare standards are met for these flocks. We would expect action to be taken against any holding which failed to meet the requirement to use trained operators.

Future development of the NWD
We welcome the foresight and initiative of AWEX and certain commercial interests in developing a market for improved welfare merino and fine wools. We are pleased to continue our work with AWEX and other progressive partners in the Australian wool industry in building on the current system. Continual progress towards these goals is required to increase supply of assured high welfare status merino and fine wools and we look forward to future updates on these achievements.

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