

An overview of the mulesed-free wool assurance initiatives

The assurance initiative overview has been created based on survey questions sent to all assurance personnel in 2019. FOUR PAWS believes all initiatives hold some value, and some more than others,

however ultimately it is up to each brand to make an assessment. FOUR PAWS will continue to highlight the traceability capacity of each initiative listed below as the systems evolve.

	Responsible Wool Standard (RWS)	NewMerino® Standard	ZQ Standard	Authentico	Sustainawool	National Wool Declaration (NWD)
Managed by	Textiles Exchange, a not-for-profit organisation, specialising in ethical textiles.	NewMerino, a specialist organisation designed to certify wool supply while remaining independent of the commercial elements of the transaction.	The New Zealand Merino Company (NZM), a wool marketing and innovation company which owns and operates the ZQ Standard	The Schneider Group, a family-run, multinational company, dedicated to producing, sourcing and processing of animal fibres.	The Australian Wool Exchange Ltd (AWEX) is an independent, not-for-profit industry organisation providing services to its members and the industry.	The Australian Wool Exchange Ltd (AWEX) is an independent, not-for-profit industry organisation providing services to its members and the industry.
Breec modification types certified / included FP ideal: Only Non-Mulesed (NM) and Ceased-mulesed (CM) permitted. Mulesed (M), Steined (S) not permitted.	Does not permit mulesing (CM permitted)	Does not permit mulesing (CM permitted)	Does not permit mulesing (CM permitted)	Does not permit mulesing (CM permitted)	The SustainaWOOL Integrity Scheme accepts Non-Mulesed and Ceased Mulesed (SustainaWOOL GREEN), and Mulesed with Pain Relief (SustainaWOOL BLUE). An additional certification tier, SustainaWOOL GOLD, is available for growers producing NM only.	The NWD declares the mulesing status of each mob of sheep, i.e. NM, CM, M or Mulesed with Pain Relief (PR).
Transparency mechanism FP Ideal: full supply chain traceability, backed by a chain of custody approach. The aim of such systems should be to verify the origin and reduce the likelihood of batches/garments including/mixing with mulesed sheep wool.	Ensures a chain of custody, from the farm to the retailer. This includes audits and certification of each member of the supply chain and content claim certificates for every batch of wool.	Traceability is built in as a component of the system, beginning at farm and through to spinning. NewMerino coordinates supply through a Chain of Custody as an independent party measuring input and output at each stage. It requires supply chain partners to keep all appropriate records for audit.	Traceability to farm is a component of ZQ and beyond farm is tailored to meet each client's supply chain needs. NZM hold RWS SC therefore this can include TE's Chain of Custody.	Ensures a chain of custody, from the farm to wool top. As a wool buyer and top maker, The Schneider Group controls its own supply chain from auction to wool top and therefore can ensure chain of custody. All Authentico top making facilities are RWS certified.	All SustainaWOOL lots are traceable to an individual grower and farm of origin. AWEX provides SustainaWOOL certificates to Supply Chain Partners upon request. AWEX maintains records of all SustainaWOOL member growers and Supply Chain Partners including wool brokers and private treaty merchants, wool exporters, wool processors, brands and retailers.	AWEX provides Mulesing Status Certificates to buyers & users on request. AWEX maintains complete records of all sale lots that are audited, verified and inspected. The AWTA Test Certificate can be used to trace back to the selling agent. Information from audits (specified below), are communicated to buyers and selling agents pre-sale where possible, and post-sale if necessary.
Frequency of audits FP ideal: 100% of all farms checked annually on site by a third-party accredited auditor prior to certification.	100% of farms are audited through both desk audits and on-site inspections annually. Group certification is allowed and is annually audited by third party accredited certifying bodies	100% of farms are audited initially with a desk audit which is then followed with an on-site audit within the first year. Producer Declarations are required for initial registration and to maintain certification. On-farm audits required every two years to maintain supply status.	100% of farms are 3 rd Party audited on site, on a 3-year cycle as a minimum, plus additional random auditing and inspections. Growers sign a declaration annually indicating on-going commitment to the ZQ program.	The AWEX NWD audit applies to all members. In addition, random annual audits are conducted on farm by an accredited 3 rd party certifying body, Control Union. Group certification is allowed.	SustainaWOOL GOLD members' farms are audited annually. SustainaWOOL (BLUE & GREEN) members' farms are re-accredited every year, involving a mandatory desktop audit, and physical inspection of the farm on a 5-year cycle. Every sale lot of wool is inspected every year.	Each year, AWEX conducts 1,000 desk top audits of the NWD, 275 Verifications of the use of PR and 225 on-farm inspections for NM and CM.
Parallel production at the farm level permitted? FP ideal: No parallel production permitted.	No	No	No	No	No	Yes
Can brands label garments with this assurance system, and are consistent marketing assets available? FP ideal: Third party certification logos are made available to brands and retailers, and the use of these is overseen by the standard setting body.	Yes	Yes	Yes	Yes	Yes	Yes and no. As the NWD is not a certification scheme, marketing assets are not provided; however, the brand/retailer has the option of communicating its status.

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<p>Compliance mechanism</p> <p>FP ideal: Clearly communicated repercussions for mis-information. Including a lifetime ban for those found guilty of being deliberately misleading.</p>	<p>Annual audits at farm level including unannounced audits combined with supply chain compliance to the Content Claim Standard (CCS).</p> <p>Compliance mechanism in place and dependent on whether non-compliance is major or minor.</p>	<p>Where major non-compliance is detected supply status is suspended. If wilful non-compliance is detected, certification is cancelled and supply will not be drawn from these farms.</p>	<p>The ZQ Standard assigns a non-conformance status and should egregious violations occur, members will be removed from the programme immediately. Implications of non-compliance are stipulated within the contracts for wool supply, which are revoked in such circumstances.</p> <p>Request for re-entry to the program will be referred to the ZQ Governance Group and NZM Senior Management.</p>	<p>Where major non-compliance is detected, membership is removed and supply will not be drawn from this farm.</p> <p>Re-entry will be referred to Senior Management for decision.</p> <p>Where a minor compliance issue occurs, we will work with the grower to reach full compliance in order to ensure required standards are achieved.</p>	<p>Non-compliance results in suspension of accreditation, and advice to wool selling agents and buyers, until remedied to AWEX's satisfaction.</p>	<p>Two levels of Non-Compliance may be determined – level 1 and level 2. If it is determined the breach is a level 2 Brand/PIC will not be able to make a future declaration until an on farm inspection or PR Verification has been undertaken.</p> <p>If a declaration (regardless of type) is found to be non-compliant, the buyers (and the broker) of the incorrectly declared wool are informed and advised of the correct mulesing status. They and their wool processing clients will consider their position.</p>
<p>What third party bodies are involved?</p> <p>FP ideal: Separation between the entities writing the standards, and those who are doing the verification against that standard. Standards are created in line with best practice principles.</p>	<p>Seven global certification bodies are accredited to audit against the RWS. Textiles Exchange does not manage farm audits.</p> <p>The RWS was developed using the ISEAL Principles of sustainable standard creation.</p>	<p>NewMerino systems are verified by the certification body Control Union.</p> <p>NewMerino carries out its own desk audits and on-farm audits.</p>	<p>Farm audits are carried out by the certification bodyASUREQuality New Zealand Ltd. and their global partners.</p> <p>The ZQ standard is at the final stages of certification to ISO/IEC 17065:2012 conformity assessment standard which includes requirements for certification bodies, products, processes and services.</p>	<p>On farm audits are carried out by the certification body Control Union.</p> <p>Since Authentico is an Integrity Scheme it can build on any other existing standard if in compliance with NM status.</p>	<p>AWEX is currently completing certification for SustainaWOOL under ISO9001.</p>	<p>AWEX is currently seeking ISO accreditation for the work processes it has in place in relation to the NWD-IP.</p>

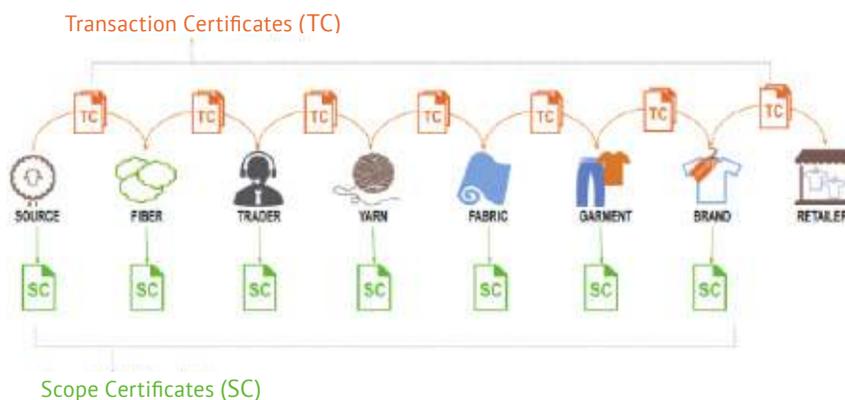


Additional considerations:

- While FOUR PAWS encourage the use of effective certification schemes, it is acknowledged they cannot always provide a 100% guarantee.
- The National Wool Declaration is not a standard setting body nor a certification scheme as such, however it has been included due to its high-level of use within Australia to date.
- FOUR PAWS is against any form of breech mutilation/ modification. This includes mulesing and a new form of breech modification called steining/ freeze branding (the use of liquid nitrogen) due to continued concern for sheep welfare.

There is no robust scientific evidence to back claims that freeze branding does not cause animals severe pain or stress. FOUR PAWS has informed each of the initiatives listed above that freeze branding should not be certified as non-mulesed, and for wool coming from freeze branded sheep – that this should be clearly labelled as such.

- Parallel production refers to whether producers can sell both non-mulesed and mulesed wool.
- The aim of the Chain of Custody approach is to preserve the identity of the claimed material, and to track its movement through the supply chain. As shown below, this can be done through Scope Certificates (SC) and Transaction Certificates (TC), verifying that both the company is qualified to produce goods to a given standard, and the goods being shipped from one company to the next conform to the given standard.¹¹⁸



Source: Textiles Exchange Responsible Wool Standard - chain of custody system