

## Animal Welfare in the Australian Wool Industry – Concerns and Recommendations from German Fashion Brands and Retailers

Addressee: General Secretariat IWTO, The Woolmark Company

Dear Ms. Wight, Dear Mr. Gosse,

As German/European fashion brands and retailers we are committed to the protection of animal rights and animal welfare and strive to procure products containing animal fibres or substances in the most responsible and ethical way. Any kind of mistreatment, violence, neglect or unnecessary suffering of animals is not tolerated.

This is not just our aspiration as responsibly acting companies but also what we are expected from our customers, both B2B and B2C. In general, the awareness of the general public on the importance of animal welfare is rising every day. Non-governmental organizations enforce this trend through public campaigns suggesting a direct causal connection between fashion companies' business conduct and animal welfare violations in the textile supply chain. In addition, initiatives and multi-stakeholder alliances for sustainable textiles focus on the topic of animal welfare more and more, altogether leading to an increasing pressure on German/European brands and retailers.

Against this background, we expect our partners in the supply chain to actively foster animal welfare and make it a priority as well. This implies to comply with all applicable laws, regulations and conventions as well as with the principles laid out in the internationally recognized "Five Freedoms" of animal welfare, codified by the Farm Animal Welfare Council. Accordingly, animals shall be free of hunger and thirst, discomfort, pain, injury or disease, fear and distress, and should be able to express normal, innate, not-harmful behaviour. Furthermore, it is also important to be aware of the environmental impacts of animal farming, like land use, climate emissions and desertification. In order to prevent or minimize these effects, farmers and raw material suppliers shall have suitable environmental management systems in place including the implementation and documentation of effective measures.

At the same time, while being aware of the critical issues that can be linked to the sourcing of animal derived products, as brands and retailers we firmly believe in the quality and the sustainable aspects of animal-derived and thus biodegradable materials. We also see clearly that there is an ongoing demand for animal fibres and materials from our non-vegan customers. For this reason, banning animal-derived materials from our collections, has been and must be always the last option to prevent animal rights violations in our supply chains, especially as long as there are no comparable vegan alternatives available on the market.

On these grounds, in order to adhere to our commitment to safeguard animal welfare, the undersigned brands and retailers are aiming at increasing transparency and effective controls of animal welfare standards throughout their supply chains. In the end, transparency and monitoring shall also raise the availability of materials that are explicitly certified to animal welfare criteria – which will raise trust and brands' credibility on the side of customers and the critical public as well as benefit successful, customer-oriented business practice.

For the wool supply chain, the above-mentioned principles translate as follows:

- Sheep and goats that provide wool for our products shall be treated according to the Five Freedoms of Animal Welfare and be raised on farms that preserve land health.
- In addition, regarding Australian wool, our customers have particularly critical concerns regarding the practice of "mulesing". While it is understood that the removal of wool-bearing skin from around the breech of a sheep, for many years, has been common practice and the most responsible action to prevent the parasitic infection flystrike, the treatment is still considered highly controversial with regards to animal welfare, especially when used without significant pain release applied before the treatment. Public campaigns and media continue to draw the attention of customers to this issue, without explaining the complexity or potential necessities in the background. In other words: Brands, consumers and the media more and more expect fashion companies to only offer products with non-mulesed wool.
- Therefore, we urgently ask the Australian wool industry to set clear targets for the phase-out of mulesing, including a roadmap and timeline for the implementation of respective measures. This should encompass a significant increase of data transparency regarding mulesing-status of farms (cf. 30 percent non-declared mulesing status in 2018).
- Data transparency also means clear and unambiguous definitions. This aspect has been recently at risk with respect to the "NM" (non-mulesed) category of AWEX's National Wool Declaration. We would like to emphasize that "NM" must continue to be used only for wool that comes from sheep that have not received any kind of breech modification or alternative treatment method like e.g. freeze branding with liquid nitrogen/"steining", or clips. New breech modifications must be classified in a new category such as "BM" (Breech Modification) instead of allowing alternative breech modifications to be declared as "NM(2)". This would dilute an established and internationally recognized declaration of non-mulesed wool, with negative effects on the public acceptance of "non-mulesed" declarations and customers' trust.
- While it is highly appreciated that the International Wool Textile Organisation has published a summary of global woolsheep welfare standards in its Specifications for Wool Sheep Welfare and that it cooperates with the World Organisation for Animal Health and further animal health specialists – in order to raise trust and credibility, an effective monitoring of the implementation of these standards is seen as key. We believe that combining the already existing IWTO Test Certificate on the mulesing status and general farm practices with additional animal welfare criteria, could be an easy and suitable way to address this demand. Similarly, we highly recommend the inclusion of animal welfare standards in the Woolmark Standard. This would help increase the availability of certified wool as a possible alternative to more sophisticated or costly standards like for example the Responsible Wool Standard or organic standards like GOTS. A further possibility would be to start a more open cooperation with and/or the active promotion of already existing standard systems and initiatives (e.g. driven by Textile Exchange) that include animal welfare requirements and checks among your stakeholders.
- Furthermore, we believe that all kind of awareness raising and capability building measures will be helpful to prevent animal welfare violations, for example a monitored training program for temporary workers on responsible sheering practices – based on your respective guidelines.

- Finally, with regards to transparency and traceability, we welcome all efforts and projects that address these challenges on an industry-wide level. The promotion of the Woolmark Company's WoolQ eSpeci programme is a good example that shows a clear benefit for increasing transparency, enabling monitoring as well as storytelling from the farm. A proactive communication towards us as brands and retailers on the progress and use cases of these projects is always more than welcome.

Thank you for taking these concerns and recommendations into further consideration and forwarding them to relevant partners and stakeholders. As German/European brands we will be happy to continue our fruitful dialogue on animal welfare in the wool supply chain and are looking forward to getting your feedback regarding the issues described.

If you have any questions, please do not hesitate to contact Daniela Buchbender:  
[buchbender@germanfashion.net](mailto:buchbender@germanfashion.net)

Yours sincerely,

			
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