

Stakeholder Review: Feedback and Responses

Date: June 2016

Document: **Responsible Wool Standard**

Organization	Paragraph	Commented text	Proposed change	Comment (justification for change)
Please fill out the feedback form with your suggestions for edits or additions to the standard text. Please list your organization, the paragraph referenced, the text you are commenting on as it is currently written, how you would rewrite the text, and your comments or justifications for the change. See below for examples. Thank you for taking the time to contribute!				
	General Comment	From the first draft to this second draft there have been many modules added to the standard. This standard is focused on what is to be expected from a wool producer to be classified as meeting these criteria. The 5 animal rights and the best management practices of sheep handling seemed to be the focus. These modules had some good information and clarification on these items.		In my opinion this is where we need to start and then build into the standard the other modules as the acceptance of the standard grows.
Response	One of the key changes in the revision following the first stakeholder consultation was to reduce the number of sub-requirements and to build in greater flexibility ensuring the applicability in different production systems and regions. Different requirement types are used for the animal welfare modules and the land management modules. The land management module requirements are designed to allow for continuous improvement with Major requirements that have to be met in order to achieve certification and Minor requirements. In the first year of certification 50% of the applicable Minor requirements need to be met. For subsequent years, this score needs to increase by an additional 10% until 90% or above is achieved.			
	Definitions, RWS standard document	“NC” “Non-compliance”	Define the levels of NC: NC – 1: NCs relating to critical practices are not allowed. Critical practices shall meet the requirements of the RWS before or at the time of the first audit. Critical practices are: mulesing, castration, tail docking, and on-farm slaughter. NC – 2: NCs relating to the treatment of animals shall be corrected within 30 days of the farmer receiving the audit report or before the wool leaves the farm. NC – 3: NCs relating to documentation or infrastructure	I know the levels of NC are explained in the Farmer Workbook but most people are going to look at the standard first so it may be helpful to explain what NC-1, 2, and 3 mean in the standard document itself.
Response	The General Information section has been extended and the Requirement Types are now included there.			
	Certification & Auditing > Audit Cycle > Farms or Farm Groups	“Chain of custody of the previously shorn wool is certified.”	Chain of custody of the previously shorn wool is certified to the RWS .	Do you need to specify that the previously shorn wool must have been certified to the RWS (and not any other random certification)?
Response	As this refers only to the first certification cycle it is not possible for the wool to already be certified to the RWS. The text has been amended to say ‘chain of custody of the previously shorn wool is confirmed’. The Certification Body will be responsible for verifying this.			
	General Comment	The way it is put together it is an all or nothing standard. I would think to get more people doing something; it should be like the Leeds standard. Gold Silver and Bronze classifications. Many of the wool producers will not be able to attain all the standards required in this second draft. Looking at an		. I would think to get more people doing something; it should be like the Leeds standard. Gold Silver and Bronze classifications

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		all or nothing game the growers will not attempt to comply. Just like PETA, there is always a way to nitpick readings or ask for more information. So for consideration they need to look at several classifications.		
Response	A tiered approach was discussed during the standard development process but it was felt that this approach would make clear communication to consumers challenging. The land management module takes a continuous improvement approach with the intention of making the standard more accessible.			
	Page 5	Wool production has increasingly come into focus for brands and consumers as certain animal rights organizations shine a harsh light on poor practices in farming, even if the reality is that these practices are not typical of most farming systems.		Some harsh practices are routine in farming (e.g. castration without pain elimination, tail docking, on-farm slaughter without stunning) - even if these procedures are legal. That has nothing to do with animal rights activism. We don't see the need to criticize animal rights organizations in the RWS—indeed we wouldn't be having this conversation without them shining the light on these practices.
Response	The feedback has been noted and the text has been rephrased.			
	Page 8	The auditor gives a maximum of 2 months window within which the on-site audit will happen, and they arrive without any additional announcement.		Two-months is too long to give prior notice of an unannounced audit
Response	The strategy for unannounced audits will be developed by December 2016.			
	Feed Module	It is stipulated that the wool producer provide an annual feed plan for his animals. So take Grower Joe from southern California. His sheep are wintered at a home ranch. In the spring he moves his sheep behind the farm harvest (Beets, Potatoes, Kiwi's, Corn). The sheep eat the forage not collected by the harvest. The farmer gets his field cleaned up and fertilized, wool producer gets free feed. Now, the wool producer needs to know chemical application, pesticide application, quantity, half-life of the chemicals used. This is only for one year as the fields get different things planted, different fertilizers applied so this will take some time each year. Then in the summer he runs his sheep on BLM lands by permit. The wool producer might get his allotment permits 2 months before moving the sheep. How is he going to do a feed plan		

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		when he is not sure where he will be? Has the government sprayed the forested area with moth killer? Another unknown. So for sheep producers there are many things in the second draft that is going to be problematic.		
Response	The farmer will not be evaluated on things that are outside of his or her control. In the example given, the auditor will look to verify that there is a plan in place for ensuring that the nutritional needs of the sheep are met that is appropriate to the farming system.			
	AW2.1	GP3 and GP4 are referenced in Farmer Workbook, as is a Grazing and Feeding Plan. Has this been omitted from the current draft?		Because grazing planning involves more than feed requirements (and the guidance references environmental sustainability), it may make sense to elaborate on these aspects and cross-reference them in the Land Management section.
Response	The content around nutrition and the Grazing and Feeding Plan had been restructured and the reference to GP3 and GP4 should have been removed. Further elaboration is now both in the guidance document and the self-assessment questions.			
	AW2.6	2. Stocking rates shall be determined according to class of stock, season, available feed and total grazing pressure.	2. Stocking rates shall be determined according to class of stock, season and total grazing pressure, including reasonable estimates of use by local herbivores	Some level of native herbivore use should also be included in grazing planning
Response	The requirement has been amended as suggested.			
	AW2.8	4. Any problems with feed or water shall be addressed immediately.	4. Any problems with feed or water for animal welfare or land health shall be addressed immediately.	<p>“problems” is a vague of a term that should be clarified at least in terms of for whom or what there is a problem.</p> <p>While this section deals with animal welfare vs. land management, we could not find an appropriate other place that describes that grazing management may need to be changed based on rapidly conditions, such as drought.</p> <p>Perhaps it should be included as a 4th bullet under AW 2.6 instead?</p> <p>If so, the language could be something like:</p> <p>4. Adaptive management will be used in situations in which natural forage is less available than planned, such as during drought or heavy snow, to avoid damage to forage resources.</p>
Response	Thank you for the feedback, we have added a reference to this in the guidance. We recognise that ‘problems’ is a vague term and are addressing how these should be interpreted in the auditor guidance.			

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	AW3.3 guidance	New addition	While secure fencing aids in husbandry, care should also be taken to provide passage for wildlife as possible. This may be in leaving gates open and providing access to pastures when sheep are grazing elsewhere. It also means considering wildlife in fence design- what species, small and/or large, will be unable to cross a farm based on fence typed used? (additional information: www.wildlifefriendly.org/resources)	Fencing to secure small stock is a very helpful tool in protecting livestock from predation. Yet, so doing fragments already diminishing habitat and corridors for wildlife, sometimes with critical results.
Response	Thank you, this has been added to the Guidebook.			
	AW4.1			It looks like all the details on what needs to be in the plan were lost. Was this retained in a guidance document somewhere?
Response	Yes, this is now within the Guidebook along with the template.			
	AW4.11	For all methods, pain relief shall be applied when suitable pain relief is available on the market.	For all methods, pain relief shall be applied when suitable pain relief is available on the market .	Remove "on the market". Since some pain relief is only available through a veterinarian and can be used off-label, it is still "available", but can't be purchased over the counter so might not be considered "on the market".
Response	Noted and will be amended			
	AW4.12	For all methods, pain relief shall be applied when suitable pain relief is available on the market.	For all methods, pain relief shall be applied when suitable pain relief is available on the market .	As above.
Response	On the market has been removed.			
	AW4.12	2. The procedure shall be performed using either: a) Application of a rubber ring b) Emasculator c) Cryptorchid (shortening of scrotum) d) Surgical. Pain relief is mandatory	2. The procedure shall be performed using either: a) Application of a rubber ring b) Emasculator c) Cryptorchid (shortening of scrotum) short-scrotum method d) Surgical. Pain relief is mandatory	Check terminology
Response	We have amended this to say just shortening of scrotum to be clearer. The wording was aligned with the New Zealand Code of practice where the term is used (definition: an animal in which one or both testes have not normally descended from the abdominal cavity to the scrotum and the colloquial term for short scrotum males)			
	AW4.13	Ear marking, tagging and tattooing are permitted methods of identification.		What is meant by "Ear marking"? If it involves cutting out pieces of skin from the ear, we should not permit it.
Response	The requirement has been amended. Notching is only permitted in cases where this is a legal requirement.			
	AW4.19	"When an animal slaughtered on-farm, it shall be done using..."	"When an animal is slaughtered on-farm, it shall be done using..."	
Response	Thank you, this is been amended.			

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	AW4.19	When an animal slaughtered on-farm, it shall be done using a method that is quick, causes minimal stress and pain, and results in a rapid loss of consciousness followed by death without the animal regaining consciousness.		Thank you for including this!
Response				
	AW4.21	2. Electroejaculation and laparoscopic artificial insemination shall be carried out only by veterinarians or by trained and competent operators under veterinarian supervision. Appropriate pain relief shall be used.	2. Electroejaculation and laparoscopic artificial insemination shall be carried out only by veterinarians or by trained and competent operators under veterinarian supervision. Appropriate pain relief shall be used.	Electroejaculation is painful and should not be permitted. The usual routes of pain control do not work for it.
Response	The requirement has been amended to prohibit electroejaculation.			
	AW4.22	All worker shall be able to recognize the signs of lambing difficulty and know when and how to provide appropriate assistance and when to seek assistance...	All workers shall be able to recognize the signs of lambing difficulty and know when and how to provide appropriate assistance and when to seek assistance...	An "s" is missing from "worker"
Response	Thank you, we have amended the text.			
	AW5.2			It looks like the sub-requirement is missing?
Response	The sub-requirement has been reinstated for 5.2			
	AW 5.3	"Mistreatment includes rough physical contact such as kicking, striking, slamming gates on the sheep, tripping, throwing or dropping animals, dragging or pulling sheep by the fleece, tail, ears, head, or neck, or dragged by the back legs."	Mistreatment includes rough physical contact such as kicking, striking, slamming gates on the sheep, tripping, throwing or dropping animals, dragging or pulling sheep by the fleece, tail, ears, head, or neck, or dragging by the back legs.	
Response	We have edited the text, thank you.			
	AW5.6	In situations where the farm is responsible for or in control of transport of sheep, the requirements in the RWS Transport Guidance or regional legal requirements shall be met.		There are a couple of key points I was hoping we could be sure were in the transport guide, including stocking density limits, a requirement that the animals are hauled in safe, well-maintained vehicles with trained/experienced drivers, and a prohibition on moving animals when it's too hot or too cold. The guide should also include a good discussion of fitness for transport

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				<p>criteria. The OIE Terrestrial Animal Health Code has a very good list. I think the following should be included at a minimum; these animals should not be transported:</p> <ol style="list-style-type: none"> 1. sick, injured, weak, or disabled animals 2. those that are unable to stand unaided and bear weight on each leg 3. those that are blind in both eyes 4. those that cannot be moved without causing them additional suffering 5. newborn lambs 6. pregnant animals which would be in the final 10% of their gestation period at the planned time of unloading 7. females travelling without young which have given birth within the previous 48 hours 8. those whose body condition would result in poor welfare because of the expected climatic conditions. <p>The American Meat Institute has a guide that was developed with Temple Grandin's help, and it's a great resource: www.animalhandling.org/ht/a/GetDocumentAction/i/58425</p> <p>Page 4 and 5 have stocking density recommendations for sheep.</p>
Response	Thank you. We have amended the Transport Document.			
	AW5.9	All other animals kept on the farm shall be treated humanely.		Thank you for including this!
Response				
	Soil Management & Bio Diversity	Soil management and bio diversity are modules that are way out there for a normal sheep producer to manage and report.		
Response	The land management module has got Major requirements which have to be met by all and Minor requirements where a continuous improvement approach can be taken. (i.e. in			

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<p>the first year, 50% of the Minor requirements have to be met and this has to be improved for subsequent years.). Please also note that not all requirements are applicable on all farms. This is indicated by a reference to the Land Classes that the requirement applies to.</p>				
	LM1.1	<p>LM1.1 Land shall not be degraded by overgrazing and/or other management techniques. Soil and land health including soil erosion, compaction, organic matter and any other areas of risk relevant to the farm, shall be addressed through actions and in a written management plan.</p>	Soil and land health, including forage resources , soil erosion, compaction....	<p>Omission of references to ‘forage’ or vegetation does not seem advisable as that is what farmers may primarily be able to track and observe.</p> <p>We would suggest a new LM bullet, to follow 1.1. and follow the same format as LM 1.2 on Soil Compaction and 1.3 on Soil Erosion. While there may be some overlap in the responses, the emphasis on vegetation is sufficiently different, especially in areas where native range is the primary grazing resource, to make so doing seem worthwhile.</p>
Response	Thank you for the feedback, we have added forage resources to the requirement.			
		Add in new bullet, following 1.1	<p>LM (new bullet) Forage resources shall be monitored and managed. Steps shall be taken to prevent or minimize degradation of forage resources, especially native range and perennial cover, and to restore degraded areas.</p> <p>Monitoring a. Are there any areas in your farm where forage resources are degraded due to animal traffic? Please be ready to show the auditor an example. 1 – Farmer demonstrates a good understanding of herbaceous and woody vegetation and can accurately identify affected areas. Answer matches auditor observations on the farm. ½ - N/A 0 - Answer does not match auditor observations; they are not paying attention to compaction.</p> <p>b. Do you use any monitoring points (see <i>Monitoring Point Guidance</i>) for compaction? 1 - They have monitoring points that correspond to the RWS guidance. ½ - N/A 0 - They do not use any monitoring points.</p> <p>Management</p>	<p>Same as above</p> <p>Another possibility would be to reference the grazing plan here.</p>

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			<p>c. What actions are you taking to minimize or prevent degradation of the forage base?</p> <p>1 - The actions that are needed to address the health of the land are being taken. ½ - Some actions are being taken on some or all of the land, but further efforts are needed to fully address the issue. 0 - No actions are being taken.</p> <p>d. For any areas that are already damaged, are you working to restore these areas? If so, how?</p> <p>1 - Damaged areas have been fully restored or firm plans are in place to restore them. ½ - Some actions are being taken on some or all of the land, but further efforts are needed to fully address the issue. 0 - No actions are being taken.</p>	
Response	Thank you for the suggestion. This has been added to the biodiversity module.			
	LM1.5	LM 1.5 The farmer shall monitor key indicators of land health	This remains in Guidance in Farmer Workbook but not in standards	See above- is there another standard that directly suggests vegetation monitoring?
Response	This was an editing error and is now back in the standard.			
	LM 2.1	LM2.1 Sensitive and high conservation value areas and wildlife species on the property shall be monitored and managed.		Is there a way to define sensitive and high conservation value areas? What type of training will exist for auditors to recognize these areas?
Response	Additional guidance is included in the auditor guidance.			
	LM 2.1 guidance			We are so pleased that the option for concurrent audit under the Wildlife Friendly standards is mentioned in the guidance text. Thank you!
Response				
	LM2.3	LM2.3 Farmer shall monitor and manage the population of predators and wildlife (birds, mammals, or reptiles) on the farm. Lethal control shall be minimized and done humanely.	<p>LM2.3. Farmer shall monitor the population of predators and other wildlife (birds, mammals, or reptiles) on the farm and apply livestock husbandry practices that maintain biodiversity.</p> <p>Or even better: Farmer shall observe and keep records of the known wildlife (predators, mammals, birds or</p>	The term “manage the population” of predators and wildlife would mean either hunting or lethal control in the vast majority of interpretations. We don’t think RWS means to suggest that lethal control of predators or would be the primary means to respond to wildlife presence/absence. Rather, we believe RWS would prefer that

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			reptiles) on the farm and apply livestock husbandry practices that maintain biodiversity.	livestock management be adapted. Further, “population monitoring” suggests a level of rigor that is difficult for a farm to accomplish. It may be better to suggest observation and record-keeping. Will guidance for what “minimizing” and “humane” lethal control are be offered?
Response	Thank you for this feedback. The requirement has been amended.			
	In guidance 2.3a	How often do you monitor for the population of predators and wildlife (birds, mammals and reptiles) and keep records of observations?	1-Farmer strives to observe and keeps regular records of the known wildlife (predators, mammals, birds or reptiles) on the farm ½-Farmer observes known wildlife (predators, mammals, birds or reptiles) on the farm but does not keep records 0-Little wildlife observation takes place on the farm	Suggest changing, “monitor for the population” in the original text to something closer to “observes’.
	2.3 Add-in new guidance		1-Farmer applies 2 or more livestock husbandry management practice to maintain biodiversity 1/2- Farmer applies at least one livestock husbandry or land management practices to maintain biodiversity 0-Farm does not manage livestock management to maintain biodiversity	
Response	Thank you for this feedback. The self-assessment has been amended accordingly.			
	LM2.3	All Farmer shall monitor and manage the population of predators and wildlife (birds, mammals, or reptiles) on the farm. Lethal control shall be minimized and done humanely.		The currently written text is not comprehensive enough. The previous draft directed readers to a “Predator Reference guide”, which would have contained more guidance, I presume. I’m wondering why this changed, and how we can make it stronger? At the least, leg-hold traps, other non-discriminant traps and compound 1080 should be prohibited. Even where 1080 is used by government agencies for control of “pest” species, farmers should not, if not required by law. This should definitely be a major requirement. No certified farm should be using leg-hold traps or other clearly inhumane predator control tactics. This is a key animal welfare requirement.
Response	Thank you for the feedback – the requirement has been amended and lethal control is now a separate requirement. Additional guidance will be added to the Guidebook.			
	LM 2.5	LM2.5 Hunting, fishing or gathering of rare, threatened or endangered species is	LM2.5 Hunting, fishing or gathering of rare, threatened or endangered plant or animal species is prohibited	Is this what is intended?

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		prohibited		
Response	The requirement has been changed to clarify.			
	In guidance, Farmers Manual, page 79	On-line references for monitoring		<p>Suggest that different and/or clearer, step-by-step references be recommended. The go-to manuals we are familiar with do not appear to be on-line at present. However, just about every US state extension and/or NRCS office has a variant. The existing references are likely not stepwise enough for farms unfamiliar with monitoring points to adopt.</p> <p>Also: in text re: monitoring, might note value of taking a photo looking straight down at vegetation at monitoring point (in addition to landscape monitoring photo), as these can be very useful in vegetation monitoring</p>
Response	References have been amended and further guidance will be added over time.			
	In guidance, Farmers Manual, page 79	Predation guidance	Add in additional resources: www.peopleandwildlife.org.uk/ www.wildlifefriendly.org/resources	Unfortunately, there is no single global site for references on coexistence with wildlife. We have compiled reputable references for N. America on the wildlifefriendly.org site and will add to these globally, as possible.
Response	Reference have been added to the Guidebook.			