



Medicines & Poisons Scheduling
Secretariat (MDP88)
GPO Box 9848
Canberra ACT

AWGA Submission to TGA re rescheduling of Trisolfen from S4 to S6 Status.
Including 3 attachments

Dear Sir or Madam,

The Australian Woolgrowers Association (AWGA) is one of national peak bodies representing the Australian wool industry.

AWGA strongly recommends rescheduling of TriSolfen to S6 status as a matter of wool industry priority given that the industry is united behind such a sensible and timely move by the TGA.

Since 2005, the image and reputation of Australian wool has been under a barrage of international criticism over the controversial but necessary procedure of mulesing. Mulesing is a valuable on farm surgical procedure that effectively protects merino ewes from breech fly, performed by farmers with no vet supervision. Since the invention of Trisolfen, the wool industry has been afforded a level of international protection owing to the fact that mulesing can now be performed with effective pain relief and improved wound healing.

AWGA discussions with major international processors, fashion industry representatives and EU and USA national retail associations have consistently demanded that Trisolfen be increasingly adopted as best practice for mulesing, if Australian wool is to improve its international welfare credentials after so much negative publicity in international press, allowing their brands to be better protected in the market place from animal rights activity. (Please see 3 attachments).

In essence, the decision not to allow Trisolfen to be more easily purchased and administered could have further serious international trade implications via refreshed boycotts of wool soon to be reportedly implemented in 2014 by animal right activists. Thus, we strongly believe that Trisolfen must be moved to an s6 standard, allowing more ease of ordering, easier access, cost reduction, and increased uptake by the wool industry, thereby reducing the impacts of possible forthcoming threats to our international wool trade.



Further reasons why Trisolfen must be given an S6 status:

- Woolgrowers in remote regions on a regular basis complain about the difficulty in purchasing Trisolfen from vets. S6 status would allow over the counter sales through normal retail channels, would greatly ease tyranny of distance access to TriSolfen.
- Large percentages of lambs that are mulesed without pain relief every year are in remote areas without direct or easy access to Trisolfen. The current vet only Trisolfen distribution basis discriminates against those who are trying to improve best practice welfare.
- Woolgrowers are trying to do the right thing for animal welfare but it is unreasonable that growers in remote regions should have to carry a significant extra cost burden to travel to a vet to purchase a product that is not applied by or overseen by the vet when it is applied.
- Changing of the schedule would allow AWGA to undertake significant education and advertising to their members on the importance of using pain relief during mulesing currently this is prohibited under a S4 schedule.
- As a major grower organization we have not had one complaint or report of misuse since it became commercially available in 2006, in fact, all reports have been praiseworthy and of a highly productive nature of the product.
- All main stream welfare organizations are now calling for Trisolfen's use to be used by the entire industry, something that is impossible until it is available over the counter as are many other chemicals and pharma products. This can only be achieved via a s6 rescheduling.

We are sure that common sense will prevail and that your excellent organization will agree with us and all other wool bodies of the urgent and necessary need to reschedule Trisolfen, allowing more growers easier access and use, guaranteeing better welfare outcomes for our sheep, allowing for more competition in the market place, whilst boosting the welfare marketing credentials of the Australian wool clip, primarily giving much needed confidence to our customers overseas.

Shane Edwards
Chairman AWGA

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