Ministry for Primary Industries
Manatū Ahu Matua

Summary of Submissions

Proposed Act and regulation changes to improve NAIT
(National Animal Identification Tracing scheme)

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Executive summary

On 30 October 2018 the Ministry for Primary Industries (MPI) invited the public to provide feedback on 13 policy proposals aimed at improving the legislative framework for the National Animal Identification and Tracing (NAIT) scheme. Comment was also invited on three further areas that might help improve NAIT, and a number of proposed technical changes to the Act and regulations. Public consultation closed on 19 December 2018 and MPI received 92 submissions, including a number from organisations on behalf of their membership.

Many submissions contained information that did not relate to the legislative change proposals, but were comments about the operational functioning of the scheme. Those submissions have therefore been shared in confidence with NAIT Limited, so that the feedback can be noted and addressed.

Summary of feedback on the proposals

We have grouped the 13 proposals contained in the consultation document into the following four themes, according to the general issues they aim to address:

- tagging changes
- incentives to comply
- strengthening the scheme
- improving access to and use of NAIT data.

Tagging changes

This theme relates to the following proposals:

a. require that a PICA only uses NAIT tags at the NAIT location for which they were issued, when tagging an animal for the first time (proposal 6.2 in the public discussion document)

b. rename "impracticable" to tag to "unsafe" to tag (proposal 7.3)

c. change the timeframe for when a PICA must declare the impracticable to tag exemption from "48 hours prior" to "before sending", and make failing to record the movement in advance an infringement offence (proposal 6.4)

d. prohibit and make it an offence to transport untagged animals without an exemption (proposal 7.4)

e. require untagged animals arriving at a NAIT location to be separated from other animals (proposal 7.5).

There was broad acknowledgement in the submissions that compliance with tagging requirements must be improved and that a number of these proposals will help with that. The main concerns raised were around the practicalities of implementation.

A majority of submissions offered support for the first three proposals on the basis that these changes provide biosecurity benefits (i.e. improved animal traceability). The proposal to change the reporting timeframe

of untagged animals to "before sending" was seen to increase the practicality and workability of NAIT requirements, as it acknowledges the reality of animal transport where missing tags are often not noticed until an animal is loaded onto a truck. This change would make it easier for PICAs to comply with the Act.

Those opposing this group of changes raised issues around the potential costs and practicality of the proposals (e.g. cost associated with farmers no longer being able to use existing tags when tagging an animal for the first time at a new location).

The proposal to make it an offence to transport untagged animals without an exemption received more varied feedback. A small majority of submissions were in favour of the proposal mainly for compliance reasons (i.e. it would make it harder to transport untagged animals). Those not in favour said that the proposal is impractical to implement (e.g. stock are often loaded in darkness and it would be difficult for transport operators to physically check for tags). A number of submissions also noted that the responsibility for transporting animals should remain with the sending PICA and not be transferred to the transporter who, in effect, would become a NAIT enforcement agent.

The final proposal that would require untagged animals arriving at a NAIT location to be separated from other animals received limited support, with submissions opposing the change outnumbering those in favour. Those in favour generally thought the change represented good biosecurity practice. The submissions opposing the change thought that the justification for the change was flawed (i.e. when animals are already mixed during transportation there is little point separating them on arrival at a NAIT location). Others commented that the proposal was impractical and not enforceable.

Incentives to comply

This theme relates to the following proposals:

a. make previous NAIT location history for animal available to a PICA as a potential seller (proposal 6.7)

b. align penalty limits with those in the Biosecurity and Animal Products Acts (proposal 7.1)

c. align infringement fees with those under the Biosecurity and Animal Products Acts (proposal 7.2).

There was broad support for these proposals, with the main rationale being that they would improve compliance.

A substantial majority of submissions supported the first proposal in this group on the basis that it could help inform stock purchasing decisions by giving buyers more confidence about the biosecurity history of animals, and that this information should be available to both buyers and sellers.

A number of submissions (both in favour and not in favour) noted the impact this proposal might have on farmers seeking to sell stock born or previously resident in areas perceived as 'risky' and how this may lead to non-compliance in an effort to mask the origin of an animal.

A majority of submissions were in favour of the proposals aligning penalty and infringement fees with the Biosecurity and Animal Products Acts, mainly because increased fees and penalties demonstrate the seriousness of non-compliance and help ensure compliance with the Act. Others raised concerns that the NAIT scheme needs to be made more user friendly and usable first, before thought can be given to increased penalties and infringement fees. A number of submissions noted that, up until now, enforcement has been lacking and this is largely at the heart of the lack of compliance with NAIT*.

> *** These views are also contained in a number of submissions in favour of the proposed changes.**

Strengthening the scheme

This theme relates to the following proposals:

a. amend the definition of PICA to clarify that the responsibilities apply to everyone in charge of animals (proposal 6.3)

b. require a PICA to report annually the presence and estimated numbers of non-NAIT animal species at a NAIT location (proposal 6.1).

A majority of submissions were in favour of the first proposal in this group, mainly because it would improve accountability and provide more clarity and certainty around the definition of a PICA. Submitters also asked for clarification on what the responsibilities and liabilities would be. The main concerns expressed relate to the perception that it would lead to increased bureaucracy.

Feedback on the second proposal on non-NAIT animal species numbers was more variable. A small majority was in favour, citing the biosecurity benefits of obtaining information on the numbers of non-NAIT animals that may be susceptible to the same transmittable diseases as NAIT animals.

A number commented on the limited value the collected data would have as it only provides a snapshot of the gross number of animals at one point in time. Submissions also noted that farmers already have to provide this information to Statistics New Zealand and IRD once a year, and so they would be reporting the same thing to multiple sources.

In addition, a number of submissions suggested that the current NAIT scheme needs to function properly before introducing a new reporting requirement.

Improve access to and use of NAIT data

This theme relates to the following proposals:

a. amend the purposes of holding core data to include responding to stock theft and wandering stock (proposal 6.6)

b. allow any public sector organisation to request access to NAIT core data as long as the Act's purposes for holding this data are met (proposal 6.5)

c. improve access to NAIT information by MPI and other authorities (proposal 7.6).

Most submissions agreed with these proposals on the grounds that NAIT data should be used as effectively as possible, although some had concerns around privacy implications.

A large majority of submissions were in favour of the proposal to amend the purposes of holding core data to include responding to stock theft and wandering stock, saying NAIT data will be useful for this purpose. The second and third proposals were also supported by a majority of submissions, mainly for the perceived biosecurity benefits these changes might have.

Across all three proposals concerns were raised about the potential misuse of data that might come from broader access. Some submissions suggested that access to data for wandering or stolen stock should be restricted to relevant organisations (i.e. Police and animal control authorities).

Feedback on other possible areas of improvement

In addition to the above proposals, the consultation document sought feedback on the following areas:

- information about animal movements during transportation (discussion area 8.1)
- the role of stock agents and traders (discussion 8.2)
- potentially including other species in NAIT (discussion 8.3).

Information about animals during transportation

Submitters were asked whether they would support requiring more details about the transportation of NAIT animals and whether transport operators should have a role in reporting NAIT animal movement information.

Feedback was varied with little support for either proposition. It was generally acknowledged that the transport history of animals is important for biosecurity purposes (e.g. information on the co-mingling and routes of animals during transport) and that transporters play a key role in the system. However, a common concern expressed in many submissions was the potential cost increase associated with the recording of additional stock movement information, especially if this requirement was placed on transporters rather than PICAs, and the complexity of capturing this information through NAIT.

Submissions from organisations and individuals representing the transport sector universally opposed these suggestions, highlighting practical difficulties and the additional costs of providing the information.

The role of stock agents and traders

Submitters were asked about their experiences with stock agents and traders in relation to NAIT, and whether stock agents and traders should have a specific role in the scheme.

Submissions highlighted a lack of consistency both in interactions with stock agents/traders and the roles they take. There was broad support for increased regulation of the sector.

Positive experiences noted in submissions included stock agent/trader 'know how' of the NAIT scheme and the educational role they can play in helping farmers comply. Negative experiences related to compliance and reporting issues, such as the failure to report stock transactions to NAIT, and the reluctance to reveal sellers' details to the purchasers of stock (ostensibly for fear of being cut out of any future deal).

A majority of submissions were in favour of stock traders and agents playing a specific role in NAIT, highlighting that many already do (for example as information providers).

Potentially including other species in NAIT

Submitters were asked whether they support other species being included in NAIT, and if so, which other species should be included and what type of information should be collected.

A majority of submissions did not support this suggestion on the basis that the current system needs to be functioning well first, before thought can be given to including of other species. Of the submissions that expressed a view on which species should be included, sheep, goats, pigs and camelids were common answers with a clear preference for farm/mob level information to be provided rather than individual animal data.

Other comments

In addition to the above, the public was invited to provide comment on the following:

- technical amendments
- implementation
- monitoring, evaluation, and review.

Few comments were received on these areas, and those that have been made are included under the relevant headings in the main body of this paper.

Consultation process

In October 2018 the Ministry for Primary Industries (MPI) published a consultation document and invited feedback on proposed amendments to the National Animal Identification and Tracing (NAIT) Act 2012 (the NAIT Act) and associated regulations, and on three other discussion areas.

The proposals contained in the consultation document were triggered by:

- a recent Operational Solutions for Primary Industries (OSPRI)-led review of the NAIT scheme (findings were made public in early April 2018)
- the recent *Mycoplasma bovis* outbreak, which highlighted a number of improvements that could be made to the NAIT scheme.

The proposed amendments to the NAIT Act and regulations, in concert with operational changes OSPRI is making to its business processes and Standards, are aimed at remedying the identified shortcomings of the scheme.

Public consultation on the proposals started on 30 October 2018 and included a media release and a launch event for key NAIT stakeholders. On the same day, the discussion document and submission form were published on the MPI website. Hard copies of the document were also made available. Further activities to encourage public engagement and submissions during the following weeks included:

- targeted social media messages directed at industry organisations and the public
- advertisements in rural media and regional daily newspapers
- articles in industry publications
- shared content on industry social media.

In addition, emails were sent to individual stakeholders, industry groups, Māori and iwi, and interested parties. Engagement meetings were held with stakeholder and industry groups and MPI officials attended rural events during the consultation period to raise further awareness of the proposed changes.

The public consultation closed on 19 December 2018.

92 submissions were received from industries, organisations, and individuals with an interest in the NAIT scheme.

Submissions were received from the following:

- 47 individuals (trade/occupation unknown)
- 18 individual farmers
- 11 industry organisations/associations representing the following sectors/industries:
  - dairy (2)
  - meat (3)
  - deer (2)
  - farming/farmers (3)
  - transport (1)
- 3 agricultural technology businesses
- 2 transport businesses
- 2 not-for-profit organisations
- 1 community organisation
- 1 consultant
- 1 dairy business
- 1 farming business
- 1 food assurance company
- 1 food business
- 1 mortgage broker
- 1 RFID technology group
- 1 stock trade business.

A full list of submitters is provided at the back of this document.

The following chapters summarise the comments made on the proposals.

The chapter numbering refers to the relevant sections in the public consultation document.

5 | Priorities for change

5.1 Do you agree with the priorities and objectives for NAIT?

COMMENT SUMMARY

52 submissions addressed this question.

77% (40 submissions) agreed or conditionally agreed with the priorities and objectives for NAIT, 10% (5 submissions) did not agree while the views of the remaining 13% (7 submissions) did not express a definitive opinion.

Submissions noted that up until recently compliance failure has largely been due to the absence of compliance incentives and the lack of enforcement of the NAIT legislation.

Some submissions suggested additions or amendments to the objectives and priorities:

- one submission suggested that the following objective should be added – to provide users, particularly farmers, with access to information that will enable them to make better decisions about managing biosecurity risks
- one submission pointed out that, further to the priorities mentioned in the discussion document, a key driver behind the NAIT scheme is to improve tracing capability when infectious agents or chemical contaminants may pose a risk to food safety, as well as biosecurity
- the objective of helping to achieve government priorities was considered to be too broad and should be more narrowly defined.

The reasons for disagreement with the proposed priorities and objectives mainly related to the practicality of the overall scheme or technical (tag-related) issues. Comments of this nature have been captured elsewhere in this summary.

The comments that did not express a definitive opinion generally did not directly relate to NAIT priorities and objectives. The views expressed in those submissions have therefore been captured elsewhere in this summary, as appropriate.

6 | Proposals to support the implementation of the NAIT Review

6.1 Require a PICA to report annually the presence and estimated numbers of non-NAIT animal species at a NAIT location

6.1.1 Do you support this proposal?

COMMENT SUMMARY

55 submissions addressed this proposal.

51% (28 submissions) supported or offered qualified support for the proposal, 31% (17 submissions) disagreed, while 18% (10 submissions) were unclear on whether they supported the proposal or not.

The submissions highlighted the following benefits of the proposal:

- it enhances the response to transmittable animal diseases
- it will assist in creating a more comprehensive snapshot of where animals at risk of infectious disease are and will enhance the future management of biosecurity risks (i.e. response to disease outbreak)
- greater traceability is required as non-NAIT animals can suffer from and transmit the same infectious diseases as NAIT species
- corrects a fundamental weakness in animal tracing and identification in New Zealand, namely that non-cattle and deer species are not covered (but the basic flaw that still remains is that MPI will not have data on farms with non-NAIT species only)
- aligns with other jurisdictions. Competitor countries (Australia, UK, and Ireland) are moving toward greater traceability of additional stock classes. This is important because market expectations demand that level of traceability in order to achieve market access.

The submissions suggested that there were a number of issues and risks to be addressed if this proposal was taken forward:

- data entry of non-NAIT species should be made simple and quick to do
- reporting requirements should be kept to a minimum and should be proportionate to the benefits
- the information provided should be restricted to animal species that are affected by similar diseases
- information must be stored in a way that is meaningful and accessible
- there needs to be clear accountability around how this data is stored and accessed.

Those that disagreed with the proposal highlighted the following concerns:

- the current system is not functioning well. There is a need to focus on fixing this first before introducing reporting requirements for other species
- the introduction of an 'other species' reporting requirement creates further room for error and a greater monitoring burden
- the proposal would involve doubling up of reporting requirements. Annual returns to Statistics NZ require this information and farmers have to submit stock numbers to IRD every year
- the data is of limited value given feral/wild animals play a large role in the spread of disease; and the returns are only gross estimated numbers on non-NAIT animals at a point in time
- NAIT compliance is already burdensome. The proposal will add cost for limited benefit
- farmers will resist this requirement unless a guarantee is given that the data will not be used for non-NAIT purposes
- there is no need for the requirement – farmers do not need to be informed about disease outbreaks in non-NAIT species
- recording of non-NAIT animals is only relevant if these animals have been moved between farms.

6.1.2 Is there anything that may affect your ability to provide this information?

COMMENT SUMMARY

36 submissions addressed this question.

47% (17 submissions) indicated that nothing should affect their ability to provide this information. 53% (19 submissions) stated that they might have issues providing this information.

Issues of concern include:

- Ability to provide accurate numbers:
  - sheep tallies in extensively grazed blocks are hard to provide
  - not all locations have the same balance date
  - numbers vary greatly over a year.
- Compliance burden:
  - farmer time and effort expended on entering information (for limited/no obvious benefit)
  - extra time involved tallying stock for enterprises that run large numbers of animals
  - doubling up of reporting requirements to Stats NZ and IRD.

A number of suggestions were made on limiting the impact of introducing the reporting requirement on farmers:

- use information collected from existing reports, rather than creating another report for farmers to complete
- send out a form on non-NAIT animals to PICAs/farmers once a year to complete
- NAIT/MPI needs to provide clear guidance through multiple channels on what information farmers need to provide for the requirement to work.

Finally, an agricultural technology business suggested that they required a period of time to build the ability to record non-NAIT animal species into their NAIT compliance software and mobile app.

6.1.3 Is there a point in the farming calendar when it would make most sense to make an annual declaration?

COMMENT SUMMARY

47 submissions addressed this question.

A majority of submissions (60%) suggested that the annual declaration should take place at the balance date of accounts or at the end of the financial year.

Most of these respondents were in favour of 30 June because this date corresponds with the end of the financial farming year and this is the date when Statistics NZ requires a return on stock numbers. Other respondents suggested that this information should be due "at the balance date of accounts' because not everyone has the same balance date.

Other suggestions included that the reporting time should be:

- up to individual farmers (to allow for fluctuations in work load during the year; or to allow for the annual declaration to be made when stock levels are highest – this might be most helpful in the case of a disease outbreak)
- the takeover date for dairy farmers (this is point in time when most stock movements occur)
- after calving
- pre-lambing/calving (farmers have more time to record the information and have more definitive stock numbers)
- in winter time
- aligned with annual TB tests
- when stock numbers are low (Autumn/May: many animals would have gone to slaughter, young stock have moved to off-farm grazing, and many of the other routine jobs of the farm year will have been completed).

Six respondents (13%) suggested that there was no point in the farming calendar when it would make sense to make an annual declaration.

6.2 Require that a PICA only uses NAIT tags at the NAIT location for which they were issued when tagging an animal for the first time

6.2.1 Do you support this proposal?

COMMENT SUMMARY

51 submissions addressed this proposal.

71% (36 submissions) supported or offered qualified support for the proposal, 18% (9 submissions) were opposed while 12% (6 submissions) were unclear about whether they supported the proposal or not.

Submissions noted the following benefits with the proposal:

- animal history/traceability: during a disease outbreak, it will allow an animal to be traced to its place of origin (birth). It is the only way to accurately trace animals

- international best practice: other nations prohibit the use of ear tags at locations other than the places they were issued for

- improve compliance and traceability: PICAs cannot use just any tag when tagging an animal.

In addition, a number of respondents believed this requirement already exists (and were already meeting it).

A number of submitters in favour of the proposal made the following suggestions:

- all NAIT tags should be left at a NAIT location if the PICA moves

- MPI and/or OSPRI should work with tag providers and manufacturers to make it clearer which location tags are to be used, and print the NAIT location on tags

- multiple NAIT numbers should not be allowed on land where a current NAIT number exists unless a PICA can clearly show separation of individual classes of stock that are farmed completely separately from stock being farmed under another NAIT number

- it is important that the traceability accuracy is not watered down where multiple properties are under the same management – the meaning of 'property' needs to be clearly defined for NAIT number purposes. Depends upon whether the NAIT location can be deemed one location under multiple properties if they are in close proximity

- there should be exemptions for certain circumstances. For example, in the case of a dairy animal calving early when at grazing, the animal (calf) should be identified according to the herd it belongs to.

Submissions highlighted the following concerns with the proposal:

- change should not be necessary

- someone should be able to replace a lost tag and link the tag number to the lifetime ID number of the animal irrespective of whether the tag was issued to a specific property

- if a tag and corresponding animal are registered as being at a location, it should not matter where the animal was first tagged; the link is made by registering the tag and animal with NAIT – if the animal loses its tag the link will be lost regardless

- the effectiveness of the proposed requirement may be limited by tag loss and the fact that tags are not tamper proof

- a range of issues may impact on a PICA's ability to use the appropriate NAIT tag including: time lag between ordering tags and the tags arriving; tag failure/loss; tag cost; and lack of clarity about what tags are to be used when replacement tags are required

- it is unclear what the expectation would be when re-tagging an animal (i.e. for the second time)

- is complicated for those who run multiple farm locations:

  - there are often multiple locations per PICA. Requiring the PICA to hold tags per location may mean wastage of tags and also a more complicated system for tag management which may lead to errors

  - it will be complicated for PICAs to ascertain which tags/NAIT numbers to use when there are several separate blocks in one farming enterprise

  - tags should be linked to PICA/farmer rather than location – when a farmer moves (and buys another farm), NAIT Ltd could record a change in the location of that farmer.

- one submission commented that requiring a PICA to only use NAIT tags at the NAIT location for which they were issued is not the easiest/most efficient way to achieve identification and whole of life traceability [no further explanation given].

Some submissions also made some suggestions for implementing the proposal:

- NAIT needs a facility for unused, or redundant tags to be taken off the database
- one submitter suggested that in situations where a farmer (e.g. a sharemilker) moves location they may have surplus tags at the end of the year. To encourage farmers to buy sufficient tags for a season at one location, and not penalise them when there are surplus tags, NAIT Ltd should institute a tag buy-back scheme or another way of reimbursing farmers for unused tags.

6.2.2 How would the proposal impact you? How would you manage any issues?

COMMENT SUMMARY

41 submissions addressed this question.

59% (24 submissions) reported that the proposal would have no impact on them or did not apply to them.

Impacts reported in the remaining submissions are similar to those already noted under question 6.2.1 and relate to:

- compliance costs (i.e. time consuming, cost of having to stock an increased number of tags, unused/ unusable tags)
- complications for those who run multiple farm locations
- information/education (changes will need to be clearly communicated to farmers).

6.2.3 What in your view is a reasonable timeframe for implementing this proposal?

COMMENT SUMMARY

39 submissions addressed this question.

A wide range of timeframes was offered for implementing the proposal (mostly in the immediate to 3 years range). Most respondents who provided a reason for their response stated that the proposal should be implemented immediately or within 12 months. The main reason mentioned for a 12 month timeframe was to allow farmers to use up their existing tags.

Reasons for the immediate implementation of this proposal include:

- using up old stocks won't be a problem if they are already registered to the farm as they should be
- a short timeframe might add costs to the PICA, but the bigger picture needs to be considered: NAIT is there to help prevent or contain the spread of animal diseases such as *Mycoplasma bovis*.

6.3 Amend the definition of PICA to clarify that the responsibilities apply to everyone in charge of animals

6.3.1 Do you support this proposal?

COMMENT SUMMARY

45 submissions addressed this proposal.

80% (36 submissions) supported or offered qualified support for the proposal. 11% (5 submissions) did not support the proposal, while it was unclear whether the remaining 9% (4 submissions) supported the proposal or not.

Submissions highlighted the following benefits of the proposal:

- Improved accountability and clarity:
  - provides greater clarity and certainty around the definition of PICA so that it applies to both individuals and body corporates
  - in a corporate situation, responsibility/liability should lie with management or directors
  - it is an administrative amendment that improves clarity among system participants around their roles and responsibilities.
- Alignment with the Animal Welfare Act 1999 (AWA): requirements that align with other legislation relevant to farmers creates a clearer/consistent message. For consistency in legislation, the definition of a PICA should be the same definition as used in AWA.

Submissions identified the following areas for discussion:

- the NAIT Act is not clear about what the responsibilities of body corporates currently are, nor is it clear with the suggested change
- the legislation needs to be clear on overlapping responsibilities between multiple PICAs in charge of the same animals. For example, if one PICA commits an offence, are all other PICAs responsible for those animals also liable?
- a natural person must undertake NAIT requirements – a company should have oversight.

Among those that disagreed with the proposal some were concerned about the additional bureaucracy. Others considered that while owners should be able to delegate and instruct others to act on their behalf the owner of the animals should ultimately be responsible.

6.3.2 Do you think companies are clear on their NAIT obligations under the current definition of PICA?

COMMENT SUMMARY

29 submissions addressed this question.

24% (7 submissions) indicated that companies are clear on their NAIT obligations. 17% (5 submitters) indicated that they did not know if companies were clear about their obligations, while 34% did not directly respond to the question posed.

The submissions highlighted divergent views, which are reflected in the following comments:

- companies generally are clear about their NAIT obligations, but farmers/PICAs are not
- to most people working in the industry, it has always been clear who is in charge and who has end responsibility
- the *Mycoplasma bovis* outbreak highlighted that there is a general lack of understanding across the board (companies and individuals) around NAIT responsibilities (an 'educational campaign' is needed)
- handling of animals in companies is undertaken by many people with varying levels of authority and NAIT knowledge
- some companies are well removed from grass roots operational level (and therefore have little knowledge of NAIT requirements at senior management level).

6.3.3 How would the proposal impact on you?

COMMENT SUMMARY

31 submissions addressed this question.

77% (24 submissions) indicated that the proposal would have no/minimal impact. 23% (7 submissions) suggested the proposal would have the following impacts:

- increased accountability for senior staff/management in a company and NAIT system actors
- less role clarity if there are multiple PICAs in an organisation
- some staff training may be required.

6.3.4 Are there any flow on effects from ensuring the definition of PICA is clear that it applies to body corporates?

25 submissions were received on this question.

Flow on effects mentioned include:

- increased pressure on corporations to ensure their employees are fulfilling their NAIT obligations – companies may need to invest in staff training
- greater clarity for all parties involved in NAIT
- the penalties for non-compliance will be higher for those operating under a corporate structure.

6.4 Change the timeframe for when a PICA must declare the impracticable to tag exemption for animals from "48 hours prior" to "before sending", and make failing to record the movement in advance an infringement offence

6.4.1 Do you agree with this proposal?

COMMENT SUMMARY

48 submissions addressed this proposal.

63% (30 submissions) supported or offered qualified support for the proposal, 27% (13 submissions) disagreed, while 10% (5 submissions) did not offer a definitive opinion.

Submissions identified the following benefits with the proposal:

- it would make NAIT compliance easier and less cumbersome for farmers and, because recording is made easier, it is right that it should become an infringement offence if a PICA fails to record the movement in advance

- changing the requirement to "before sending" removes confusion as "48 hours prior" is open to interpretation

- "before sending" is more practical – PICAs are often unaware of missing tags until animals are loaded for transport.

Some submissions highlighted issues with the proposal:

- it is not always practical to report the movement of stock in advance – making a declaration depends on being able to access a computer between the time stock is loaded on a truck and when the truck leaves the farm

- practicality of recording movements in advance for isolated farms (i.e. limited connectivity and poor stock handling facilities).

Others suggested refinements:

- clarification is needed in cases when a tag is lost in transit or is listed as untagged because a meat company fails to read a tag

- the timeline requirement could be refined further to "before, or at the time of sending". This will allow the PICA to upload data once the animals have been drafted and loaded and before the animals have reached their destination

- a fit-for-purpose reporting system needs to be developed. Animal movements can often commence outside standard working hours and there is uncertainty that farmers' efforts to make impracticable-to-tag declarations will be received, recorded and appropriately dealt with

- meat processors must also be notified of such declarations in advance – there are a number of Overseas Market Access requirements that restrict product from cattle that are not identified in accordance with the Biosecurity (Animal Identification Systems) Regulations.

Those that disagreed with the proposal highlighted the following concerns:

- impractical/lost tag not obvious until animal is being moved:
  - checking tags are in place when loading cattle is an imprecise process – missing tags may be overlooked
  - PICA is not always present when stock are picked up for transport – need clarity on what happens if an animal does not have a tag
  - unclear on the value of retagging an animal if it is going directly to slaughter, as this proves nothing as far as traceability goes. Retagging animals that have lost their tags at point of trucking only provides links the animal back to the farm of dispatch
  - electronic Identification tags are subject to failure at times – an animal with a faulty tag will be recorded at processors as 'untagged', even though it clearly has a NAIT tag in its ear
  - safety concerns around retagging mature service bulls.

Some submissions suggested that untagged animals should not be transported at all:

- animals that are unsafe to tag should also be considered unsafe to transport
- all animals should be tagged – if farmers do not have the facilities to tag an animal safely, they should not have animals in the first place.

6.5 Allow any public sector organisation to request access to NAIT core data as long as the Act's purposes for holding this data are met

6.5.1 Do you support this proposal?

COMMENT SUMMARY

50 submissions addressed this proposal.

62% (31 submissions) supported or offered qualified support for this proposal. 22% (11 submissions) did not support this proposal. 16% (8 submissions) did not provide a definitive opinion.

Submissions outlined the following benefits of the proposal:

- Maximise/streamline use of NAIT for core purposes and to ensure NAIT is fit for purpose:
  - if it improves traceability and response time to anything that puts the industry at harm the information should be shared
  - this will provide benefit to biosecurity in general as more use of the data will inform biosecurity decisions and research from a broader range of perspectives.

- Transparency and clarification of who can access data/clear purpose for data access: provided that organisations accessing the information are doing so for one of the core purposes of NAIT and that their employees accessing the data are bound by usual confidentiality clauses.

Some submissions suggested the following limitations and checks be considered:

- government agencies should have access to NAIT data provided it is not used for purposes beyond those specified in the NAIT Act 2012 and the costs of providing this access are not borne solely by NAIT Ltd

- the Act should restrict data access to stakeholders of the NAIT organisation and public service organisations as defined in the State Sector Act 1988

- further clarification is needed around the purposes for which the data can be accessed

- the term 'core' data needs to be defined in further detail

- data use should be restricted to time sensitive activities such as identifying who to contact about wandering stock, suspected rustled stock and biosecurity outbreaks.

Reasons for not supporting the proposal include:

- the scope of the proposal is very broad in terms of which organisations could access data. The proposal allows too many people to access NAIT data and this increases the potential for its misuse outside the purposes set out in the Act

- concern that individual information will become available to people and organisations that have no legitimate reason to have access to this level of information

- concerns about the way OSPRI/NAIT currently provides data and the quality of that information.

One submission noted that allowing any public sector organisation to request access to NAIT data might result in a decrease in NAIT scheme compliance. Specific reference was made to data sharing with IRD and how this might lead to the lessening of NAIT compliance by "tax dodgers".

6.5.2 How would this proposal impact you?

COMMENT SUMMARY

27 submissions addressed this question.

56% (15 submissions) indicated that the proposal would have no or only minimal impact.

44% (12 submissions) noted the following impacts:

- Positive:
    - it will increase the efficiency and effectiveness of public sector responses to biosecurity, natural disaster and other events (such as wandering stock and stock theft).
- Negative:
    - increased compliance burden (compliance consent requirements might increase)
    - invasion of privacy (i.e. loss of control over personal data).

6.6 Amend the purposes of holding core data to include responding to stock theft and wandering stock

6.6.1 Do you support the proposal to include responding to stock theft as a purpose of holding core data?

COMMENT SUMMARY

50 submissions addressed this proposal.

92% (46 submissions) supported or offered qualified support for this proposal. 4% (2 submissions), disagreed with the proposal, while a further 4% did not provide a definitive view.

Submissions highlighted the following benefits of the proposal:

- NAIT is a good tool to help investigate stock theft
- the proposal is a logical extension of the 'traceability' purpose of NAIT
- would be most beneficial in speeding the tracing and return of stolen animals.

The following suggestions for further improvements were made:

- data provision could be further streamlined, and increased use made of data in investigations:
  - any case investigation into stock theft should automatically involve a parallel investigation into whether the suspects have similarly breached NAIT obligations to record movements or have removed ear tags
- data could also be used in cases where an animal has been accidently incorporated in a neighbour's herd (and payments made to the legitimate owner at time of slaughter)
- in future, a phone app could be developed to take EID numbers and return the current point of contact.

Some submissions suggested access should be restricted to relevant organisations (i.e. police and animal control authorities) and privacy breaches need to be avoided through sign-in and monitoring processes. Moreover, those organisations without the equipment and training to identify animals for which this information is required should not be permitted access. One submission suggested PICA permission should be required to release data.

One submission noted that tag removal would reduce effectiveness (i.e. tags are easily removed or replaced by stock thieves).

Those that disagreed with the proposal considered it should be up to the PICA to report lost stock to the police.

6.6.2 Do you support the proposal to include responding to wandering stock as a purpose of holding core data?

COMMENT SUMMARY

47 submissions addressed this proposal.

89% (42 submissions) supported or offered qualified support for this proposal, while 6% (3 submissions) disagreed. The remaining 4% (2 submissions) did not offer a definitive opinion.

Those in favour of the proposal considered NAIT a good tool for responding to wandering stock, allowing a more efficient and faster response. Wandering stock is a risk to animal welfare, anything that can assist in identifying and returning the stock to their owners and potentially identify repeat situations that can be addressed is welcome.

The qualifications and concerns with this proposal were similar to those in relation to providing access to data to address stock theft. Submissions noted appropriate training is needed for organisations accessing data and privacy breaches need to be avoided.

Some submissions considered the proposal was not necessary as other identification tools already allow for the easy return of wandering stock or because, more often than not, they belong to a neighbour and a phone call would suffice to resolve the issue.

6.7 Make previous NAIT location history for an animal available to a PICA (as a potential seller)

6.7.1 Do you support this proposal?

COMMENT SUMMARY

54 submissions addressed this proposal.

80% (43 submissions) were in favour of this proposal, 7% (4 submissions) disagreed, while 13% (7 submissions) did not provide a definitive opinion.

Submissions supporting the proposal noted:

- full animal life history should be available (buyers and sellers):
  - purchasers of animals/PICAs should have full and immediate access to NAIT animal history, including NAIT location history
  - all previous locations should be available to everyone, not just immediate previous location.
- this would help inform purchasing decisions, as access would give buyers more confidence about the history of animals. It allows potential buyers to view an animal's history to better manage food safety and biosecurity risks within their businesses
- this information is already available but hard to access.

Some of those who disagreed with the proposal considered it may not go far enough. Some submissions noted the full animal history should be available to all PICAs. The previous movement means nothing if the one prior to that was of most risk.

Some respondents were, however, concerned that the implementation of the proposal could disadvantage sellers of animals in areas that have been unfairly tainted. One submission suggested that careful consideration needs to be given to the unfair financial and wellbeing consequences this proposal might have on farmers seeking to sell stock born or previously resident in areas perceived as 'risky'. This may lead to non-compliance to mask the origin of animals. Others suggested that this information should be available once a purchase has been made.

To avoid this risk the respondent suggested consideration should be given to a 'whole of life traceable' flag in the NAIT system, which would give farmers certainty that an animal has a fully traceable history (this suggestion would not make the full lifetime history available to a PICA). The respondent also suggested that NAIT develop and implement a system where rapid notification is provided to farmers in circumstances where they are likely to be in possession of, or about to purchase, animals from a farm known to pose a heightened risk of infection.

Another submission commented that traders would not like this proposal as they could be by-passed for future sales (presumably because a purchaser might obtain the details of the farm of origin/breeder).

6.7.2 What animal life history information would you find useful? How far back into an animal's history would you seek information?

COMMENT SUMMARY

42 submissions addressed this question.

The large majority of submissions (83%) expressed an interest in having access to the full lifetime history of an animal.

The preferred level of detail captured under lifetime history differed between submitters. Some submissions expressed an interest in obtaining just location information (either with/without owner details). Others also wanted lifetime information on things like the disease/treatment status of NAIT animals, the type of milk calves had been fed, and breaks in the traceability chain/tag changes. One submitter was interested in the history of an animal in the past three years (no further explanation provided).

Other submissions expressed an interest in more restricted information relating to: an animal's current location, the general area it is from, health treatment information, and whether an animal ever has been in a herd/area with a transmittable disease.

Two submissions suggested that having animal information available in an 'e-passport' system would be useful.

6.7.3 Do you see any additional risks with making previous animal location information available to the current PICA?

COMMENT SUMMARY

37 submissions addressed this question.

19 submissions did not foresee any additional risks or had no opinion.

Additional risks mentioned in the remaining responses include:

- could unfairly hurt the seller from an area considered 'risky'
- imprecise tool if you trying to trace where an animal might have contracted a disease (animal could have gone through multiple farms or be mixed with at risk animals during transport)
- stock agents might be by-passed
- a stock agent might try hide identity of client (for fear purchaser might contact client directly and cut out 'middle man')
- potential breaches of privacy.

6.7.4 What impact might this proposal have on PICA compliance with NAIT?

COMMENT SUMMARY

29 submissions addressed this question.

28% (8 submissions) indicated that this proposal would not have an impact on PICA compliance. 45% (13 submissions) commented it would have a positive impact, while 17% (5 submissions) negative. The remaining 3 submissions were ambivalent on the impact on this proposal on PICA compliance.

Those that indicated a positive impact said:

- more detailed record keeping will be required, which means that more detailed records will be available
- the proposal will increase NAIT compliance as there will be an incentive for PICAs to keep records complete for all animals
- PICAs who want to sell their stock will need to be NAIT compliant at all times (too risky to buy off non-compliant PICAs).

The main reason given for an expected negative impact on compliance relates to a belief that some unscrupulous PICAs may try to hide animal location history information that may affect the saleability of animals (i.e. animals from areas considered 'risky').

7 | Proposals to make NAIT fit for the future

7.1 Align penalty limits with those in the Biosecurity and Animal Products Acts

7.1.1 Do you support this proposal?

COMMENT SUMMARY

45 submissions addressed this proposal.

58% (26 submissions) supported or offered qualified support for this proposal. 24% (11 submissions) opposed the proposal. The remaining 18% (8 submissions) were unclear on whether they supported the proposal.

Submissions in favour of aligning penalty limits noted:

- NAIT is only valuable when compliance is high – one of the tools to encourage compliance is an effective enforcement regime
- for NAIT to work, all farmers need to record stock movements, and there need to be substantial penalties to help ensure farmers to do this
- to ensure the NAIT system works well, both education and enforcement will need to occur
- this change signals the importance of animal traceability in the overall biosecurity framework in New Zealand.

The following qualifiers and concerns were expressed in relation to the proposal:

- the system needs to be made more user friendly before penalties are applied. NAIT technical team should visit farmers and look at the problem areas in the system and how they can be improved
- more emphasis is required on education and training, before penalties are enforced. Most farmers are trying to comply but do not know how to use the NAIT system properly
- large numbers of farmers still do not know how to use the NAIT portal (low computer literacy issue). Investment should be made in PICA training to ensure farmers can use the system and thus comply with NAIT requirements
- a farmer should only be penalised if he/she has made serious and deliberate transgressions or has shown repeated patterns of non-compliance with NAIT
- the main issue is enforcement, not penalty limits: enforcement of the rules is lacking existing penalties have (therefore) not been applied – had they been, better compliance would have been achieved.

7.2 Align infringement fees with those in the Biosecurity and Animal Products Acts

7.2.1 Do you support this proposal?

COMMENT SUMMARY

34 submissions addressed this proposal.

59% (20 submissions) were in favour of the proposals, 26% (9 submissions) disagreed, while the remaining 15% (5 submissions) did not provide a definitive opinion. The comments reflected the same themes as the discussion on aligning penalty limits.

Submissions in favour of aligning infringement fees noted that increased infringement fees level demonstrates the seriousness of non-compliance:

- the value of NAIT is only realised where compliance is high – one of the tools to encourage compliance is an effective enforcement regime with penalties and infringement fees are set at levels that deter non-compliance
- aligning penalty limits/infringement fees and requirements across various pieces of legislation would send a clearer and more consistent message to farmers.

The following qualifiers and concerns were expressed in relation to the proposal:

- training required
- adequate training needs to be given to those with little IT knowledge. Increased resources should be applied to education relative to compliance enforcement
- proportional approach is important; NAIT is complicated – things go wrong and people make mistakes and it isn't equitable to heavily fine people under these circumstances
- elements of NAIT compliance are constrained by circumstances beyond a farmers control (e.g. lost tags)
- accidental non-compliance occurs and a graduated infringement system should be considered
- infringements can be issued on a per animal basis making the potential cost of having a number untagged animals disproportionately high and beyond what is considered fair
- enforcement activity is needed
- an effective compliance system requires both verification and enforcement so that all participants are encouraged to meet their NAIT requirements
- enforcement should be more aligned to the "carrot rather than the stick"
- enforcement of NAIT rules has been lacking – changing infringement fees levels by itself is not going to increase NAIT compliance
- fees should not be increased until the NAIT system is reliable, user friendly, simple to use and the reasons for non-compliance are better understood (the average age of farmers is close to 60 and their ability to engage with NAIT in its current form is likely to be limited)
- any perception that the regime is unjust in the level of punishments being meted out for low-level offending may be counter-productive (and may reduce rather than increase compliance).

7.3 Rename "impracticable" to tag to "unsafe" to tag

7.3.1 Do you support this proposal?

COMMENT SUMMARY

53 submissions addressed this proposal.

74% (39 submissions) supported the proposal, 9% (5 submissions) disagreed, while 17% (9 submissions) did not express a definitive opinion.

Reasons for supporting the proposal include:

- the current definition is ambiguous
- some farmers are using "impracticable to tag" inappropriately
- any exception for untagged animals should be restricted to exceptional circumstances and should not be a way for PICAs to avoid tagging or paying fees on an animal
- stock should be tagged when young so the number presented with no tag being classed as unsafe should be minimal.

One submission went further asking whether there a need for an exemption in the first place. Owners of animals should have appropriate facilities for their animals to be safely handled for either animal treatment or for tagging purposes.

One submission expressed concern that farmers are financially encouraged to adopt unsafe practises (e.g. animals without a tag incur a $13 administration fee) and that this should be of interest to WorkSafe.

Reasons given for not supporting the proposal include:

- there are circumstances when it is truly impractical to tag an animal, but not unsafe to do so (e.g. fallow deer)
- it is unlikely that a change in technology would change practice
- small/lifestyle farms might not have appropriate facilities to safely tag animals.

7.3.2 Do you currently use the "impracticable" to tag exemption? When do you use it and why?

COMMENT SUMMARY

41 submissions addressed this question.

68% (28 submissions) indicated that they did not use the exemption, while 32% (13 submissions) do.

Reasons for using the exemption include:

- lack of good facilities to deal with large and dangerous animals. Will not risk retagging large stroppy animals that are difficult to handle (e.g. sire bulls)
- tag retention /quality is a problem:
  - when tags go missing and this is not picked up until the point of loading
  - (older farmer) not prepared to retag older bulls or some cows because a properly applied tag has been lost.
- one submitter noted that there are existing exemptions for fallow and trophy deer and that this exemption is in effect an impractical to tag exemption (i.e. these deer have vulnerable ears).

7.3.3 How could "unsafe to tag" be defined to reflect the intent of safeguarding farmers while preventing abuse of the exemption?

COMMENT SUMMARY

42 submissions addressed this question.

The following suggestions were made on how "unsafe to tag" could be defined:

- depends on farmer/stock handling facilities:
  - all farms should have adequate stock handling facilities – only animals that are so wild that they cannot be restrained by usual measures (e.g. crush) should be considered "unsafe to tag"
  - essentially the use of the "unsafe to tag" exemption is a judgement call to be made by individual farmers and is largely dictated by their stock handling facilities or the amount of risks/he is willing to take
  - where there is risk of serious harm to the farmer as a result of tagging an individual animal.
- consult Worksafe on how "unsafe to tag" could be defined
- "unsafe to tag" animals to be approved by an authorised person such as a vet
- animal size should be a determinant of when to use the exemption: 400 kgs for cattle was mentioned.

In addition to the suggestions made on to how "unsafe to tag" could be defined, it was suggested that any abuse of the tagging exemption would be obvious to spot by investigating the frequency of the use of the exemption by stock class and age.

7.4 Prohibit and make it an offence to transport untagged animals without an exemption

7.4.1 Do you support this proposal?

COMMENT SUMMARY

55 submissions addressed this proposal.

55% (30 submissions) supported or offered qualified support for this proposal, 33% (18 submissions) did not support it, while 13% (7 submissions) did not articulate a definitive view.

Submissions noted the following in support of the proposal:

- it should be an offence to transport untagged animals – correctly tagging and recording animals at all times is required to ensure the accuracy and reliability of the NAIT system

- PICAs are often not present when the animals are being picked up – it would be easier to make the transporter responsible for missing tags before moving them

- PICAs and transporters should be jointly responsible for ensuring that untagged animals without an exemption are not transported

- the proposal needs to be policed – it should not be left to the transporter

- the new infringement offence would make it harder for untagged animals without an exemption to be moved, which would increase compliance.

One submission noted that the movement of untagged animals negatively impacts on the disease tracing process and reduces the efficacy of disease control. Given their role in moving animals transport operators should bear some responsibility for the NAIT system. However, the feasibility of introducing transport liability requires further thought, work and consultation.

Other submissions highlighted the following reasons for not supporting the proposal:

- PICA responsibility:
    - responsibility should remain with the PICA sending the animals – it is unreasonable and impractical to ask livestock agents or transport operators/truck drivers to check every single animal before loading and to refuse to transport these animals
    - the liability and ability to tag and register an animal lies with the PICA and not the transport operator
    - the proposal is problematic as it turns transport drivers into NAIT enforcement agents.

- the proposal might decrease compliance (by creating an underground market with increased food safety risks)

- provision needs to be made for unavoidable breaches/clarification of the exemption process: tags do get lost during transport – need clarity on what happens in these cases

- the proposal is unnecessary/impractical to implement as stock are often loaded in the dark – it could be very difficult for transport operators to physically check every animal for NAIT tags

- need clarity on how will this requirement would be policed.

7.4.2 What are the implications of this proposed change?

COMMENT SUMMARY

36 submissions addressed this question.

The following implications were noted:

- increased compliance:
  - introducing an offence provision is expected to increase PICA and animal transporter compliance
  - OSPRI will need to actively monitor NAIT compliance.
- will support transport operators by providing them strong grounds to refuse to move untagged animals
- adds complexity to the NAIT system
- may unfairly impact on PICAs that make all efforts to comply with NAIT (i.e. tag loss during transport)
- increased costs:
  - the proposal will result in increased transport operator involvement in checking whether animals have tags. This will slow down the loading process. The increased time involved and investment in scanning devices will be passed on to PICA in the form of higher transport costs
  - increased time in yards to check for tags
  - expense of having to put in cattle handling facilities in run-off blocks.
- increased enforcement will be needed
- negative impact on farmer/transporter relationship:
  - impact on commercial relationship between PICA and transporter (if a transporter refuses to transport an untagged animal, this decision will have a negative impact on his/her relationship with a farmer/PICA and might result in the loss of business)
  - tag loss (i.e. arguments might arise around whether this occurred pre-transport or during transport).

7.5 Require untagged animals arriving at a NAIT location to be separated from other animals

7.5.1 Do you support this proposal?

COMMENT SUMMARY

47 submissions addressed this proposal.

34% (16 submissions) supported or offered qualified support for this proposal, 45% did not support it, while 21% (10 submissions) did not articulate a definitive opinion.

Submissions in favour of the proposal noted that it was good biosecurity practice and that the requirement aligns with, and reinforces, ASD requirements under the Animal Products Act. It was noted, however, that different solutions might be appropriate for sale yards and farm yards. Untagged animals should be segregated where animals are aggregated/mixed at a sale year or similar facility. Moreover, clear protocols and exceptions will need to be in place when untagged animals are unloaded (e.g. in instances where an animal has lost its tag during transport).

Those that did not support the proposal or had concerns about it noted:

- justification unclear:
  - if the untagged animals are clearly part of a correct mob then what is the biosecurity risk?
  - untagged animals have already mixed with other animals
  - what is the point of separating animals when the only place untagged animals should be arriving is at a place of slaughter?
  - untagged animals should not be transported farm to farm in the first place.
- not feasible/practical/enforceable:
  - how is this going to be enforced when it is common that farmers are not present when stock are unloaded into yards?
  - tags fall out all the time
  - people are likely to assume all animals are tagged and let them out without checking
  - it would also necessitate taking delivery of animals in handling facilities, which adds complication
  - deer are highly social and separating less than 3 animals from the herd is likely to result in significant stress (animal welfare issue)
  - because the proposal is impractical farmers will simply not comply
  - many farms do not have the capacity to hold animals separately for any period of time
  - to make the proposal feasible any requirement to hold animals separately upon arriving at a location untagged should have 'where practicable' inserted into any legislation.

7.5.2 How would this proposal impact on you?

COMMENT SUMMARY

30 submissions addressed this question.*

13 submitters indicated that the proposal will not have a significant impact because they already kept untagged animals separate, would not accept untagged animals, or never received an untagged animal. Others stated that the proposal would not have an impact because they would simply ignore what they considered to be an unworkable proposal.

The following impacts were mentioned by the remaining respondents:

- health and safety:
  - animals need a period of rest after transport – trying to ascertain which animals are untagged and then drafting out untagged animals is especially risky in tired and stressed animals
  - keeping animals separated from a mob/herd might become agitated and become a safety risk to the PICA trying to handle them.
- time and cost of providing separate paddocks and checking and potentially separating animals on arrival
- the proposal is unworkable (e.g. because of lack of stock handling facilities at the receiving property).

> * Of this number, nine submissions noted that the proposal did not apply to them or provided comment that was not directly relevant to the question posed.

7.6 Improve access to NAIT information by MPI and other authorities

7.6.1 Do you support the proposal to provide MPI with direct access to the NAIT database?

COMMENT SUMMARY

45 submissions addressed this proposal.

78% (35 submissions) supported or offered qualified support for this proposal; 20% (9 submissions) did not support it, and 1 submission did not articulate a definitive view.

Submissions highlighted the following benefits:

- increase MPI/NAIT efficiency/oversight:
    - this proposal will assist MPI to carry out its monitoring role more effectively and efficiently
    - the fact that OSPRI has created a "view" of the NAIT data base for MPI is inappropriate and has hindered the *Mycoplasma bovis* response – MPI must have full access to the NAIT database
    - if NAIT compliance is to be enforced, MPI and police need to have ready, direct access to data.

The following implementation issues were identified:

- training requirements:
    - access to NAIT data needs be accompanied by the provision of appropriate training for staff accessing the system if the outcome of faster access to data in response to situations is to be achieved
    - MPI staff accessing this information need to understand the practicalities of how animals are moved and transacted through the various components of the livestock industry.

- appropriate use restriction:
    - as long as the access to, and use of, data meets the purpose of holding core data, as defined by the Act
    - if the access is for use in a biosecurity threat – access for any other use needs to be approved by the owner of the animals on a case-by-case basis
    - need to ensure the data could not be accessed for IRD or ETS purposes.

Submissions that did not support the proposal noted:

- they were not comfortable with MPI deciding who has access to NAIT data – that determination should remain with NAIT

- MPI has not shown themselves to be worthy of trust to date [no explanation given]

- MPI data access is open to abuse – it could be used by other Government departments for reasons other than those specified in the NAIT Act.

7.6.2 Do you support the proposal to allow MPI to facilitate access to the NAIT database for other authorities?

COMMENT SUMMARY

39 submissions addressed this proposal.

62% (24 submissions) supported or offered qualified support for this proposal, 28% (11 submissions) did not support it while 10% (4 submissions) did not express a definitive opinion.

Submissions that supported the proposal typically noted it would increase system efficiency:

- MPI seems to be the most appropriate organisation to share the data

- it would be useful for MPI to be able to share the data during major natural disasters where significant livestock displacement can occur

- the process by which authorities can obtain information on wandering stock should be streamlined and they should also be able to obtain information on the last-known PICA of dead stock to ensure appropriate disposal and entry into NAIT of the animal's fate.

The following implementation issues were identified:

- appropriate training is required to ensure MPI staff accessing this information understand the practicalities of how animals are moved and transacted through the livestock industry

- appropriate use restriction: data access should be limited to circumstances related to the purposes and objectives of NAIT. Further clarification is needed on what data can be accessed, by whom and for what purpose.

Submissions that did not support the proposal noted:

- having MPI service other organisations, such as Police, would just add another level of complication – let these organisations have direct access

- NAIT should remain the gatekeeper of data rather than simply an administrator. Other authorities should be able to go direct to NAIT if there is a legitimate reason for them to access data

- privacy concerns around which organisations might obtain NAIT data.

8 | Other possible improvements to NAIT

8.1 Information about animal movements during transportation

8.1.1 Would you support requiring more details about the transportation of NAIT animals?

COMMENT SUMMARY

43 submissions addressed this question.

42% (18 submissions) supported this suggestion, 33% (14 submissions) were not in favour, while 24% (11 submissions) did not express a definitive opinion.

Submissions supporting the suggestion recognised transport history is important for biosecurity purposes:

- during disease outbreaks, transport is an important area of possible contact between animals
- currently PICAs have little idea where cattle have been during transport (and whether co-mingling has occurred)
- some transporters will collect cattle and leave them in cattle yards overnight before transporting the animals on (it is important to record these transit stops from a biosecurity perspective)
- scanning of animals by transporters as they are loaded on and off transport vehicles could offer additional important control points in tracking information such as key location/numbers of tagged animals/confirmed point of loading/unloading.

Submissions identified some implementation issues and potential cost increases:

- increased transporter investment in traceability technology may be required (e.g. tag scanner/readers)
- transport companies may increase cartage prices which will result in cost increases for farmers
- increased information sharing between transport operators, NAIT and PICAs could be complex and therefore perhaps not workable.

Some submissions offered practical suggestions relating to recording animal movements:

- a PICA generating a sending or receiving movement could easily record the transport company used which might be useful information to have when dealing with a possible biosecurity event
- Ultra-High Frequency (UHF) technology could further contribute to biosecurity by providing faster read times over greater distances.

Submissions that did not support the proposal did not consider transport information added value, thought it would increase costs, and was not practical:

- skeptical as to whether gathering movement information make enough difference during a disease outbreak to warrant the time and cost involved
- most deer transportation is either direct to slaughter plants, or if capital stock, transported by cartage companies that use industry accredited trained drivers
- will add an unnecessary layer of complexity and compliance costs to transport operators
- it is impractical/unreasonable to expect senders of animals to know and provide detail on the transport of animals
- transport information should only be required in emergency situations (and only for animals that are mixed during transport and not going to slaughter). During a biosecurity event, animal movement information will invariably be obtained anyway
- it is up to the PICA to provide all NAIT details. A lot of the issues with NAIT (and the need for further transport information) could be avoided if PICAs are present when animals are picked up/dropped off
- sending and receiving farmers have no knowledge about the extent of mixing of animals in each consignment – therefore farmers do not have knowledge as to whether movement information is of value
- further technical research and data analysis needs to be undertaken to ensure that value would be added to the NAIT system and proposed changes aligned with the purpose of the Act.

8.1.2 Should transport operators, who may not be a PICA, have a role in reporting information about NAIT animal movements?

COMMENT SUMMARY

50 submissions addressed this question.

38% (19 submissions) supported or offered qualified support for this suggestion. 34% (17 submissions) disagreed, while 28% (14 submissions) did not offer a definitive opinion.

Submissions supporting the suggestion noted:

- it would provide another level of data validation/recording of animal movements, and in doing so would enhance the traceability of NAIT animals
- transporters play a key role in the national biosecurity system and they must therefore be held accountable for areas under their responsibility
- requiring transport operators to report information directly to NAIT should be weighed against the risk of increased transport costs. Technological solutions, such as UHF RFID, may assist in establishing a convincing value proposition (this technology can also be used by transporters outside NAIT)
- transporters are best placed to provide information on whether co-mingling of animals has occurred during transport.

A number of submissions offered practical suggestions:

- if transporters are to have a role in reporting animal movements it should be at a batch movement level
- all trucks could be provided with scanners that could send real time information on animal movements to NAIT (and only tagged animals to be allowed on transporter)
- transporters could provide information on location of transit yards, mingling/separation of stock in yards, and the mixing of animals from different locations during transport.

Reasons for not supporting this suggestion include:

- PICA responsibility: reporting animal movements should be the responsibility of farmers/PICAs, as they control the transaction or movement process

- cost: an animal movement information provision requirement on transporters will increase animal transport costs

- practical obstacles for transport operators recording animal movements (untagged animals, driver capability, health and safety issues associated with the scanning of animals).

Some submissions suggested further analysis: any changes to the requirements on transport operators requires a thorough consultation process involving those working in the transport and livestock brokering industry. Establishing a working group of transport agents would be valuable to determine actual transporter practice and to understand what barriers exist to offering movement information.

8.1.3 Are you aware of the information currently gathered on NAIT animal movements by transport operators? Do others, for example PICAs, have access to this information?

COMMENT SUMMARY

36 submissions addressed this question.

Most submissions indicated that they were not aware of information gathered by transport operators.

Mention was made of the following information in the remaining submissions:

- collection and drop off points for animals

- information on ASD forms

- digitised information animal movement information held by transport operators for internal purposes.

8.1.4 Are there barriers that may prevent greater involvement of the transport sector in NAIT?

COMMENT SUMMARY

39 submissions addressed this question.

Submissions noted the following barriers to transporters playing a greater role in NAIT:

- compliance burden on transport operators not wanting to play a role in NAIT enforcement

- cost barriers:
  - to transport operators: investment in scanning technology/equipment; administration and driver time
  - to PICAs/farmers: any additional costs incurred by transporters for playing a role in NAIT would be passed on to PICAs farmers (in the form of increases in transport costs).

- system capability/resource barriers: there is a lack of a practical means of collecting and transmitting movement information at this time

- time constraints/issues: if drivers are required to perform specific NAIT functions, such as scanning animals onto trucks, this might result in transport delays

- truck driver issues:
  - drivers choose to drive trucks not do paperwork, and are not adept at documentation
  - drivers may be placed in an awkward position of having to judge NAIT compliance which should be the farmer's responsibility
  - may result in transport companies having greater difficulty in attracting/hiring truck drivers if the latter are to be held accountable for NAIT compliance.

A number of submissions suggested that further analysis and consultation is required to meaningfully answer this question.

8.1.5 What would be the impact on you of giving transport operators a formal role in the NAIT scheme?

COMMENT SUMMARY

37 submissions addressed this question.

Impacts noted include:

- improved accuracy of NAIT data/traceability of animals/compliance
- greater transport sector transparency/accountability
- reduction in number of transport operators – some transport operators would not have systems in place to be able to play a formal role in NAIT
- increased costs to both transporters and PICAs/farmers (specific comments are similar to those provided under 8.1.4).

8.1.6 Are there other options for improving information and traceability associated with livestock mingling during transportation?

COMMENT SUMMARY

33 submissions addressed this question.

Options noted include:

- include transport operator information in the NAIT system and record these details in the sale/ movement process
- include transport operators in existing herd data management systems and allow them to record stock movements. This would provide information on who has been in charge of an animal at a given point in time and allows the data that is already recorded in the sale process to be more detailed and robust
- branding of animals
- EID readers on the doorway of trucks, with GPS and automatic printouts or uploads to NAIT
- many transport companies track movement in real time – that data can be used to provide traceability information
- transport operators should notify PICAs if their stock is going to be transported with stock belonging to different PICAs.

8.1.7 Please detail your current practices related to transit stops and other temporary holding areas. Do the definitions in the NAIT Act need to be clarified?

COMMENT SUMMARY

25 responses addressed this question.

18 submissions indicated that: they did not use transit stops; they did not know or have no control over what happens to their animals during transport; or, the question did not really apply to them.

The remaining submissions reported the following practices:

- transit stops are only used for long distant/inter island transport of NAIT animals
- animals belonging to different farmers/PICAs are kept separate at yards/transit stops (one submission noted a one client per day per yard policy)
- animals are drenched and quarantined for 24 hours before transport.

One respondent reported that they avoided transit stops at all costs because of bad experiences [no further explanation offered].

8.2 The role of stock agents and traders

8.2.1 What are your experiences with stock agents and traders in relation to NAIT?

COMMENT SUMMARY

35 submissions addressed this question*.

29% (10 submissions) reported mostly positive experiences. 23% (8 submissions) reported mixed experiences, 23% reported negative experiences, while 6% (2 submissions) advised that they did not use stock agents/traders. Two submissions on this question were from stock agents/traders. The opinions expressed in the remaining 5 submissions (13%) did not directly respond to the question or were not directly relevant.

Submissions reporting positive experiences noted the trader/stock agents know how and understanding of NAIT compliance requirements. They have been valuable in recording stock movements, helping farmers with NAIT compliance and are better at compliance than most farmers. Stock agents maintain a comprehensive and accurate register, and the change in ownership and movement records are very efficient and accurate and have been since NAIT's formal introduction.

The submissions from stock agents noted that they play a vital part in helping PICA comply with NAIT. They play a crucial role as NAIT administrators at auctions and private sale transactions. If stock agents did not perform this function, the lack of understanding of the NAIT process amongst many farmers would lead to more non-compliance. Many 'old school' farmers rely on the agent to turn up and scan their cattle on exit and do the transfer for them.

* Five submitters answered that the question did not apply to them and they have been excluded from this tally.

**Submissions noting mixed experiences focussed on the brokers reluctance to reveal sellers'
or buyers' details and a range of compliance and reporting issues:**

- on some occasions when selling or buying livestock, it has been difficult to get details of the other party from the agent to complete the NAIT transaction in a timely manner

- agents are reluctant to reveal client details to buyers to avoid being potentially cut out of a next deal between the two PICAs

- some traders/agents are inaccurate when reporting stock movements on behalf of PICAs.

Negative experiences noted related to compliance and reporting issues:

- a minority of stock agents/traders fail to comply with NAIT obligations or misinform farmers that they have completed these on their behalf

- not all animals get scanned, especially at sale yards and stock agents don't seem bothered

- failure to report stock transactions from sales yards to NAIT

- stock agents attempting to change the identification of animals, using old tags, or untagged animals being accepted into stockyards

- stock agents on-selling animals after advising farmers that animals will be sent to meat processors. This results in incorrect records as the animal is still alive but has been reported by the farmer as culled.

One submission noted that most of the issues around agents and traders would clear up if the wider recommendations from the NAIT Review Technical Advisory Group were acted on.

8.2.2 Do you think stock agents and traders should have a specific role in the NAIT scheme?

COMMENT SUMMARY

39 submissions addressed this question.

67% (26 submissions) consider stock agents and traders should have a specific role in NAIT, 15% (6 submissions) disagreed, while 18% (7 submissions) did not express a definitive opinion.

Submitters that considered stock agents and traders should have a specific role noted:

- stock agents and traders should be subject to the same rules and regulations as PICAs

- they already play a specific role as accredited information providers, although ultimate responsibility should remain with PICAs

- stock traders and agents should ensure timely transmission of information between vendor and purchaser as they are the broker between the two parties

- agents/stock traders who record stock movements on behalf of PICAs should be obliged to carry out that role in accordance with the NAIT rules and be liable to penalties for non-compliance

- stock agents/traders could play an important educational role. They should be very familiar with NAIT requirements and they are therefore in a good position to fulfil an educational role around the importance of complying with the regulations. They have technological know how.

Others suggested that stock agents and traders should be subject to rules beyond NAIT:

- the industry needs to be regulated to ensure greater consistency around good practice and behaviour

- livestock traders and agents should have some form of professional accreditation and code of conduct.

Those submissions that disagreed or had reservations noted:

- giving agents/ traders a role would add another layer of compliance which will slow down the transfer of animals within NAIT
- it should be up to a PICA to choose whether they engage an agent/trader for a specific activity on their behalf.

8.2.3 What would be the impact on you if stock agents and traders had a specific role in NAIT?

COMMENT SUMMARY

33 submissions addressed this question.

Impacts noted include:

- it could increase compliance which would improve the NAIT system:
  - stock agents/traders are highly professional and experienced and are adept at accurately reporting stock movements; they can provide NAIT mentoring/education to farmers (thus improving overall system)
  - stock agents/traders will be incentivised to follow proper procedures if they were given a specific role
  - the inclusion of stock traders/agents will result in a more robust traceability system.
- increased legal accountability will discourage agents/stock traders from offering information provision services to PICAs
- it would add confusion and decrease NAIT compliance and add cost to the system (e.g. it would make it slower to report stock movements, stock movement entries will need to be double-checked).

8.3 Potentially including other species in NAIT

8.3.1 Do you support other species being included in NAIT?

COMMENT SUMMARY

54 submissions addressed this question.

33% (18 submissions) supported or offered qualified support for this suggestion, 57% (31 submissions) did not support it, while 10% (5 submissions) did not articulate a definitive opinion.

Submissions supporting the inclusion of other species in NAIT noted it makes sense from a biosecurity perspective as other species are equally susceptible to certain diseases (i.e. it would improve the management of a disease outbreak and minimise its impact). It would also ensure regulatory alignment with some competitor nations (e.g. Australia).

While supporting the inclusion of other species, some submissions noted that herd based recording might be more appropriate for some species (e.g. sheep). Others noted that the level of traceability required for different species may be different due to cross-animal sector differences in the risks to be managed, market access requirements, movement patterns, economics and practical considerations.

Some submissions considered there is a need to fix the current system first before considering its expansion to other species:

- NAIT needs to demonstrate they can manage an acceptable system for cattle and deer before other animals are included

- the current system needs to be become more accurate and robust and better (NAIT) compliance/ outcomes need to be achieved before including other species

- the data entry system needs to be made more user friendly and more training on system use is required

- a reliable EID tagging system (with tags staying with the animal) needs to be in place first.

Other submissions considered more research needs to be done into appropriate traceability systems for non-NAIT species. Different animal industries have different practices and requirements – the NAIT system, as currently configured, might not be appropriate for other species. A broader discussion needs to take place around whether current NAIT technology is fit for purpose before other species are included.

Some submissions did not support the extension of the NAIT scheme to sheep because they considered animal identification was not practical or was incompatible with current sheep farming practices:

- lambs are the premium product and are slaughtered at an average age of 6 months

- sheep and lambs are mostly finished at the farm of origin – there is limited trade

- average mortality is 6% per year and the majority of carcasses are never found in hill country (resulting in a large number of animals not being able to be accounted for in the system)

- ears are softer and therefore not suitable for existing tags

- sheep are handled as a mob and not as individual animals.

Some submissions suggested it should be up to individual industry organisations (for other species) to decide whether or not NAIT coverage was required. It was suggested industry databases are best run on an industry wide basis and for a purpose – the Government Industry Agreement (GIA) process should be sufficient to manage a biosecurity outbreak.

8.3.2 Which species do you think are the most important for NAIT to cover?

COMMENT SUMMARY

43 submissions addressed this question.

Species mentioned for coverage by the NAIT scheme in order of frequency include:

- multiple species* (i.e. camelids, horses, goats, existing NAIT species, pigs, cloven hooved animals, all species that pose biosecurity threats to livestock production)

- existing NAIT species (i.e. cattle and deer)

- sheep

- pigs

- goats.

* This category is used when respondents have mentioned more than two species.

8.3.3 What traceability information do you think would be most useful to collect?

COMMENT SUMMARY

40 submissions addressed this question.

Respondents highlighted the following:

- disease/treatment/animal health status information and data
- farm location
- farm to farm movement history
- herd/mob level data (using herd numbers for groups of animals)
- individual animal traceability (one submission noted that the cost of this might be prohibitive for sheep farmers)
- the same information as listed on ASD forms
- property level information for sheep and individual level for pigs.

8.3.4 What would be the challenges of including other species in NAIT?

COMMENT SUMMARY

42 submissions addressed this question.

Challenges mentioned include:

- compliance issues:
  - a higher proportion of sheep farmers are 'old school' traditional farmers who would struggle with complying with NAIT requirements
  - lack of farmer buy-in especially because the current system is not functioning well
  - enforcement of NAIT requirements.
- training: farmers will require training on how to use the NAIT system; some farmers will require basic IT skills training
- fix the current system first: before other species are included, farmers will need to feel confident that existing issues with NAIT have been resolved
- a better understanding needs to be gained on movement patterns, existing traceability systems, and potential costs before consideration can be given to other species being included in NAIT
- increased PICA compliance costs, which may lead to resistance:
  - more data entry/reporting for farmers who are already struggling with keeping up with current requirements
  - the logistics of handling thousands of animals and keeping track of tallies
  - the additional cost involved (e.g. RFID tags)
  - increased costs for no perceived benefits.
- tag issues: the cost of tags relative to the low individual value of some animals and their average lifespan (i.e. sheep); and, tag quality/retention – too many go missing; sheep poke their heads through fences which contributes to tag loss.

8.3.5 What are your views on the potential timing for including other species?

COMMENT SUMMARY

32 submissions addressed this question.

The following views on timing were noted:

- other species should be included as soon as possible given the biosecurity risk they pose
- other species should be included after the current system is working well (2, 3, and 5 year timeframes were given)
- consider a phased approach for the introduction of other species. Gather relevant information on non-NAIT species first (details on movement patterns, existing traceability systems, and potential costs) and then develop a strategy for phased species implementation
- do not introduce other species to NAIT as currently configured. Non-NAIT species industries should have an opportunity to investigate traceability systems currently in place in and outside NZ so that options can be proposed that fit the needs of these industries
- never (as there is no benefit of including other species).

9 | Technical amendments

9.1 Do you have any comments on the technical amendments set out in chapter 9 of the discussion document?

COMMENT SUMMARY

12 submissions addressed this question*.

The following comments were noted:

- the alignment of the NAIT Act with the Search and Surveillance Act 2012 in particular sends clearer messages around compliance needs to farmers

- one submission stated that the powers for officers and authorised persons should stay the same until the implications of the Search and Surveillance Act 2012 containing the procedures and rules for how these powers are exercised are better understood

- there were concerns around amendments to align with the Search and Surveillance Act 2012 (specifically legislative references 2 and 3): one submission expressed concern that farmers are being treated differently to other members of society, in that MPI officers can enter their properties without a search warrant.

* Note that some of the submissions merely stated that they had no comment on this section.

10 | Implementation

10.1 Do you have any comment on the proposed approach to implement proposals for change to the NAIT Act or regulations?

COMMENT SUMMARY

15 submissions addressed this question.

Comments included:

- clear communication and engagement with NAIT stakeholders is essential. Stakeholders, including industry groups, rural communities, and farmers/PICAs, must continue to be consulted on the timing and implementation of the proposed changes. MPI and NAIT need to communicate and work with farmers to make the NAIT system more practical and easier to use

- implement the changes as soon as possible to provide certainty for the sector

- the proposed legal and administrative changes do not really address the core reason why NAIT has failed in the first place; the reliability of the tagging system. The focus must shift back to this issue

- the way in which the proposed changes are implemented need to keep the end users in mind and the practical challenges they face in complying with NAIT

- enforcement activities should focus on deliberate non-compliance rather than accidental non-compliance such as tag loss

- the focus needs to shift from improving data collection (which the current proposals address), to investment in preparedness for effectively using this data during a biosecurity incursion or similar event.

11 | Monitoring, evaluation, and review

11.1 Do you agree with the proposed approach to monitoring, evaluation, and review?

COMMENT SUMMARY

25 submissions addressed this proposal.

36% (9 submissions) supported or offered qualified support for the proposed approach to monitoring evaluation and review, 16% (4 submissions) disagreed, while 48% (12 submissions) were unclear or unsure.

The submissions made the following points.

- **Accountability:** MPI must ensure that OSPRI meets all of its statutory obligations and all farmers must be made aware of the KPIs that MPI expects OSPRI to meet.

- **Key Performance Indicators (KPIs):** The KPIs used to measure how well NAIT is performing need to be well considered – random audits and stocktakes on farms could give a good indication of NAIT compliance levels.

- **Transparency:** a monitoring, evaluation and review process allows for system strengths and areas for further improvement to be identified – this will ensure that the public can have confidence that the time and effort invested is having a positive impact. An annual report should be made available for wider stakeholder review.

- **Stakeholder engagement:** Stakeholder engagement in developing frameworks to monitor, evaluate and review the performance of NAIT is very important. It was suggested that holding regular stakeholder engagement forums is important to make sure that NAIT is heading in the right direction. One submission (from a NAIT shareholder) stated that they wish to work in partnership with the other NAIT funders to ensure the scheme delivers the benefits that levy payers expect and are entitled to.

- **Communication & support:** Good communication and a collaborative approach is essential for NAIT to work. PICAs who are making a genuine effort to comply may need some patience and help.

- **Address the current issues first:** Those that disagreed with the proposed approach considered more effort needs to go into fixing the current system first. Some respondents considered there is little point implementing a monitoring, evaluation, and review process when the issues at the core of the system failure have not been addressed – the unreliability of the electronic animal identification system (i.e. tags) and the complex, hard to use NAIT operating system.

Other general matters raised

Compliance, communication and transparency issues

- The NAIT system when first introduced appeared to be a good tool for the industry to track animals during a biosecurity incursion. The system was let down by lack of farmer training, NAIT awareness, and the absence of enforcement. This has become especially apparent during the recent *Mycoplasma bovis* outbreak when it took a great deal of time to identify animals of interest. Better communication of NAIT responsibilities to PICAs, more education and stricter enforcement of breaches will help ensure that the system functions better in future.

- One submission suggested a legislative change to require that the NAIT system undergoes a mock response tracing exercise every two years to ensure that the system is achieving its objectives (which includes compliance).

- There is currently little incentive for farmers to comply with tagging requirements when an animal goes to slaughter. An untagged animal incurs a $13 administration levy but the reduction in the meat price for an untagged animal, which on average is around $150 for a $1500 animal, is often absorbed by the meat processor.

- Responsibility for data entry when transfers of NAIT animals take place should rest with the vendor only (and payment for these animals should only proceed once this has happened).

Other matters mentioned in submissions

- The NAIT scheme/legislation should be limited to endemic pests and diseases (by extension, 'exotic' diseases should be dealt with at the border).

- Create a system split for different stock classes: Breeding units (farms) present far less of risk than trading units. Animals tend to stay on site and the only outside animals that enter the property are a few breeding bulls during the year. Consequently, there are far less movements to trace for a breeding unit. The submission suggests that a PICA would need to nominate what type of unit they have but does not go into any further detail about this suggestion.

- The NAIT scheme is not the best way to deal with biosecurity incursions: The tagging of animals is not cost-effective given that wild animals can transmit diseases. The focus should be in not letting diseases into the country in the first place.

- Alignment with other animal tracking systems: NAIT scheme performance and utility could be greatly enhanced by integrating it with the ASD system.

A large number of comments were received on technical issues that do not directly relate to the legislative proposals put forward by MPI, especially in relation to tags (e.g. reliability, retention/loss), NAIT scheme technology and the usability of the NAIT online recording system (user interface). These comments relate to the operation of the scheme rather than the legislative framework, and will be considered separately by NAIT Limited.

Table of submitters

NUMBER	SUBMITTER	NUMBER	SUBMITTER
1	Grant & Rachel Cockburn	47	Alan Moody
2	Ari Burt	48	Andrew Mason
3	Beth Parker	49	Dr Micheal Warren
4	Paul Roberts	50	Anders Crofoot
5	Ian Webb	51	Katherine McCallum
6	Bubbles Otway	52	Douglas Lineham
7	Sheena Martin	53	Graeme Edwards
8	Denise McNie	54	Lawrence Field
9	Jamie Falloon	55	David Bull
10	Robert Sloss	56	Tim Hale
11	David Ody	57	FarmIQ
12	Dirk Sieling	58	Mike Cranstone
13	Ian Carter	59	Merryn Pugh
14	Rob Chrystall	60	James Gibson
15	Ivan Howe	61	Willy Lefrink
16	Kate Ferry	62	CC Scheepers
17	Peter Walsh Livestock Associates	63	Robert Ervine
18	Nathan Baish	64	Morag Tippett
19	Marion Corbett	65	Road Transport Forum NZ
20	Chris Turner	66	Ruapehu Federated Farmers
21	David Pearce	67	New Zealand Pork
22	Mark McKenzie	68	Roger Morris
23	LIC	69	Fonterra Cooperative Group
24	Peta Lean	70	Peter Scott
25	Judith Moore	71	New Zealand RFID Pathfinder Group Inc
26	Dan Lynch	72	Paul Marshall
27	Nigel Mulholland	73	Beef+Lamb NZ
28	Graham Halstead	74	Datamars Ltd
29	Mike Connor	75	Wendy and Mark Clement
30	Richard Stocker	76	Roger Bray
31	Dave Stanton (a) and (b)	77	Dairy Companies Association of NZ
32	Matt Pepper	78	DairyNZ
33	Arnold Chamove	79	Matt Long
34	Ralph Mason	80	Federated Farmers of NZ
35	Garrick Batten	81	Rural Women New Zealand
36	Vikki Svensson	82	Tim and Julie Robilliard
37	Paul Warneford	83	Meat Industry Association of NZ
38	Noeline Berkett	84	Paul Cowie
39	Dan Jex-Blake	85	AsureQuality Ltd
40	Peter Morgan	86	Silver Fern Farms
41	Trevor Brown	87	NZ Deer Farmers Association
42	Tania Dunlop	88	Deer Industry New Zealand
43	Lu Ferrer	89	Stephan Brook
44	Phillip Steele	90	Pamela Callahan
45	Cathy Brown	91	Mike Slater
46	Kerry Worsnop	92	Andy Fox

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