

18 December 2018

Consultation on NAIT regulatory change proposals
Ministry for Primary Industries
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DairyNZ submission on Proposed Act and regulation changes to improve NAIT MPI Public Discussion Paper No: 2018/14

1. INTRODUCTION

- 1.1 DairyNZ is the industry good organisation representing New Zealand's dairy farmers. Funded by a levy on milk solids and through government investment, our purpose is to secure and enhance the profitability, sustainability and competitiveness of New Zealand dairy farming. We deliver value to farmers through leadership, influencing, investing, partnering with other organisations and through our own strategic capability. Our work includes research and development to create on-farm practical tools, leading on-farm adoption of best practice farming, promoting careers in dairying and advocating for farmers with central and regional government.
- 1.2 DairyNZ welcomes the opportunity to submit on the proposed NAIT Act and regulation changes and represent the interests of our levy paying dairy farmers.

2. EXECUTIVE SUMMARY

- 2.1 DairyNZ wishes to submit the below comments on the proposed Act and regulation changes to improve NAIT (National Animal Identification and Tracing Scheme). NAIT is a traceability framework with multiple moving parts (i.e. beyond an IT based system) and multiple responsible parties involved. A shared responsibility approach that includes all key parties involved will be essential to ensure the entire framework is fit for purpose.
- 2.2 The feedback outlined in this submission letter and the MPI submission form focuses on the broader NAIT regulatory system and the proposed regulations/changes of relevance to dairy farmer's roles in helping achieve good traceability outcomes on New Zealand dairy farms.
- 2.3 A robust traceability scheme is in New Zealand's national interest. As an industry, we are committed to supporting the overall strengthening of the traceability framework, in addition to other best practices already being undertaken by dairy farmers. An important part of optimising the current framework will involve ensuring that full understanding is gathered of the current systems ease of use/practicality and exploring potential for additional technological advances/ease of use tools with industry leaders. Refer to the MPI submission document section 8.1 for further comment.

- 2.4 DairyNZ is generally supportive of the proposed changes - most of the proposals will provide further clarity regarding what is and is not permitted on dairy farms and will strengthen the good traceability practices already being undertaken by dairy farmers. Several proposals require further clarification from MPI – namely around the privacy of NAIT shareholder information accessed within NAIT database. Specific comment is provided on each of the proposed changes in section 3 below and the MPI submission form.
- 2.5 DairyNZ supports working in partnership with Government, the broader industry and OSPRI to understand and achieve good traceability outcomes which are supported by conclusive science.
- 2.6 We value involvement in developing traceability regulations and welcome the opportunity to work with MPI and OSPRI in assisting dairy farmers to understand the new regulations.

3. COMMENT ON SECTION A: Implementing the NAIT Review recommendations

3.1 Require PICAs to report annually the presence and estimated numbers of non-NAIT animal species (such as goats, pigs or sheep) at a NAIT location, to provide better information about co-mingling of animals in the event of a disease outbreak.

DairyNZ strongly supports MPI working in partnership with the various species industries to fully understand and scope existing non-NAIT species movement and traceability practice within New Zealand. From a biosecurity perspective, understanding the status/movement of other species will be valuable in evaluating certain exotic disease risks such as foot and mouth disease virus (FMDV) e.g. sheep and goats.

3.2 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, to ensure that animals can be traced effectively back to their origin.

DairyNZ acknowledges the importance of tracing an animal back to its point of origin/birth. We encourage MPI to strongly engage across all farming systems as part of this consultation process to fully understand the practical considerations associated with; the lag time for ordering tags, failure rate of tags, the cost of tags, management of surplus tags, and provide clarity about the process for replacement tags. Please refer to MPI submission form section 6.2 for further detail.

3.3 Amend the definition of PICA to clarify that the responsibilities apply to all persons in charge of animals, to ensure that organisations as well as individuals are clear on their obligations.

NAIT is a traceability framework with multiple moving parts and multiple responsible parties involved. DairyNZ supports a responsible approach across all parts of the traceability chain e.g. all parties in charge of animals have a key part to play. The PICA definition amendment aligns well with other recent regulation updates that focus on a shared responsibility approach e.g. Animal Welfare updates. Alignment of expectations of responsibility and compliance measures across regulation allows for clear and consistent message delivery to farmers.

3.4 Change the timeframe for when a PICA must declare the movement of impracticable to tag animals from '48 hours prior' to 'before sending' and make failure to declare an infringement offence. This will be a more practical timeframe for farmers, and signal the seriousness of non-compliance

DairyNZ is generally supportive of this change, with the additional comment that clear definition be provided by MPI as to what constitutes an animal that is 'unsafe to tag'. Any limits around total numbers of untagged/unsafe animals which may be accepted/transported also requires clarification. Please refer to MPI submission form section 6.4 for further detail.

3.5 Allow public sector organisations to request access to NAIT core data as long as the Act's purposes of holding this data are met, to ensure most effective use of data.

As a programme of OSPRI New Zealand, NAIT has three industry shareholders representing the beef, dairy and deer sectors. DairyNZ request that further clarification/confirmation be provided by MPI as to;

- I. The scope/definition of "any public sector organisation"
- II. The scope/definition of 'core data'
- III. Status of shareholder data/restricted access information during the period it is acquired/held by the requesting organisation e.g. subsequent accessibility under an Official Information Act (OIA) request.

Refer to MPI submission form section 6.5 for additional detail.

3.6 Amend the Act's purposes of holding core data to include responding to stock theft and wandering stock, to streamline the processes for accessing NAIT data for people that need it.

DairyNZ is generally supportive of this change.

3.7 Make previous NAIT location history for an animal available to a PICA (as a potential seller), to enable PICA to manage potential biosecurity risks when buying and selling animals.

DairyNZ is generally supportive of this change with additional comment provided in MPI submission form section 6.7.

COMMENT ON SECTION B: Making NAIT fit for the future – proposals arising from the *Mycoplasma bovis* response

3.8 Align penalty limits with those in the Biosecurity and Animal Products Acts, to give the courts more ability to match the penalty to the seriousness of the offence.

DairyNZ is generally supportive of this change, alignment across regulations relevant to dairy farmers allows for clearer and consistent message delivery to farmers.

3.9 Align infringement fees with those under the Biosecurity and Animal Products Acts, to better reflect the seriousness of non-compliance with NAIT.

DairyNZ is generally supportive of this change, alignment across regulations relevant to dairy farmers allows for clearer and consistent message delivery to farmers. The recent Animal Welfare regulation update process may provide valuable feedback for this process.

3.10 Rename "impracticable" to tag to "unsafe" to tag, to better reflect its purpose.

DairyNZ is generally supportive of this change, with the additional comment that clear definition be provided by MPI as to what constitutes an animal that is 'unsafe to tag' and any limits specified around total numbers of untagged/unsafe animals which may be transported. Refer to MPI submission form section 6.4 for further comment.

3.11 Prohibit and make it an offence to transport untagged animals without an exemption, to ensure animals are tagged and to improve traceability.

A robust traceability scheme is in New Zealand's national interest and DairyNZ is supportive of this change. Additional comment is provided in MPI submission form section 6.7 on several practical on farm

considerations and clarity required by MPI on responsibility across the traceability chain (i.e. sender, transporter and receiver).

3.12 Require untagged animals arriving at a NAIT location to be separated from other animals, to more effectively manage the biosecurity risk.

Further information/clarity is requested as outlined in MPI submission form section 7.5.

3.13 Improve access to NAIT information by MPI and other authorities, to ensure data access is as efficient as possible

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Refer to MPI submission form section 6.5 for additional comment.

Thank you for the opportunity to comment on this discussion paper.

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