

20 March 2019

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Consultation on NAIT Standards
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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 Standards Consultation represent the interests of our levy paying dairy farmers.

2. EXECUTIVE SUMMARY

- 2.1 DairyNZ wishes to submit the below comments on the proposed Standards.
- 2.2 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. A key part of optimising the current framework will involve ensuring that a shared responsibility approach is adopted by all parties involved across the traceability chain.

3. COMMENT ON KEY CONSULTATION QUESTIONS

- 3.1 **Are you in agreement with the key changes to the NAIT Accreditation of Entities dealing with Animals Standard?**

DairyNZ support the key changes to ensure a robust performance framework and ensuring clear obligations on the entities dealing with animals.

Are you in agreement with the key changes to the NAIT Accreditation of Information Providers Standard?

DairyNZ support a robust performance framework and ensuring clear obligations on the entities dealing with animals. The additional comments are provided below;

Funding

1. NAIT accreditation is viewed as a general business cost – a cost recoverable from the beneficiaries of that service, not all NAIT levy-payers/ the public. Consideration should be given to assigning the cost of accreditation and auditing to the accredited entities versus current NAIT levy payers. Increased compliance will contribute to improving the NAIT scheme. However, these costs are not associated with core NAIT services therefore at the expense of improvements to core NAIT services.
2. The accreditation fee (\$500) is unlikely to cover successful operation of a strengthened compliance regime/assessment of applications for the entities involved. The fees and forms regulations could be updated to include a fee allowing full cost recovery of accreditation, audit, monitoring and re-accreditation processes provided by NAIT.

Complaints management

The complaints management policy could also be further strengthened e.g. requirement for accredited entities to make their complaints procedures to PICAs available publicly.

3.2 **Are you in agreement with the key changes to the NAIT Animal Identification Device Approval Standard?**

DairyNZ are generally supportive of these changes- with additional comments below.

A similar approach to the ACVMG adverse event reporting for veterinary medicines could be considered with regards to reporting of tag issues- e.g. the obligation for all reports received by the accredited entity to be reported to the NAIT organisation and annual reporting on overall trend analysis/numbers reported as part of their accreditation approval.

The user instructions accompanying the device provides advice on how to report problems with device retention. However, the instructions currently enable one of multiple contacts to be listed- which creates an inconsistent approach e.g. the licensee or NAIT. A consistent approach is recommended - to avoid the risk of information not being reported e.g. the first recipient does not advise the other organisation of the complaint.

It is also noted that NAIT must give prior approval for the removal of a NAIT device; this carries potential animal welfare implications e.g. where immediate tag removal is warranted on welfare grounds and contact with NAIT is unavailable e.g. out of normal business hours. In this event a condition could be adopted to remove the tag where there are sufficient grounds for removal and reporting to NAIT as soon as practical following removal e.g. by the next business day.

3.3 **Are you in agreement with NAIT Animal Identification Device Approvals Guidelines that support the NAIT device standard?**

DairyNZ are generally supportive of these changes- with additional comments below.

The animal identification advice is one of the most critical parts of the traceability system –ensuring the most robust accredited device meeting durability, efficacy and tolerability standards is procured is key.

The potential exists that overseas providers could have access to improved device technology, yet the guidelines specify New Zealand only suppliers. Specifications and performance standards underpin the device manufacture and customer support processes, therefore is the potential for supply by overseas suppliers e.g. through an approved New Zealand distributor.

Amending the fees regulations for enabling full cost recovery for accreditation and auditing services carried out by NAIT would also help address the cost associated with overseas accreditation/audit.

3.4 **Are you in agreement with the NAIT Performance Assurance Guidelines that support the NAIT device standard? Please provide feedback for the guidelines for performance assurance document.**

It is noted that a 16% weighting has been given to the assessment of device performance. Given the crucial role of the device (fit for purpose) in the overall traceability system – recommendation is the weighting be increased (and subsequent reduction in weighting on other performance categories).

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

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