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DairyNZ submission on strengthening Sheep and Pig Traceability in New Zealand

1. DairyNZ appreciates the opportunity to provide feedback on strengthening sheep and pig traceability in New Zealand.
2. We support a two-step approach to strengthening the traceability of sheep and pigs in New Zealand, with a shift to mandatory electronic Animal Status Declarations (eASD) for all livestock under the Animal Products Act 1999 in the interim that will deliver an effective mob based sheep and pig traceability system, with an emphasis on the need to address gaps through a longer-term view of including sheep under NAIT (National Animal Identification and Tracing). This approach directly supports New Zealand's export reputation, biosecurity readiness to respond to major livestock diseases, and sector productivity.
3. We understand that the commercial pork industry, comprising approximately 65 members, operates its own ASD form for domestic purposes. While recognising that these operators are not exporters, if digitised with unique farm locations it would provide an effective and fit for purpose long term traceability system for that industry. Of greater concern is backyard pigs and the need to think about their inclusion in NAIT long term.
4. DairyNZ is the industry good organisation that represents all New Zealand dairy farmers. DairyNZ is focused on helping farmers build profitable, sustainable, and resilient farm businesses through extension, advocacy, science and research. Our purpose is to deliver a positive future for New Zealand dairy farming.
5. DairyNZ is funded by a levy on milk solids that is paid by all dairy farmers under the Commodity Levies Act 1990, a significant proportion of our work is allocated towards biosecurity. DairyNZ is the major shareholder in NAIT Ltd with Beef + Lamb NZ, DeerNZ and the Crown through the Ministry for Primary Industries (MPI).
6. We are submitting on this consultation to highlight the importance of a strong sheep and pig traceability system that supports market access, aligns with practices of our trading partners, and strengthens New Zealand's biosecurity system.



General comments

7. New Zealand requires an efficient traceability system that supports official assurances, strengthens traceability of species not currently in NAIT (including improved data quality, availability, and interoperability), enables rapid market re-entry following a disease event, reduces regulatory and operational burden, and supports commercial differentiation and trade.
8. Internationally, there is a trend towards individual animal traceability for sheep. New Zealand is one of the minority OECD countries that has not adopted individual sheep traceability, which is notable given our high reliance on primary exports.
9. DairyNZ considers that the current paper-based ASD system does not provide the appropriate level of timeliness, data quality, or accessibility required to support a biosecurity response or meet scrutiny from trading partners.

Recommendation

Step 1: Interim shift to mandatory eASDs for all livestock

10. We support the interim shift to mandatory eASDs for all livestock (not just sheep and pigs) for the following reasons:
 - I. It provides the opportunity for mob-level verifiable information in an electronic database that is less administratively burdensome to follow up in the event of a biosecurity or food safety response, enabling more timely access to, and effective use of the information.
 - II. It modernises systems/processes with the benefit of being able to add verification of data fields, such as critical unique farm location information, and enables reporting to be undertaken to better understand compliance levels and risks.
 - III. Shifting to mandatory eASDs has the added benefit of being able to reduce compliance effort for dairy farmers as eASDs and NAIT movements longer term could be done together (or automatically) if the systems are integrated, like the intention of the defunct MyOSPRI.
11. While mandatory eASDs for all livestock would strengthen biosecurity systems and processes, material gaps would remain including:
 - I. There is no requirement for location registration of where sheep or pigs are held, and if animals are not moved to another property during their life (e.g. lifestyle animals), those locations would not be captured. This poses risk in the event of a biosecurity response.
 - II. There is no requirement or current ability under the Animal Products Act for individual animal identification or movement recording, which may be limiting if international expectations move toward individual animal traceability requirements.

Step 1 funding:

12. There is a potential risk that dairy farmers would pay twice for two systems that capture similar information. Dairy farmers currently pay for NAIT through NAIT levies, and any development of a new eASD system (or shifting eASDs off the MyOSPRI platform) should be paid for through the Meat Commodity levy that is paid on both beef and dairy cattle sent to slaughter. The market access benefits that dairy farmers would receive from an eASD system relates to the facilitation of trade in meat products to overseas markets, so it is appropriate that the same levy mechanism funds eASDs.



Step 2: Sheep included in NAIT in the long term, not limited to mob-level

13. Given the limitations of eASDs, we propose a longer-term approach of including sheep in NAIT (not limited to mob-level) to provide sufficient traceability and reduce risk to the wider livestock sector. This is based on the following rationale:

- I. ASDs, whether paper-based or electronic, capture information for food safety to provide assurances to export markets, rather than for the purpose of biosecurity. NAIT provides for a comprehensive generic traceability system to support biosecurity response, minimising duplication of using multiple systems, especially for farms with both sheep and beef movements.
- II. NAIT requires location registration for properties with NAIT animals, which captures lifestyle blocks/ non-commercial animals which would be missed by eASDs.
- III. NAIT was intended to provide animal traceability at either the mob or individual animal level. Currently, the NAIT scheme only provides for individual animal level traceability, but mob-level traceability can be enabled by amending NAIT regulations. However, international expectations are likely to move towards individual animal level traceability and so it would be short-sighted to rule out individual traceability of sheep in the future.
- IV. We understand that the commercial pork industry, comprising approximately 65 members, operates its own ASD form for domestic purposes. While recognising that these operators are not exporters, if digitised with unique farm locations it would provide an effective and fit for purpose long term traceability system for that industry. Of greater concern is backyard pigs and the need to think about their inclusion in NAIT long term.

Step 2 funding:

14. The funding model would need negotiation. DairyNZ recognises that extending NAIT to sheep would involve significant design, cost and capability and would require phased implementation.

Next steps

DairyNZ welcomes the opportunity to discuss these topics further, if you have any questions on the feedback provided in this submission, please contact:

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Yours sincerely,

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