



Submission Form

Improving the National Animal
Identification and Tracing (NAIT) Scheme

Once you have completed this form

To email this document with your submission:

- Save the submissions form to your computer
- Open the form in Adobe reader – Adobe can be downloaded here <http://get.adobe.com/uk/reader/othersversions/>
- Complete the sections you wish to provide a response for
- Press the ‘send’ button at the end of the form, which will pre-populate an email to NAITsubs18@mpi.govt.nz
- Press ‘send’ on the email to submit your form

Note: The form must be completed in Adobe Reader. It will not work if it is completed in a browser.

While we prefer email, you can also post your submission to:

Consultation on NAIT regulatory change proposals
Ministry for Primary Industries
PO Box 2526
Wellington 6140
New Zealand

Submissions must be received no later than **5.00pm on 19 December 2019**.

The consultation process

Making a submission

Your submission may respond to any or all of the proposals. You are also welcome to provide other information that you think might be relevant to this consultation. If possible, any views you express should be supported by evidence or examples of how the proposals would affect you.

Anyone may make a submission, either as an individual or on behalf of a group or an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.¹

¹ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG.

Use of information

MPI will use the information provided in submissions to inform our analysis and the advice to Ministers.

Official Information Act 1982

Any submission you make becomes public information. Anyone can ask for copies of all submissions under the Official Information Act 1982 (OIA). The OIA says we must make the information available unless there is a good reason for withholding it. You can find those grounds in sections 6 and 9 of the OIA.

Tell us if you think there are grounds to withhold specific information in your submission. Reasons might include if it is commercially sensitive or personal information. Any decision the Ministry for Primary Industries makes to withhold information can, however, be reviewed by the Ombudsman, who may require the information be released.

Submitter details

Name of submitter or contact person:	
Are you submitting as an individual or on behalf of a group?	Individual Group
Organisation (if applicable):	
Email:	

Chapter 5: Priorities for change

5. Do you agree with the priorities and objectives for NAIT? Please explain in detail.

Chapter 6: Proposals to support the implementation of the NAIT Review

Proposal 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? Please explain in detail.

6.1.2 Is there anything that may affect your ability to provide this information? Please explain in detail.

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

Proposal 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? Please explain in detail.

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

6.2.3 What in your view is a reasonable timeframe for implementing this proposal (e.g. how long would it take you to use up existing supplies of tags)?

Proposal 6.3

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

6.3.1 Do you support this proposal? Please explain in detail.

6.3.2 Do you think companies are clear on their NAIT obligations under the current definition of PICA? Please explain in detail.

6.3.3 How would the proposal impact on you?

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

Proposal 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

6.5.1 Do you support this proposal? Please explain in detail.

Proposal 6.5

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

6.5.1 Do you support this proposal? Please explain in detail.

6.5.2 How would this proposal impact on you?

Proposal 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? Please explain in detail.

6.6.2 Do you support the proposal to include responding to wandering stock as a purpose of holding core data? Please explain in detail.

Proposal 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? Please explain in detail.

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

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

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

Chapter 7: Proposals to make NAIT fit for the future

Proposal 7.1

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

7.1 Do you support this proposal? Please explain in detail.

Proposal 7.2

Align infringement fees with those under the Biosecurity and Animal Products Acts

7.2 Do you support this proposal? Please explain in detail.

Proposal 7.3

Rename “impracticable” to tag to “*unsafe*” to tag

7.3.1 Do you support this proposal? Please explain in detail.

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

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

Proposal 7.4

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

7.4.1 Do you support this proposal? Please explain in detail.

7.4.2 What are the implications of this proposed change?

Proposal 7.5

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

7.5.1 Do you support this proposal? Please explain in detail.

7.5.2 How would this proposal impact on you?

Proposal 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?
Please explain in detail**

**7.6.2 Do you support the proposal to allow MPI to facilitate access to the NAIT database for
other authorities? Please explain in detail.**

Chapter 8: Other possible improvements to NAIT

Discussion area 8.1

Information about animal movements during transportation

8.1.1 Would you support requiring more details about the transportation of NAIT animals? Please explain in detail.

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

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?

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

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

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

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?

Discussion area 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?

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

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

Discussion area 8.3

Potentially including other species in NAIT

8.3.1 Do you support other species being included in NAIT?

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

8.3.3 What traceability information do you think would be most useful to collect? For example, property details? mob-level information? or information on individual animals?

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

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

Chapter 9: Technical amendments

9. Do you have any comments on the technical amendments set out in chapter 9 of the discussion document? Please identify which proposed amendment numbered from 1 to 16 your comment relates to.

Chapter 10: Implementation

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

Chapter 11: Monitoring, evaluation, and review

11. Do you agree with the proposed approach to monitoring, evaluation, and review? Please provide evidence to support your view.