

NAIT Submission Form
Biosecurity Discussion Paper No: 01/08
Prepared for public consultation

Submission from:

Fields marked with a * are required

National Animal Identification and Tracing – Enhancing New Zealand’s animal identification and tracing systems

This form is included to assist you. Submissions in another format are welcome, as are any additional or general comments. You may also continue your response on a separate sheet where needed. So that you can be contacted for further information and clarification please provide the following details:

Name *

Organisation/Company *

Address *

Phone

Fax

Email *

Privacy Act

In preparing the summary of submissions, the National Animal Identification and Tracing Governance Group may want to attribute specific statements to an individual or organisation. If you do not want to be identified in the report please indicate by completing the following:

I do not wish to be individually identified

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Yes

Please indicate your main areas of interest relevant to animal identification and traceability systems:

(tick one or more boxes as applicable)

- Cattle / Deer owner / Manager
- Animal products processing sector
- Stock and station agent
- Database service provider
- Other livestock sector (e.g. pigs, sheep, etc)
- Animal products exporting sector
- ID system service provider
- Industry association

Other (please specify)

Please answer the following as clearly as possible:

Q1. Do you have any information or suggestions that you feel NAIT should take into consideration when setting up this system?

We have serious concerns in four major areas.

- Biosecurity, - Urgent and serious consideration of incorporation of the two missing major species (sheep and pigs), is required in order to advance NZ's biosecurity protection status.
- Unique animal identifier, - The use of the standard international unique numbering system administered by GS-1 should be considered, as it is currently in worldwide use through a number of industry-related organisations.
- Evaluation of new RFID technology, -deer farmers report considerable difficulty in the consistency of use and reading of the current low frequency RFID technology used in deer. There is also the potential for substantial cost savings in incorporating UHF in tags and scanning equipment.
- Governance structure and costs, - we encourage consideration and adaptation of the AHB database (DMIS) and governance structure in order to further develop and run NAIT. We support the need for the associated Farmsonline property register as proposed and funded by the Government. An Incorporated Society structure would be appropriate, with an industry based Representatives' Committee.

Q2. What other data that is not discussed in this document do you feel should be collected?

- Proposed NAIT add-ons that have the ability to record animal health and treatment history, disease events, etc. are not necessary, detracting from the core role of tracing individual animal lifetime movements.
- If farmers should wish to add this data, it should be their decision and at their expense.

Q3. What views do you have about the proposal to require the inclusion of deer on NAIT under regulations from 2011?

We are resolutely opposed to the mandatory requirement of deer to be included by 2011.

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- There is a lack of full biosecurity compliance across all farmed species.
- The costs of tagging are relatively high.
- There is little perceived marketplace benefit for the deer industry.
- Product and food safety traceability can be achieved now.

Q4. Have we achieved a pragmatic balance between the level of proposed compliance required to ensure NAIT meets biosecurity, market access and other regulated needs and NAIT being able to support other on-farm and off-farm information needs?

- Yes
 No
 Not sure

Both yes and no.

- The current NAIT proposal more than sufficiently covers basic needs and compliance on a per species basis with cattle and deer to the extent of overkill.
- Additional information is well catered for under individual company QA schemes.
- Compliance may be difficult to achieve given the threat of lost and expensive tags.

Q5. We have identified ways in which we propose to ensure that animal identification and movement information is recorded, including who is responsible. Does this approach make sense and what will this mean for participants?

- The key point of data capture and transfer to NAIT should be at sale yards and processors.
- We support and encourage the training of accredited third party operators.

Q6. What other rules and incentives can you suggest so we can ensure that the information on NAIT is kept accurate and up-to-date?

As stated, we are fundamentally opposed to this concept and struggle to think of incentives or additional rules of compliance. However; in order to prove Government support for the programme, they could:

- Pick up the direct cost of tagging for the first 12 months.
- Pick up the difference in cost between RFID tags and the current average tags for a further 2 years.
- Assist sale yards and processors in the set up and establishment of the scanning and data transfer systems.

Q7. What are your preferred methods for raising industry funds to support the establishment and ongoing costs of the NAIT system?

- Cattle levy
 Tag levy
 Direct contributions
 Movements levy

Other (please describe)

We do not agree with the current 35% Crown, 65% industry split and would support increased Crown obligation to at least a 50-50 balance for operational costs.

Q8. What may need further work to ensure a smooth transition between current systems and the new NAIT system?

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Clear and simple communication on the need, costs and benefits of NAIT. Adoption of the above incentives would also help to ensure a smooth transition between systems.

Q9. The proposed transition to NAIT is by way of an initial non-mandatory sign-up phase, before the NAIT requirements are regulated by 2011. What is the likely interest in starting to register animals, record movements and other information before it becomes compulsory?

- Yes, I plan to register animals as soon as NAIT is available on-line
- Yes, I plan to register animals and record movements using NAIT when available
- Yes, I am interested in using full NAIT functionality, when available
- No, I will wait until it becomes regulated and compulsory
- Not applicable to me (I do not own or keep cattle or deer)

NAIT will need to demonstrate or allow the industry to demonstrate in partnership with NAIT, that the technology for deer and deer systems is valid, cost effective and state of the art.

Q10. In your opinion, is there anything else in the concept design that we may have overlooked and needs further consideration before we proceed with building NAIT?

The ability to incorporate new technology in tag and reader design rapidly as these replace outmoded technology.

Q11. If you are a farmer, are you likely to purchase RFID readers?

- Yes, for my own properties
- Yes, if I can come to a sharing arrangement with other parties, e.g. other farmers
- No, I will prefer to engage a service provider, e.g. stock agent or trucking company who can read my animals' RFID

Q12. If you are a farmer, would you consider using RFID for other on-farm activities?

- Yes, I plan to invest in on-farm use of RFID systems in the next five years
- No, I have no plans to use RFID for on-farm management in the next five years
- Not sure, I will see how others use RFID before I make any decision

In spite of some of the limitations associated with incorporated RFID technology, we are aware of considerable management advantages which are able to be gained through RFID use. With good industry – wide support, the Focus Farms network will feature the use of RFID electronics in deer farming to add to understanding and application for deer farmers.

Q13. Do you wish to receive an electronic copy of the NAIT newsletter to keep up with the NAIT project and system development?

Yes / No?

Other Comments:

In conclusion...

The NZDFA does not have the current support of its deer farmers to support the introductory or proposed mandatory phases of NAIT, as outlined in the discussion document. The proposed scheme is based around the Crown requirement for additional information from the rural sector

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to meet an enhanced biosecurity obligation in international terms. We believe that current systems can achieve that for deer at no additional cost to the industry.

The deer industry has been a leader in the fields of traceability and QA, and the NZDFA is supportive of moves to improve New Zealand's biosecurity. We would suggest that NAIT should not be so focused on mandatory introduction for individual species, rather allowing voluntary uptake until systems are in place to allow a co-ordinated mandatory introduction across all farmed animal species.

Market access, traceability and food safety requirements can be fulfilled by the existing high standard of industry and company QA programmes which are properly driven by the market. Until the technology has been proven, new technology adopted (if required), and the cost benefit analysis shown, the proposed NAIT system governance costs and timing does not meet deer farmers expectations for support, and their directions to NZDFA to stay out of the system in the immediate future will not change.

Note: ***The New Zealand Deer Farmers' Association:***

- 1 The New Zealand Deer Farmers Association has a mandate to represent all active deer farmers and is funded by ~2000 voluntary subscription paying levy-paying members of an estimated 3600 currently active farmers within the broad administrative framework of Deer Industry New Zealand, and represents the majority of the 1.4M farmed deer in New Zealand.
- 2 It is a fully Incorporated Society that promotes the views and interests of the producers at all levels, and is lead by an Executive Committee of 4 including the Chairman. An executive and administrative responsibility is now assumed by its Producer Executive within Deer Industry New Zealand. The Executive also sits on the NAIT TAG to represent both Deer Industry New Zealand and DFA viewpoints.
- 3 The Association is regionally located through its 23 Branches and 3 Breed Societies and has a strong relationship with regional councils, related agricultural industries and its own industry relationships.
- 4 The NZDFA recognises that the positions stated here are based on feedback at industry forum and AGMs by way of discussion and remit from individual members and supported by majority decision.
- 5 The NZDFA acknowledges the opportunity created to have various view points expressed through Deer Industry New Zealand representation on the NAIT TAG and GG bodies, and advises that these views may not necessarily be endorsed or shared in their entirety by Deer Industry New Zealand and its Board and Executives.

For the New Zealand Deer Farmers' Association

Chairman: (name here), (branch name here) Branch of the NZDFA.