



National Animal Identification and Tracing Scheme

National Operations Plan 2024/25



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1. Executive summary

This document is the National Operational Plan (NOP) for the National Animal Identification and Tracing (NAIT) Scheme. It has been prepared by NAIT Ltd as required under Section 10(1) (a)(x) of the National Animal Identification and Tracing Act 2012 (the NAIT Act) to give operational effect to the NAIT Scheme.

NAIT Ltd, a wholly owned subsidiary of OSPRI NZ Ltd (OSPRI) is the NAIT organisation accountable for implementing the NAIT Scheme pursuant to Section (7) of the NAIT Act.

New Zealand's ability to respond quickly and effectively to disease outbreaks is dependent upon the availability of accurate and up-to-date livestock identification and traceability information. Animal identification and traceability information helps protect farmers livelihoods by:

- enabling effective responses to livestock disease outbreaks
- supporting food-safety assurances of livestock products, and
- supporting market assurance and access for livestock products.

The NAIT Act specifies the legal obligations of persons in day-to-day charge of NAIT animals (PICA's) for ensuring that accurate and up-to-date traceability information is available for these purposes as follows:

- Register as a PICA.
- Register NAIT locations.
- Identify (tag) and register NAIT animals.
- Declare the movement of NAIT animals from a NAIT location to another.
- Declare the death, loss, or intended export of NAIT animals.
- Ensure that the information listed above is correct and up-to-date.

NAIT Ltd is obliged under the NAIT Act to implement the NAIT Scheme by:

- issuing, maintaining, and administering standards that:
 - ensure that NAIT identification devices (ear tags) provide unique, clear, and lasting identification
 - ensure that accredited information providers and entities dealing in NAIT Animals (for example saleyards and meat processors) who carry out one or more functions or duties on behalf of a PICA have an ability to perform these functions in a manner that also protects personal privacy and data security
- maintaining an information technology system that receives and retains information provided by PICAs, suppliers of NAIT identification devices, and accredited information providers and entities dealing in NAIT Animals in accordance with their obligations under the NAIT Act and associated regulations and standards, and
- ensuring animal identification and traceability information is available to support biosecurity, food safety, and market access purposes by considering and granting applications for access to NAIT information system data which conform with the purposes and data access rules specified in the NAIT Act.

The NAIT Act also specifies that NAIT Ltd is responsible for implementing the NAIT Scheme by:

- providing appropriate information, educational material, or training to inform parties of their obligations under the NAIT Scheme
- monitoring compliance, and
- undertaking compliance and enforcement.¹

A range of policies are specified to support the implementation of the NAIT Scheme, especially where this requires or may lead to the imposition of legal obligations or costs. Inclusion of these within this NOP is based upon the possible need for interested parties to have greater clarity than can be easily obtained by reviewing the NAIT Act and associated regulations and standards. These policies describe or provide for:

- the issuance, maintenance, and administration of NAIT Standards
- the NAIT Information System and data access for approved purposes
- monitoring compliance, and
- compliance and enforcement.

The inclusion of these policies within this NOP does not preclude further specification of NAIT Scheme implementation through subsidiary or related plans or operational procedures.

¹ Compliance and enforcement of the NAIT Scheme is undertaken in collaboration with the Ministry for Primary Industries.



2. The NAIT Scheme

2.1 Introduction

Animal traceability is critical to the success of New Zealand's farming sector. A strong traceability scheme means the livestock industry can recover more swiftly if there is an exotic disease incursion. Such a scheme also enables better management of emerging and endemic diseases, food safety issues requiring individual animal traceability (such as exposure to environmental toxins), and market access issues.

The NAIT Scheme provides assurance to local and overseas markets about food safety standards and cattle and deer product integrity and provides the ability to integrate animal health information which allows any response activity to be prioritised based on location and animal status.

The NAIT Scheme came into effect on 1 July 2012 for cattle and on 1 March 2013 for deer. It has been compulsory for the Person in Charge of Animals (PICAs) from these dates.

This document was prepared by NAIT Limited, a wholly owned subsidiary of OSPRI NZ Ltd, acting as the designated NAIT organisation pursuant to section 8 of the National Animal Identification and Tracing Act 2012.

As per Section 10(1)(a)(x) of the NAIT Act, this document:

- a) sets strategic and operational goals;
- b) sets objectives and priorities for the NAIT organisation and the NAIT Scheme;
- c) identifies the expectations of those persons who have an interest in the NAIT Scheme;
- d) specifies the measures by which the NAIT organisation's performance of its functions and duties will be assessed; and
- e) specifies how the NAIT organisation's activities will be independently audited against those measures.

2024–2025 is the last year of the current 2022–2025 Triennial Business Case (Traceability Operational Strategy), which has a goal of delivering the core capabilities of a reliable traceability scheme that is fit for purpose in the event of a disease outbreak.

2.2 Funding and governance

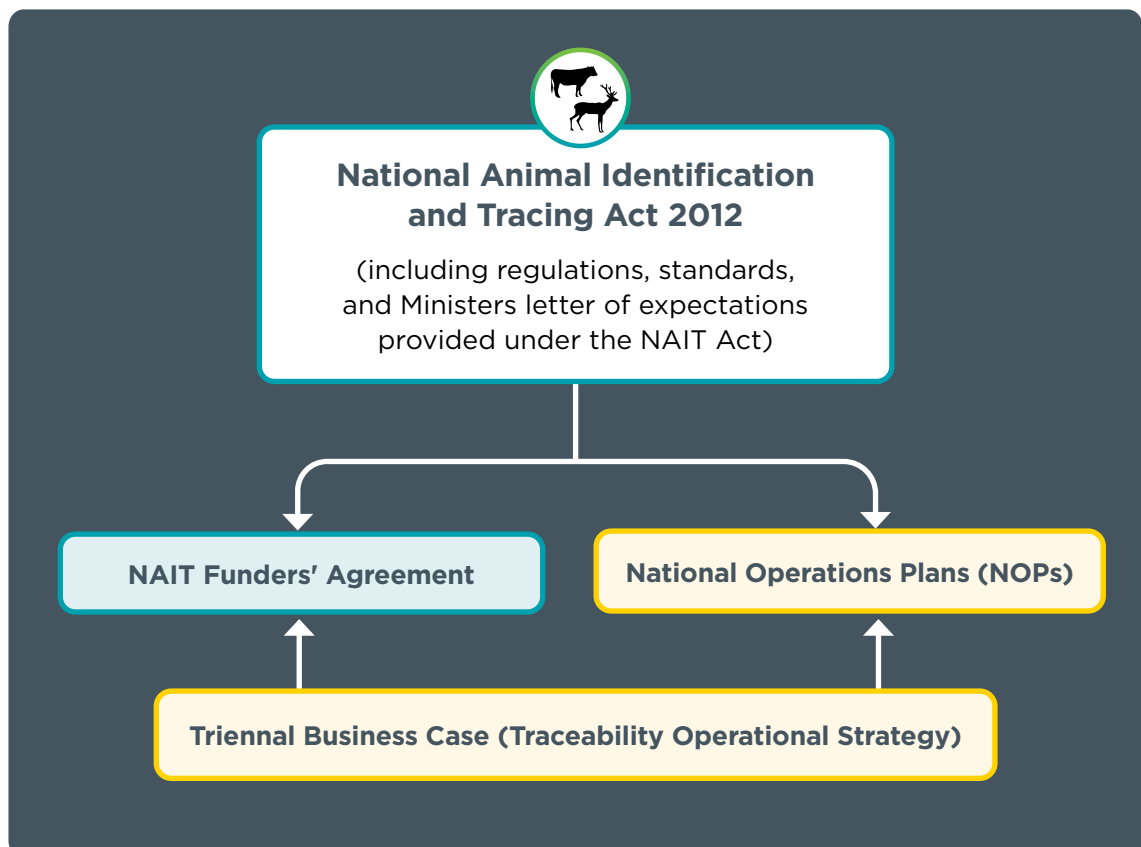
2.2.1 Funding

The NAIT Scheme is funded by a Crown contribution through the Ministry for Primary Industries (MPI), levies paid by farmers (as set in the regulations) and a deer industry contribution. NAIT Ltd is accountable to the funders of the NAIT Scheme.

2.2.2 Governance

The NAIT Scheme is governed by a series of documents, illustrated in Figure 1.

Figure 1. The NAIT Scheme's governance and funding structure

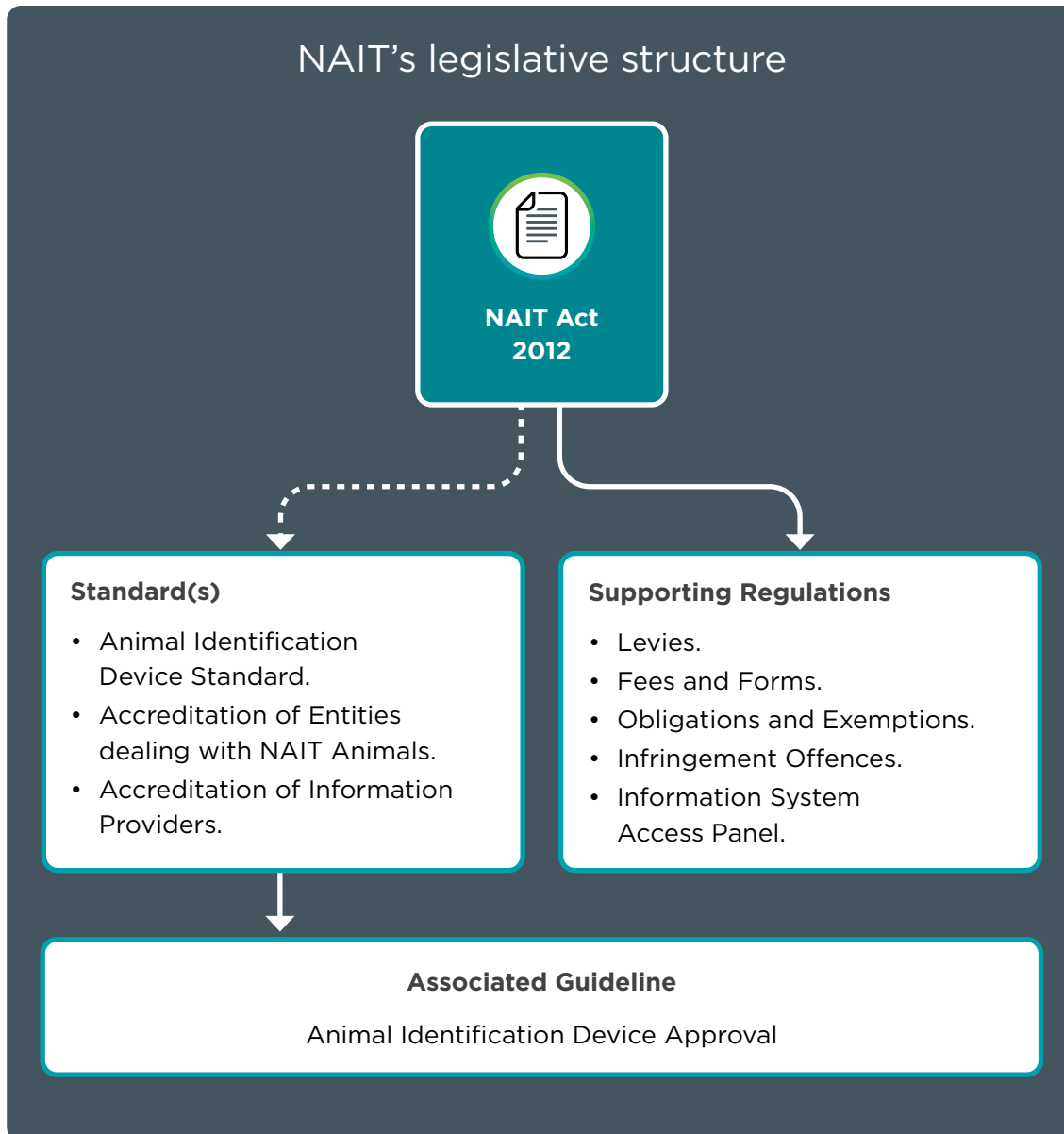


2.2.3 The NAIT Act and supporting regulations

NAIT Ltd is the designated NAIT organisation under Section 8 of the National Animal Identification and Tracing (NAIT) Act 2012.

In addition to the NAIT Act, the NAIT Scheme is delivered through supporting regulations, standards, and guidelines set by NAIT Ltd, as illustrated in Figure 2.

Figure 2. The NAIT Scheme’s regulatory and legislative structure



2.2.4 The NAIT funders agreement

The current NAIT Funders’ Agreement, agreed by NAIT Ltd and all funders, or their representatives, sets out the ways of working and key terms for the release of funds to NAIT Ltd to enable it to fulfil its core functions and duties under the NAIT Act. The agreement has a term of three years, in line with the triennial levies’ consultation process, ending on 30 June 2025.

The agreement outlines the following expectations that the NAIT Scheme:

- supports biosecurity and food safety response tracing (including fast moving diseases such as Foot and Mouth Disease)
- supports and integrates with wider systems and processes (including MPI's compliance plan and enforcement functions)
- aids ease of use for farmers (including call centre support) and enables data security, integrity, and integration
- provides tracing and disease management support for long term biosecurity management programmes to enable them to satisfy the necessary national and international standards.

Additionally, the agreement outlines the following:

- roles and responsibilities for funders and NAIT Ltd regarding the NAIT Scheme
- reporting requirements and timing, and
- the need for a triennial business case to be developed which identifies the business needs that reasonably satisfy the above outcomes. Funding received by OSPRI NZ Ltd (as the holding company of NAIT Ltd) to administer the NAIT Scheme go towards addressing these business needs.

2.2.5 The Triennial Business Case (Traceability Operational Strategy)

In the final year of the three-year funding cycle, NAIT Ltd and funding agencies will collaborate to identify the NAIT Scheme's business needs, priorities, objectives, risks, and prospective investments for the next three years. This will be documented in a business case for the next funding period.

The purpose of the business case is to demonstrate to funding agencies how the funding collected will be used to achieve the outcomes outlined in the funder's agreement and the expected costs and finance requirements.

The financial component of the business case will be independently reviewed.

2.2.6 The National Operations Plan (this document)

This document fulfils Section 10(1)(a)(x) of the NAIT Act. It has been written for those who have an interest in the NAIT Scheme and/ or NAIT Ltd as the NAIT Organisation.

2.2.7 Auditing the NOP

As required by law, this NOP will be audited. NAIT Ltd will do this by:

- arranging for an annual audit against the measures specified in the NOP
- providing the Minister with the independent audit findings as soon as practicable after the audit has been completed.

Additionally, to ensure successful delivery of the NAIT NOP, NAIT Ltd will:

- consider the views and priorities of the Crown and industry funders
- report on our progress quarterly through "Quarterly Business Reviews" and provide the report to management, the NAIT Ltd board and funders
- report progress against our benefits and key performance indicators including NAIT compliance metrics (aggregated and disaggregated) in our quarterly reporting
- look to industry research and international learnings where applicable when developing projects or initiatives and apply this knowledge where possible.

2.3 Strategic and operational goals

2.3.1 Strategic goals

Our Strategic goal for the NAIT Scheme is that:

“There is full traceability of animals within the NAIT Scheme”.

Full traceability is achieved when we know where an animal has been from birth to death.

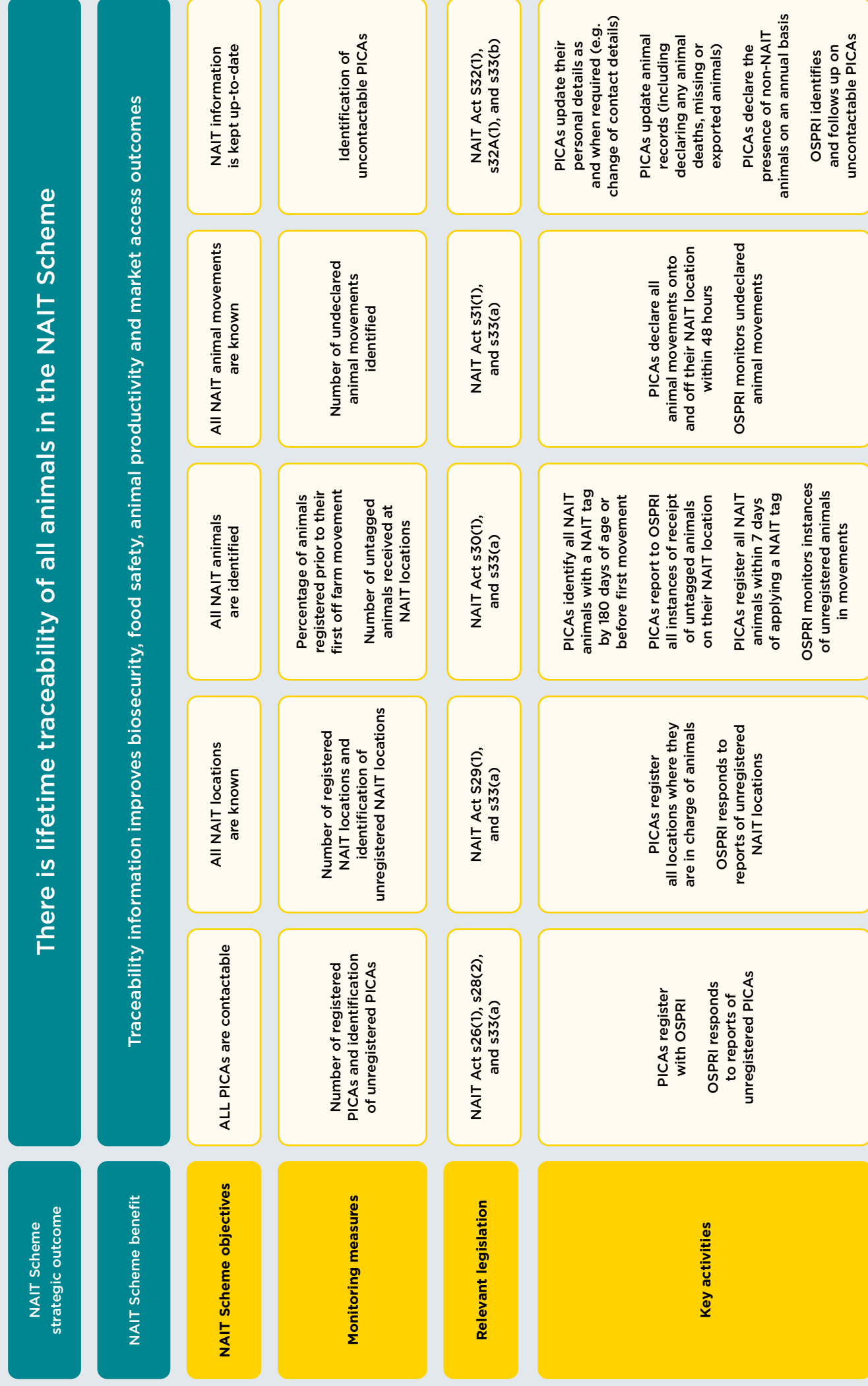
2.3.2 Operational goals

The success of the NAIT Scheme relies on the achievement of the following operational goals:

- **Farmers and PICAs are contactable,**
Meaning in the event of a biosecurity outbreak or other civil emergency, we easily and quickly identify and contact those who are impacted.
- **NAIT locations are known,**
Meaning that all locations where NAIT animals are held are known to NAIT Ltd to facilitate traceability.
- **NAIT animals are identified, and**
Meaning all NAIT animals are tagged and registered with NAIT Ltd.
- **NAIT animal movements are known.**
Meaning all movements of NAIT animals are declared to NAIT Ltd to enable full lifetime traceability of all NAIT animals.

The NAIT Scheme goals, objectives and measures are further illustrated in Figure 3. Achievement of these objectives through the key activities outlined is central to the success of the NAIT Scheme.

Figure 3: NAIT Scheme goals, objectives, and measures



2.4 Measuring performance of functions and duties

2.4.1 Traceability key performance indicators

Our strategic level indicators are:

- achieve 80% compliance with NAIT obligations as measured on the traceability compliance scale (an indicative trendline indicator consisting of aggregated data across the two available NAIT compliance measures for the recording of events within the legally required time frames, baseline 66.6%)²
- delivering a NAIT system that is easy to use and fit for purpose
- 80% of Stakeholder and Committee Chairs express confidence in NAIT Ltd and its programmes, measured 6 monthly.

2.4.2 Progress to date

We expect to realise several benefits as we go. Below are the benefits we have realised so far either in the 22/23 or 23/24 years and the activities we have taken to get there.

Benefit	Metric	Activities completed by end of June 2024
More resources for those who need help	Number of information providers accredited.	Farmers in all regions have an accredited information provider available to them by December 2023.
	Quantity of support farmers can access through education, training, and communications on understanding and meeting NAIT obligations.	Four industry campaigns run for major movement events i.e. Moving Day (May–June), beef calving (August–November), dairy calving (July–September), and breeding bull sales (June–December). Improvement of 10% on July 2022 on website page visits for NAIT educational content. Delivery of the National Education Project.
	User feedback surveys from Support Centre quality metrics.	Maintenance of a high customer satisfaction (CSAT) ³ score.
	25% reduction in calls to the Support Centre, where those calls relate to the fulfilment of basic NAIT obligations within 12 months post the release of NAIT MVP functionality in MyOSPRI portal.	Baseline for measurement established in Q1 and remeasured in Q4 (23/24).
Seamless integration	Customer satisfaction survey on third-party integration.	First survey undertaken for benchmarking.
	Number of entities accredited for integration.	33 entities accredited.
Improved data accuracy	Annual on-farm audits using the legislative powers and tools available in the NAIT Act.	Design and plan for implementation of the on-farm compliance audit programme. ⁴

² The Traceability Indicative Compliance Scale is a combination of measurements for i) animal registration before movement and ii) movement timeliness.

³ CSAT replaced the Net Promoter Score during the 23/24 year.

⁴ Note the timing differ from the Traceability Operational Strategy (where design was intended to be completed in the 22/23 year and implementation completed in the 23/24 year. Due to resource constraints this has been delayed.

2.4.3 Benefits for this reporting year

The development of NAIT in MyOSPRI has been slowed down during the 23/24 year. Consequently, some of the benefits outlined in the current Traceability Operational Strategy have not been realised or progressed as originally planned. The benefits that are dependent on the release of NAIT in MyOSPRI have changed or are delayed.

Benefit	Metric	Activities to be completed by June 2025
Improved tracing of livestock in a disease outbreak	Favourable feedback from disease response teams on the performance of the traceability system and tools during a biannual disease tracing desktop exercise.	Investigate the feasibility of running desktop tracing exercises with internal customers.
	Customer satisfaction survey on third-party integration.	Remeasure benchmark in Q4.
Seamless integration	Zero data accuracy issues relating to accredited third-party integration.	Define high priority data accuracy issues for incorporation into the third-party software standard and/or technical specifications for OSPRI Connect (part of NAIT in MyOSPRI).
	MyOSPRI SMART API reporting and monitoring for errors.	Design SMART metrics for error reporting.
More resources for those who need help	Quantity of support farmers can access through education, training, and communications on understanding and meeting NAIT obligations.	Run four industry campaigns for major movement events i.e. Moving Day (May–June), beef calving (August–November), dairy calving (July–September), and breeding bull sales (June–December).
	User feedback surveys from Support Centre quality metrics.	Maintenance of a high CSAT score above industry standard of 70–85%.
Improved ability to self service	25% reduction in calls to the Support Centre, where those calls relate to the fulfilment of basic NAIT obligations within 12 months post the release of NAIT in MyOSPRI.	Remeasure benchmark in Q4.
	In-system MyOSPRI metrics (e.g. time spent on a page in MyOSPRI, click-throughs to user guides, use of information providers).	Design the in-system MyOSPRI metrics.
Improved data accuracy	Within 12 months of the release of NAIT functionality in the MyOSPRI portal, 90% of NAIT locations audited will have greater than 85% aggregated compliance across the range of NAIT obligations audited.	Design reporting on compliance of NAIT locations that have been audited.
	Annual on-farm audits.	Implement the agreed approach by utilising available data from OSPRI managed disease programmes (TBfree and <i>M. bovis</i> Free) to compare animals scanned on-farm with NAIT records to assess data accuracy.

2.5 Stakeholders

The NAIT Act requires the NOP to identify the expectations of those persons who have an interest in the NAIT Scheme (sections 10(1)(a)(ix) and 10(1)(a)(x)(C) of the NAIT Act 2012). There are several persons who have an interest in the NAIT Scheme, including:

Persons	Who
The NAIT Scheme provider	NAIT Ltd
OSPRI's shareholder organisations and funders	<ul style="list-style-type: none"> • Beef + Lamb New Zealand. • DairyNZ. • Deer Industry New Zealand. • NZ Government (funder, non-shareholder).
Those who have obligations under the NAIT Act and regulatory framework	<ul style="list-style-type: none"> • Farmers (PICAs (Person In Charge of Animals) and PICA delegates). • OSPRI Committees. • Saleyards. • Stock and station agents. • Meat processors. • Livestock exporters. • Livestock transport operators. • Tag manufacturers. • Information providers and accredited entities dealing with NAIT animals.
Those who rely on the information in NAIT	<ul style="list-style-type: none"> • Disease control functions, within NAIT Ltd and elsewhere • Ministry for Primary Industries: <ul style="list-style-type: none"> • Readiness, response and incursion investigation teams. • Food safety. • NAIT Compliance Officers. • Animal Welfare Officers. • Biosecurity Policy. • Office of the Chief Scientist. • Police (wandering stock and stock theft).
Others	<ul style="list-style-type: none"> • Animal renderers. • Veterinarians. • Farm supply stores. • Federated Farmers. • Livestock genetics companies. • Local government (Animal Control). • Ministry of Foreign Affairs and Trade. • Other livestock industry 'peak-body' organisations. • Primary Industry Training Organisations. • SPCA.

2.5.1 Funders' expectations

The NAIT Scheme's funding agencies have outlined the following expectations that they have for the scheme, these are that the NAIT Scheme:

- supports biosecurity response tracing (including fast-moving diseases like Foot and Mouth Disease requiring rapid status reporting)
- supports/integrates with wider systems and processes, including MPI's compliance and enforcement functions
- aids ease of use for farmers and enables data security/integrity/integration e.g. through MyOSPRI
- provides tracing/disease management support for long-term biosecurity management programmes to enable them to satisfy the necessary national/international standards (e.g. TB).

2.5.2 Stakeholders' expectations

Feedback from our stakeholders is below:

"Consideration needs to be given to the future data opportunities around genetics, dairy cross, age, breed, sex, and treatments and what other data of value we could capture through the MyOSPRI transaction."

"NAIT is predominantly focussed on disease control, it needs to increase its focus on market assurance with meat processors having a greater access to data to support market access and assurance."

"We have programmes where we need to see the whole of life ownership, which currently we have to manually follow a paper trail. If this came through MyOSPRI, we could further enrich this data with additional information captured on farm and around that animal."

"OSPRI and stakeholders need to value market access, we are a major earner for the sector through market access."

The deterrents provided with the VADE model are inadequate, they aren't potentially large enough to deter offenders."

"Meat processors have the opportunity to educate and incentivise behaviour, e.g. missing tags, false information, lack of traceability."

"We are entering a digital future where the opportunity to capture and share data is so valuable. Consideration needs to be given to who has access to this."



3. Implementing the NAIT Scheme

The success of NAIT Scheme relies on collaborative effort, including farmer and industry input, third-party industry providers, joint compliance work with MPI, and funders' expertise. The effectiveness of the NAIT Scheme relies on participants to record the current location and movements of individual animals, for example, between farms, and information about the person in charge of those animals at each location.

Farmers and PICAs are responsible for providing the animal identification and traceability information required to support biosecurity, food safety, human health, and market access purposes.

NAIT Ltd is responsible for providing information, education, standards, and systems that enable PICAs to comply with their animal identification and traceability obligations, monitoring compliance, and undertaking enforcement actions where necessary by agreement with MPI Compliance and Response group.

The following section provides further information on the responsibilities of PICAs and NAIT Ltd in delivering the NAIT Scheme.

3.1 Responsibilities of PICAs

PICAs are responsible for providing animal identification and traceability information.

PICAs are persons in day-to-day charge of NAIT animals, including farmers, saleyard operators and meat processors. They are obligated to:

- register as a PICA
- register all locations where NAIT animals are held
- identify NAIT animals with a NAIT tag and register these animals
- declare the movements of NAIT animals from one NAIT location to another
- declare the death, loss or export of NAIT animals, and
- keep NAIT information up-to-date.

These obligations are expanded below.

3.1.1 Register as a PICA with NAIT

A person who is in day-to-day charge of NAIT animals (either continuously or intermittently) must register as a PICA with NAIT. The requirement to register as a PICA includes the owner or nominated representative of saleyards and meat processing facilities in addition to farmers of NAIT animals.

PICA registration must be completed within 48 hours of the end of the day of becoming a person in day-to-day charge of NAIT animals.

Note: It is the person in charge of animals that must register with NAIT, this is not necessarily the owner of the animals. Consideration should be given as to who is the most appropriate person to register as the PICA. There can only be one PICA per NAIT number.

Registered PICAs may delegate specified procedures and obligations under the NAIT Act to a PICA delegate. A PICA delegate is someone who can register with NAIT and have access to the PICAs NAIT account (via their own secure system login). They can take care of some of the PICAs NAIT obligations on their behalf (for example recording movements and registering animals). The PICA remains legally responsible for ensuring they have met their NAIT Scheme obligations.

PICAs may also appoint an accredited information provider to carry out one or more NAIT obligations on their behalf, see the information providers and accredited entities section of this document for more detail.

3.1.2 Exemptions

Organisers of school pet days, event organisers, transit stop owners, transport operators and drovers (in these capacities only) are exempt from the obligation to register as a PICA.

3.1.3 Register location

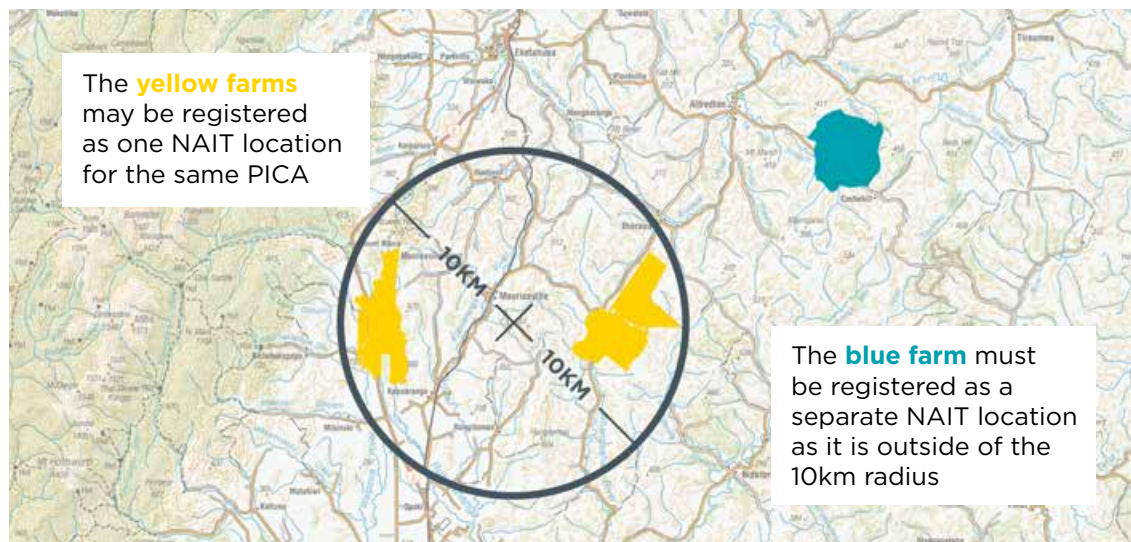
PICAs must register every location where they are in charge of NAIT animals. These are called NAIT locations. Event organisers (e.g. agricultural shows and rodeos) and transit stop owners must also register locations where NAIT animals will be held (even temporarily).

A NAIT location may comprise a single rating unit, or two or more contiguous or non-contiguous rating units. Where a PICA is in charge of NAIT animals on two or

more non-contiguous rating units the PICA may register these as a single NAIT location providing that part of each contiguous group of rating units fall within a circle with a 10-kilometre radius. An example can be found in Figure 4 below.

A PICA must register multiple NAIT locations, if required (i.e. where the PICA is in charge of animals at multiple locations that do not fall within a circle with a 10km radius as per Figure 4).

Figure 4: Example of registration of multiple rating units



Upon registering a NAIT location, the PICA will be supplied with a 'NAIT number' which is used to identify the NAIT location and is required when purchasing NAIT tags, registering NAIT animals and declaring animal movements.

3.1.4 Tag and register animals

A NAIT animal born on a NAIT location must be tagged within 180 days of birth or before its first movement off the NAIT location, whichever comes first. These animals must be registered with NAIT within 7 days of the end of the day that the NAIT tag was fitted.

PICAs must ensure that all NAIT animals in his or her charge are correctly fitted with a NAIT tag at all times, unless an exemption applies.

Animal registration links the animal and its birth information to its PICA and its current NAIT location and is a key component in supporting the NAIT Scheme to maintain high quality traceability information.

Throughout the life of an animal, there may be cause to require a NAIT tag to be removed. PICAs must seek authorisation from a NAIT officer or NAIT authorised person to remove and replace NAIT tags whenever the need arises (e.g. the NAIT tag cannot be read by an RFID reader).

Upon removing a NAIT tag, a new NAIT tag must be applied to the animal and the two tags (original and new) must be linked in the NAIT information system. This maintains the animal's traceability records.

If an animal loses its NAIT tag at any point (and the original tag is not known), a new NAIT tag must be applied as soon as practicable, and the animal must be registered.

3.1.5 Exemptions

PICAs are exempt from the requirement to tag and register animals in the following circumstances:

- Newborn animals less than 180 days of age (or before the animals first movement off its birth NAIT location, whichever comes first).
- The PICA has determined that it is unsafe to fit a NAIT tag.
- Fallow deer that the PICA has determined are impracticable to tag.
- Cattle or deer born on a game estate, safari park or zoo. *(Note that as a condition of the exemption PICAs are required to provide NAIT with the number of NAIT animals to which this exemption applies each year).*
- Calves less than 30 days of age that are moved from the NAIT location that they were born to a meat processing facility and stays at the facility until they die.



3.1.6 Declare all NAIT animal movements

Movements of NAIT animals must be declared by all PICAs involved in the movement. This means:

- PICAs who send NAIT animals off their NAIT location must declare the movement to NAIT Ltd
- PICAs who receive NAIT animals onto their NAIT location must declare the movement to NAIT Ltd.

Movement declarations must be made within 48 hours of the end of the day:

- of departure from the location from which the animals are moved (declared by the sending PICA), and
- of arrival at the location to which the animals are moved (declared by the receiving PICA).

All NAIT animals must be fitted with a NAIT tag prior to moving unless an exemption applies.

If a receiving PICA receives NAIT animals that are not fitted with a NAIT tag they must:

- i. notify NAIT Ltd

And either:

- ii. fit a NAIT tag and register the animal within 48 hours after the end of the day on which the animal arrived, **or**
- iii. arrange with the sending PICA for the animal to be returned.

Where a PICA is the PICA for both the origin and destination location only one movement declaration is required.

Animals that are exempt from tagging and registering can be moved in some circumstances, these are:

- unsafe to tag animals are only able to be moved to a meat processing facility, game estate, safari park or zoo
- impracticable to tag animals (fallow deer) are only exempted from the obligation to ensure these animals are fitted with a NAIT tag if they are moved to a meat processing facility, game estate safari park or zoo.

3.1.7 Exemptions

PICAs are exempt from the requirement to declare the movement of NAIT animals in the following circumstances:

- PICAs that are either:
 - an organiser of school pet days
 - transport operators or drovers when moving NAIT animals
- the sending PICA moving animals to an accredited saleyard or meat processing facility
- accredited saleyards are exempt from declaring animals moved to and from a saleyard when the saleyard is used as a transit stop
- movements between two NAIT locations on the Chatham Islands.

Persons are exempt from the obligation to ensure that NAIT animals moved are fitted with a NAIT tag in the following circumstances:

- Transport operators and drovers that have a declaration from the sending PICA that the animals have been fitted with NAIT tags and registered with NAIT.
- Calves less than 30 days of age that are moved from the NAIT location that they were born to a meat processing facility and stay at the facility until they die.

3.1.8 Declare death, loss, or export

PICAs must declare the death or loss of NAIT animals within 48 hours after the end of the day on which the animal is slaughtered or the PICA first knows the animal has died or is lost.

PICAs must declare the export of animals at the port of export before the animal leaves New Zealand.

3.1.9 Declaration of certain livestock that are not NAIT animals

PICAs must declare the number of alpacas, emus, goats, llamas, ostriches, pigs and sheep farmed or held on their NAIT location(s) on or by 31 July of each year.

3.1.10 Keep NAIT records up-to-date

PICAs must ensure their NAIT records are correct at the time they are provided and are kept up-to-date. PICAs must update their NAIT records within 30 days of any change occurring to information supplied.

3.2 Responsibilities of Information Providers and Accredited Entities

Information providers and accredited entities (meat processors and saleyards) can assist PICAs with providing animal identification and traceability information in the following ways:

- Information providers can provide information to NAIT Ltd on behalf of a PICA.
- PICAs sending a NAIT animal to an accredited saleyard or meat processor are exempt from the obligation to declare an animal movement.

NAIT Ltd outlines the additional criteria that is required for an entity or information provider to become accredited in their accreditation standards.

Accredited information providers, saleyards and meat processors must comply, at all times, with the standards issued by NAIT Ltd. The main obligations set out in the standards include, but are not limited to, the following:

- Timely submission and management of NAIT data.
- Information system and security requirements.
- Performance requirements.
- Operational requirements and disaster recovery.
- People capability and training requirements.
- User role definitions and expectations.

Accredited information providers, saleyards, and meat processors may assist PICAs to meet their NAIT obligations as described below:

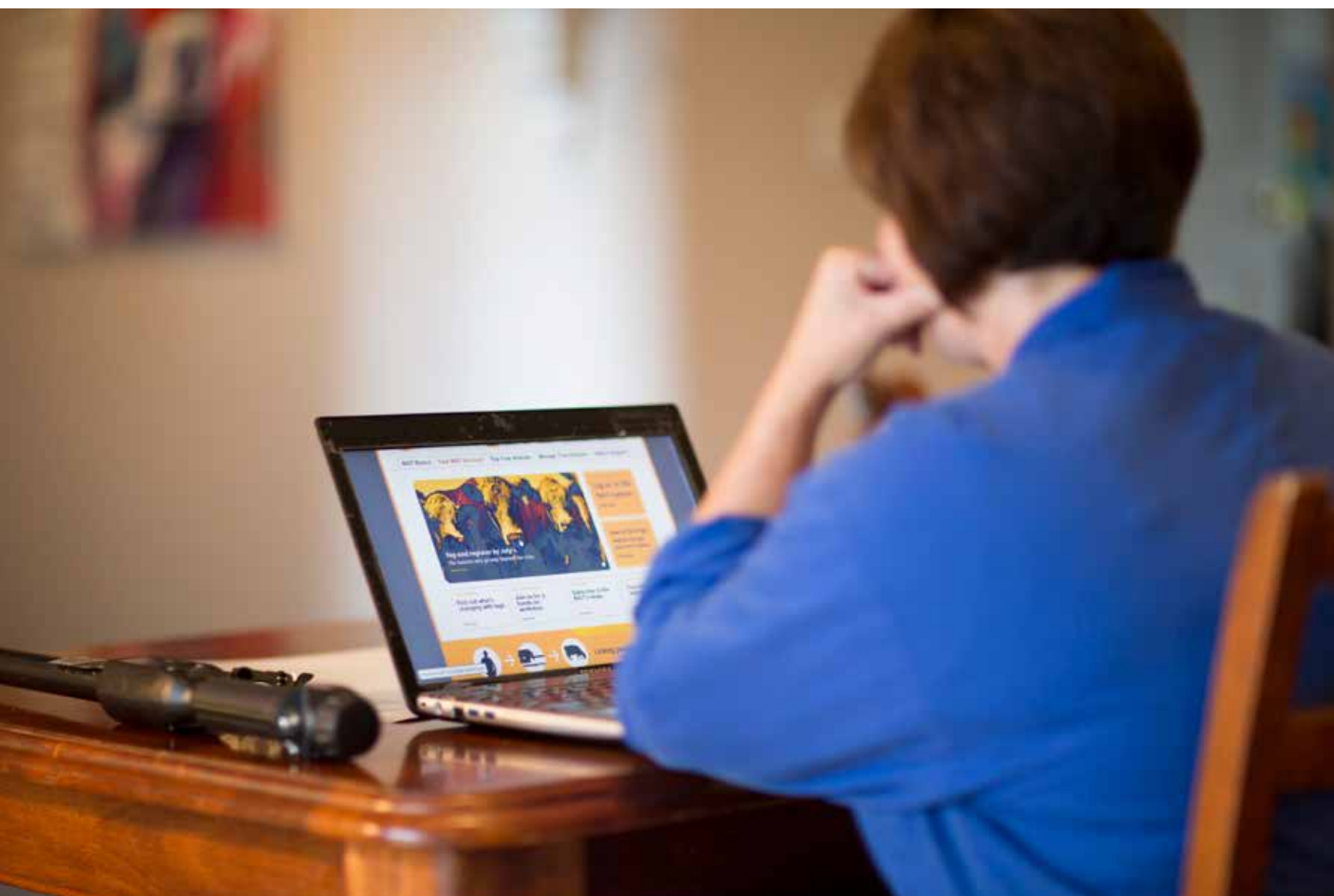
3.2.1 Information Providers

Information Providers are organisations or persons accredited by NAIT Ltd to assist PICAs with fulfilling their NAIT obligations. Many accredited information providers link their software system with the NAIT Information System for the purposes of importing and editing traceability information on behalf of a PICA.

Information Providers may perform one or more of the following functions or duties on behalf of a PICA:

- Carrying out NAIT animal registrations.
- Declaring NAIT animals' movements.
- Providing information to NAIT Ltd.
- Notifying NAIT Ltd when NAIT animals die, are lost or exported live.
- Registering a person as a PICA or PICA delegate.

Information Providers must have a contract with each PICA that they act on behalf of that outlines that permission has been granted by the PICA for the Information Provider to access and manage the PICAs NAIT information via the NAIT information system (or their own system that links to the NAIT information system).



PICAs remain legally responsible for ensuring they have met their NAIT Scheme obligations, even when using an information provider.

3.2.2 Saleyards

Saleyards that deal with NAIT animals may be accredited by NAIT Ltd as an accredited entity dealing in NAIT animals. When sending NAIT animals directly to an accredited saleyard the sending PICA is exempt from the obligation to declare the movement to that saleyard.

When receiving animals from an accredited saleyard, the receiving PICA remains obligated to declare the receiving movement within 48 hours after the end of the day of arrival at the location to which the animals are moved.

3.2.3 Meat processors

Meat processors that deal with NAIT animals may be accredited by NAIT Ltd as accredited entity dealing in NAIT animals. When sending NAIT animals directly to an accredited meat processor the sending PICA is exempt from the obligation to declare the movement to that meat processor.

3.3 Responsibilities of manufacturers of approved NAIT tags

Tag manufacturers may be approved by NAIT Ltd to supply NAIT tags for the purposes of identifying NAIT animals.

NAIT tag manufacturers are required to demonstrate that their ear tags meet the specifications of the Animal Identification Device standard prior to receipt of approval to supply NAIT tags.

Some of the performance requirements that ear tags must demonstrate they meet include, but are not limited to, the following:

- Electronic readability.
- Visual readability.
- Tensile strength.
- Resistance to tampering.
- Temperature resistance (cold, dry heat, damp heat).

Prospective NAIT tags are also required to undergo three years of field trials on a minimum of three farms located in geographically and climatically different areas of New Zealand.⁵ The purpose of field trials is to test tag retention and readability in a live farming environment.

⁵ Applicants may apply for acceptance of results from field trials performed in other countries as long as these trials were conducted in equivalent conditions. Acceptance of results from international field trials is limited to a third of the number of tags that are to be trialled in New Zealand (i.e. reducing the number of tags to remain in the full trial in NZ from 1200 to 800).

3.4 Responsibilities of NAIT Ltd

NAIT Ltd has a duty to administer the NAIT Scheme, this includes engaging with stakeholders and the collection of levies to fund the scheme.

Fundamental to administering the scheme is the provision of services and resources that assist PICAs with meeting their NAIT obligations.

NAIT Ltd focus areas are:

- ease of use and system integration
- helping farmers and industry to comply
- partnering with the wider biosecurity system.

Activities planned for the 2024/25-year focus on these three areas as well as preparing the business case for the 2025/28 period.

NAIT Ltd provides the following resources and services to the farming sector.

3.4.1 The NAIT information system

NAIT Ltd is responsible for maintaining the NAIT information system that enables:

- receipt of animal identification and traceability information from PICAs
- integrations with software systems operated by accredited information providers and entities
- storage of animal identification and traceability information, and
- the supply of animal identification and traceability information for approved purposes.

NAIT Ltd is responsible for processing applications for access to NAIT information system data, and for granting access for purposes specified by the NAIT Act including biosecurity, food safety, human health and market access purposes.

3.4.2 Provision of information and education

NAIT Ltd provides PICAs with access to information and education to inform them of their obligations under the NAIT Scheme. NAIT Ltd meets this obligation by providing the following services:

- **Website:** NAIT Ltd publishes educational material, such as training modules, as well as general information about the NAIT Scheme on its website. The website also contains printable user guides, tutorial videos, news articles and contact information for NAIT Ltd.
- **Marketing and communications:** NAIT Ltd runs targeted, frequent, timely and educational marketing campaigns throughout the year providing PICAs with relevant information across a variety of electronic platforms (including email and social media) and post mail.
- **Support Centre:** Operating a dedicated Support Centre with knowledgeable staff who can assist with general queries and with meeting NAIT obligations on behalf of a PICA.
- **Regional presence:** A network of regionally based support staff who provide local support options to PICAs who need information or assistance including hosting:
 - drop-in sessions held throughout the country where tailored, one to one assistance is provided, and
 - regional presence at agricultural events and joint events with industry partners, such as Fieldays.

3.4.3 Issuing of standards to support the NAIT Scheme

NAIT Ltd is responsible for ensuring that the animal identification devices (NAIT tags) and accredited services provided by third parties support the effective operation of the NAIT Scheme.

The NAIT Act allows NAIT Ltd to accredit information providers, saleyards and meat processors if they meet the criteria and conditions outlined in the standards issued by NAIT Ltd. The standards are set by NAIT Ltd.

NAIT Ltd is responsible for ensuring that information providers and accredited entities (saleyards and meat processors) that carry out functions or duties on behalf of PICAs:

- Employ or contract persons with the relevant competencies.
- Have appropriate resources, including hardware and software systems.
- Meet the requirements of regulations and standards made under the NAIT Act.
- Have signed a data sharing agreement with NAIT Ltd that provides for data management, protection of personal privacy, and data security.

The NAIT Act allows NAIT Ltd to issue an animal identification standard which outlines the specific requirements for any identification device (NAIT tag) that is part of the NAIT Scheme. NAIT Ltd is responsible for ensuring that approved NAIT tags provide unique, clear, and lasting identification of animals.

3.4.4 Monitoring, compliance and enforcement

NAIT Ltd and MPI are jointly responsible for monitoring PICA, approved NAIT tag manufacturer, and accredited information provider compliance with their NAIT Scheme obligations as well as implementing the compliance and enforcement strategy for the NAIT Scheme.

3.4.5 Monitoring

NAIT Ltd is responsible for monitoring PICA compliance with their obligations. NAIT Ltd monitors PICA registrations and declarations, assesses reports of suspected noncompliance, and may refer cases to MPI for further investigation.

Particular attention is paid to:

- analysis of NAIT data to identify instances when a NAIT animal has been involved in a movement prior to registration (failure to register)
- undeclared animal movements
- Any other report of non-compliance received.

NAIT Ltd and MPI staff also monitor NAIT compliance through having an intermittent presence at meat processors and saleyards.

NAIT Ltd is also responsible for monitoring information provider, accredited entity and tag manufacturer compliance with its standards, rules, and guidelines. Once these entities or products (i.e. NAIT tags) receive accreditation/approval with the NAIT Scheme, NAIT Ltd responds to issues raised by PICAs in relation to their performance.

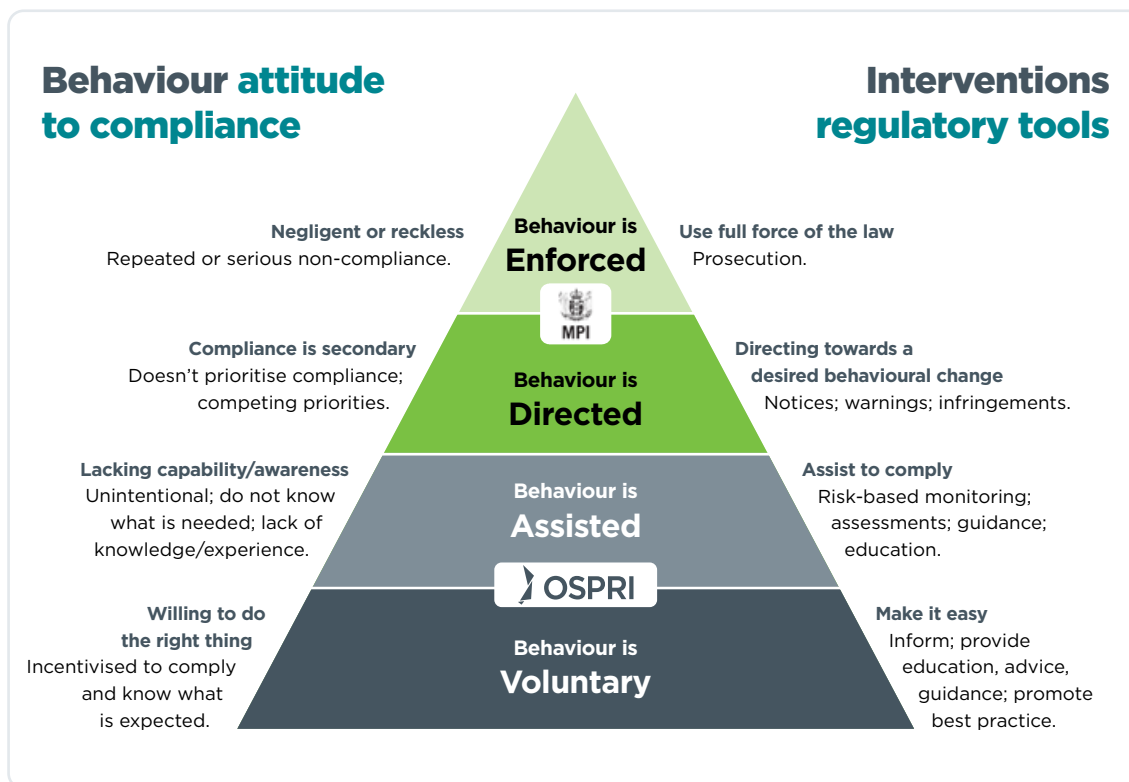
Information providers and accredited entities are also audited every three to five years to ensure they remain compliant with the relevant standards.

3.4.6 Compliance and enforcement

NAIT Ltd has a responsibility to undertake compliance and enforcement functions for the NAIT Scheme. MPI (on behalf of the Crown) may also undertake compliance and enforcement functions under the NAIT Act.

NAIT Ltd and MPI take a joint approach to enforcement using the VADE (Voluntary, Assisted, Directed, Enforced) compliance model to ensure that the enforcement approach encourages PICA awareness of their obligations, and is evidence informed, transparent, risk based and proportionate.

Figure 5: The VADE model



NAIT Ltd's primary role in compliance enforcement is to undertake the Voluntary (V) and Assisted (A) functions. These include ensuring key information and education is available to PICAs so that they can easily comply with their obligations. It also involves intervening early when NAIT Ltd becomes aware of instances where PICAs require, or will likely require, additional assistance with meeting their NAIT obligations. A list of the activities and services that NAIT Ltd provides that align with these functions can be found in Appendix B.



MPI is responsible for the Directed (D) and Enforced (E) functions within the VADE model. These include responding to more serious and/or repeated instances of non-compliance can involve issuing warnings, infringements and taking prosecutions as and when required.

The primary focus of NAIT Ltd and MPI's enforcement approach is to maximise the proportion of PICAs that voluntarily comply with their NAIT Scheme obligations. NAIT Ltd seeks to maximise voluntary compliance through the provision of information, education, standards and systems make it easy for PICAs to comply. When monitoring activities detect non-compliances NAIT Ltd and MPI apply Assisted, Directed, and Enforced approaches as summarised below.

NAIT Ltd and MPI apply the following principles when considering compliance and enforcement interventions:

- **Consistency of process:** Our actions will be consistent with the legislation and within our powers. Compliance and enforcement interventions will be consistent and predictable in similar circumstances.
- **Fairness and proportionality:** We will apply regulatory interventions and actions appropriate for the situation. We will use our discretion justifiably and ensure that our interventions are appropriate in the circumstances and that our interventions and actions are proportionate to the risks posed to NAIT Scheme outcomes.
- **Based in evidence:** We will use an evidence based and informed approach to our decision making.
- **Outcomes focused:** We will focus on the most important issues to achieve the best traceability outcomes.
- **Responsive and effective:** We will consider all alleged non-compliance to determine any actions required to minimise its impact on the integrity of the NAIT Scheme.

3.4.7 Assisted compliance

Assisted compliance comprises activities that increase PICA awareness of their obligations and their enforcement. It is reliant on the detection of non-compliances by monitoring activities. The focus of assisted compliance activities is to advise PICAs that there is a compliance issue to be addressed and provide guidance for how they can seek assistance to become voluntarily compliant in the future. Assisted compliance also reminds PICA's that their compliance is being monitored and informs them that continued non-compliance will result in formal direction or sanction.

3.4.8 Directed compliance

Directed compliance refers to use of legal powers by NAIT Officers and Authorised Persons to 'direct' a person to do something in order to achieve a behavioural change or an action required for the PICA to become compliant with the NAIT Act. It includes the use of warnings, infringement notices and notices of direction.

3.4.9 Enforced compliance

Enforced compliance includes the application of the full extent of the law. Enforced compliance may be applied due to continued non-compliance following application of earlier components of the VADE model. However, it may also be the appropriate initial intervention in cases where PICA's have deliberately chosen to break the law or where the facts of the case make a lesser intervention inappropriate. Such cases are formally investigated with a view to prosecution.



4. Operational policies

4.1 NAIT Information System

NAIT Ltd aims for the NAIT information system to be fully accessible by PICAs at least 99.3% of the time.

Expected outages and maintenance: If the NAIT information system needs to be taken down for routine maintenance, the following process is followed:

- The outage window is communicated to and approved by the Head of Traceability.
 - The standard outage window is Sundays 09:00am – 12:00pm.
- Communications of the outage window is made to the public via the OSPRI website and on the NAIT information system login page.
- Targeted communications of the outage window are sent to users determined to have higher than average use of the NAIT information system (e.g. accredited entities).

4.2 NAIT data applications

All applications for access to NAIT data are assessed by the NAIT System Administrator.

NAIT System administrator role: The NAIT system administrator (administrator) is a statutory appointment under s39(b) of the NAIT Act, the purpose of this role is to manage access to NAIT data and the NAIT information system.

NAIT data access panel: A panel of persons possessing specialist expertise in both the livestock industry and privacy law. NAIT data access panel (panel) members are appointed by the NAIT Organisation for the purposes of handling NAIT data access requests.

NAIT core data: NAIT core data is defined as information required to be provided under the NAIT Act, or regulations made under the NAIT Act, to the NAIT organisation.

Application process: Any New Zealand citizen, resident or body corporate can apply for access to NAIT core data. The application must be made to the administrator and must include the details as prescribed in the NAIT data access request form.

The administrator will assess all applications for NAIT data in the first instance to ensure the following:

- The applicant has requested the data for a purpose of holding core data, as listed in s40 of the NAIT Act. If the application is for a purpose not listed in s40, it will not be approved. S40 purposes are as follows:
 - a) to enable the NAIT Organisation, a NAIT officer, or a NAIT authorised person to exercise their powers and carry out their functions and duties to assist other persons with duties under this Act to carry out their duties
 - b) to facilitate the purposes of the **Animal Products Act 1999, Animal Welfare Act 1999, Biosecurity Act 1993, Commodity Levies Act 1990, Primary Products Marketing Act 1953**, and any other enactment relating to animals or animal health
 - c) to respond to the following human health issues:
 - i. food residues associated with animals
 - ii. food-borne diseases associated with animals
 - iii. diseases transferable between animals and humans
 - d) to provide data supporting productivity, market assurance, and trading requirements
 - e) to respond to natural disasters or requests from emergency services when rapid access to data on animals and people is needed to manage risks to the lives and welfare of animals and people
 - f) to provide statistical data for policy development and related advice about the industries to which this Act applies
 - g) to enable the NAIT organisation to publish general agricultural statistics under **section 49**
 - h) to provide data to enable a potential purchaser of a NAIT animal to trace the location history of the animal over its life
 - i) to respond, or assist others with duties to respond, to inquiries about theft of NAIT animals, wandering NAIT animals, or NAIT animals found dead in public places.
- Whether the application can be determined by the NAIT system administrator alone or whether the NAIT data access panel is required to determine the application.
 - Applications for information about a persons own information, or an animal that the person is the PICA for, must be determined by the administrator.
 - The following applications must be referred to the panel:
 - applications from OSPRI NZ Ltd, TBfree or *M. bovis* Free
 - applications that seek direct logon access to the NAIT System
 - applications for data that is to be provided for an indefinite period of time

- applications that seek bulk data that is not specific to a PICA, individual movement, or animal (i.e. data for all animals or all movements of a particular type)
- applications where it is uncertain whether release of the data is reasonably necessary for a purpose set out in s40 of the NAIT Act
- others where the Administrator believes the application is of significance to the industry.

The application will either be approved in full, approved in part or declined by the administrator or panel.

The release of NAIT data may be required outside of the standard application process if the NAIT Organisation is presented with a production order or other legal instrument used to gather information from organisations (e.g. court order).

4.2.1 Complaints procedure

If an applicant for NAIT data is not satisfied with the outcome of their application (determined by either the panel or administrator), they can submit a written complaint and request a review of the decision.

After receiving a formal complaint, the administrator has the option of reviewing the original determination themselves or of referring the complaint to the panel for review.

The administrator must notify the panel of all complaints received for an administrator decision.

The administrator or panel must provide the applicant with the outcome of a reconsideration within 15 working days.

If the applicant is not satisfied with the outcome of the review, they can request that the decision is reconsidered by the NAIT board.

Review by the NAIT board: If requested, the NAIT board will review all relevant documentation relating to the original application as well as any additional information provided throughout the review process. The NAIT board may appoint an independent reviewer of the decision. The NAIT board will then provide the panel and administrator with their recommendation on whether the decision should be upheld or amended.

The panel will then inform the applicant of their final decision.

4.3 Issuing of NAIT standards, and guidelines

The NAIT Organisation has issued the following standards and guideline as required under the NAIT Act, these are classed as secondary legislation:

- **NAIT Animal Identification Device Standard** (device standard).
- **NAIT identification device approval guidelines** (guidelines).
- **Accreditation of information providers.**
- **Accreditation of entities dealing with NAIT animals.**
- **NAIT identification system standard.**

NAIT Ltd periodically reviews these standards and guidelines as well as the potential need for any new standard or guideline to be issued. If NAIT Ltd believes a new standard, rule or guideline is required it will be drafted in collaboration with any potentially affected parties (or their representatives) as and when required.

When NAIT Ltd is satisfied that the new standard is efficient, effective, and appropriate, it will be put out for consultation.

Prior to issuing a new standard, or amending/revoking an existing standard, NAIT Ltd will consult all persons that they reasonably consider to be representative of the interests of those who are likely to be affected by the standard.

4.3.1 Approval of NAIT devices

NAIT Ltd manages requests from tag manufacturers seeking approval of their products (ear tag) for use within the NAIT Scheme under the device standard and NAIT identification device approval guidelines as and when they are received.

Once conformance with the device standard and guidelines have been established, NAIT Ltd will enable the new NAIT tag to be uploaded into the NAIT information system for use as an approved NAIT tag.

4.3.2 Accreditation of information providers and entities dealing with NAIT animals

NAIT Ltd manages applications for accreditation under the accreditation of information providers and accreditation of entities dealing with NAIT animals standards as and when they are received.



The accreditation process requires people with a NAIT login at the accredited organisation to complete online education modules on NAIT, biosecurity and their obligations as accredited providers. In addition, independent auditors complete a full evaluation of the organisation against the standards. This provides assurance that accredited organisations meet the standards.⁶

When accreditation is approved, the NAIT system administrator will approve access to the NAIT information system (and the data within it) for the accredited organisation. Access to NAIT data is reasonably necessary to assist other persons with duties under the NAIT Act (s40(1)(b)).

Upon receipt of an application for accreditation, NAIT Ltd will determine the appropriate fee payable by the applicant.⁷

Accredited organisations are monitored by NAIT to ensure they continue to meet the standards during their period of accreditation. Any performance issues are managed in accordance with section 7 of the standards. Accreditation must be renewed every 3-5 years, at which point, the organisation will go through the independent audit process again.

4.4 Monitoring compliance with NAIT Scheme

NAIT Ltd and MPI takes an intelligence-led approach to monitoring compliance with NAIT obligations. This supports NAIT Ltd and MPI to make robust, easily justifiable decisions based on data and information. NAIT Ltd's intelligence function carries out monitoring activities for the NAIT Scheme and provides recommendations to allow NAIT Ltd and MPI based on findings. These recommendations are used to prioritise further investigations and compliance and enforcement work.

Key sources of information include:

- **NAIT data:** this is analysis of the data held within the NAIT information system. Monitoring of NAIT data involves identifying gaps, inconsistencies and patterns that may indicate the presence of a compliance or behavioural issue
- **information from people:** NAIT Ltd also becomes aware of instances of non-compliance through people, including members of the public, who lay complaints or express concerns about NAIT compliance.

NAIT Ltd prioritises:

- the needs of statutory disease management programmes (e.g. national eradication of bovine TB and *Mycoplasma bovis*)
- unregistered animals declared in an animal movement
- undeclared animal movements
- any other report of non-compliance received.

4.4.1 Monitoring compliance with NAIT Scheme

Where monitoring activities have detected the potential presence of non-compliance with the NAIT Scheme, further investigation is required to determine if a breach has occurred. Investigation may be carried out by either NAIT Ltd or MPI staff, depending

⁶ The 4 standards currently in place are: NAIT Identification System Standard; NAIT Standard - Animal Identification System; NAIT Standard - Accreditation of Entities Dealing with NAIT Animals; NAIT Standard - Accreditation of Information Providers.

⁷ Pursuant to Cl 4A of the National Animal Identification and Tracing (Fees and Forms) Regulation 2012 www.legislation.govt.nz/regulation/public/2012/0114/latest/LMS298295.html.

on the situation and may involve the use of powers to investigate as detailed in schedule 2 of the NAIT Act. These are:

- **production of information:** a NAIT Authorised person or NAIT Officer may direct any person to provide details (including their own personal details), information or documents and to answer any relevant questions to the investigation⁸
- **inspecting and auditing of NAIT core data:** a NAIT Officer may inspect or audit NAIT core data at any time for the purpose of ascertaining compliance with the obligations set out in the NAIT Act
- **power to determine status of a person as a PICA:** if a location has no registered PICA, a NAIT officer must determine who the PICA is for that NAIT location
- **power of entry without warrant for inspection:** at any reasonable time, a NAIT Officer or NAIT authorised person may enter and inspect a place (e.g. a farm) without a warrant in order to ascertain compliance with the NAIT Act.⁹

4.4.2 Monitoring of PICAs (farmers)

The below describes NAIT Ltd and MPIs policies for monitoring PICA farmer non-compliance with the NAIT Scheme.

Unregistered PICAs and NAIT locations: NAIT Ltd and MPI follow up on reports and instances of potentially unregistered PICAs and NAIT locations as they are made aware of them. This includes assessing the credibility of the report as well as any other related factors and may involve a NAIT officer determining who is the PICA for a location.

Where appropriate, the Support Centre will attempt to contact unregistered PICAs and/or PICAs of unregistered locations in the first instance.

Identify and register NAIT animals: Monitoring of PICA obligations to identify (with a NAIT tag) and register NAIT animals involves the following:

- Reports are produced that identify instances when a NAIT animal has been involved in a movement prior to registration (failure to register). These reports are supplied to MPI for compliance and enforcement action.
- NAIT Ltd and MPI follow up on instances of untagged NAIT animals received at a NAIT location.
- NAIT Ltd and MPI staff have a presence at meat processors and saleyards where they can observe and investigate instances of untagged and unregistered NAIT animals received at these sites.

Declare NAIT animal movements: NAIT Ltd and MPI monitor NAIT movement declarations by analysing NAIT data to identify NAIT locations that have outstanding NAIT movements associated with them (pending movements) as well as identifying where a NAIT animal has gaps in its movement history caused by undeclared animal movements.

NAIT Ltd and MPI also investigate NAIT movement discrepancies as they are reported.

Keep NAIT up-to-date (including declare animal death, loss and live export):

NAIT Ltd and MPI will follow up on reported instances of non-compliance with the obligation to keep NAIT information up-to-date. In cases where a PICA cannot be contacted by the Support Centre or where further investigation is required, these instances may be escalated to MPI for further investigation.

⁸ Any requirement to provide information must be reasonably necessary for the purpose of determining whether a person is complying with the NAIT Act.

⁹ Note: this does not include a dwellinghouse or marae or any building associated with a marae without express consent of the occupier or a search warrant.

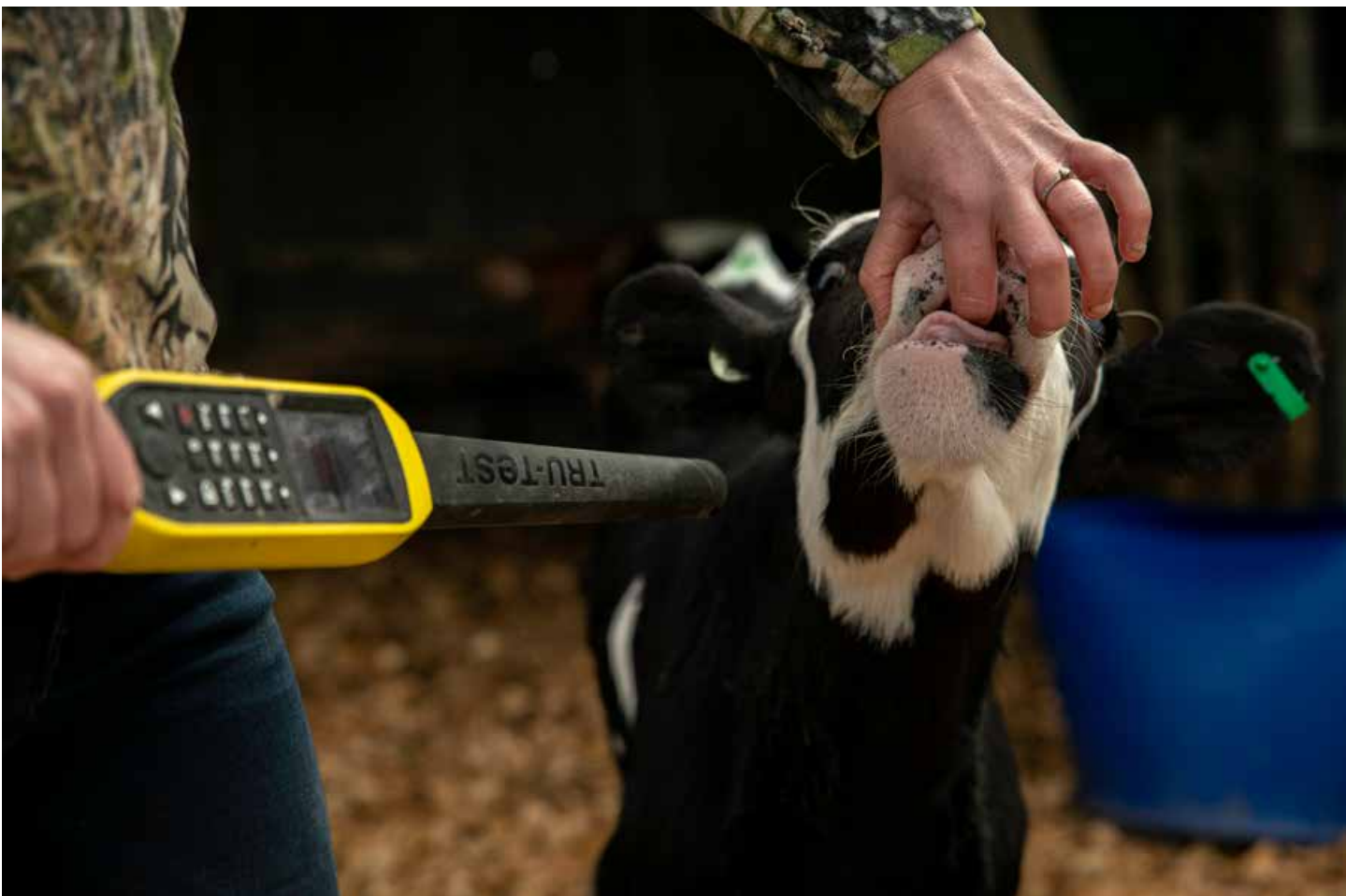
4.4.3 Monitoring of accredited information providers and entities dealing in NAIT animals

Entities and information providers seeking accreditation are required to undergo NAIT Scheme and NAIT information system training and demonstrate that their internal systems, processes and policies allow for them to achieve the requirements set out in the NAIT Act and relevant standards.

Instances of non-compliance with the NAIT Act and/or non-conformance with NAIT standards are investigated as they are reported. NAIT Ltd and/or MPI will investigate when an accredited entity has made an incorrect declaration (e.g. a movement) relating to NAIT animals with a view to correcting the information. Repeated and ongoing compliance issues will be investigated further and the entity or information provider may be subject to further auditing and/or compliance and enforcement intervention.

NAIT Ltd and/or MPI staff have a presence at meat processors and saleyards where they can observe the day-to-day operations and monitor NAIT compliance.

Further to this, once they become accredited, entities and information providers are subject to regular audits, every 3-5 years, to ensure compliance with the NAIT Act and standards is maintained. In some cases, for example where entities are new and are unable to demonstrate long standing implementation of policies, auditing may be required after 1 year to maintain their accredited status.



Where previous non-conformance with the standard has been detected, and subsequently corrected, a specific audit will take place to ensure ongoing conformance with the relevant clauses of the standard.

4.4.4 Monitoring of manufacturers of approved NAIT tags

At the point of application for NAIT tag approval, tag manufacturers must be able to demonstrate that they can meet the requirements outlined in both the NAIT device standard and guidelines.

Once NAIT tags are approved for supply, NAIT Ltd monitors non-conformance with the standards through a complaints process where PICAs can provide details about issues they have experienced with NAIT tags (e.g. retention, readability, durability or other performance issues). These complaints are passed on to tag manufacturers directly for investigation and response with NAIT Ltd's involvement if required.

4.4.5 Compliance and enforcement

NAIT Ltd and MPI jointly undertake compliance and enforcement functions under the NAIT Act. The VADE model is applied for each instance of detected non-compliance. Depending on the circumstances surrounding the non-compliance, the offending person will either receive assisted, directed, or enforced interventions. Factors considered when determining the appropriate intervention include (but are not limited to):

- the severity of the non-compliance
- the person's attitude and willingness to comply
- the person's ability to comply
- previous instances of non-compliance.

Appendix B outlines the services and tools that NAIT Ltd provides to support PICAs to achieve voluntary compliance with the NAIT Scheme.

When it is deemed appropriate to assist a PICA in response to detected non-compliance, NAIT Ltd and MPI will make efforts to educate PICAs to ensure they are aware of their obligations, are taught how to comply and are urged towards ongoing compliance.

In cases where voluntary and assisted interventions have not been effective, or when a NAIT Officer has determined that assisted interventions are not appropriate, directed and/or enforced interventions will be used.

Directed activities include warnings, infringements and any directions made by a NAIT Officer to enable compliance with the NAIT Act.

Enforced interventions are utilised in serious and repeated cases of non-compliance with the NAIT Act. MPI NAIT Officers are responsible for undertaking these interventions in line with MPI's organisational policies and advice from the Solicitor General. Enforced interventions involve commencing prosecutions.

The two-part test: Issuing infringement notices and commencing prosecutions may only be done if they meet the two-part test outlined in the Solicitors-Generals Prosecution guidelines:

- **evidential sufficiency:** meaning there is available and admissible evidence sufficient to provide a reasonable prospect of conviction; and
- **public interest:** meaning prosecution is required by the public interest.

Consideration of the following (and other) factors will be included in determining whether an infringement notice can be issued, or a prosecution should commence:

- the seriousness of the offending
- if the offending is likely to be continued
- evidence of previous offending (e.g. warnings or infringements)
- the presence of extenuating or mitigating circumstances which mean that a prosecution is not in the public interest.

Written warning: Warnings are issued in instances where lower levels of offending are detected and the NAIT Officer has determined that higher interventions are not appropriate. A written warning must not be issued unless the issuing NAIT Officer is satisfied that the offence has been committed and could be proved in court, but that it is not in the public interest to issue an infringement notice.

Issuing infringement notices: Where an infringement offence¹⁰ is detected, and the NAIT Officer in charge has determined that issuing an official warning is not considered to be appropriate, the NAIT Officer may issue an infringement notice to the offending person in accordance with the NAIT Act.

Prosecution: Prosecution may be commenced in cases of serious and/or repeated non-compliance and where the two-part test can be met. Additional to this, the prosecution decision maker must also consider:

- MPI's statutory objectives and enforcement priorities
- alternatives to prosecution (such as directive options)
- any relevant statutory timeframes
- resources available to MPI and the likely length and cost of a prosecution relative to the public interest.

MPI's detailed prosecutions and infringements policy can be found here:

www.mpi.govt.nz/dmsdocument/16279-MPI-Organisational-Prosecutions-and-Infringements-Policy

¹⁰ A list of infringement offences can be found in schedule 1 of the National Animal Identification and Tracing (Infringement Offences) Regulations 2012 (www.legislation.govt.nz/regulation/public/2012/0396/latest/DLM4920511.html) and in the Offences and Penalties section of this NOP.

Appendix A – NAIT Ltd Programme of Work 2024/25

The programme of work 2024/25 described in the table below complements the NAIT National Operations Plan (NOP) 2024/25. It includes both business as usual activities required to implement the NAIT Scheme and projects and initiatives required to improve NAIT Ltd's ability to implement the NAIT Scheme as described in the Traceability Operational Strategy (2022-2025).

The activities included in the programme of work have been grouped according to the key focus areas for the Traceability Operational Strategy 2022-2025. These focus areas are:

- ease-of-use and system integration
- helping farmers and industry to comply
- partnering with the wider biosecurity system.



Priority	Activities
Focus area: Ease of use and system integration	
Deliver and implement an easy-to-use and fit for purpose information systems to support the implementation of the NAIT Scheme	<ul style="list-style-type: none"> • Support the independent technology review of OSPRI's ISSP programme to deliver fit for purpose and easy-to-use information systems that significantly improve the implementation of the NAIT Scheme. Successful implementation will include supporting business changes including: <ul style="list-style-type: none"> • Development and consultation of a Third-Party Software Standard. • Education, communication and marketing materials to support the roll-out of the new systems.
Integration with wider systems and processes	<ul style="list-style-type: none"> • Continue to work with MPI and stakeholders to identify potential integration opportunities to support biosecurity, food safety and market access outcomes.
Focus area: Helping farmers and industry to comply	
Helping farmers and industry to comply with their NAIT obligations	<ul style="list-style-type: none"> • Continue to assist farmers through the OSPRI Support Centre. • Provide support to farmers through presence at agricultural shows, field days and saleyards. • Continuous improvement of services provided to customers through case management, training and recording standard practices in the knowledge base. • Continue to develop communications material on how farmers and others can best understand and meet their NAIT obligations. • Implement five key industry campaigns, including distributing key messages and calls to action through our partners: <ul style="list-style-type: none"> • Moving day. • Beef calving. • Dairy calving. • Breeding bull sales. • Deer weaning. • Regional drop-in centres providing tailored one-to-one assistance. • Regional workshops and education sessions. • Continued access to education materials (online training modules) for information providers and entities dealing in with NAIT animals.
Intelligence in support of regulatory compliance	<ul style="list-style-type: none"> • Continued provision of regional reporting dashboards to Regional Partners. • Continued provision of regulatory intelligence in support of the joint MPI/NAIT compliance plan. • Initiate delivery of new regulatory intelligence enabling greater focus on non-compliance with movement declaration obligations.

Priority	Activities
Focus area: Partnering with the biosecurity system	
Industry partnerships	<ul style="list-style-type: none"> • Continue to engage with our Technical Reference Groups to enable industry representatives to provide: <ul style="list-style-type: none"> • advice about participants experience of the NAIT Scheme • opportunity to raise traceability issues affecting industry.
On-farm audit programme	<ul style="list-style-type: none"> • Implement the on-farm audit programme as agreed with funding agencies. • Implement new reconciliation tools and associated collateral to increase NAIT Ltd's capacity to assist famers to reconcile their NAIT accounts.
Accreditation of information providers and entities dealing in NAIT animals	<ul style="list-style-type: none"> • Monitor and maintain NAIT Standards and Guidelines. • Review the approach to implementing the: <ul style="list-style-type: none"> • Accreditation of Entities Dealing in NAIT Animals Standard. • Accreditation of Information Provider Standard. • Audit and accredit information providers and entities dealing in NAIT animals. • Monitor the performance of accredited entities.
Programme management and administration	
Traceability Operational Strategy	<ul style="list-style-type: none"> • Develop a Triennial Business Case that enables Funding Agencies and NAIT Ltd to: <ul style="list-style-type: none"> • agree the approach to implementing the NAIT Scheme for the next three-year period inclusive of any projects and initiatives required • determine the appropriate level of Industry and Crown funding required to implement the agreed approach to implementing the NAIT Scheme.
Financial review	<ul style="list-style-type: none"> • Provide the Minister with supporting information required to conduct a three-year review specified by section 57 of the NAIT Act.

Appendix B – Voluntary and assisted interventions

NAIT Ltd supports PICAs to achieve voluntary compliance through the provision of services, information, education and training. This includes:

Voluntary interventions:

- The NAIT information system, allowing PICAs to meet all their NAIT obligations at any time online.
- NAIT Ltd regional operating model enhances its presence in the regions and allows for on the ground support to be provided through regional support staff. NAIT Ltd has a presence at key farming events including field days and local agricultural shows as well as operating regular workshops, drop-in centres, and other events for the purposes of supporting PICAs in their local community with fulfilling their NAIT obligations.
- Online educational materials that are available through the website.
 - Educational materials are available in multiple formats including full system user guides, one-page fact sheets, tutorial videos providing system walk-throughs and online based self-guided learning modules.
- Education provided through national communications campaigns that are run in line with the farming calendar to support PICAs during busy times of the year. These include moving day, beef calving, dairy calving, breeding bull sales and deer weaner sales.
 - NAIT Ltd also sends targeted communications in response to events (e.g. severe weather events) to inform PICAs of relevant information in a timely manner.
- Providing ‘starter packs’ to newly registered PICAs to provide information and guidance about their role as a PICA.
- Having a social media presence (posting frequent tips and updates).
- Having reminder stickers on NAIT tag order boxes to remind PICAs to register their NAIT animals after tagging.
- A NAIT tag scanner loan service operated through the Support Centre enabling access to scanners for PICAs who require it.

Assisted interventions:

- Targeted communications, engagement and support is provided to PICAs where non-compliance is detected (e.g. where a NAIT location has undeclared animal movements).
- One-on-one support provided over the phone through the OSPRI Support Centre.
- One-on-one support through regional partners (through nationwide drop-in sessions held).

