

Consultation response

NAIT Consultation

2024

1. Background

During July and August 2024, we consulted with NAIT users on their views of the current NAIT scheme and how it's put to use. Participants were asked for feedback to establish areas where we can improve.

This document provides our response to the feedback that was received.

The feedback will be used to help develop the NAIT scheme's priorities and objectives for the next three years.

2. The NAIT scheme

Having access to accurate data about livestock is crucial when dealing with an infectious disease or biosecurity threat. The NAIT scheme was established in 2012 to record accurate and up-to-date information about farmers/person in charge of animals (PICA), locations, animal identification and traceability. The NAIT scheme protects 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 collection of this data requires OSPRI to provide farmers/PICAs with access to a NAIT information system, including education, training, and support to enable farmers/PICAs to meet their obligations in addition to monitoring compliance and referring non-compliant PICAs to MPI for compliance and enforcement.

3. The consultation approach

OSPRI sought the views of NAIT users to better understand how implementation of the scheme can be improved.

The consultation received 316 responses from a wide range of participants including farmers and PICAs, meat processors, livestock transport operators, tag manufacturers, information providers, and accredited entities.

How we analysed the responses

Responses to open-ended questions were analysed using a thematic qualitative analytical method to identify common themes mentioned across the submissions.

Most submitters raised one or more issues in their feedback. An issue could be a problem or a suggested solution to a problem. The issues were summarised and grouped into themes. For most themes (e.g. the NAIT information system), there were also sub-themes (e.g. user-friendliness).

4. Feedback

While more of the 316 submissions offered positive feedback on the implementation of the NAIT scheme than negative, the responses showcased a wide range of perspectives.

- 44% of submitters responded that it was mostly easy or very easy to comply with NAIT scheme obligations versus 24% that responded it was mostly difficult or difficult.
- 68% of submitters responded that PICAs were aware or very aware of their NAIT scheme obligations versus 12% that responded they were unaware or very unaware.
- 36% of submitters responded that the NAIT support services available to assist PICAs to comply were good or very good versus 22% that responded they were poor or very poor.
- 41% of submitters responded that NAIT compliance and enforcement is effective or very effective at deterring PICA from non-compliance versus 21% that responded it was ineffective or very ineffective.

Common themes

Some aspects of the scheme attracted more feedback than others, common themes raised across all consultation questions in rank order were:

1. **NAIT information system** (mentioned in 35.0% of total responses)
2. **Current approach to compliance** (mentioned in 21.4% of total responses)
3. **Communication and education** (mentioned in 17.2% of total responses)
4. **NAIT tags** (mentioned in 13.5% of total responses)
5. **Support services** (mentioned in 8.5% of total responses)

Responses to improving the NAIT scheme

Responses to questions about opportunities to improve the NAIT scheme highlighted:

- the NAIT Information System is not sufficiently user friendly, and they find it to be a significant barrier to compliance. Specific issues highlighted included:
 - NAIT Information System integration with 3rd party software results in data inaccuracies between two systems
 - absence of a phone app that PICAs could use when offline or on farm.
- the time, effort and cost of meeting NAIT obligations is too high.
- more educational resources would be helpful, particularly walk through videos and checklists.
- NAIT tags were easily lost, and
- OSPRI Support Centre wait times, and the practicality of advice could be improved.

Submitters provided differing opinions about the use of infringement fines with similar number of submitters stating that they believe that penalties are needed to target non-compliant participants, as stated that current use of fines is heavy handed and stressful.

5. Our response

OSPRI has considered submissions, this is our response to the common themes from the consultation feedback:

- We agree that the current NAIT Information System is not sufficiently user friendly, and that the system needs to provide better integration with 3rd party software. We agree that a phone app that could be used when offline/out of signal would be useful and help with compliance. We are currently investigating the feasibility of replacing the NAIT Information System to address these issues. Our findings will be included in our draft business case that will be sent to funding agencies for approval in the first half of 2025.
- We are currently developing more educational resources for PICAs, including a series of walk through videos already [available on YouTube](#), these will be added to the OSPRI website in due course. We will also investigate the feasibility of developing an online repository that enables PICAs to quickly and easily find the information they need to assist them to comply with their obligations.
- We recognise the frustration that NAIT tag losses cause for PICAs which is why the NAIT [Animal Identification Device Standard](#) prescribes strict criteria for tag retention and readability. Our standards are set at the same or higher level than those of comparable traceability schemes in Australia, the United Kingdom and Canada. All approved NAIT tags available for purchase in New Zealand are also recognised as approved tags by comparable overseas authorities.
- While we are confident that the NAIT tags available in New Zealand represent the best RFID tags that are currently available worldwide, we acknowledge that there are opportunities to improve tag performance. We will continue to monitor international developments and innovations in RFID tags and will consider how we can improve ongoing monitoring to NAIT tag performance to ensure that any tag faults are promptly identified and addressed.
- OSPRI has employed additional Support Centre people and is actively exploring new more efficient methods to keep call waiting times within our three-minute target. We will review staff training to ensure that our advice is high-quality and reflects the realities of working on farm.

These responses will be further investigated for inclusion in the Traceability Operational Strategy for the 2025/26 to 2027/28 period. NAIT Ltd will consult on the draft strategy in the first half of 2025 prior to finalisation.

The table below answers the closed ended questions we received in the consultation feedback.



SUBMITTER THEME AND SUBTHEME	OUR RESPONSE
1. NAIT INFORMATION SYSTEM	
<p>1.1 User-friendliness of NAIT information system</p> <p>Many respondents do not find the current NAIT information system user-friendly. Many responses cited that the website is slow, clunky, and particularly difficult for older NAIT information system users or those with lower computer literacy skills. Consequently, respondents find the user-friendliness of the information system as a significant barrier to compliance.</p>	<p>We acknowledge that the current NAIT information system is not sufficiently user-friendly. We are investigating the feasibility of replacing the NAIT Information System.</p>
<p>1.2 Interoperability with third-party software</p> <p>Many respondents noted they wanted better NAIT information system integration with third-party software such as MINDA. Respondents noted the current system can create data inaccuracies between the two platforms. Respondents also noted currently MINDA can only 'speak' to NAIT and would prefer two-way communication.</p>	<p>We acknowledge there are opportunities to improve the integration of the NAIT information system with third-party software. We are investigating the feasibility of replacing the NAIT Information System.</p>
<p>1.3 Development of a NAIT app for devices</p> <p>Some respondents suggested a phone application (app) would be a useful solution to the current information system, particularly if PICAs could use it when offline and/or on-farm.</p>	<p>We acknowledge the suggestions of a phone app that will work in offline environments to enable the ability to register animals and record movements while they are out on the farm. We're investigating the feasibility of delivering a phone app as part of the replacement of the NAIT Information System.</p>
<p>1.4 Access to movement history</p> <p>Several respondents noted it is difficult to have access to past movements and animal history.</p>	<p>We understand that NAIT information system users would value having access to past movements and animal history. We will investigate the feasibility of delivering this requirement in a manner that meets the data protection requirements of both the NAIT Act 2012 and the Privacy Act 2020.</p>

<p>1.5 Difficulty recording movements in 48 hours</p> <p>Some respondents noted PICAs can struggle meet their obligation of recording NAIT animal movements within 48 hours and suggested more time would make meeting this obligation easier.</p>	<p>NAIT Ltd is the Management Agency responsible for implementing the NAIT scheme, and as such does not have the authority to change the requirement for PICAs to record animal movements within 48 hours. While we cannot change the requirements, we are investigating the feasibility of replacing the NAIT Information System which would make it easier for PICAs to meet this obligation.</p>
<p>1.6 Data inaccuracies on NAIT accounts</p> <p>Some respondents noted that there are accuracy issues in the information system as their NAIT accounts do not reflect the animals in their herds. Some respondents noted it is difficult to record dead or missing animals in the information system, which can create data inaccuracies on NAIT accounts due to 'ghost animals' or 'dead wood' on accounts. Respondents noted this creates barriers to compliance.</p>	<p>We are aware of the difficulties PICAs may have recording dead or missing animals on the current NAIT information system, which can lead to data inaccuracies on NAIT accounts. We have developed guides on our website and walk-through videos to explain this process. Website: record dead animals or record missing animals. Video: record dead animals or record missing animals.</p> <p>We have developed a new reconciliation process to assist PICAs to reconcile the animals in their herds. PICAs should contact the OSPRI Support Centre to access this service.</p> <p>We will also investigate the feasibility of making it easier for PICAs to reconcile their herds as part of replacing the NAIT Information System project.</p>
<p>1.7 Adding a 'group animals' feature</p> <p>A few responses suggested it would be useful to be able to group animals into herds or mobs on the information system as it would make reconciliations or movements easier.</p>	<p>We recognise the benefits that a 'group animals' feature could have for NAIT information system users. However, we also recognise that this feature may cause additional work for PICAs to maintain the list of animals within each group.</p> <p>This feature will be considered as part of replacing the NAIT Information System project.</p>

2. CURRENT APPROACH TO COMPLIANCE AND ENFORCEMENT

2.1 Use of penalties for non-compliance

Although respondents provided mixed responses on the cost and frequency of fines, most responses in this sub-theme noted that they find the current use of fines heavy handed and stressful. Conversely, some responses noted that the majority of NAIT Scheme participants are compliant, and they believe penalties are needed to target non-compliant participants.

The NAIT scheme's ability to provide accurate animal identification and traceability information to protect livestock industries from biosecurity, food safety and market access threats is dependent upon the compliance of all NAIT users. Participant compliance with NAIT scheme obligations will continue to be monitored and enforced to ensure that all participants provide the animal identification and traceability information required to protect the dairy, beef and deer industries.

2.2 Burden and cost of compliance

Many respondents raised the issue that complying with the NAIT system costs NAIT scheme participants (particularly PICAs) a lot of time and money, which creates a lot of frustration for PICAs.

We acknowledge that the current NAIT information system is not sufficiently user-friendly, and this increases the compliance effort required. We are investigating the feasibility of replacing the NAIT Information System to reduce the effort required to comply with NAIT scheme obligations.

2.3 Responsibility for non-compliance

Some responses raised frustrations that they risk non-compliance penalties due to other NAIT Scheme participants' non-compliance, for example receiving animals without tags or without all animals' NAIT files included on a receiving movement. This issue was raised by both PICA and transport operator respondent categories. These responses noted they would prefer responsibility placed on those creating the sending movement or farmers and saleyard agents respectively.

The NAIT Act requires both the PICA that sends NAIT animals off their NAIT location and the PICA who receives NAIT animals onto their NAIT location to declare the movement. Each PICA is responsible for meeting their own obligations the receiving PICA is not held accountable for non-compliance by the sending PICA.

In the event that the receiving PICA receives untagged animals they are required to notify NAIT Ltd and either:

- Fit a NAIT tag and register the animal with 48 hours after the end of the day on which the animal arrived, or
- Arrange with the sending PICA for the animal to be returned.

We will ensure that notifications of receipt of untagged animals are referred to the Ministry for Primary Industries Compliance and Enforcement team.

<p>2.4 Understanding causes of non-compliance</p> <p>Some responses noted they feel the NAIT Scheme does not have an understanding or flexible approach to non-compliance and suggested cases of non-compliance can be one-off or accidental such as tag loss or issues with the information system.</p>	<p>All cases of non-compliance (with the exception of gross or reckless cases) are initially dealt with through the provision of an official warning. The use of infringements fines is reserved for PICAs that do not take effective corrective actions in response to these warnings.</p>
<p>3. EDUCATION AND COMMUNICATIONS</p>	
<p>3.1 More online and video resources</p> <p>Many responses suggested it would be useful to have videos on the website or YouTube to educate NAIT Scheme participants on different parts of the NAIT Scheme, such as using the NAIT information system, explaining the value of NAIT, and demonstrating on-farm examples of how different types of farmers comply with the NAIT Scheme.</p>	<p>We have recently updated our YouTube channel with a series of NAIT system user guides, the guides cover how to complete all of the required NAIT obligations.</p> <p>We also have videos on our website of New Zealand farmers describing how they use NAIT on their farms, which can be found here. We appreciate the importance of “real life examples” and will look at opportunities to develop more of these resources.</p> <p>We will also investigate the feasibility of developing an online repository that enables PICAs to quickly and easily find the information required to assist them to comply with their obligations.</p>
<p>3.2 Checklist of actions and obligations</p> <p>Some respondents suggested it would be useful to have a short ‘to do’ list which outlines PICA actions and responsibilities. Respondents on this subtheme suggested this should be easily found on the website and shared at industry events.</p>	<p>We currently have several checklist-style resources to help remind PICAs of their NAIT obligations. We appreciate the importance of this style of resources and will look further into the development of more of these resources. Our current checklists can be found here:</p> <ul style="list-style-type: none"> • Deer checklist • Moving farms checklist • Calving checklist • Moving bulls checklist

<p>3.3 Educational content for targeted groups (e.g. lifestyle block owners or high-risk areas)</p> <p>Some responses suggested it could be useful for NAIT Ltd to create targeted education resources for groups where compliance levels are lower or farm in a high-risk area, such as lifestyle blocks or controlled areas.</p>	<p>All PICAs have the same NAIT obligations irrespective of the number of NAIT animals they are responsible for. We tailor our education and information to the needs of different audiences. There is already specific content on our website targeted towards lifestyle block PICAs which can be found here and here. Throughout the year we implement a series of campaigns based on high-risk events in the farming calendar.</p>
<p>3.4 More resources on the value of the NAIT Scheme</p> <p>Some respondents raised the issue that educational resources and communications messaging should be improved to raise awareness of the value of the NAIT Scheme, such as biosecurity and market access benefits.</p>	<p>Animal traceability is critical to the success of New Zealand's farming sector, as a strong traceability scheme will enable the livestock industry to recover more swiftly from an exotic disease incursion. The scheme has strong benefits for New Zealand's biosecurity, food safety, and market access.</p> <p>As the success of the NAIT Scheme relies on all NAIT Scheme participants fulfilling their obligations, it is important that everyone who participates and implements the NAIT Scheme understands why a robust traceability system critical for New Zealand's primary sector and wider economy. We will look at ways to expand this messaging in future communications and educational resources.</p>
<p>3.5 Workshops and training sessions in partnership with industry events and groups</p> <p>Several responses suggested NAIT Ltd should deliver training workshops at industry events or in partnership with industry bodies. Topics suggested for these workshops included the value of the NAIT Scheme, how to use the NAIT information system, and what NAIT Scheme participants' obligations are.</p>	<p>Our Regional Partners regularly host workshops and information sessions in collaboration with our industry partners and we will look for more opportunities to partner on more training workshops, you can find our upcoming events here: Upcoming events OSPRI</p>

<p>3.6 More communication and collaboration with PICAs</p> <p>Some respondents raised concerns that they do not feel like PICAs and farmers are listened to in the design of the NAIT Scheme and would value being collaborated with, rather than just communicated to.</p>	<p>We recognise that PICAs are central to the success of the NAIT scheme as they provide the animal identification and traceability information required to protect the dairy, beef, and deer industries from biosecurity, food safety and market access threats.</p> <p>We initiated this consultation round prior to the development of the next traceability operational strategy to ensure PICAs voices were heard and considered as part of the strategy development. The PICA submissions received have provided constructive feedback on how we can improve the implementation of the NAIT scheme, and we will continue to provide PICAs with future opportunities.</p>
<p>4. NAIT TAGS</p>	
<p>4.1 Tag retention and quality</p> <p>Most responses referencing NAIT tags noted that tags are easily lost and PICAs spend a lot of time and money replacing lost tags. Many responders suggested that tags are easily lost due to being made of poor quality or because their design means they are easily caught and ripped out of animals' ears. A few responses noted that tag loss also creates traceability issues as often the PICA does not have the original tag number from the lost tag.</p>	<p>We recognise the frustration that NAIT tag losses cause for PICAs which is why the NAIT Animal Identification Device Standard prescribes strict criteria for tag retention and readability. Our standards are set at the same or higher level than those of comparable traceability schemes in Australia, the United Kingdom and Canada. All approved NAIT tags available for purchase in New Zealand are also recognised as approved tags by comparable overseas authorities.</p> <p>We will continue to monitor international developments and innovations in RFID tags and will consider how we can improve ongoing monitoring of NAIT tag performance to ensure that any tag faults are promptly identified and addressed. Farmers that experience significant NAIT Tag losses should report the issue to NAIT Ltd for investigation.</p>
<p>4.2 Microchips</p> <p>Some respondents suggested a microchip could be a viable solution to prevent tag loss as well as animal theft.</p>	<p>Microchips are not considered for use as there is a risk of them migrating within the animal and ending up in the human food chain.</p>

<p>4.3 Tag cost</p> <p>Some responders noted that they want tags to be cheaper. This is partly due to the number of tags which are lost on farm or in transit and the cost associated with replacing them.</p>	<p>We are committed to ensuring there is a competitive market for NAIT ear tags that comply with the tag standard and are affordable for NAIT Scheme participants. When developing our tag standards, we consider the cost of manufacture, readability, and retention of tags.</p> <p>Currently, fully approved NAIT tags are available from three tag manufacturers:</p> <ul style="list-style-type: none"> • Allflex • Datamars/Zee Tags • Leader Products
<p>4.4 Automatic tag registration</p> <p>Some responders suggested that automatically registering NAIT tags at point of purchase would improve ease of compliance.</p>	<p>When NAIT tags are purchased, they are assigned to your NAIT location and uploaded to the NAIT Information System as “unused” ready for when you need them.</p> <p>Animal registration occurs when you apply the tag to an animal. NAIT requires information about the animal you have applied the tag to in order to better identify the animal should it be subject to tracing or sampling for disease control programmes and to meet increasingly tighter traceability around animal products and international trade requirements. Due to these animal information requirements, it is not possible to “pre-register” the tags at the time of purchase.</p>
<p>5. SUPPORT SERVICES</p>	
<p>5.1 Support Centre wait time</p> <p>Many submissions on this topic noted there are often long wait times for the support centre to answer their calls, which can be frustrating for PICAs to balance alongside their busy days. Some responders suggested increasing support centre opening hours or number of support staff, or introducing a booking system or callback option could be solutions to this issue.</p>	<p>The Support Centre aims to answer all calls within three minutes, ensuring timely assistance for our customers. However, busier periods over the last year have resulted in increased wait times. To address this, OSPRI has employed additional people and is actively exploring new, more efficient methods to reduce wait times. A call-back service has also been implemented, allowing customers to request a return call during peak periods.</p>

<p>5.2 Quality and practicality of Support Centre advice</p> <p>Several responses noted the quality of support provided by the support centre. However, some responses suggested that improving support centre staff's technical knowledge of farming would improve the quality and practicality of the support provided.</p>	<p>NAIT Ltd and OSPRI take the quality of our support services seriously and will work with our Support Centre to improve staff training to ensure our advice is practical, high-quality and reflects the realities of working on-farm.</p>
<p>5.3 Regional support</p> <p>Some responses noted that regional support is useful and would value more opportunities for local support and one-on-one visits.</p>	<p>We always aim to provide high-quality support to all NAIT Scheme participants and are pleased that our regional support services are useful to attendees.</p> <p>Our regional support representatives regularly host events where one-on-one support is available, to see events in your area, visit: Upcoming events OSPRI</p>

6. Next steps

We are in the process of drafting next Traceability Operational Strategy for the 2025/26 to 2027/28 period. The submission responses in this document will be further investigated where necessary for inclusion in the strategy.

We will seek feedback on the draft strategy in the first half of 2025.