



# **NATIONAL ANIMAL IDENTIFICATION AND TRACING (NAIT) 2019/20 NATIONAL OPERATIONS PLAN**

01 JULY 2019 – 30 JUNE 2020

**NAIT Ltd is the NAIT organisation named under section 7 of the National Animal Identification and Tracing (NAIT) Act 2012. NAIT Ltd is a wholly owned subsidiary of OSPRI New Zealand Ltd, a private not for profit company owned by DairyNZ, Beef + Lamb New Zealand and Deer Industry New Zealand. NAIT Ltd is partly funded by the New Zealand Government through the Ministry for Primary Industries. OSPRI NZ currently manages the NAIT and TBfree New Zealand programmes.**

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# 1. PURPOSE

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This document is the National Operations Plan (NOP) for New Zealand's National Animal Identification and Tracing Scheme (NAIT Scheme) as prepared by NAIT Ltd, pursuant to Section 10(1)(a)(x) of the National Animal Identification and Tracing Act 2012 (the Act).

As required by the Act, this plan sets the goals, objectives and priorities for the NAIT scheme for 2019-2020.

## 2. EXECUTIVE SUMMARY

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The NAIT Scheme is designed to record birth, movement and death events of animals, records the person in charge and the location where animals are held.

The objective of the NAIT Scheme is to deliver lifetime traceability for livestock and animal products. An efficient and effective NAIT Scheme is essential to manage biosecurity outbreaks or food safety incidents, and to safeguard and enhance the current market share and price premiums of New Zealand animal products.

One of OSPRI's strategic outcomes for 2019-2024 is that there is full traceability of the animals within the NAIT scheme. Full traceability means that the NAIT information system contains records of where a NAIT animal has been from birth to death or live export.

This NOP has been developed taking into account OSPRI's Strategic Plan 2019-2024, the Annual Operating Plan 2019-2020, analysing NAIT user behaviour and feedback from shareholders and stakeholders.

The NOP outlines five operational areas of focus with key activities that position NAIT Ltd to effectively deliver a comprehensive and reliable tracing system. The five areas and outcomes are:

1. **Accessibility** - The NAIT system and NAIT data are accessible to users.
2. **Data accuracy and performance** - NAIT delivers accurate, high quality traceability data.
3. **Usability and Value** - The NAIT system is easy to use and adds value for farmers and stakeholders.
4. **Compliance** - Robust systems and processes, developed in partnership by OSPRI with its shareholders and the Ministry for Primary Industries (MPI), deliver verifiable compliance with NAIT obligations.
5. **Confidence** - Stakeholders and users have confidence in the efficacy and performance of NAIT.

The NOP will be delivered by NAIT Ltd. Some actions will be joint with MPI, such as compliance activities and others like the regional network of super users will require the support of key stakeholders.

Progress towards the five outcomes will be monitored monthly by OSPRI's Executive Leadership Team and reported on quarterly and annually to the OSPRI Board and the Minister for Biosecurity.

## 3. BACKGROUND ON THE NAIT SCHEME

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The NAIT scheme (the scheme) was introduced in 2012 to address the need of New Zealand's primary industries to be able to implement an effective lifetime traceability system for its livestock and animal products. It aims to improve our capability for managing biosecurity outbreaks or food safety incidents, and to safeguard and enhance the current market share and price premiums of New Zealand animal products. The scheme currently applies to farmed cattle and deer, but the Act provides for other species to be brought into the scheme (at either an individual or mob-based manner) if required.

The scheme is required to meet the purposes prescribed by section 3 of the NAIT Act. These are:

- provide for the rapid and accurate tracing of individual, or groups of, NAIT animals from birth to death or live export
- provide information on the current location and movement history of individual, or groups of, NAIT animals
- improve biosecurity management

- manage risks to human health arising from residues in food, food-borne diseases, and diseases that are transmissible between animals and humans
- support improved animal productivity, market assurances, and trading requirements.

The scheme is funded by tag and slaughter levies and a departmental allocation from the New Zealand Government through MPI.

## 4. THE NAIT INFORMATION SYSTEM

The NAIT information system is the statutory electronic system (database) that captures the data required to administer the scheme. Data is held in the NAIT information system for the following purposes:

- 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 the NAIT Act to carry out their duties
- to facilitate the purposes of the Animal Products Act 1999, Biosecurity Act 1993, Commodity Levies Act 1990, Primary Products Marketing Act 1953, and any other enactment relating to animals or animal health
- to respond to the following human health issues
  - food residues associated with animals
  - food-borne diseases associated with animals
  - diseases transferable between animals and humans
- to provide data supporting productivity, market assurance, and trading requirements
- 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 life and welfare
- to provide statistical data for policy development and related advice about the industries to which this Act applies
- to enable the NAIT organisation to publish general agricultural statistics
- to provide data to enable a potential purchaser of a NAIT animal to trace the history of the animal over its life.

Access to data held within the NAIT information system is tightly governed. All requests to access NAIT data must be made through the NAIT System Administrator and be made in accordance with the NAIT Act. An independent Data Access Panel reviews and makes determinations on the majority of data access requests and publishes an annual report.

## 5. STRATEGIC CONTEXT

### OSPRI STRATEGIC PLAN 2019-2024

OSPRI's Strategic Plan for 2019-2024, contains two strategic outcomes, four critical enablers for success, and seven impacts that the company expects to deliver over the next five years. Progress will be assessed against thirteen Key Performance Indicators that will be reviewed in the 2021/2022 financial year.

The Strategic Plan framework diagram is attached at **Appendix1**.

The NOP supports the OSPRI strategic goal of **full traceability of livestock animals within the national traceability scheme**, under which key users have confidence and which compares favourably against other traceability schemes internationally. Full traceability means that the NAIT information system contains records of where a NAIT animal has been from birth to death or live export.

The NAIT programme must have high data integrity resulting from high levels of compliance if it is to meet user, industry, shareholder and Government requirements and deliver the benefits of product and market assurance, biosecurity incursion response, and disease management traceability. Without high compliance, the management of a biosecurity incursion

response or food safety incident is likely to be more difficult, costly and prolonged, and may result in a delayed return to normal market access conditions.

In addition to enabling a faster response in the event of an animal health, food safety or biosecurity incursion incident, a reliable and adaptive NAIT scheme will enable industry to capture additional livestock attributes (such as animal treatments and disease status) for product differentiation. These features will assist farmers to make informed livestock purchasing decisions and may add value for those participating in the scheme.

The desired strategic outcomes for traceability of NAIT animals are set out in the following framework.

Strategic Goal	Outcome	Measure
Full traceability of NAIT Animals within the National Traceability Scheme	Animal health and disease managers have confidence in the traceability scheme.	In relation to agreed performance criteria, key users indicate confidence in the traceability scheme.
	Timely and accurate animal traceability information is available for management of disease incursion.	Incursion managers consider the traceability system to be fully functional for a range of disease incursion scenarios.
	Provenance of animals can be verified prior to processing.	Off-farm end users of the system confirm that it delivers the required pre-processing animal provenance information.

## OSPRI ANNUAL OPERATING PLAN 2019/20

The OSPRI Annual Operating Plan (AOP) sets out OSPRI’s key initiatives and activities for 2019-2020. The AOP and annual operating budget set out the annual work plan for OSPRI and outline the steps and milestones required to deliver the strategic outcomes, benefits and KPIs of the Strategic Plan.

The five areas of operational focus in this NOP are consistent with the traceability projects and activities identified in the OSPRI AOP.

## 6. UNDERSTANDING NAIT USERS

As part of developing the OSPRI AOP and NAIT NOP, we analysed the behaviours and attitudes of our users towards compliance with the NAIT scheme. Understanding our users is critical to develop effective strategies to engage them and to improve both compliance with, and performance of, the NAIT scheme.

To better understand our users, we adapted a commonly used compliance theory and applied it to NAIT users to define their attitudes and behaviours and the strategies suitable for each group. Four types of users were identified, and further detail is summarised in **Appendix 2**.

### NAIT BEHAVIOUR TYPES

1. **Voluntarily compliant** - These users are aware of their NAIT obligations and do everything within their powers to be compliant. They understand the importance of the NAIT scheme, traceability and biosecurity, and the role that they play. These users are generally compliant with all regulatory schemes.
2. **Inadvertently non-compliant** - These users want to be compliant, but for several reasons are not fully compliant. The users understand the importance of traceability and biosecurity but may not see the connection between this and their obligations under the regulatory framework.

3. **Opportunistic non-compliant** - These users are aware that they have NAIT obligations but do not perceive the value of compliance as being worth the cost. They may also not be fully aware of their obligations, but this may trend towards wilful ignorance.
4. **Deliberate non-compliance** - This group of users (generally thought to be 10-15% of all users) are actively disengaged from NAIT. Due to their disengagement it is difficult to ascertain what their beliefs and attitudes are.

The user-behaviour has informed the development of five areas of operational focus that are designed to improve the scheme and increase levels of compliance. These involve making it easier for people to use the NAIT Scheme to meet their obligations through communications, support and a responsive contact centre and demonstrating the value of a full and comprehensive traceability system to farmers.

## 7. AREAS OF OPERATIONAL FOCUS

Five areas of operational focus have been identified to achieve the required strategic outcomes for the lifetime traceability of NAIT animals. These are:

1. **Accessibility**
2. **Data accuracy and performance**
3. **Usability and Value**
4. **Compliance.**
5. **Confidence.**

### FOCUS AREA 1: ACCESSIBILITY

<p><b>Outcome:</b> The NAIT system and NAIT data are accessible to users.</p>
<p><b>Link to OSPRI AOP:</b></p> <ul style="list-style-type: none"> <li>• Improve compliance with NAIT re-registration.</li> <li>• Enhance the traceability regulatory framework.</li> <li>• Improve compliance.</li> <li>• Improve data quality, integrity and accuracy</li> </ul>

Feedback from farmers and other NAIT system users indicates the need to make the system easier to use, to provide more support for users, and to enable better access to NAIT data. Greater support is also needed by users to complete the re-registration of all NAIT locations (the mapping of locations to LINZ land parcels is crucial to delivering improved traceability data and to support the response to biosecurity disease incursions and natural disasters). These accessibility needs will be addressed through a range of communications, user support and system improvements.

Improved NAIT data quality and integration with the TBfree Disease Management System will also support more efficient livestock TB eradication with reduced on-farm TB testing costs.

#### *Key Accessibility Actions for 2019/20*

No	Actions	Who
1.1	<p>All NAIT system users will have access to support and problem solving to assist them meet their NAIT obligations via:</p> <ul style="list-style-type: none"> <li>• a highly responsive contact centre</li> <li>• relevant, plain English and timely information via the OSPRI website and NAIT publications on an ongoing basis.</li> </ul>	Client Services and NAIT Operations

No	Actions	Who
1.2	Integration of NAIT and TBfree disease management data continues towards full roll-out of risk-based livestock TB testing by 2022.	Disease Management Team, NAIT Operations and Technology Solutions
1.3	Improve access to NAIT information for authorised MPI personnel and other disease and biosecurity managers to better support disease tracing and NAIT compliance as prescribed by the Act.	Technology Solutions
1.4	Establish a regional network of trained NAIT super users	Client Services and NAIT Operations
1.5	Develop a mechanism that allows accredited stock agents to record one-legged movements on behalf of a PICA.	NAIT Operations and Technology Solutions

## FOCUS AREA 2: ACCURACY AND PERFORMANCE

<p><b>Outcome:</b> NAIT delivers accurate, high quality traceability data.</p>
<p><b>Link to OSPRI AOP:</b></p> <ul style="list-style-type: none"> <li>Enhance the traceability regulatory framework.</li> <li>Improve compliance.</li> <li>Improve data quality, integrity and accuracy.</li> </ul>

Inaccuracies in NAIT data have accumulated from a combination of user non-compliance or partial compliance, incomplete animal movement recording, and the use of incompatible information technology systems.

Data quality improvement projects will be undertaken to prevent further entry of incorrect or corrupt data into the NAIT system and to correct, quarantine or remove existing inaccurate data. Processes will be established for regular monitoring of data quality, while support and advice for system users will be focused on improving and maintaining full and accurate data input.

### *Key Accuracy and Performance Actions for 2019/20*

No	Actions	Who
2.1	Provide targeted advice to farmers and other system users on the importance of accurate NAIT data and the impact of poor data quality on traceability and market assurance.	Client Services and NAIT Operations
2.2	Establish a NAIT Operations Response Team to re-register or deactivate those locations with no animals currently registered and re-register those locations with less than 20 animals.	NAIT Operations
2.3	Identify and prevent sources of incorrect NAIT data or data corruption from occurring.	NAIT Operations and Technology Solutions
2.4	Complete the NAIT Re-registration Project.	NAIT Operations, Technology Solutions and Client Services
2.5	Develop and implement processes for identifying and correcting incorrect or corrupted animal specific data within the NAIT information System.	NAIT Operations and Technology Solutions
2.6	Establish an internal NAIT data quality programme for the ongoing maintenance of NAIT data.	NAIT Operations and Technology Solutions

## FOCUS AREA 3: USABILITY AND VALUE

### Outcome:

The NAIT system is easy to use and adds value for farmers and stakeholders.

### Link to OSPRI AOP:

- Improve compliance with NAIT re-registration.
- Enhance the traceability regulatory framework.
- Improve compliance.
- Improve data quality, integrity and accuracy.
- Research and Innovation.

Improving the usability of the NAIT system recognises that if farmers find direct value in a system that is easy to use, then they will participate in it with greater effect. A key focus is the development of tools that enable farmers to access animal health and traceability records to support livestock purchase and on-farm biosecurity management decisions.

NAIT Ltd will also work with key stakeholders to develop a Traceability Quality Assurance Programme (QAP) and rating system for farmers for implementation by 2022. The Traceability QAP will be both stand-alone and able to be integrated into an industry approved total farm QAP. The QAP is seen by farmers as an important product differentiation tool that will add a market premium for those who score highly.

Planned improvements to the NAIT web interface and on-line workflows are intended to simplify users' interaction with NAIT. In addition, NAIT Ltd is also working with its industry partners to identify and implement changes that add value to farmers, such as the recording of animal treatments in NAIT, electronic Animal Status Declaration forms, undertaking NAIT account health checks and enabling users to generate self-assessment reports for on-farm audits.

### Key Usability and Value Actions for 2019/20

No	Actions	Who
3.1	Continue the enhancement of the existing electronic Animals Status Declaration (eASD) product, while working with stakeholders on a new approach as part of wider development of the NAIT scheme.	Technology Solutions and NAIT Operations
3.2	Provide farmers that have had their herds scanned with NAIT account health checks to support them in correcting and updating their accounts.	NAIT Operations
3.3	Support the development of an industry-led integrated on-farm biosecurity/traceability work plan by participating in a joint working group with DairyNZ and Beef + Lamb.	NAIT Operations, Technology Solutions and Client Services
3.4	Participate in industry-led farmer workshops/roadshows to discuss on farm biosecurity/traceability in collaboration with DairyNZ and Beef + Lamb.	NAIT Operations, Client Services and Technology Solutions
3.5	Provide farmers with online tools and regional support to enable them to self-audit and correct their NAIT accounts.	NAIT Operations, Technology Solutions and Client Services
3.6	Implement technical and operational changes required under the NAIT Amendment Bill (No.2)	NAIT Operations and Technology Solutions
3.7	Develop and release new animal history reports that enable farmers to access animal health and traceability records to support purchasing and on-farm biosecurity management decisions.	NAIT Operations and Technology Solutions
3.8	Develop a report that enables a saleyard to produce a report of animals for sale and an indication of their lifetime traceability.	NAIT Operations and Technology Solutions
3.9	Work with industry stakeholders to commence the development of a Traceability Quality Assurance Program (QAP) for implementation in 2022.	NAIT Operations, Technology Solutions and Client Services

No	Actions	Who
3.10	Develop and release the new NAIT user interface.	Technology Solutions and NAIT Operations

## FOCUS AREA 4: COMPLIANCE

<p><b>Outcome:</b> Robust systems and processes, developed in partnership by OSPRI and MPI, deliver verifiable compliance with NAIT obligations.</p>
<p><b>Link to OSPRI AOP:</b></p> <ul style="list-style-type: none"> <li>• Improve compliance with NAIT re-registration.</li> <li>• Enhance the traceability regulatory framework.</li> <li>• Improve compliance.</li> <li>• Improve data quality, integrity and accuracy.</li> </ul>

One of the criticisms of the operation of the NAIT scheme has been the lack of consequences for non-compliance and that there were no systems or processes in place to monitor, report and act on non-compliance.

This has resulted in a high degree of non-compliant behaviour, and in some cases, perverse behaviour driven by personal financial gain. A key recommendation of the NAIT Review 2018 was the need to take a firmer approach to non-compliance and to strengthen the regulatory framework and tools available to enforce the scheme.

In response, MPI and OSPRI have recently signed a NAIT Compliance Support Agreement that outlines the responsibilities of both parties in relation to NAIT compliance. The agreement uses the VADE (Voluntary Assisted Directed Enforced) compliance model to separate the functions of both agencies. Under this agreement, OSPRI has responsibility for Voluntary and Assisted compliance actions. To give effect to the agreement, OSPRI and the MPI have developed a joint compliance action plan for 2019/20 attached at **Appendix 3**).

The action plan identifies the following four compliance focus areas for 2019/20:

1. **Intelligence** - We have the information we need to target high risk areas of non-compliance within the NAIT scheme.
2. **Communication Clarity** - Farmers/PICAs are clear about what is expected of them and understand the benefits of being compliant with NAIT.
3. **Focused Compliance** - All PICAs have completed their NAIT reregistration and all animals are tagged and registered.
4. **NAIT Integration** - PICAs have confidence that they are meeting their NAIT obligations when entering data using 3<sup>rd</sup> party software.

### *Key Compliance Actions for 2019/20*

No	Actions	Who
4.1	Implement the joint MPI/OSPRI NAIT Compliance Action Plan.	NAIT Operations and MPI
4.2	Establish and report quarterly on the following key performance indicators: <ul style="list-style-type: none"> <li>• Animal tagging and registration</li> <li>• % movements recorded within timeframes</li> <li>• % untagged animals on farm and at slaughter without exemption</li> <li>• % of animals with lifetime traceability</li> <li>• % of PICAs and NAIT locations registered.</li> </ul>	NAIT Operations and MPI
4.3	In collaboration with shareholders and MPI, develop a targeted communication campaign on the importance of meeting NAIT obligations,	NAIT Operations, MPI and Client Services

No	Actions	Who
	the benefits of an effective NAIT system and the risks and consequences of non-compliance.	
4.4	In partnership with MPI <i>Mycoplasma bovis</i> Strategic Science Advisory Group, identify drivers for non-compliant behaviour and develop strategies to address non-compliant behaviour.	NAIT Operations, MPI and Client Services
4.5	Develop the NAIT Compliance Scale and establish a baseline measurement for the purpose of communicating how compliance will be measured and reported to users.	NAIT Operations, MPI, Technology Solutions and Client Services
4.6	Work with MPI to develop and implement a compliance plan for those who have not re-registered.	NAIT Operations and MPI

## FOCUS AREA 5: CONFIDENCE

<p><b>Outcome:</b> Stakeholders and users have confidence in the efficacy and performance of NAIT.</p>
<p><b>Link to OSPRI AOP:</b></p> <ul style="list-style-type: none"> <li>• Enhance the traceability regulatory framework.</li> <li>• Improve compliance.</li> <li>• Improve data quality, integrity and accuracy</li> <li>• Research and Innovation.</li> </ul>

Stakeholder and user confidence are critical success factors for NAIT. Farming and industry stakeholders have a key leadership role towards farmer and user engagement and compliance with NAIT. To this end they need to be satisfied that NAIT will deliver on expected livestock traceability benefits.

Disease managers and those involved with biosecurity incursion responses need to have confidence that when needed, the NAIT system can quickly provide relevant and accurate animal traceability records.

Stakeholders will be closely involved in ongoing work and decision-making to improve NAIT performance and maximise traceability benefits. The establishment of the Traceability Technical Advisory Committee will be the key mechanism for stakeholders to advise on NAIT system issues and operational policy. OSPRI will continue to engage its regionally based farmer advisory groups for the advice on NAIT and will form four industry specific Traceability Reference Groups to provide advice to the Technical Advisory Committee from an end-user farming perspective.

### *Key Confidence Actions for 2019/20*

No	Actions	Who
5.1	Establish a Traceability Technical Advisory Committee (TAC) to provide advice on new and emerging technologies that improve the traceability of NAIT animals.	NAIT Operations, Client Services and Technology Solutions
5.2	Establish the NAIT Audit and Accreditation Team.	NAIT Operations
5.3	Establish the following Traceability Reference Groups (TRG) to support and advise the TAC on traceability objectives from an end user perspective: <ul style="list-style-type: none"> <li>• Farmer TRG</li> <li>• Meat Industry TRG</li> <li>• Technology TRG</li> </ul>	NAIT Operations, Client Services

No	Actions	Who
	<ul style="list-style-type: none"> <li>Stock and Station Agent TRG</li> </ul>	
5.4	Commission an independent research study of culled animal tags to identify the causes of tag degradation or performance failure.	NAIT Operations and R&D Manager
5.5	<p>Improve the regulatory framework for the operation of the NAIT scheme through the development and implementation of the following NAIT Standards:</p> <ul style="list-style-type: none"> <li>Entities Trading in NAIT Animals</li> <li>Entities Processing NAIT Animals</li> <li>Accreditation of Third-Party Software and Data Integration Standard</li> <li>NAIT Identification System Standard</li> </ul>	NAIT Operations
5.6	Commence implementation of the NAIT Audit and Accreditation Programme for Information Providers and Accredited Entities.	NAIT Operations
5.7	Perform a Traceability Desk Top exercise to test the traceability performance of the NAIT System against the following agreed performance targets. The purpose of this first exercise is to validate the testing framework and to establish a baseline measure for future exercises.	NAIT Operations, Technology Solutions and Client Services

## 8. MONITORING AND REPORTING

The successful implementation of the NOP will be assessed against the following:

- government priorities and expectations relating to OSPRI's functions and duties in the NAIT Act
- the key performance indicators outlined in OSPRI's Strategic Plan
- the outcomes of the five operational areas of focus in this NOP.

We will monitor our progress monthly and report to the Board and Minister on a quarterly basis. Annually, we will report against our performance within the OSPRI Annual Report to enable stakeholders and the wider public to assess our performance, as well as submitting an Annual Report to the Minister specifically on our performance against this plan along with:

- how any money appropriated by the Crown or collected as levies under the NAIT Act has been spent in the financial year
- how NAIT Ltd is addressing the government priorities and expectations relating to NAIT Ltd.'s functions and duties in the NAIT Act
- the findings of any independent audits.

## 9. KEY PERFORMANCE INDICATORS

The following key performance indicators have been identified in the OSPRI Strategic Plan for animal traceability and system performance. The indicators will be monitored on a regular basis as a tool to help inform the progress against this plan.

Key Performance Indicator	Measured by
95% of new animals subject to NAIT and registered from 2020 have lifetime traceability.	As measured by analysis of data within NAIT. Establish a baseline measure in year one and then report quarterly
The traceability system is assessed by incursion managers as “functional or fully functional” in relation to a range of disease incursion scenarios.	Incursion managers are surveyed to assess the functionality of NAIT. Establish a baseline in year one and then survey annually.
90% compliance with NAIT Regulations as measured on the Traceability Compliance Scale.	Develop a Traceability Compliance Scale and establish a baseline measure in year one and then report quarterly.
A performance review of NAIT in 2022 reports favourably on our system against international tracing systems.	Review the attributes of a high performing traceability system in year one. Monitor attributes annually with independent review of NAIT in 2022.

The following key performance indicators have been developed for the Annual Operating Plan 2019-2020. The indicators will be monitored on a quarterly basis to inform progress.

Key Performance Indicator	Measured by
Development and release of a NAIT compliance scale to track the impact of compliance initiatives and improvements to the scheme.	A compliance traceability scale will be developed and NAIT compliance will be baselined
95% lifetime traceability of animals from January 2020 is maintained	As measured through NAIT data and analysis and reported quarterly
Less than 20% of animals are auto-registered in NAIT	As measured through NAIT data and analysis and reported quarterly
More 75% of movements are recorded within 48 hours in NAIT	As measured through NAIT data and analysis and reported quarterly
100% of movements are recorded within 5 days in NAIT	As measured through NAIT data and analysis and reported quarterly

# APPENDIX 1: STRATEGIC PLAN FRAMEWORK



## APPENDIX 2: USER BEHAVIOUR

NAIT User Behaviour	Engagement/Compliance Strategy/Tools
<p><b>Voluntarily compliant</b></p> <p>These users are aware of their NAIT obligations and do everything within their powers to be compliant. They understand the importance of the NAIT scheme, traceability and biosecurity, and the role that they play. These users are generally compliant with all regulatory schemes.</p>	<ul style="list-style-type: none"> <li>• Regular communication on what is happening with NAIT, key upcoming activities and what is expected of them.</li> <li>• Educational material (fact sheets, guidelines, tutorial videos and animations) on meeting NAIT obligations.</li> <li>• Focus on seamless and efficient tools to make compliance easy while maintaining high degrees of accuracy.</li> <li>• Monitor compliance and notify users of non-compliant behaviour so that they can address the issue (e.g. NAIT Nudge and NAIT Health Checks).</li> <li>• Give users the tools for monitoring their own compliance (e.g. Compliance Summary Report).</li> </ul>
<p><b>Inadvertently non-compliant</b></p> <p>These users want to be compliant, but for several reasons are not fully compliant. The users understand the importance of traceability and biosecurity but may not see the connection between this and their obligations under the regulatory framework. These users want to comply and if given the right tools and support will meet their obligations. The reasons for non-compliance may include:</p> <ul style="list-style-type: none"> <li>• lack of understanding of their obligations</li> <li>• not fully understanding the importance of certain obligations and how these impact animal traceability and biosecurity responses</li> <li>• lack of appropriate tools (tag readers, computers, suitable connectivity)</li> <li>• low levels of computer/technical literacy.</li> </ul>	<ul style="list-style-type: none"> <li>• Plain English communication material with an emphasis on using other farmers to front face this.</li> <li>• Educational material (fact sheets, guidelines, tutorial videos and animations) on meeting NAIT obligations.</li> <li>• Demonstration of compliance benefits.</li> <li>• Face to face sessions, small group workshops or support from regional superusers and local champions.</li> <li>• Simple easy to use tools to help users be compliant (wands linked to smart phones, simple NAIT user interface, access to reliable and trustworthy information providers).</li> <li>• Monitor compliance and notify users of non-compliant behaviour so that they can address the issue (e.g. NAIT Nudge and NAIT Health Checks).</li> <li>• Give users the tools for monitoring their own compliance (e.g. Compliance Summary Report).</li> <li>• Responsive and accessible customer service representatives available through the contact centre.</li> </ul>
<p><b>Opportunistic non-compliant</b></p> <p>These users are aware that they have NAIT obligations but do not perceive the value of compliance as being worth the cost. They may also not be fully aware of their obligations, but this may trend towards wilful ignorance. However, they are aware that without some compliance that they cannot get their animals to market. They do not see value in complying with NAIT and generally do not see its connection to market assurance, biosecurity and disease management. NAIT is seen as an unnecessary regulatory burden and additional cost.</p> <p>These users will demonstrate minimal compliance and will actively try to avoid compliance were possible. Behaviours will include:</p>	<ul style="list-style-type: none"> <li>• Plain English communication material with an emphasis on using other farmers to front face this.</li> <li>• Educational material (fact sheets, guidelines, tutorial videos and animations) on meeting NAIT obligations and how this relates to market access, assurance, on-farm biosecurity and disease management.</li> <li>• Face to face sessions, small group workshops or support from regional superusers and local champions.</li> <li>• Simple easy to use tools to help them be compliant (wands linked to smart phones, simple NAIT user interface, access to reliable and trustworthy information providers).</li> </ul>

NAIT User Behaviour	Engagement/Compliance Strategy/Tools
<ul style="list-style-type: none"> <li>not tagging animals until first movement off-farm, not registering animals</li> <li>active and deliberate efforts to appear compliant to avoid detection of non-compliance, such as confirming all movements regardless of accuracy and registering tags but not applying them to animals</li> <li>never recording sending movements and only confirming movements generated by others.</li> </ul>	<ul style="list-style-type: none"> <li>Responsive and accessible customer service representatives available through the contact centre.</li> <li>Give users the tools for monitoring their own compliance (e.g. Compliance Summary Report).</li> <li>Monitor compliance and notify users of non-compliant behaviour so that they can address the issue (e.g. NAIT Nudge and NAIT Health Checks).</li> <li>Escalated compliance action if the user demonstrates persistent non-compliant behaviour: <ul style="list-style-type: none"> <li>Letters of non-compliance.</li> <li>Referral to, and investigation by, MPI NAIT compliance officers.</li> <li>Infringement fines.</li> <li>Prosecution (unlikely as most users in this group will modify their behaviour when they realise that there are consequences for non-compliance).</li> </ul> </li> </ul>
<p><b>Deliberate non-compliance</b></p> <p>This group of users are actively disengaged from NAIT. Due to their disengagement it is difficult to ascertain what their beliefs and attitudes are.</p> <p>There is subsection of people in this group who are deemed conscientious objectors. These people believe that farming and tagging animals is cruel and that animals should be able to live out the lives without ‘unnecessary human interference’.</p> <p>Those demonstrating deliberate non-compliance will fly below the radar, they often operate in a closed farming system and use saleyards and/or meat processors who accept untagged animals as a means of getting their product to market.</p>	<ul style="list-style-type: none"> <li>Targeted prosecution upon detection of deliberate non-compliance followed up with compliance monitoring and subsequent prosecution for repeat offenders.</li> <li>Plain English communication material with an emphasis on using other farmers to front face this.</li> <li>Educational material (fact sheets, guidelines, tutorial videos and animations) on meeting NAIT obligations and how this relates to market access, assurance and on-farm biosecurity and disease management.</li> <li>Face to face sessions with a reliance on local champions.</li> <li>Simple easy to use tools to help them be compliant (wands linked to smart phones, simple NAIT user interface, access to reliable and trustworthy information providers).</li> <li>Responsive and accessible customer service representatives available through the contact centre.</li> </ul>

## APPENDIX 3: COMPLIANCE ACTION PLAN

### OSPRI/MPI NAIT COMPLIANCE ACTION PLAN 2019/20

#### Intelligence

**Goal:** We have the information we need to target high risk areas of non-compliance within the NAIT scheme.

**Actions:**

- MPI/OSPRI will research and understand how key user groups interact with the NAIT scheme to identify and/or formulate best practice protocols.
- OSPRI/MPI will establish a joint NAIT data intelligence working group to ensure NAIT compliance officers have the information they need to identify non-compliance.
- MPI NAIT compliance analysts will be given direct access to the NAIT reporting services data set.
- The data intelligence working group will assess innovative methods of intelligence gathering to enable the alignment of on-farm compliance with the NAIT information system.
- The data intelligence working group will develop a strategy and agreed workplan to address existing data quality issues.

#### Communication Clarity

**Goal:** Farmers/PICAs are clear about what is expected of them and understand the benefits of being compliant with NAIT.

**Actions:**

- OSPRI/MPI will establish a joint NAIT communications working group.
- The communication's working group will develop a joint communications strategy that includes:
  - Key messaging
  - Benefits of compliance
  - Risks of non-compliance
  - Stakeholder support for, and engagement with, NAIT compliance
- OSPRI/MPI will agree on defined roles and responsibilities for compliance messaging.
- The communications working group will develop strategies to engage and communicate with PICAs who are isolated to ensure they are aware and are meeting their NAIT obligations.
- OSPRI/MPI will develop and communicate agreed guidance for user processes to ensure industry best practice complies with NAIT Legislation.

#### Focused Compliance

**Goal 1:** All PICAs have completed their NAIT reregistration. **Goal 2:** All animals are tagged and registered.

**Actions: NAIT Reregistration**

- OSPRI will focus on continuing to encourage PICAs to reregister their locations.
- OSPRI will include NAIT non-reregistration as a non-compliance indicator in the monthly non-compliance analysis and reporting.
- MPI will investigate the infringement framework that would be applicable for NAIT non-reregistration.

**Actions: Animal Tagging and Registration**

- OSPRI will focus on informing PICAs of the obligation to tag and register their animals in NAIT.
- OSPRI will identify and report high risk offenders to MPI compliance team on a monthly basis.
- MPI NAIT Compliance team will follow-up offenders reported as non-compliant with regard to infringement and enforcement action.

#### NAIT System Integration

**Goal:** PICAs have confidence that they are meeting their NAIT obligations when entering data using 3<sup>rd</sup> party software.

**Actions:**

- OSPRI will develop a 3<sup>rd</sup> party software Standard to enforce NAIT data access and quality Standards.
- OSPRI/MPI will consult with 3<sup>rd</sup> party software providers and information providers on the draft Standard.
- OSPRI will complete the audit accreditation of all information providers under the revised Standard.
- OSPRI will arrange joint audit and accreditation training for applicable OSRI and MPI staff.
- OSPRI will ensure the revised Standards enable MPI compliance officers to issue a notice of non-conformance to an accredited person or organisation.
- MPI NAIT compliance officers will assess compliance of information providers and accredited entities against the performance requirements as deemed appropriate during their investigations.