

**CONSULTATION ON
THE REGISTRATION
OF ENTITIES TRADING
IN NAIT ANIMALS
STANDARD
SUMMARY OF PUBLIC
SUBMISSIONS**

Introduction

Stock and station or livestock agents (collectively known as traders) play a critical role in the New Zealand traceability system and this proposed new Standard will help to clarify their part in the National Animal Information and Tracing (NAIT) scheme.

Having accurate and up to date animal movements in NAIT is a cornerstone of our ability to rapidly trace animals in a disease control response. Traders buy and sell large numbers of NAIT animals and possess large quantities of NAIT information, so they are crucial participants in the NAIT scheme.

In early 2021, OSPRI consulted with the public on a new Standard for livestock agents that included these key proposals. Livestock agents will need to:

- Be registered with OSPRI.
- Pass a ‘fit and proper person’ test.
- Complete educational modules.
- Provide NAIT information to people in charge of animals (PICAs). In the future, agents will be able to log in with OSPRI and access certain information to add value.

Public consultation was undertaken to ensure that the settings of the Standard are appropriate, well-targeted, and address industry needs. Ahead of public consultation, the *Registration of Entities Dealing in NAIT Animals Standard* was drafted and intensively consulted with industry reference groups.

Survey and submissions

Details of the survey

Public consultation was done via a survey using the online platform SurveyMonkey. The survey was widely advertised to the public through OSPRI’s website, online advertisements in the Rural News, and Facebook posts. The survey was open from 15 January to 14 March 2021. Responses were anonymous.

The survey consisted of explaining a part of the new Standard, then asking quantitative questions (“Do you agree with X?”), then qualitative questions (“Any other comments? If you don’t agree with something, say why here”) in free-text boxes.

For more general questions there were ‘slider’ sentiment bars. For example:

* 28. The Standard addresses all of the issues it needs to.



Note: percentages in this summary are rounded.

Summary of submissions

- 146 submitted responses; 54 (39%) filled in the whole survey to the end. Submissions were largely from farmers.
- 22 submissions (15%) were from stock and station agents; 101 (69%) were from farmers.
- 131 individual submissions; 15 organisation submissions.

Support for trader obligations

There was resounding support for the obligations traders should be under (e.g., providing NAIT information it holds to a PICA farmer or to NAIT in a usable form upon request), broad agreement around the definition of a trader and the requirements for traders to be fit and proper people.

Less support for administration and fees

Negative sentiment focused on the administration required by registration. Specifically, the charging of fees; annual renewal of registration, and the disclosure of NAIT requirements in publications. There was a fear that traders would pass costs on to farmers.

Unknown scale

The survey continued to highlight a key theme of implementing the Standard – it is difficult to gain information on how many individuals and organisations it will apply to. This has consequences for the scale of implementation and OSPRI resourcing requirements.

Submitters found the Standard complex

The survey also highlighted that the new Standard is complex, with several different requirements. Several submissions expressed the need to have more simplicity in the Standard to get more buy-in and improve compliance.

Potential for confusion

Submissions also highlighted that when implementing the Standard it will be vital to be clear about who the Standard will apply to (e.g., not farmers who occasionally sell their own animals), what the expectations will be (e.g., relevant criminal convictions, and who will and won't be considered a fit and proper person), and what they will have to do.

Possible changes based on feedback

OSPRI has reviewed all submissions from the public via the consultation and from engagement with industry and is considering the following changes:

- Reduce or ease administrative-heavy tasks such as completion of registration forms and assessments, renewal of registration, disclosure of specific NAIT information in publications, and completion of an educational module.
- Reduce or remove fees wherever possible (possibly in conjunction with the reduction of administration).
- Clarify how the new Standard fits in with other NAIT standards and what will constitute a fit and proper person (including criminal offending disclosure requirements).
- Make clear whenever possible who the new Standard applies to, what the expectations will be, and what they will have to do.
- Boost general NAIT education coming from large technology platforms for the sale of NAIT animals.

Submission themes

Who the standard applies to

- 81% of submitters agreed the definition of a trader required to register (“regularly engaged as a third party in the sale, gift or exchange of NAIT animals for reward. This includes stock and station agents, livestock brokers, livestock traders and meat processor procurement representatives.”) was correct and applied to the right people.
- Estimation of the numbers covered by the Standard based on these definitions were 4,600 individuals and 3,200 organisations.

Themes in the free text box related to the difficulty of estimating how many people and organisations would be covered by the Standard, difficulty in understanding the language of the Standard, and curiosity regarding how the Standard fit into the broader landscape of other NAIT Standards.

Fit and proper person test

- 90% of submitters agreed with the requirement to adhere to NAIT requirements and to New Zealand's biosecurity.
- 72% of submitters agreed with the requirement for traders to understand their NAIT obligations by doing an education module.
- 61% of submitters agreed with the requirement to have a 'clear criminal record'. [This is defined in the Standard as fraud/dishonesty, animal welfare, and biosecurity/NAIT].

Themes in the free text box related to:

- the lack of clarity around what a 'clear criminal record' would be and what to take into account when considering this
- the potential that an educational module won't achieve its objective.

Obligations and abilities of traders

- 85% of submitters agreed we have set the right expectations for traders when they are advertising cattle and deer for sale.
- 93% of submitters agreed with the requirement for a trader to provide NAIT information it holds to a PICA farmer or to NAIT in a usable form on request.
- 95% of submitters agreed with the requirement for a trader to provide NAIT numbers to sending and receiving PICAs if asked.
- 90% of submitters agreed with the requirement for a trader to inform the sending and receiving PICAs that the NAIT animal movement involves legal obligations under the NAIT scheme.
- 75% of submitters agreed with the requirement for media, like websites and newspapers, that are specifically set up to sell cattle and deer will help traders provide this information.
- 90% of submitters agreed we have given traders the right abilities in NAIT (e.g. report a movement to NAIT but the PICAs have to formally confirm it to fulfil their obligations) when they are advertising cattle and deer for sale.
- 90% of submitters agreed with the ability for a trader to access and provide certain NAIT information ^{1,2}.

The sentiments in the free text box went towards requiring more education through large trading platforms (TradeMe was mentioned often) and away from requiring disclosure of specific NAIT details; and imposing regulatory requirements on smaller media companies and newspapers.

Compliance

- 88% of submitters agreed we have been reasonable in setting our standards for unacceptable behaviour and resolving any issues.

Commentary varied greatly in the free text box: including support for trader compliance, negative sentiment towards charging, and clarity around process.

Administration

- 40% of submitters agreed registration fees were reasonable.

¹ **Ability to access** information relating to the general (that is, not street addresses or farm names) current and previous locations of a NAIT animal, where the entity has the NAIT device information for that animal; access a NAIT number for a PICA where the registered entity trading in NAIT animals has provided two pieces of information about the PICA; and notify the NAIT organisation that a movement of animals has occurred by providing the required movement details, without formally making a declaration.

² **Requirement to provide** the NAIT number or sub-region of a sending and receiving PICA if it is available to the entity; requirement to inform the sending and receiving PICAs that a NAIT animal movement involves NAIT legal obligations; requirement to provide NAIT information to the PICA or directly to the NAIT organisation upon the PICA's or NAIT organisation's request. Offence to conceal or forge any of this information.

- 65% of submitters agreed the requirement for individuals to complete an education module is reasonable.
- 56% of submitters agreed that registration lasting for a year is suitable.
- 67% of submitters agreed the process for the Standard coming into effect seemed workable and reasonable.

General sentiments

- “I support a NAIT Standard being put into place to set NAIT’s expectations for entities trading in NAIT animals” – sentiment sat at agreement.
- “The Standard addresses all of the issues it needs to.” – sentiment sat at ‘addresses too much’.
- “The Standard is clearly written and sets understandable expectations.” – sentiment sat at ‘somewhat clear’.
- “It is clear how this Standard fits in with other NAIT standards.” – sentiment sat at ‘somewhat clear’