

Consultation Response

NAIT Device Standard

2025

Executive summary

This document presents the outcome of the recent public consultation on proposed amendments to the current NAIT Device Standard. The consultation sought to ensure the standard remains fit for purpose, reflects international best practice, and supports effective and efficient animal traceability.

A total of 151 submissions were received from a broad cross-section of stakeholders, including farmers, Persons in Charge of Animals (PICAs), tag manufacturers, and saleyards.

The consultation focused on three key areas:

1. Expanding the range of approved NAIT devices to include one-piece RFID tags
2. Removing an outdated visual identification code format no longer in use
3. The loss of NAIT Devices which was split into;
 - a) Revising the method for measuring tag loss
 - b) Removing the requirement for annual reporting.

Feedback indicated strong support for the introduction of one-piece tags and highlighted some concern with the performance of existing devices. While there was general support for simplifying tag loss reporting, views were mixed on the proposed shift to a cumulative loss rate.

Following the comprehensive analysis of submissions, NAIT Ltd recommended approving the amendments related to items 1, 2, and 3a. The proposed change to adopt a cumulative loss rate under item 3b was not approved at this time, as it was determined that further analysis is required to fully understand its potential impact on the industry.

The amended Standard will now be finalised, formally gazetted, and communicated to stakeholders, with commencement scheduled 28 days after publication.

NAIT Board decisions

NAIT Ltd carefully analysed all responses and submissions in alignment with our strategic priorities, maintaining our commitment to placing farmers at the centre of decision-making. Based on this analysis, at the July 2025 meeting the NAIT Board made the following decisions:

Requirements for NAIT devices

Approved the expanded scope of the NAIT Device Standard to include one-piece tags.

The Board acknowledged the strong support from respondents for a greater choice in approved NAIT devices and improved retention. Whilst there were a small number of concerns raised in submissions, the Board agreed that existing clauses in the Standard regarding animal welfare and retention sufficiently address them.

Approved formats for visual identification codes

Approved the removal of the Visual Identification Code format (Participant Code – Sequence Number) from the NAIT Device Standard, noting the absence of opposing feedback and the minor nature of the amendment.

The Board acknowledged that the participant code – sequence number format was not supported by the Dairy industry and that only a small number of tags with this format have ever been produced and with none being sold since 2014.

Any existing tags with this format will still be valid.

Tag loss measurement

2% cumulative loss

NAIT Ltd advised the board that the proposed change to adopt a 2% cumulative loss measurement should not proceed at this time, due to the need for further analysis and understanding of its potential implications for the industry. Accordingly, the Board **did not approve** amendment to *Clause 2.29*.

Reporting requirements

Approved the removal of the requirement to annually report on tag loss noting the absence of opposing feedback and the practical nature of the amendment.

The Board acknowledged that while reporting on NAIT tag loss was important, the current NAIT Information System does not enable PICAs to easily report losses.

Drafting error

Approved amendments to *Clauses 2.25 and 2.27* due to identified drafting errors.

The Board acknowledged the drafting errors of clause 2.25 that referenced the location of the RFID transponder and clause 2.27 that had conflicting measures of “0.001%” and “1 in 1000” in relation application failure rate.

Purpose and scope

The purpose of this consultation was to review and update the NAIT Device Standard (the Standard) to ensure it remains relevant, effective, and aligned with the operational needs of the primary sector along with aiming to provide farmers with a broader range of solutions to achieve effective, lasting animal identification.

The proposed changes aimed to improve the durability and usability of animal identification devices, enhance traceability, and ensure the standard reflects current international best practices.

In addition to aligning with best practice, the NAIT organisation is legally required to consult with stakeholders prior to issuing, amending, or revoking any NAIT animal identification standard. Specifically, *Section 14(3)(b)* of the NAIT Act 2012 (the Act) mandates that consultation must occur with individuals or groups reasonably considered to represent the interests of those likely to be substantially affected by the proposed changes.

Scope

The consultation focused on three key areas of the NAIT Device Standard:

1. **The requirements for NAIT devices** – to allow for the use of one-piece RFID tags alongside existing two-piece tags.
2. **The approved formats for Visual Identification Codes** – with a proposal to remove an outdated format no longer in use.
3. **The loss of NAIT devices**
 1. Proposing a shift from a “3-year rolling average of 2%” to a “2% cumulative loss rate over a 3-year period” for improved clarity and precision and;
 2. The removal of the requirement for NAIT Ltd to annually report on tag loss.

Consultation method

The consultation was conducted publicly between 29 May and 15 June 2025. Stakeholders were invited to review the proposed amendments and submit feedback via an online submission form although some respondents submitted via email. These submissions were included and the views expressed were considered as part of the consultation process.

The consultation was promoted through the OSPRI website, social media and through direct communication with all interested parties including over 95,000 Persons in Charge of Animals (PICAs) and PICA delegates.

Participants

Who was consulted

The consultation engaged a broad cross-section of stakeholders from the primary sector, including farmers, PICAs, PICA delegates, saleyards and stock agents, tag manufacturers, and other interested parties. These groups were identified as being substantially affected by the proposed amendments to the Standard and were invited to provide feedback through a public submission process as required under the Act.

Participation summary

A total of **151 submissions** were received. The breakdown of responses by participant group is as follows:

	SUPPORTIVE	OPPOSED	NOT APPLICABLE ¹	TOTAL
Farmers, PICAs and PICA delegates	39	8	91	138
Other			9	9
Saleyards/stock and station agents			1	1
Tag manufacturers	1	2		3
Grand Total	40	10	101	151

Most applicable submissions commented on the change regarding one-piece tags, with few commenting on the changes to tag loss measurements and the requirement to report annually, and none specifically commenting on the removal of the identified visual identification code (Participant Code – Sequence Number).

¹ Some submissions were classified as not applicable, as they were either unrelated to the scope of this consultation or provided only general commentary on NAIT, OSPRI, or the broader animal traceability system.

Key themes and feedback

Requirements for NAIT devices

Summary of feedback

Nearly all supportive submissions expressed strong backing for the introduction of one-piece RFID tags. Respondents cited potential improved retention, broader choice for farmers, reduced risk of injury to stock, and alignment with international practices as key benefits.

In addition, many respondents, regardless of their stance on the proposed changes, criticised the performance of existing NAIT devices. Common concerns included poor retention rates, damage to animals including animal welfare concerns, and difficulty in re-tagging. These comments further reinforced the potential value in expanding the range of approved tag types.

Support for one-piece tags

1. *"Providing farmers with more choice of quality RFID tag designs, from reputable suppliers, must be good for the industry and for supporting long term traceability."*
2. *"The use of one-piece NAIT tags would be great, from looking at usage overseas they seem to stay in better, especially in system where cattle can rub on fences and remove the button tabs from the current RFID tags."*
3. *"A one-piece tag put near the top of the cow's ear would be more practical."*
4. *"One piece devices sound like an excellent move."*

Criticism of current two-piece tags

1. *"I rear 1 beef calf for the freezer each year and my fencing is 7 wire with battens. Every year the calf at some point puts his head thru the fence to eat, catches the round tag and rips his NAIT tag out leaving a huge tear in his ear. I do home kill so the animal never leaves the property so this causes unnecessary suffering it causes the animal."*
2. *"The problem that I have experienced is that the permanent Identification tags come out. I use [redacted] tags and the male tag breaks away either at the female end or just under the top of the tag. This part of the tag device is not up to scratch."*
3. *"We lose NAIT tags from young and mature animals both in the pasture and while transporting them. Personally, I think the roundness which encourages tags to roll around and around means they will always be lost. We have paid ridiculous fines for sending stock to the works. Our own recording system, that of LICs and NAITs all show these animals as NAIT tagged and herd tagged. This happens on farm within hours of their being born. We have been farming over 50 years and find NAIT tags simply the worst tags to retain. Probably the most long lasting cattle tags are brass ones which are hard to obtain. NAIT is compulsory, brass is not. We also DNA our stock and replacing lost tags is more expensive than just the replacement tag itself. Object to being fined the whole cost of a cull when other identification remains."*
4. *"I'm fed up with replacing NAIT tags. No matter which brand I use, every time I send 10–20 animals at a time to the works I have to replace a few tags. And they all had tags last year when I had to replace a heap due to moving farm. It is not unrealistic to expect NAIT tags to last 10 plus years—the brass tag and small calf tag all do and are put in at the same time as the NAIT button. Since NAIT is for life, could animals have a better more permanent solution that can't be lost?"*

Suggestions for alternatives

A small number of submissions suggested alternative technologies, such as microchipping, as a potential long-term solution. While microchips have been identified as not viable due to food safety concerns, these suggestions reflect a desire for innovation and improved traceability.

1. *"In addition to single piece tags, we would like to see consideration paid towards **Microchips** being tested/approved. These are well tested and used in other animals. Placement on the neck or near the tail would make for easy scanning and be resistant to tag loss. In respect of tag losses - our stock are most at risk of losing tags when they are scratching up against deer fencing or being yarded into pens with similar mesh gating."*
2. *"The changes are ok. The loss of tag rate is higher than that. I wish **microchipping** of capital stock was an option like vets do for cats/dogs to reduce cost of lost/replaced tags."*
3. *"The requirement is for a permanent eartag. We all know the loss or "loss" of tags is prevalent. Why can't a permanent **EID be placed into the ear base**? That together with a readable eartag would be much more workable. Refer: <https://bvajournals.onlinelibrary.wiley.com/doi/10.1136/vr.d2789>"*

Diverging opinions

While many respondents supported the introduction of one-piece NAIT tags, several raised concerns regarding their safety, readability, and compatibility with existing systems. These concerns were most notably expressed by tag manufacturers and a few farmers with technical experience.

Representative Quotes

1. *"One-piece tags are typically placed around the outer edge of the animals' ear and as such, when the ear naturally grows, it creates growth deformities and/or retention issues and/or infection issues. With such issues, farmers will need to replace the tags and incur further cost around animal welfare."
(From Tag Manufacturer)*
2. *"Adding a metal fold over device may cause confusion with existing non-EID brass, nickel and metal tags which have been used in NZ cattle for 70 years. Under the existing scheme guidance, the NAIT tag must be able to be visually read and manually entered into the NAIT system to complete a movement. With the orientation of the tag this would require the head bailing of the animal which may add additional labour." (From Tag Manufacturer)*
3. *"Unless there is some significant improvement in retention or tag read distance then I don't see any reason to start using one-piece tags. With some cattle it is likely hard to see in their ear due to hair growth... Currently the existing tags have on the round male portion it has the NAIY symbol and the text "do not remove " thus making it very easy to identify if cattle has a tag in. Having a secondary system with a narrow rectangle confuses this very easy universal identification system."*

Concerns and mitigations

NAIT Ltd acknowledges the valid concerns raised by respondents and considers these matters to be sufficiently addressed within the following clauses of the amended Standard:

Stakeholder Concern	Mitigation / Response
Animal welfare risks	<p>Clauses 2.32 and 2.33 of the Standard adequately addresses these concerns.</p> <p>Clause 2.32 – NAIT devices must not.... adversely affect the health and wellbeing of an animal, during or after their application.</p> <p>Clause 2.33 – Manufacturers of NAIT devices must specify on the accompanying instructions whether any precautions need to be taken when the device is applied to prevent potential harm or hazards</p>

Low retention rates	Proposed amendments to the Standard do not change retention requirements. All currently approved NAIT devices are also approved by comparable overseas jurisdictions.
Manual readability challenges in high-throughput environments	<p><i>Clause 2.23</i> of the proposed amended Standard addresses these concerns. There has been no change in the proposed amended Standard to readability standards and these requirements are applicable for both one-piece and two-piece tags.</p> <p>Clause 2.23 – <i>Printing on NAIT devices shall remain readable for the lifetime of the animal.</i></p>
Compatibility with existing RFID readers and visual ID systems	<p><i>Clause 2.24</i> of the Standard adequately addresses these concerns.</p> <p>Clause 2.24 – <i>In the absence of electromagnetic interference, 99.9% of NAIT devices must be machine readable:</i></p> <p><i>without duplication or omission</i></p> <p><i>under all New Zealand field conditions</i></p> <p><i>in animals moving freely at a rate of up to 2 metres per second in single file past a reading point with a portal width of 0.8 metres.</i></p> <p>Compatibility is assessed during device approval trials.</p>
Confusion with non-NAIT metal tags	This concern will be mitigated by requiring one-piece tag manufacturers to take responsibility for market education. This includes leading a targeted public awareness campaign in coordination with OSPRI.
Concern about mandatory re-tagging of existing livestock	The proposed amendment expands approved device options without affecting the status or use of currently approved tags. No re-tagging of any currently tagged NAIT animals is required.

The approved formats of visual identification codes

Summary of feedback

There was no specific feedback supporting or opposing the removal of the (Participant Code – Sequence Number) format, which is no longer in use. This format was last issued in 2014 and is not approved under the Dairy Herd Test standard. Its removal is considered a housekeeping amendment to align the NAIT Device Standard with current operational practices and ensure consistency across identification systems.

The absence of direct feedback suggests that respondents were either supportive of the change or do not consider it impactful to current operations.

Diverging opinions

While no respondents explicitly objected to the removal of the outdated format, a small number of submissions expressed a general desire for greater flexibility in Visual Identification Code formats. These comments focused on the importance of adaptable tagging systems that accommodate diverse farm management practices, such as sex-based numbering or year-based identification.

However, it is important to note that the proposed amendment would only prevent new tags being issued using the outdated format. It would not affect the registration or use of existing tags already in circulation.

The loss of NAIT devices

There are two changes in this section:

1. The current Standard sets a physical tag loss threshold based on a “three-year rolling average of 2% tag loss”. The proposed amendment recommended replacing the rolling average with a 2% cumulative loss rate over a three-year period.
2. The current standard outlines a requirement for NAIT Ltd to annually report on tag loss. The proposed amendment is to remove this requirement due to the current NAIT information system being unable to adequately capture meaningful tag loss data.

Summary of feedback

1. There was both support and opposition surrounding the proposed shift to a cumulative 2% tag loss rate over a three-year period. Several submissions also noted that the current average-based metric was difficult to interpret and apply consistently.
2. There was also no specific feedback opposing removing the requirement to publish an annual report on tag loss, however one responded outlined they would like to see more on this in the future.

Representative quotes supporting the change

1. *“Agree with reporting the cumulative loss of tags. We have several animals on our records which are ‘ghosts’. Either tag losses or faulty tags when we scan everything that is sold. It is very usual to retag 2–3 animals each time.”*
2. *“I support the changes intended to be made. I would eventually like to see some clarification of the loss recording proposal however it is not required at this stage of the process”*

Opinions related to acceptable rates of NAIT device loss

Several respondents mentioned in their submission that the requirement for 2% tag loss (both cumulative or rolling over a 3-year period) is not appropriate and does not accurately represent on farm reality. Some respondents shared experiences of high tag loss rates, particularly in older animals, or under challenging environmental conditions such as rough terrain and the use some types of fencing.

Diverging opinions

Several respondents, predominantly tag manufacturers, either objected to the proposed amendment (part 1) or expressed concern that insufficient detail had been provided to assess the potential industry impact of shifting to a 2% cumulative loss rate. Additionally, several submissions noted that the current average-based metric is difficult to interpret and apply consistently.

One respondent specifically objected to the change to a “2% cumulative loss rate over three years” citing the need for a more rigorous and transparent analysis to understand the potential implications for the industry.

As a result, NAIT Ltd has re-reviewed historical field trial data and acknowledges that further work is needed to assess how this change in calculation methodology could affect future field trials. This effort is essential to ensure fairness and consistency across both current and future approved devices, while also ensuring that farmers have the highest quality tags available to support effective livestock management and long-term traceability.

Representative quotes objecting or expressing concern

1. *In conclusion, we oppose the proposed changes to the NAIT scheme, particularly the introduction of the new one-piece NAIT tag. Our concerns encompass a number of key areas: first, the shift*

from an “average 2% loss rate” to a “2% cumulative loss rate” necessitates a more rigorous and transparent analysis to understand its implications for the industry. (From Tag Manufacturer)

2. *“The proposed revision to the standard to move from an “average 2% loss rate” to a “2% cumulative loss rate” is not clearly defined, an increased level of detail is required to determine the industry impact. Cumulative protocol: may need to include the services of a qualified independent biometrician to calculate the loss rates, taking into account the actual numbers of animals and losses over duration of the trial. This analysis takes into account that not all animals identified at the commencement of the trial will be presented for every read and also takes into account the timing of the recorded loss. (Ref: B.8, NLIS Animal Identification Technology Approval Program Rules, 20 March 2020)” (From Tag Manufacturer)*

Drafting errors

Clause 2.27

During the analysis of submissions on the proposed amended standard, one respondent correctly identified a drafting error in Clause 2.27. The clause stated:

Clause 2.27 – The application failure rate for NAIT devices shall not exceed 0.001% (1 in 1000 attempts). Any attempt to apply a device that does not result in the device being applied effectively is considered a failure, provided the manufacturer’s instructions are followed.

The original figure was mathematically incorrect, as 1 in 1000 corresponds to 0.1%, not 0.001%. To correct this error and ensure consistency between the numerical value and the percentage, the following revised wording was proposed to the NAIT Board:

Clause 2.27 – The application failure rate for NAIT devices shall not exceed 0.1% (1 in 1000 attempts). Any attempt to apply a device that does not result in the device being applied effectively is considered a failure, provided the manufacturer’s instructions are followed.

Clause 2.25

During the analysis of the proposed standard following submissions, NAIT Ltd identified a minor drafting error in Clause 2.25. The clause stated:

Clause 2.25 – Following application, the transponder contained within the female portion of NAIT devices shall be machine readable, under New Zealand field conditions, for the life of the animal. The terminology used in this clause, specifically “female portion”, does not reflect the proposed shift to a broader range of device configurations, which now include both one-piece and two-piece designs.

To address this, the following revised wording was proposed to the NAIT Board:

Clause 2.25 – Following application, the transponder contained within NAIT devices shall be machine readable, under New Zealand field conditions, for the life of the animal.

This amendment is considered minor and is allowable without public consultation due to Section 19(4)(b) of the Act which states that:

However, the NAIT organisation is not required to consult under subsection (3) (a) if the NAIT organisation is satisfied that—

the accreditation standard needs to be issued, amended, or revoked urgently; or

an amendment to the accreditation standard is minor and will not adversely affect the substantial interests of any person.