



Ministry for Primary Industries & The National Animal Identification and Tracing (NAIT) Organisation

Joint National Animal Identification and Tracing (NAIT) Scheme

Compliance Strategy



Foreword

Gray Harrison, National Manager Animal Welfare and NAIT Compliance, Ministry for Primary Industries

As a member of the World Organisation for Animal Health, in accordance with their requirements, New Zealand developed the National Animal Identification and Tracing (NAIT) Scheme. The Scheme which commenced on 1 July 2012.

The legislation to support this, the National Animal Identification and Tracing Act, came into effect on 20 February 2012. One of its key purposes is:

 To establish a tracing system that provides for the rapid and accurate tracing of NAIT animals from birth to death.

In mid-2017 an outbreak of *Mycoplasma bovis* (*M. bovis*) was detected in New Zealand cattle. The NAIT system faced its first traceability test. It fell short. Along with missing key data, such as registered animals and records of movements, it contained inaccurate data.

The Ministry for Primary Industries (MPI) were tasked to work alongside OSPRI (as co-regulators) to deliver a tougher approach to NAIT compliance.

By 2019 a dedicated MPI NAIT Compliance Team, consisting of a nationally dispersed team of warranted NAIT Officers, was in place to undertake enforcement of the NAIT Act.

Working in partnership with OSPRI, industry, and farmers, we can have a leading livestock traceability scheme that is fit for purpose, works in the event of a disease outbreak, and provides assurance to our trading partners.

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Foreword

Kevin Forward, Head of Traceability, OSPRI

Traceability and NAIT are vital for biosecurity. The NAIT scheme relies on farmers and others to make declarations of who they are, where they farm, what cattle and deer they are in charge of, and when and where their cattle and deer move. This means compliance is a vital requirement for the NAIT scheme to work, through farmers providing accurate data to NAIT.

If NAIT compliance is compromised, our traceability system is threatened, and we run the risk of having a system that will not perform in the event of a disease outbreak. We saw this in 2017 when *M. bovis* wreaked havoc on New Zealand farms. At the same time the NAIT scheme was found to be lacking. Farmer compliance was poor, farmers saw little value in the scheme, and there was no enforcement of the scheme. While overall compliance has improved from less than 50% in 2017/18 to approximately 68% at the end of May 2022, there is still a lot more to be done.

NAIT Limited (the NAIT organisation designated by statute), and its contracted service provider OSPRI, support compliance by making sure farmers have the tools and the knowledge to get it right. That includes having easy to use technology solutions, providing user guides and information on our website, loaning scanners, enabling private sector service delivery, accrediting industry providers, and providing customer support through our Support Centre and Regional Partner network.





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Purpose

The purpose of this strategy is to outline

- Why the NAIT scheme is important, and our compliance journey to date
- NAIT Ltd and MPI's joint NAIT compliance approach
- Our legal framework
- · Our design principles

Background

Why Is Biosecurity Important?

Biosecurity helps us protect New Zealand's flora and fauna, both on the land and in the sea – in doing so we protect our economy and environment, as well as human health and our socio-cultural values, including Māori cultural and spiritual values.

Most of New Zealand's export earnings are generated by the primary sector. Our biosecurity systems, processes, and resultant health status provides us with access to overseas markets. Unwanted organisms impact profitability and productivity – reducing how much we can earn and how much we can sell.

Biosecurity also protects New Zealand's environment both indigenous and valued introduced species, ecosystems, and landscapes, New Zealand's people, and our cultural wellbeing.

Traceability And Biosecurity

A robust traceability scheme means the farming sector can get back to business sooner if there is a biosecurity threat, food safety concern or market access issue. If the source of the disease can be identified and contained, then the risk and cost to the wider supply chain can be minimised. It also means that New Zealand can reassure our trading partners about the integrity of our products and retain access to international markets.

Being in control of disease spread, through having lifetime traceability of animals, reduces the risks and costs to the wider farming community and supply chain.

NAIT Ltd and MPI are committed to supporting farmers to practice good on-farm biosecurity by ensuring the NAIT scheme is fit-for-purpose and future-focused.

OSPRI's strategic outcome for the NAIT scheme is that there is full traceability of NAIT animals. Full traceability is achieved when we accurately know where an animal has been from birth to death. The closer we get to full traceability, the more value we can deliver through the NAIT scheme.

Legislative Framework

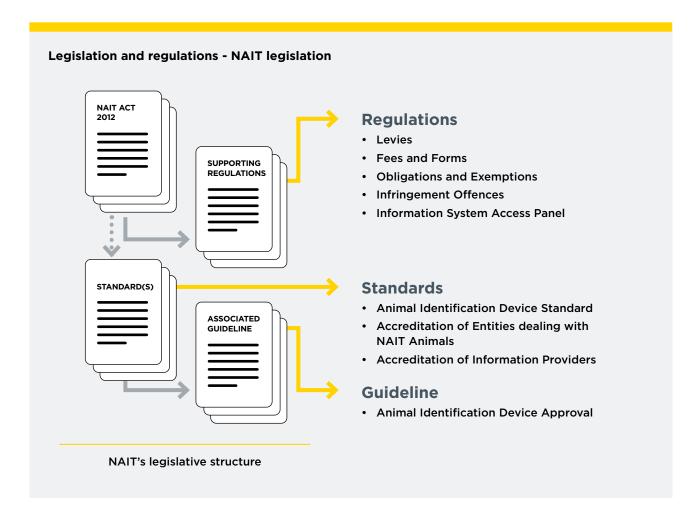
The National Identification and Tracing Act 2012

The NAIT Act 2012 sets out the requirements participants in the NAIT scheme must meet. It also allows for regulations, standards and guidelines to be made under the Act.

Some main elements of the NAIT Act are:

- **1.** What animals are subject to NAIT requirements (currently cattle and deer)
- 2. What the NAIT obligations are
- **3.** Accessing the data in the NAIT information system (the NAIT system) and other data relevant to the NAIT scheme.¹
- 4. Enforcement of the scheme (NAIT enforcement officers and their powers, offences, etc.). NAIT Ltd's focus is on education and assisting farmers (as seen in the VADE model shown in this document).

¹ This is done in a variety of ways. Farmers can see their own NAIT data; NAIT enforcement officers, the NAIT organisation, and MPI can use this data to administer the NAIT scheme; others can store and extract data to supplement NAIT data by agreement; and anybody can apply to NAIT for data.



Authorised Persons

Section 52 of the NAIT Act 2012 allows for the appointment of NAIT Authorised Persons by the Director-General of MPI (as well as NAIT officers who are employed by MPI).

The Act's legal framework for NAIT authorised persons sits independently of NAIT Ltd. NAIT authorised persons employed by NAIT Ltd are appointed through their employment.

All NAIT Authorised Persons must undergo training to obtain a warrant, and NAIT training to use powers. NAIT Ltd has internal policies and frameworks governing when OSPRI people can use Authorised Person powers.

Information Sharing

There are set processes in place for how NAIT data is exchanged between NAIT Ltd and MPI. These follow the comprehensive data access requirements set out in the NAIT Act.

NAIT officers have access to NAIT core data as of right to carry out their functions, powers, and duties under the NAIT Act 2012.²

Outside of NAIT officer access, MPI staff can require access to NAIT data (with director-general authorisation) for a purpose in section 40 of the NAIT Act.

NAIT Ltd ensures good cyber security and privacy practice is followed when information is shared, and there is no open access of either party to the other's data.

NAIT Ltd and MPI also exchange regular reporting detailing programme progress and operational achievements.

² NAIT core data is defined as data that must be provided in accordance with the NAIT Act and Regulations. NAIT core data is retained in the NAIT system.

NAIT compliance journey

Mycoplasma bovis

The Mycoplasma bovis outbreak, which began in 2017, showed there were significant shortcomings in overall compliance with the NAIT scheme (<60% overall). While it has been acknowledged that New Zealand could not have attempted to eradicate Mycoplasma bovis without NAIT data, had the system been fit-for-purpose the response would have been quicker, less costly, resulted in less farm-to-farm transmission of the disease, and caused less stress for farmers. The lack of any enforcement measures also meant there was no consequence for not complying, and this undermined the scheme.

The key NAIT compliance issues identified in the *Mycoplasma bovis* outbreak were:

- Person, contact, and location information incorrect
- · Animals not tagged or registered
- · Animals tagged but not registered
- · Animal movements not declared
- Non-existent animal movements being declared
- · Incorrect animals included in movements
- NAIT accounts not kept up to date (what was on-farm did not match what was in the NAIT system)
- Animals declared as dead when actually alive
- Dead animals being declared in movements.

Areas of Non-Compliance

Analysis of the NAIT data accrued from inception to 2018 identified system wide non-compliance, with unacceptably high levels of non-compliance for the two key obligations of:

- Registering the animal into the NAIT System after tagging
- · Declaring animal movements

The application of a NAIT RFID tag to a NAIT animal and the registration of the animal in the NAIT system is critical because it creates an electronic record that links the animal and the

RFID tag. This enables subsequent events such as the movement of an animal from one location to another to be declared. When an animal is tagged, registered, its movements have been accurately declared, and it is kept up to date it is fully traceable.

Only 60% of all the animals fitted with NAIT RFID tags in 2016, 2017, and 2018 were properly registered into the NAIT system. The remaining 40% had animal records created automatically by the system when a movement was declared for that RFID tag. These animals lack the legally required registration information and were deemed to not be fully traceable. In 2018 the missing 40% equated to 1.6 million animals that were not fully traceable.

The Government's Response

With such poor rates of farmer compliance evident, the Government introduced a range of measures to improve farmer compliance with the NAIT scheme. Amendments to the NAIT Act and associated regulations and Standards were developed, consulted on and implemented, and new funding allocated to establish a NAIT Compliance Team at MPI.

Amendments to the Act and Regulations included:

- · Increased requirements for untagged animals.
- Increased penalties for non-compliance.
- Annual estimate of the number and type of non-NAIT animals at a NAIT location.
- Penalties for transporters moving untagged animals that do not have an exemption.
- Persons in Charge of Animals (PICAs) can only use NAIT tags for the location they were purchased for — bringing New Zealand in line with international best practice.
- Align the NAIT Act search powers with the Search and Surveillance Act.



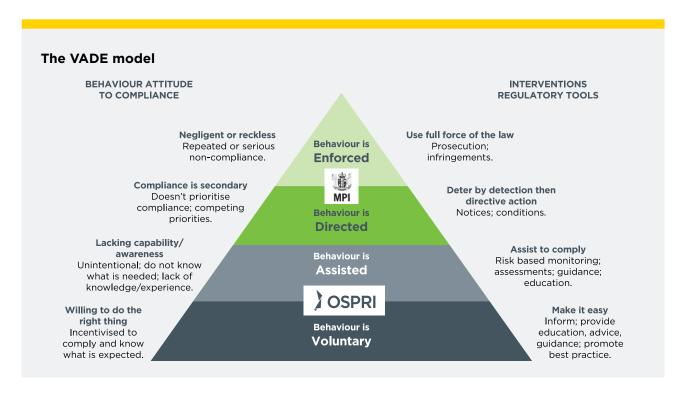
What Is NAIT Ltd's Traceability Strategy?

NAIT Ltd's traceability strategy utilises a regulatory deterrent-based approach aimed at delivering high rates of on-farm compliance, thereby ensuring we have accurate and timely data to support responses to disease outbreaks and food contamination events. Deterrence is credible when those with obligations under the scheme perceive that the risks of being noncompliant outweigh the rewards of being noncompliant. Deterrence occurs when persons who are contemplating non-compliance are dissuaded from doing so because they have an expectation of detection, and that detection will be investigated and punished with robust and proportionate sanctions (warning notices, fines, and prosecutions).

Amendments to the NAIT Act in 2019 saw a tenfold increase in the cost of fines to ensure that the deterrence is credible. This was aligned with the creation of a new NAIT Compliance Team at MPI.

NAIT Compliance Model

To facilitate farmer compliance with their obligations NAIT Ltd and MPI use a proportional, risk-based approach known as the VADE (Voluntary, Assisted, Directed, Enforced) model. The VADE model segments the regulated sector, according to different behaviours. This segmentation guides the delivery of appropriate interventions. It focuses on the earliest possible intervention to avoid the risks associated with non-compliance.



NAIT Ltd undertakes the **Voluntary (V) and Assisted (A) functions**. These include:

- education, extension, and engagement activities to increase awareness of NAIT obligations
- monitoring and reporting of registered NAIT users to identify non-compliance
- escalating ongoing non-compliance to MPI for field investigation or enforcement action.

MPI is responsible for the **Directed (D) and Enforced (E) functions**. These include:

- inspection, investigation, and enforcement
- prioritising data provided by NAIT Ltd
- utilising warning notices, infringements, and taking prosecutions.

The VADE model helps guide our thinking when we are considering taking action for non-compliance. It provides a measured and graduated approach to resolving non-compliance.

NAIT Ltd's Compliance Guiding Principles

When implementing our compliance strategy, NAIT Ltd's approach to programme design, including compliance activities, is guided by the following traceability design principles:

Traceability design principles



Customer centric

We enable our customers to practice good on farm traceability because it's vital for NZ's biosecurity.



Trustworthy

We take a balanced and fair approach to developing our initiatives, including compliance.



Clear

We are transparent and set clear goals and expectations. We hold ourselves accountable for achieving our goals.



Targeted

Our decisions are intelligence-led, ensuring we are using resources where they are needed most to achieve our outcomes.



Coordinated

We are collaborative and consultative to ensure we see the big picture.



Care

We care about what we do. We focus on ensuring we are doing the right things for the right reasons.

Theory and Research Behind the Model

An effective deterrent framework would guarantee that those who engage in non-compliance will be detected, penalised, and will receive no personal benefit from their wrongdoing. However, it is unrealistic to expect that any system could ever completely accomplish this goal, no matter how many resources are dedicated to achieving it. Therefore, as regulators we need to examine workable strategies that maximise the prospects of delivering credible deterrence in a risk-based environment.

To help develop these strategies NAIT Ltd have utilised a large body of research into what motivates people to comply with regulatory schemes. This body of research has identified three primary motivations for compliant behaviour:

- Calculated: Regulated entities comply with a given regulation when they conclude that the benefits of compliance, including averting fines and prosecutions, exceed the costs of compliance.
- Normative: Comes from a sense of moral duty and agreement with the importance of a given regulation. It is determined by two sets of considerations:

- o one's sense of civic duty to obey laws and general ideological values and the fear of shame as a self-imposed deterrent
- relates to the evaluation of the appropriateness or value of a given regulation.
 This involves the perceived reasonableness of the rule and the way it is enacted, and the fairness of the authorities in enforcing the rules and the extent to which others comply
- Social: Comes from the desire to earn the approval and respect of significant people with who they interact. Potential sources of such social pressure include other regulated parties, trade associations, external advocacy groups, the media, family and friends.

In designing our traceability strategy, we have developed initiatives that target all three motivations for compliant behaviour, with our joint compliance strategy having a strong focus on a persons calculated motivations.

Furthermore, to better understand our farmer attitudes towards compliance with the NAIT scheme, and to enable us to design a NAIT scheme that is effective, we commissioned several research studies.

Our benchmarking research was conducted in 2018 by UMR. It found:

of farmers surveyed agreed that 'Farmers have a duty to their wider farming community to comply with NAIT regulations'.

of farmers surveyed agreed that 'Farmers who do not comply with NAIT regulations should be prosecuted'.

of farmers surveyed indicated that they were mostly responsible for ensuring their farm complied with NAIT obligations.

of farmers surveyed agreed that 'NAIT provides timely and quality information on the current location and movement history of animals.'

of farmers surveyed agreed that 'Until the NAIT system is made easier to use, farmers need to be educated not prosecuted'.

of farmers surveyed agreed that 'NAIT can be given at least some credit for helping to trace *Mycoplasma bovis* to its source'.



Additional research was undertaken by Yockney and Field in 2020/2³ to understand the NAIT compliance behaviour of farmers impacted by *Mycoplasma bovis* (commissioned 18 months after compliance and enforcement activity commenced) identified that:

- Many farmers express frustration over the multiple/varying levels of compliance they must contend with
- Others suggest the rules are just for a few, rules in place for the minority
- Farmers feel like they're an 'easy target', 'villainised' in the media
- The NAIT scheme is perceived to be just another form of compliance farmers must juggle
- Many farmers see little value in the NAIT scheme

"in their minds they provide the backbone to the New Zealand economy, they feel they are rewarded with increasing regulatory programmes with which they must comply, and little thanks."

Yockney and Field (2021) identified six commitment segments which reflect farmers' overall attitudes and behaviour towards the NAIT programme. Three 'committed segments' reflect above the line or positive attitudes and behaviours, while 'uncommitted segments' reflect below the line or negative attitudes and behaviours.

Comn A farn

Committed and Champion

A farmer who is highly committed to ensuring the NAIT programme is effective as it can be -for the good of the industry and the country as a whole. They are likely to role-model behaviours and seek to influence those around them.

Committed

Pragmatic and Proficient

A modern farmer who runs a finely tuned operation. NAIT compliance is simply a cost of doing business. They are committed to best practice, which includes meeting all of their NAIT obligations.

Tolerate and Tailor

A farmer who takes the path of least resistance. Is mostly on board with NAIT but will bend the rules to make their life easier. Will do the minimum needed to tick the box.

Disillusioned and Disengaged

A practical, hands-on farmer. At a conceptual level, they see the value in NAIT. But their historical behaviour experiences with NAIT/OSPRI/MPI now serve as a barrier.

Uncommitted

Uninformed and Uninvolved

Those who have cows (as pets or lawnmowers), but don't think of themselves as being a farmer. As such, they fail to see the relevance of the NAIT system.

Resentful and Resistant

A traditional, self-reliant farmer who is resistant to change. NAIT is just more paperwork they are forced to do. They do the basics when it comes to NAIT and if they can get away with not doing it, all the better!

³ *M. Bovis* Science Programme: Understanding NAIT compliance behavior (September 2021) https://www.mpi.govt.nz/dmsdocument/48328-Understanding-NAIT-compliance-behaviour

Yockney and Field also identified five views that all farmers held in common

Relevance drives out resistance



NAIT compliance is strengthened when there is relevance:

- To me and my situation
- Of my actions on others, the community, the country.

Seamless and practical front and centre



Even a whiff of any hassle factors will turn farmers off complying. "Team of 5 milli<u>on"</u>



The NAIT system only works if everyone does their bit.

Don't let the team down.

Cutting corners makes more corners



Workarounds won't necessarily make it easier in the long run. What is the 'why'?



Farmers are very clear on the 'how' (i.e. traceability).

Is there a universal 'why' to complying?

- Animal welfare?
- · Biosecurity?
- Economy?

Having a sound understanding of what drives compliance (or non-compliance) in our target audience enables us to design targeted initiatives that encourage compliance. Over time, this will improve the accuracy of the data held within the NAIT system. This enables the NAIT scheme to meet its purposes.



AN INTELLIGENCE-LED APPROACH

Regulatory intelligence is the gathering, monitoring, and analysing of data and experience-based regulatory information needed to develop a strategy. The strategy responds to a particular regulatory issue, set of issues, or behaviours.

Regulatory intelligence is not just information and knowledge management. Regulatory intelligence is created by using data and information from a wide range of sources (including 'peoplecentred' sources); analysing it; then presenting the completed analysis, insights, and associated recommendations to decision-makers. It is used when targeted, fit-for-purpose support is required to understand the environment (including behaviours, hazards, risks, and patterns of noncompliance) and to translate data into actionable initiatives.

Regulatory intelligence is a tool that supports NAIT Ltd and MPI decision-makers to prioritise work, allocate resources, and achieve outcomes for the benefit of our stakeholders. The objectives of regulatory intelligence are:

- Support NAIT Ltd / MPI to make informed decisions about the use of resource.
- Develop insights for NAIT Ltd / MPI to understand the external environments our stakeholders are working in.
- Support measuring the effectiveness of interventions.

NAIT Ltd uses an intelligence-led, risk-based approach to enable us to be more focused when supporting those who have NAIT obligations. An intelligence-led approach utilises data analysis and information sharing. It also utilises collaboration between teams, communities, and other agencies such as MPI. It also seeks to identify repeat offenders through analysing compliance data, and discovering the trends that might accompany it in specific groups or communities.

Analysts within the MPI NAIT Compliance Team and OSPRI Traceability Team work collaboratively on agreed focus areas, to analyse data and information. NAIT Ltd has staff dedicated to producing intelligence reports and providing data analysis. These reports inform the development of strategies to address existing or emerging NAIT compliance issues.

These intelligence products are then used to design initiatives (where necessary) to address or change the underlying non-compliant behaviours. This uses the VADE model.

IDENTIFYING AND ADDRESSING NON-COMPLIANCE

Non-compliance is identified through the following means:

- General compliance and complaints process including from the public. Complaints can be made from a member of the public, or from internal OSPRI staff. In this case a compliance escalation complaint form is filled out and raised through to the MPI NAIT Compliance Team. Alternatively, members of the public can call the MPI NAIT Compliance Team directly on 0800 008 333 to report NAIT non-compliance.
- Reporting through the NAIT system
 We can detect some non-compliant events recorded in the NAIT system, and then take appropriate action. For example, when an animal that is tagged, but not registered against its current NAIT device (RFID tag) before moving off-farm, it is considered non-compliant. This is because the person in charge has failed to register the animal within 180 days of birth (and within 7 days of applying the NAIT tag), or before its first off-farm movement.
- Issues involving Accredited Entities
 Not all non-compliance is associated with
 farmers. Accredited entities such as information
 providers, saleyard operators, or meat
 processors may be non-compliant. When the
 OSPRI Support Centre or Quality, Assurance and
 Compliance team receive complaints regarding
 accredited entities, these are escalated
 appropriately for investigation and rectification.
- Identification of non-compliance by NAIT
 Officers or NAIT Authorised Persons
 There are a number of NAIT Authorised Persons
 (NAIT Ltd) and NAIT Officers (MPI) located
 regionally across New Zealand. Any one of
 these people may identify non-compliant
 behaviour. Each Officer/Authorised Person
 will then exercise discretion, within agreed
 guidelines, in deciding the best approach
 to use. This is done in accordance with our
 VADE model.

VOLUNTARY AND ASSISTED COMPLIANCE

NAIT Ltd is aware of a variety of challenges PICAs face with NAIT, and with electronically meeting their NAIT obligations. We are dedicated to supporting farmers and to continuously improving how we deliver services to them.

Since NAIT's inception in 2012, many farmers (including those with lower technological capabilities or connectivity) have invested in infrastructure and developed processes that best enables them to meet their NAIT obligations as a cost of doing business, such as computers, tag scanners, mobile devices, and satellite internet.

To support farmers, NAIT Ltd delivers a range of education, engagement, and communications activities on a regular basis. A current list of these activities can be found in Appendix A here.

DIRECTED AND ENFORCED COMPLIANCE - OUR ENFORCEMENT FOCUS

A joint focus by MPI and OSPRI, introduced in 2019, has improved the registration of animals before first off-farm movement: from 60% in 2018, to 93% in 2022. Although this appears to be a good result at face value, the remaining 7% equates to roughly 280,000 animals moving unregistered each year. It can take just one animal to cause a disease outbreak.

MPI compliance will continue to carry out enforcement activities as and when required in line with the VADE model. Including (but not limited to) the following offences:

- · Failure to register as a PICA
- Failure to register a NAIT location
- · Failure to register an animal
- Failure to declare a movement
- Failure to declare a timely movement

Ensuring all NAIT animals are correctly registered, and all movements are recorded within a timely manner is essential to ensuring that NAIT data can deliver on its core function of rapid and accurate tracing of livestock in the event of a disease outbreak or food contamination event.

In addition to this we will also investigate how we can measure and enhance the accuracy of the data that the NAIT system holds. Compliance measurements alone are limited and are not reflective of the discrepancies between the NAIT system and on farm reality. For example, the NAIT system can determine if an animal movement was recorded within 48 hours: however, it cannot be sure that the animals declared in that movement were the animals that physically moved.

PROSECUTIONS AND INFRINGEMENTS POLICY

MPI administers many Acts, Regulations and other legislative instruments across several different regulatory systems, including food safety, biosecurity, animal welfare, fisheries management, forestry and emissions trading. Investigation and Prosecution functions support these systems.

MPI's detailed Prosecutions and Infringements Policy can be found here:

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

MPI/NAIT Compliance Plan

Each year NAIT Ltd and MPI develop a joint Annual NAIT Joint Compliance Plan. This describes our shared areas of focus – broadly, Intelligence, Education, Targeted Compliance, and MyOSPRI. The plan is developed in line with the approved traceability strategy to ensure that we can deliver against agreed investment outcomes.

This plan provides an overview of the initiatives that NAIT Ltd and MPI will deliver to address the focus areas, assigns responsibilities between the two parties, and identifies our goals within these shared areas. The current Joint Compliance Plan is attached as an Appendix B here.

APPENDIX A - VOLUNTARY AND ASSISTED COMPLIANCE ACTIVITIES

These are listed below.

- Re-platforming our information systems.
 MyOSPRI will improve data accuracy and compliance monitoring, so that in the event of another disease outbreak, our farmers are equipped with the right tools to limit the environmental and economic impacts, and to stop the spread of disease. It will also work better with online systems farmers already use on-farm, to ensure movement data is only recorded once.
- Education and communications materials (constantly improved and added to) including
 - Four annual industry campaigns: moving day, beef calving, dairy calving, and breeding bull sales
 - o Mailing NAIT starter packs to new users: these describe key NAIT obligations
 - o A regular newsletter
 - o Social media presence
 - o A NAIT system 'user guide'
 - o NAIT tagging best practise how to effectively tag animals for best retention
 - o Comprehensive web guides to NAIT obligations
 - o Stickers on tag order boxes, informing PICAs that they must register animals after tagging.
- A network of OSPRI regional staff that live all over the country, often have rural backgrounds, and can interact with farmers and provide them educational advice and support so that they can become self-sufficient in meeting their obligations. These staff:
 - Develop and deliver education at a one-tomany regional level, including through events (such as Fieldays), workshops, meetings, webinars, and training days.
 - o Use NAIT data dashboards to generate insights and determine what interventions might be needed.
 - o Work with partner organisations such as Beef+Lamb, DairyNZ, Deer Industry NZ, and the Dairy Women's Network.

- A Support Centre that farmers can phone the Support Centre can perform obligations on behalf of PICAs and can receive mailed and emailed documents. The Support Centre delivers world-class service and practises continuous improvement: including through case management, training, and recording standard practises in a knowledge base.
- Information Providers, a user-pays system
 where farmers can engage a third party to
 assist them with meeting their obligations.
 OSPRI has recently strengthened this system by
 making the assessment process for Information
 Providers more rigorous.
- The ability to appoint friends, colleagues or family members as 'PICA delegates'. This is someone who has access to the PICA's NAIT account who can assist them to meet their obligations using our online platform.
- Loaning NAIT tag scanning equipment, to farmers that request it, at a nominal fee (cost of the courier).

APPENDIX B - MPI / NAIT COMPLIANCE PLAN 2023/24

ce Plan 2023-24	My OSPRI	Farmers/PICAs can easily meet their NAIT obligations	OSPRI will continue with the development of MyOSPRI. MPI will provide suggestions for improved obligation alerts for PICAs in the MyOSPRI system. OSPRI will seek feedback from MPI throughout the development of MyOSPRI. Including the NAIT Officer components of MyOSPRI. OSPRI will develop a userpays model for 3rd party integration.
	Targeted compliance	There is full traceability of animals within the NAIT scheme.	 OSPRI will provide regular reports for the failure to register offence to MPI. This will allow for continued escalated compliance action. MPI will provide education when completing escalated compliance action and refer cases to OSPRI for follow up as and when required. OSPRI will provide regular reports for failure to declare animal movement offences to MPI. MPI will begin escalated compliance action for undeclared animal movement offences. OSPRI will audit and accredit information providers and entities dealing with NAIT animals and monitor their compliance. MPI will investigate non-compliance and respond with appropriate interventions to influence and change behaviour. MPI will adopt a system wide approach to identifying and prioritising non-compliance interventions. MPI will apply Directed and Enforcement action at areas of the NAIT system where the compliance action will cause the greatest consequential compliance effect. E.g., Transport Operators, Accredited Entities and Stock Agents.
MPI/NAIT Compliance Plan 2023-24	Education	Farmers/PICAs are clear about what is expected of them.	OSPRI will continue development of a one-to-many national education project, for the 5 fundamental NAIT obligations. OSPRI will deliver a national advertising programme focused on the 4 main industry campaigns 4 and agreed targeted campaigns. OSPRI will continue to provide targeted assistance to PICAs based on non-compliance reporting (mid-level FTR offenders). OSPRI regional partners will continue to hold educational workshops and events to promote NAIT compliance and educate PICAs. MPI will review and provide advice on OSPRI communications material. OSPRI and MPI will share information regularly on general non-compliance issues as outlined in the operational guide.
	Intelligence	We are using our information to target high risk areas of non-compliance and ensure a high deterrent effect.	OSPRI will principally focus on delivering tactical and operational intelligence products in support of regulatory compliance. OSPRI and MPI will begin implementing the findings from the undeclared animal movements intelligence product. MPI will provide guidance and support in the development of regulatory intelligence products. MPI will provide supporting information for OSPRI intelligence products as and when necessary.
		Goal	

POINTS OF CONTACT

To get help and guidance:

W www.ospri.co.nz

E info@ospri.co.nz

T 0800 482 463

To report non-compliance:

T 0800 008 333 (please select option 2, and then option 2 again)

E NAITInvestigations@mpi.govt.nz

Or through our online form here:

www.mpi.govt.nz/contact-us/report-a-nait-concern/



