

**Proposal for an Enhanced
National Animal Identification
and Traceability System**

(with an initial focus on Cattle and Deer)

**Analysis of Submissions
and Pathway Forward**

December 2005

Executive Summary

There were a total of eighty three (83) written submissions made to the AITWG on the Report for Consultation.

Fifty two (52) percent of the submitters described themselves as cattle/deer owners/managers with many of the submitters having more than one main area of interest relevant to animal identification and traceability.

Overall there was broad support for most of the suggested enhancements to the current animal identification system and a number of specific suggestions as to how these enhancements might be incorporated into the current system.

Some proposed changes need further thought, particularly where submitters have pointed out practical difficulties in obtaining a high level of compliance.

The Animal Identification and Traceability Working Group (AITWG) sees the level and type of submissions as an endorsement in principle of the proposed changes. Some further development of the concept is obviously necessary and further detail on practical operation of the system needs to be worked out. The AITWG therefore proposes the development of a more detailed plan as the basis for implementation of the enhancement and so that producers can better assess the implications of an enhanced system.

In order to meet the timetable originally proposed the AITWG wishes to establish a Governance Group made up of representatives of the affected sectors to carry the project forward and is seeking funding from Government and levy organisations to develop a detailed plan for implementing the proposed changes. It is intended that the new Governance body will be in place by March but in the meantime work will continue in planning and designing enhancements to the current animal identification system.

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1.0 Introduction

This document summarises the submissions received on the consultative report, *Proposal for an Enhanced National Animal Identification and Traceability System (with an initial focus on cattle and deer)*. The report, released in July 2005, set out the findings and recommendations of the Animal Identification and Traceability Working Group (AITWG), an industry-led working group involving participants from the livestock industry, the Ministry of Agriculture and Forestry and the New Zealand Food Safety Authority. The AITWG has been discussing the current and future needs of the New Zealand livestock industries for animal identification and traceability.

The consultative report was deliberately left conceptual in content, while proposing some possible solutions for debate. It specifically looked at international trends in animal identification and traceability and existing New Zealand systems (including databases).

In the report the AITWG outlined a number of proposals and recommendations, including:

- a set of guiding principles;
- what could be collected as mandatory information from all livestock-associated premises and livestock owners/managers;
- a model for cattle and deer, outlining objectives for enhancing existing systems including establishment of a core registry of information, and the recording of movements to enable trace forward and traceback of individual animals for a range of purposes;
- a set of definitions, particularly related to the describing the movement of animals between premises that would be subject to record keeping;
- a possible structure for the core registry, including ownership, governance and how access to this information could be managed;
- that the enhancements would need to be funded and invited suggestions on what would be a fair allocation of costs;
- that, if mandating any part of the system was required, there were a range of legislative and other options that could be considered; and,
- a possible timeline for introducing the enhanced systems, firstly on a voluntary and later on a mandatory basis.

In making suggestions and recommendations, the AITWG put up a possible proposal and invited specific comment and ideas on whether people could support this as a broad model. A mandate to proceed to a more detailed design of the system was needed prior to any significant investment in design, option selection and cost-benefit analysis being made.

A detailed submission form was provided to encourage feedback around specific points raised in the proposal. This was to aid the AITWG in determining where to next, but also provided some scope for people to raise specific issues.

2.0 Summary of Submissions

There were a total of eighty three (83) written submissions made to the AITWG on the Report for Consultation. An additional submission was received more than two weeks following closure of submissions and was not included in this summary, however the submission raised no new points and broadly reflected the eighty three submissions already received.

Fifty two (52) percent of the submitters described themselves as cattle/deer owners/managers with many of the submitters having more than one main area of interest relevant to animal identification and traceability (see below).

Main areas of interest	No.	Main areas of interest	No.
Cattle/ deer owner/manager	43	Other livestock sector (e.g. pigs, sheep, etc)	23
Animal products processing sector	4	Animal products exporting sector	3
Stock and station agent	1	Transport sector	1
ID system service provider	15	Database service provider	10
Industry association	15	Other (please specify below)	21

Livestock sectors other than cattle and deer represented in the submissions included poultry, sheep, goats, pigs, horses and llama. Submitters that considered themselves to have “Other” interests included an agricultural technology company, suppliers of farm business information systems, livestock management and integrated animal management systems and suppliers and manufacturers of tags. Submissions from animal science researchers, farm consultants, IT providers and private individuals were also received.

3.0 Summary of Results

Note: all page references in this document relate to the *Proposal for an Enhanced National Animal Identification and Traceability System (with an initial focus on cattle and deer)*.

People acknowledged the uncertainty of dealing with high-level concepts rather than detailed design. Conditional support was given to proceed provided there is more detail and ongoing dialogue as the practical details are sorted out.

People in general sought a more detailed proposal. Almost half of submitters made suggestions on design elements to be considered. Four submitters specifically asked for cost-benefit analysis on the options, and others sought more cost information before making a final, informed decision. The consultative

report looked at concepts and sought a broad mandate to proceed. Further consultation with parties is obviously needed before final approval on the specifics of the scheme can be given. That aside, many of the issues raised by people should be addressed as part of the next steps. It was very valuable and helpful that most submitters made suggestions for further consideration.

Although RFID (radio frequency identification using a device that can be read when the device is passed by a suitable reader) was not proposed in the consultative report, approximately one quarter of submitters inferred that this was the case and indicated some support, or outlined things to be considered in the adoption of RFID. Views were a little polarised here. Some saw adoption of RFID devices as inevitable, given the international trends, and the means by which on-farm benefits could be best achieved. Others saw it as a significant compliance cost, particularly if animals remained on farm or were never going to be supplied to the international market. Only one submitter said “no” to RFID, while 16 submitters indicated some standardization of devices would be needed. A further 22 submitters said further investigation into RFID technology was needed to address such issues as tag retention and readability. Seven submitters either said RFID would not be needed for deer, or noted that the identification needs for cattle and deer were different.

Twelve submitters indicated that they considered the current schemes (the Animal Health Board (AHB) national identification scheme or the MINDA scheme for dairy herds) should be sufficient for their needs. There were comments received that the AHB scheme needed to be properly implemented, e.g. reporting back at slaughter, and more actively enforced (one submission), to be properly effective.

The AITWG’s consultative report proposes that the AHB’s national identification scheme is taken further and broadened to enable a number of information objectives to be achieved than purely bovine tuberculosis management. The two schemes would not exist side by side, with separate tags. Rather, the AHB scheme requirements would need to be integrated into the enhanced scheme, which would have one form of animal identification, leveraged for a range of defined purposes. The existence of both the AHB and the MINDA scheme clearly raises transitional issues that will need to be managed as part of moving forward.

Of those submitters who stated that they represented deer interests, fifty percent indicated that they supported the proposal. Deer farmers raised different concerns from beef farmers about what is proposed. The market access drivers appear to be somewhat different for deer, particularly because venison is considered a niche market where New Zealand is considered to have a quality reputation. Three submitters raised the issue whether individual animal identification is required for simple farm-to-slaughter management regimes or for deer. A principle of rewarding simple management regimes with simple obligations appears a valid argument. There is a need for further discussion on whether herd identification could be used in some cases for cattle and deer.

Ten percent of responses commented that the enhancements proposed appeared to be costly and onerous; some went as far as to think the scheme was being driven by tag manufacturers (2 submissions) and the bureaucrats (one submission), with little direct benefit on-farm, or even understanding of the practical considerations. Others, however, saw this as an opportunity to leverage a number of benefits, including those on-farm. The work of the AITWG was seen as timely and needed, with the appropriate approach being taken to raise the issues and enable debate.

The responses, and the difference of opinion on proceeding forward from some submitters, does indicate that there is a group of farmers who will need to be convinced of the benefits before providing any endorsement. Unless people make the most of the opportunities for benefit from the scheme, it is likely to remain merely a compliance cost of livestock management to them.

3.1 Current Animal Identification Systems

(refer to section 2.2 and 2.3, pages 9-11)

1. What existing animal identification systems do you use (e.g. tags, readers, recording schemes)?

Fifty six (56) of the submissions (67%) used one or more existing animal identification system.

Form of Identification	Percentage (%) ¹
Visual tags incl. AHB, MINDA, Beef breeder Society tags	79%
Electronic ID	25%
Other i.e. ear marks, branding, optical reading, tattoos	23%

2. What purpose do you currently have for these systems?

Fifty six (56) of the submissions (67%) provided one or more reasons for their existing animal identification system.

Purpose for Identification	Percentage (%) ²
On-farm Management i.e. MINDA	61

¹ nb. As some submitters used more than one form of animal identification the percentage is greater than one hundred (100).

² nb. As some submitters had more than one reason for animal identification the percentage is greater than one hundred (100).

Compliance under the National Pest Management Strategy i.e. AHB tags	38
Compliance under the Animal Products (Hormone Growth Promotants and Animal Identification Specifications) Notice 2003 or for research purposes	11
Other i.e. live animal export, security for loans, beef breeding schemes	5

3.2 Proposed Framework for an Enhanced Animal Identification and Traceability System

(refer to section 3.0, pages 13-23)

3. Do you support the General Principles and Recommendations of the Animal Identification and Traceability Working Group? (n=70; 84%)³

	Percentage (%) ⁴
Yes	76
No	15
Not sure	8

There was a difference in views on the general principles between those supporting it as an essential part of modern farming practice, a natural progression from existing state, or essential in order to keep access to markets open. Where market access was not a driver or relevant to their business, the enhancements were seen purely as a new compliance cost with the big players (2 submissions) or consumers (5 submissions) having the sole benefit.

Ten percent of submitters expressed a view that moving to individual animal identification and full traceability was not essential now, but some of these did acknowledge it would likely be needed in the future. This is consistent with the AITWG's view that in order to "future proof" our industries we need to think about the changes needed now and develop the systems required with the advantage of having a lead time available so this can be done in a planned and proactive way.

³ Where n = number of submissions which answered this question; percentage is number of submissions divided by total number of submissions (83).

⁴ Due to rounding the percentages do not always add to 100.

Those who didn't support the need for enhancements to systems tended to be less supportive of the other proposals by the AITWG or to disengage from providing further views, except to repeat that the changes were unnecessary or costly.

AITWG Response

The AITWG is pleased to see that, in general, its views reflect those of the general cattle and deer farming community. There will inevitably be differences in opinion as to how quickly an enhanced system needs to be introduced but there appears overall agreement that some improvement in the current system will stand New Zealand in good stead for the future.

- 4. To what extent do you agree that the following are key drivers for the enhanced animal identification and traceability system?** (refer to section 3.0, page 13). Give a rating 1 to 5 where 1 is strongly disagree, 2 is disagree, 3 is neither agree nor disagree, 4 is agree; 5 is strongly agree.

	Biosecurity	Market Access	Food Safety	On Farm Management	Other Commercial Benefits
Number of submissions	60	61	60	60	53
Average Ranking	4.12	3.80	3.52	2.97	2.68

There was no clear consensus on what was the primary driver; clearly there are a number of interacting drivers that are leading to the need for change. Drivers also correlated to perception of cost allocation and mandating of the system. Some additional drivers were suggested including animal welfare compliance, improved information and maintaining New Zealand's competitive advantage.

There was strong support that, if biosecurity is a key driver for the enhancements proposed, then at least sheep and pigs, if not all ruminant animals, or all animals, should be covered by the proposed scheme. Sixteen submitters recommended that the scheme be broadened beyond cattle and deer. Three submissions indicated their acceptance of the scheme would be conditional on this. This leads to consideration of a core registry for all farms and related premises handling livestock, if not for all primary sectors which have similar issues for biosecurity, food safety and market access. Such a proposal would not require all species to be individually identified. Responses from the Pork Industry Board, the Poultry Industry Association, and owners of mixed species noted this. They indicated a single overarching scheme would make management easier, and that herd/flock identification would be sufficient

for a number of species, particularly where there are closed systems or vertical integration.

AITWG Response

Again it is inevitable that there will be differing views on the major drivers for an enhanced system. Although recent biosecurity activities (Exercise Taurus, Waiheke Island) have indicated that there are opportunities to improve the current traceability systems, it is also true that to develop a more nearly complete system that other species will need to be included. The pork industry has indicated its willingness to participate in an enhanced animal identification scheme and pigs are significant carriers in the case of some diseases.

The AITWG acknowledges the importance of this species in the overarching traceability scheme. Sheep, were however, excluded from the initial focus because:

- Although the EU has a mandatory sheep identification scheme, there is a wide range of exceptions, it is implemented in a different fashion to slightly different timetables in each Member State and so it is too early to determine its effectiveness or the costs involved.*
- In general sheep are managed under different practices with far greater numbers than cattle and deer.*
- Managing an enhancement to the cattle and deer sector where an identification system already exists is administratively easier and affords an opportunity to more easily bed down systems than would be the case when trying to apply the enhancements over different species with potentially different identification rules.*

There are also good reasons for enhancing the cattle and deer system first. Cattle and deer identifiers are already in place and being used so the proposed system is an enhancement rather than establishment. Many producers have commented that they believe that the current systems could operate more effectively. Systems for biosecurity (TB) and food safety (HGP, BSE) operate separately and appear to be part of a fragmented system. While each operate effectively for their own purposes there would appear to be benefit in bringing them under a single system.

There is also likely to be increasing pressure from regulators and consumers for enhanced traceability systems to provide “peace of mind”. The processing and exporting sectors have indicated that they have ever increasing demands for information including animal raising methods and health status which imply greater need for traceability systems. Such demands could be more easily accommodated within a universal scheme that adopting additional schemes for such purposes.

3.3 Mandatory Datasets

(refer to section 3.2, page 16-17)

5. Do you agree that the provision of core, base information to a national identification and traceability system should be mandatory? (n=63; 76%)

	Percentage (%)
Yes	76
No	17
Not sure	6

Variances on the theme of full 100% compliance was regularly stated in submissions (15%); people considered there should be no exceptions or ability to opt out of the scheme as this would undermine the integrity of the data. This comment was also linked to comments that the scheme should cover all livestock species not just cattle and deer. As a result, mandating of core information is therefore required.

AITWG Response

The views of respondents are in accord with those of the Working Group.

6. Do you agree that the mandatory datasets set out in 3.2 cover the core information that is needed? (n=62; 75%)

	Percentage (%)
Yes	69
No	21
Not sure	10

Comments were made (16 submissions) that the core information needs to be kept simple and sensible (four submissions said what was proposed was too complex). There were a large number of suggestions on how this could be achieved. Allocation of numbers for animals and premises, linked to people and locations is considered core. The allocation of numbers did not need to be globally unique (one submission). While single allocation of premises numbers was advocated, there was a difference of opinion on whether animal identification needed to be allocated by one party (six submissions).

Options were for individual sectors to administer that allocation, or for the numbers to be allocated by various approved parties and uploaded into the core database or shared as part of distributed databases. People wanted MINDA and AHB scheme identification numbers to transit to the new database and either be linked to new numbers or continue to be used. Ten submissions proposed that the existing scheme be enhanced to achieve needs.

There was also a separation between this core data (people, property and herds) and transactional data, such as recording of movements, animal treatments and the like. Transactional information was suggested as being more commercially focused, with either an industry database or a range of service providers able to accept transactional records as approved by the individual farmer. Four submitters said accredited providers should be able to provide data entry.

Of the specific data suggested in the core data, the most mentioned were:

- **Birth date** (4 submissions) – a year or quarterly birth date was seen as sufficient. Actual day of birth shouldn't be mandated as a requirement.
- **Dead/missing animals** (19 submissions) – this is seen as difficult to administer for a number of reasons, not the least of which was practicality and accuracy of time-based reporting. It was suggested that animals are located on-farm unless it is determined otherwise. Recording of animal status could be done in association with other management events, such as Tb-testing or drenching in accordance with individual farm management systems. The point of slaughter could be used to automatically change status from living to dead, without further intervention, for the majority of animals. There was also questioning of how dead and missing animals could be reinstated if subsequently found.
- **Treatments** (3 submissions) – was seen as open to potential abuse given that many legal and illegal treatments could be done, and HGP's were not the sole treatment that needed recording for export purposes.

AITWG Response

The AITWG agrees that mandatory datasets should as a matter of principle be kept as small as practical. It has therefore proposed only those data required under current regulation or to cover obvious deficiencies in the data already collected. However, there must be provisions in place to allow changes to the mandatory datasets over time if warranted for future requirements.

It is not essential that animal identifiers be globally unique, however it is expected that whatever system is applied will probably be globally unique by default. Whether or not identifiers are allocated by a single body it is necessary that the identifiers themselves be at least unique in New Zealand and this implies some coordination of the number allocation process. The current system to allocate AHB and MINDA numbers would seem to be adequate to meet future needs and so it is expected that there would not need to be any change in the allocation process. Similarly the AITWG has always understood that there would be a transition phase where AHB and MINDA numbers would continue to be in circulation. It is not proposed that animals bearing these identifiers would be retagged.

The identifier itself is open to discussion.

On the specific information to be recorded, the approximate birth date is suggested as a mandatory field to fall in line with practice in overseas systems. In both Australia and Canada an approximate birth date field has been added to assist in meeting specified risk material (SRM) removal requirements. Japan, for example is insisting that the US provide meat from animals 20 months of age or younger to ensure that BSE cannot enter the food chain in that country. If age was only recorded to the closest quarter a requirement for an animal to be under 20 months would effectively become a requirement that they be under 17 months of age.

With dead or missing animals the objective is to be able to account for all animals on the farm in the case of a biosecurity emergency. In an emergency the default position will be that MAF officials will wish to inspect all of the animals that are recorded as being on that farm at that time. To avoid long and fruitless searches for animals that have escaped, died or otherwise gone missing it is important for the farmer to be able to have the facility to record missing or dead animals. Time spent searching for animals that do not exist is time that could be better spent working to control the disease outbreak and thus limiting the damage to the New Zealand economy.

Obviously in extensive farming situations the practicalities need to be considered and it may never be possible to get a completely accurate tally of the number of animals on a property. For example animals may go missing one year and re-appear the next, and so there will need to be a facility for reinstating missing animals. Dead status should be restricted for use when animals have died and their identity confirmed.

The important issue is to attempt to limit the circumstances where resources are needlessly expended in an emergency.

7. What other data do you think should be included in the mandatory datasets?

Other data suggested as part of mandatory data were:

- Parentage (4 submissions)
- Breed (3 submissions)
- Animal treatments and health status (3 submissions)
- Abattoir information (weights and yields) (2 submissions)
- Geospatially based (2 submissions)
- Compliance with third-party audited programmes (such as animal welfare, certification, HGPs) (1 submission)
- Vendor declarations (1 submission)
- Export certification (1 submission)
- Information to meet passive and active surveillance (1 submission)

There were not many proposals for additional data. Most people considered mandatory data should be kept to a minimum and provision made for “value-added” or other non-movement data to be provided by other appropriate parties on a commercial basis, rather than forming part of the core.

AITWG Response

Breed was not considered an essential component of the database. It may be of use for breeding purposes but has little or no relevance to the spread of disease or food safety.

Parentage is more difficult because in some long term traceability situations, such as BSE, parentage is important information to determine the spread of a disease. However, the benefits from collecting this information needs to be offset by the costs of collecting it from all premises as a mandatory requirement, and the impact it may have on the quality of the data provided.

Compliance with HGP programmes is of market access significance and it is proposed that HGP status will be recorded as will all components of the current animal status declaration. Parentage recording is subject to further discussion.

Weights and yields are commercially useful information and could be voluntarily recorded and therefore not part of the mandatory database.

In making these comments the AITWG notes that core information can be linked to other information (as it can be for transactional information) in other databases. Such value-added information as breed, weight and yield can be linked back to the core data using the unique identification,

but provided on a more willing buyer basis, rather than mandated for all users of the system.

GIS information is a key element in the core data.

3.4 Proposed model for Cattle and Deer Identification and Traceability

(refer to section 3.3 and 3.6, page 17-21)

8. Do you support the following concepts?

There was general support for the model but strong views expressed on practical aspects of the model.

a. The goal of 48 hour traceback (n=58; 70%)

	Percentage (%)
Yes	76
No	14
Not Sure	10

A number of farmers (3 submissions) cited 48-hour traceback as difficult where internet connections are intermittent or data could be corrupted. Some indicated they would never want to use a computer for this purpose; people also preferred manual recording to be maintained as an option (4 submissions), even if interim until loaded onto the system. This had uses if the systems crashed. Another 2 submissions, however, saw ongoing use of paper-based systems as clumsy. One submission said 12 hour traceback, and another that 24 hours, would be a better goal. One submission indicated that, if the systems were electronically stored then it should take a matter of minutes to get the data needed.

AITWG Response

The AITWG recognises that a goal of 48 hour traceback is ambitious. Nevertheless it sets a goal that is in line with international guidelines. It is possible that a 48 hour traceback may not be able to be achieved in all circumstances. The goal also needs further refinement regarding its exact definition, e.g. 48 hours from when, 100% or some lesser percentage traceback by that time.

b. Unique numbers for animals (n=59; 71%)

	Percentage (%)
Yes	81
No	15
Not Sure	3

While most people agreed, those who said no indicated that this was because different numbers could be allocated by different agencies as long as there was a process for reconciling numbers (6 submissions). Furthermore while RFID might by default provide a globally unique number, this was not significant in the New Zealand context (one submission).

AITWG Response

Comments noted, see response to Q6.

c. Unique numbers for farms/premises (n=59; 71%)

	Percentage (%)
Yes	92
No	5
Not Sure	3

d. Allocation of numbers by a single body (n=57; 69%)

	Percentage (%)
Yes	82
No	14
Not Sure	4

Where the submitter said no, there was support for a single body to allocate farm/premises numbers, even if animal identification was handled by a number of parties. One submission said unique numbers within the system were not necessary, provided that the system could recognise multiple numbers for a single animal.

e. Standardisation of animal ID devices (n=59; 71%)

	Percentage (%)
Yes	88
No	10
Not Sure	2

Some standardisation of devices (16 submissions) was agreed but within a competitive supply model. Comments were divided between strong support for RFID (11 submissions) alone, even if backed by secondary visual capability (4 submissions), or strong disagreement on the need for RFID (1 submission). A number commented that a one-device system, whether RFID or not, was administratively easier between farms and premises, especially sales yards and abattoirs who would not want multiple reading of stock to gather information.

AITWG Response

The purpose of agreeing to standardised devices is to promote certainty for farmers, processors and suppliers. Farmers and processors want to ensure that the tags they purchase can be read by whatever reader a processor, saleyard or transporter might use. Similarly the transporters saleyard operators and processors want to be sure that whatever reading device they purchase can read all of the tags used by producers. Until there is this certainty all will be reluctant to move to an RFID system and RFID will not be adopted. By agreeing to a standard purchasers can buy with confidence and suppliers know how devices need to be designed to meet the market. This will greatly enhance the uptake of RFID. Note that the AITWG proposal was not specifically about RFID, nevertheless it is expected that an RFID system will be one acceptable form of individual identification.

f. Centralised database (n=60; 72%)

	Percentage (%)
Yes	92
No	3
Not Sure	5

Overall there was strong support for this, although one person proposed the option of a distributed database. The complexity of multiple databases sharing data was cited as a problem which would need to be

overcome. There was also a view that the centralised database could be developed from one of the existing databases (5 submissions).

AITWG Response

The concept of a central or single database seems to have been interpreted in a number of different ways by submitters and needs better definition. In any case there seems to be general support for the idea of data only being recorded once, wherever it may be held, and that changes to a record therefore only need to be made to one piece of data rather than changing the same information on a number of different databases operating under different frameworks. A distributed database would meet the same criteria but has some added complexity. In any case there seems to be general agreement that the same data should not be held on multiple databases, other than for disaster recovery purposes, if this can be avoided.

g. The process for issuing numbers (n=56; 67%)

	Percentage (%)
Yes	52
No	21
Not Sure	27

The expiration of unused tags received 12 comments, mainly around the uncertainty of the number of tags that needed to be ordered in advance of birthing, or where small holdings has an infrequent need for new tags. Suggestions included:

- that the tag should be set up when the animal is actually tagged, ie when activated, rather than when supplied
- that unused tags could be returned for a refund or reactivated at a later date. This would be complex to administer.
- Issued, but unused tags could have an “in store” or “pending” status until applied.

No-one suggested a change to the existing web-based system for purchasing tags.

AITWG Response

The rationale for having tags expire was to maintain the integrity of the data on the database and to ensure that, in the case of a biosecurity emergency, the authorities have a good record on the number of animals on the farm. Another approach would be to “activate” the tags when

they are attached to animals. Tags which are able to be reused would not display evidence of tampering which may in turn affect the integrity of the system. The alternative is to have the tags activated at the time of manufacture. As long as producers are able to account for unused tags then the integrity of the system can be maintained. While a tag number is recorded on the database it only becomes “current” when animal information is recorded against it.

Another important consideration is that tags needs to be tamperproof. This would create difficulties for re-useable tags. The cost of removing, transporting and resetting a used tag are seen to outweigh the costs of using a new tag.

h. Process for notifying movements (n=56; 67%)

	Percentage (%)
Yes	63
No	20
Not Sure	18

Many people did not support both the buyer and the seller informing TRACEY of the movement, seeing this as double-handling for little benefit (7 submissions). The alternative suggested is to make one party responsible, e.g. the seller, with the purchaser having only limited data input to validate receipt of consignment, or none.

There was also concern about the need for electronic access in order to meet notification requirements and whether manual forms could still be accepted in the short term (7 submissions related to computer access and needs of non-computer users).

AITWG Response

This component of the proposed system may seem to be unnecessarily bureaucratic. However, the actual implementation of such a system could be as simple as the purchaser ticking a box to confirm receipt of the animals. The purpose of both the vendor and purchaser advising the database is to ensure data integrity and to allow producers an increased level of control. The alternative would be to have only one of the parties required to notify the database. This could pose difficulties if there is an issue of liability relating to ownership of the stock. It is possible to consider circumstances where one or other of the transactors may not wish to record an animal movement and it is not clear which, the vendor or purchaser has the greater incentive to record the movement.

i. Use of TRACEY to validate slaughter (n=56; 67%)

	Percentage (%)
Yes	73
No	18
Not Sure	9

This issue was of concern mainly in terms of timing, with one submitter worried about the animal welfare implications if animals were unable to be slaughtered because information had not been received in time.

AITWG Response

The validation of eligibility for slaughter is an extension of the current Animal Status Declaration Form (ASD) system. Currently the ASD needs to accompany stock to slaughter and this practice could continue. Given the difficulties reported with the acceptance of ASDs currently there would only be virtue in having TRACEY confirming eligibility if it streamlined the system. The AITWG does not see this as being a vital component of the system but perhaps something that could be introduced once the system has been shown to operate speedily and efficiently.

j. Periodic notification of on-property livestock losses to update databases for dead and missing animals (n=56; 67%)

	Percentage (%)
Yes	61
No	20
Not Sure	20

See comments under 6. People who mentioned notification of stock losses noted that it would be difficult to ensure compliance, but if associated with other on-farm management routines, updating could occur on a more ad hoc basis. Processes to reinstate animals would be needed.

AITWG Response

See comments under Q.6

k. Standalone governing body (n=58; 70%)

	Percentage (%)
Yes	86
No	9
Not Sure	5

AITWG Response

See comments under Q.11.

l. The ownership of the database being a custodial trust (n=53; 64%)

	Percentage (%)
Yes	66
No	6
Not Sure	28

AITWG Response

See comments under Q.11.

3.5 Definitions

(refer to section 3.4, page 20)

9. Do you support the proposed definitions for the following?

- Movement (n=59; 71%)

	Percentage (%)
Yes	81
No	8
Not Sure	10

- Person in charge (n=59; 71%)

	Percentage (%)
Yes	76
No	14
Not Sure	10

Non contiguous properties (n=57; 69%)

	Percentage (%)
Yes	67
No	11
Not Sure	23

There were few comments received on the definitions. Some thought person in charge was less relevant than the owner and only the owner was needed. Others considered a broader definition of person in charge to include anyone acting under the authority of the owner (including transport operators, sales yard personnel) should be considered.

Further debate and examples on movements, particularly between land parcels is needed to clarify actual requirements.

AITWG Response

The person in charge definition is derived from the food safety requirements for ASDs. Currently the ASD must be filled in by a person in charge which may include the owner. In a biosecurity emergency there may be multiple parties involved, for instance a farm manager, an animal owner and the property owner may all be different people and all will need to be consulted or will need to comply with MAF Biosecurity requirements. For this reason it is proposed that information be collected on farm owners and occupants, which information will be associated with the property identifier, and animal owners or “people in charge” which information will be associated with the animal identifier.

10. Do you support the following movements being recorded on TRACEY?

- Where there is a change of ownership (n=56; 67%)

	Percentage (%)
Yes	84
No	9
Not Sure	7

- Animals moving direct to slaughter (n=54; 65%)

	Percentage (%)
Yes	81
No	11
Not Sure	7

- Between non-contiguous properties under the same management (n=54; 65%)

	Percentage (%)
Yes	54
No	30
Not Sure	17

- All movements except between contiguous land parcels under the same management (n=53; 64%)

	Percentage (%)
Yes	66
No	17
Not Sure	17

- Other *Specify* (n=12; 14%)

	Percentage (%)
Yes	58
No	25
Not Sure	17

Policing of movements between non-contiguous parcels of land under the same management was raised as an issue by two submitters who saw this as difficult to enforce and easily circumvented, e.g. if the person had their own transport. People saw a distinction between a move one kilometre down the road and long distance, with the suggestion that the former is kept simple

The key questions determining whether a movement should be recorded are:

- Do the animals come in contact or mix with other animals as a consequence of, or during the movement?
- Can you get the information on the movement relatively easily when it is needed, eg for a biosecurity emergency? This implies some time component (ability to remember) and knowledge (same person in charge).

One submitter did not see change of person in charge by itself as the trigger for recording a movement if a movement to another owner or property did not occur. A combination of factors could be valid to determine movements and there were grey areas that need to be clarified or some room for independent determination if necessary.

AITWG Response

The reasons behind these definitions could have been better explained in the consultation document. The proposal is that animal movements from one property to another should be recorded unless the property to which the animals are being moved is under the same ownership, is within 10 kilometres of the farm of origin and no mingling with other animals occurs. It is not proposed that the mere changing of a person in charge be recorded as a movement nor is it proposed that in the sale of a farm (or the stock on a farm) that a “movement” would need to be recorded if the stock do not move, however the records pertaining to farm or animal ownership would need to be changed in the database. This would automatically link animals to the new owner.

3.6 Ownership, access, governance and funding

(refer to section 3.5 and 3.6, page 20-23)

11. What structure do you think is the most appropriate for managing the database on behalf of industry? *Please rank in order of preference 1 = most preferred*

	Custodial Trust	Industry/ Crown body	Incorporated society	Industry body	Other	Crown
Number of submissions	60	113	108	127	27	167
Average Ranking	1.54	2.76	3.00	3.26	3.38	4.39

There was strong support in the comments received for some form of industry ownership, whilst retaining independence (non-capture), removing potential for conflicts of interest (particularly commercial) and ensuring privacy issues were addressed.

There was a role for the Crown as a regulator, but it was less clear on what it has in relation to database ownership or management. Five submitters said Government shouldn't manage the system, and two submitters said the AHB shouldn't. By comparison three submitters considered the Crown should manage the core registry. One submitter noted that Crown ownership is vital to retain international credibility and accountability. Most did not want the Crown to have sole governance, but there was support for a joint approach.

Governance, and the setting of rules and processes, is seen as more important than ownership per se by submitters, including current database service providers. There was also a view that there should be a separation between the role of data governance and provision of services (1 submission).

AITWG Response

Further work will need to be done on an appropriate structure, bearing in mind the potential role of Government in providing regulatory backing for the funding of the system. Both the Canadian and Australian systems are industry run and the Secretary for Agriculture in the US has indicated support for a privately run system there. Depending on the Government's position on the need to enhance the current system there may be benefit in having the government represented at the governance level of the traceability organisation. There are risks arising from not having the Government involved. To avoid this possibility either

contractual arrangements between the industry traceability organisation and the government would need to be carefully crafted or the government should be included in some way in the operation of the traceability system.

12. Do you agree with the recommendations regarding control of access to the database? (n=48; 58%)

	Percentage (%)
Yes	88
No	10
Not Sure	2

Most supported strong controls on access. Six submitters noted that there should be no commercial gain from the data.

Strong rules on who has access, with the right of the farmer to allow or enable further access by a third party provider for a specific purpose came through as a common theme.

Some people (6 submissions) suggested that industry-good and public-good access should be enabled, such as for statistical information or research, again under clear rules. Only two submissions advocated access for anyone willing to pay for it.

There was strong support that the information could only be used for the purpose for which it is gathered. One submitter noted that no databases are completely secure.

AITWG Response

Access is an important issue. The consultation document identifies the need for a process to approve requests for access.

The use of the word “commercial” is perceived differently. The concept of “no-one should commercially benefit”, in its strictest sense would limit choice by the farmer to obtain commercial benefit from the information, such as using the information to better manage on-farm systems.

Keeping the information completely private to the farmer would, however, be impractical as this implies that no-one else would be allowed access to the data, even in a biosecurity emergency or food safety scare.

There are several possibilities for an access policy. One policy might be to make the information available only for biosecurity (including national pest management strategies, surveillance and incursion response) and food safety (government/regulatory use) and market access purposes. This is potentially too restrictive and would not use the information in the database to the best effect.

It is proposed that government access to the database is limited to only that information which is required for biosecurity, food safety and market access reasons. Additional access may be determined by an independent governance group or access panel. The conditions of supply of information need to be clearly spelled out. Consideration also needs to be given to those circumstances under which information needs to be made available under law, for example as the result of a court order, other legislation and specific circumstances such as disputes over ownership.

13. What would you consider would be a realistic and fair way of allocating costs for the proposed national animal identification and traceability system?

There was a variance of views in terms of relative contribution, but most people supported a combination of funding between the State and industry (33 submissions), with the latter raised through some form of transaction charge, tag charge or levy.

User pays is supported by 12 submitters. Users would include the Crown as a recognised and acknowledged user of the information including the insurance factor for biosecurity and food safety. Some also saw that market access benefited the Crown as it was an “export earner”.

It was considered by some that people with complex management regimes would make greater use of the systems, and constituted a greater risk and that they should therefore make a greater contribution (3 submissions). Five submitters said that costs should be allocated based on benefits.

There was concern by one submitter that specialist breeders would bear the majority of tagging costs if all animals needed to be tagged at birth, or prior to their first movement irrespective of age, although this cost could be reflected in the purchase price.

Subsidies on tags were suggested by a few submitters (6 submissions). The amounts suggested were up to \$50 per animal or to provide a subsidy to those properties that had a high compliance cost. One submission suggested that part of the levy collected could be returned back to subsidise tags.

A number of people considered that, since consumers demand greater traceability, they should be prepared to pay for it (5 submissions).

On-farm administrative costs of the scheme shouldn't be ignored, with some suggesting these should be the main costs to the farmer (2 submissions).

There was some incongruity between ownership of the data and allocation of costs, e.g. some people advocated a small or no role of the State while at the same time they said that the Crown should make a major contribution to the costs of the scheme.

Separating the costs of databases, establishment, transaction costs and tags was considered (9 submissions). People who suggested this often noted that the Crown could make a greater investment in the startup phase.

The perception of the importance of the drivers behind the need for enhancements to the system, was correlated to how people perceived costs should be shared.

AITWG Response

The AITWG proposal states that the costs of the system should lie where the benefits fall. Implicit in this statement is that the Crown receives benefits from the system, however the size of that benefit is yet to be determined.

The role of government in the development, governance and operation of the system is yet to be determined and, until then, discussions on funding cannot be progressed. The AITWG is working with the government on developing the case for future government involvement, including funding.

14. What rules should underpin the system that is developed? (n=68; 82%)

	Percentage (%)
Mandate using regulations	63
Reach industry agreements/MOU	16
Keep the system voluntary	16
Not Sure	4

Were the proposed enhancements to proceed, most comments supported the mandating of the system through regulations to achieve full compliance. This was mainly to ensure that recalcitrant individuals were included, with many noting in varying ways that a good, well thought-out and designed system would maximise voluntary uptake. For some submitters, high voluntary use of the system is connected to being able to have some choices, e.g. choice of service provider and ability to acquire value-added services.

The regulations did not need to be highly prescriptive, with a focus on standards and systems rather than specific services to be used. There was a role for specific sectors to determine the details where needed, using industry agreements.

Some considered that the regulations needed to allow for future flexibility in adoption of technology. Others considered that RFID was the logical way forward and that it should be mandated.

AITWG Response

While the system itself will most likely need to be mandated the AITWG believes that, where possible, flexibility should be maintained and uptake driven by commercial decisions. While the AITWG proposes a mandatory system, it does not propose at this stage mandatory use of RFID. More debate within industry is needed, however RFID as a recognised device is supported.

3.7 Next Steps

(refer to section 4.0, page 24)

- 15. Do you support the introduction of the proposed enhanced animal identification and traceability system on a voluntary basis prior to becoming mandatory? (n=58; 70%)**

	Percentage (%)
Yes	86
No	10
Not Sure	3

Most submitters had a general support for a voluntary period for a number of reasons, particularly in order to trial and test systems before they became mandated. However, the advocates of RFID considered early adoption of industry/international standards for technology and

performance measures was needed to enable the appropriate investment by parties and reduce uncertainty.

Suggestions included:

- Mandate from the start (4 submissions)
- Mandate standards for devices and data early on to allow greater certainty (4 submissions)
- Extend the voluntary period, provide a phase-in or exemptions for certain stock (8 submissions)
- Keep the system voluntary for deer (2 submissions)
- Have a trial period and/or use demonstration farms for people to see benefits and investment (13 submissions).

There were some strong advocates for an education programme (8 submissions) during the voluntary period, and that mandating could be delayed until a good uptake was achieved.

Some submitters did not support voluntary introduction, noting that few would be interested in adopting a more rigorous (and costly) system on a voluntary basis.

A number of technology service providers and the Pork Industry Board offered to assist in the pilot phase. The latter felt the size and integration of their industry would provide a good testing ground for systems.

AITWG Response

It is possible to maintain a voluntary system while agreeing to industry standards for RFID and providing certainty of the type of devices which are acceptable. Whatever technologies or systems are adopted there will be a transition phase from the current tagging, identification and recording systems to the enhanced version. This transition period will be determined to some extent by the rate of uptake of the new technologies and systems but will also need to consider the lifetime of animals affected. One important feature of a transition phase is that the longer the transition period the longer the traceability system will be operating sub-optimally and therefore the greater the risk and the longer the time until the benefits are returned to those who have implemented the system.

16. Is the timetable proposed realistic, i.e. voluntary programme introduced by 1 October 2006 and mandatory programme for cattle and deer introduced by 1 October 2007? (n=60; 72%)

	Percentage (%)
Yes	38
No	40
Not Sure	22

Most people who commented on this question saw the timetable as tight or optimistic, if not unrealistic or unachievable.

Supporters noted that existing systems could be readily adapted to meet new requirements, such as for database devices and for simple farm to slaughter traceability. This was tempered by the view that some parts of the chain, particularly sales yards and processing plants, and owners of small farm holdings and lifestyle blocks, would need a longer lead time before mandating. A strong commitment to keep to this deadline would be needed.

A longer lead time was also seen as needed if the core registry, and adoption of animal identification by other livestock sectors, was wider than for just cattle and deer. It was also needed to enable the necessary consultation and education campaign that was needed.

People want it done once and done well. For this reason they cautioned not rushing into solutions but to evaluate systems needs, design it properly and bring online the best system possible. Even then, people considered that momentum on moving forward needed to be maintained.

It was also noted that New Zealand was fortunate because it had the ability to closely look at other systems introduced overseas, evaluate what would be appropriate here, and learn from the experience of other countries. Australia, Canada and the European Union were given as systems needing further investigation (4 submissions). This could ultimately smooth out the rollout and reduce costs.

More work is needed to evaluate the range of technologies and identification devices, so that a range of options could be considered and costed. This would need to be done before a definite timetable could be set.

Early adoption of standards to remove uncertainty, but a longer lead time until mandatory, was also noted.

A July start to coincide with natural events and changeovers was proposed by 3 submitters.

The Animal Health Board noted that if changes in devices were needed, e.g. adoption of RFID, then these devices could be introduced through the existing national identification scheme for cattle and deer. This would facilitate the transition process. Manufacturers of tags indicated that it would be relatively straight forward to introduce new devices compliance with existing international standards, however, they anticipated a growing worldwide demand might affect supply.

AITWG Response

The AITWG has always considered the timetable it has set to be ambitious but achievable. An important consideration has arisen in the proposal, particularly by the dairy industry, that an appropriate time to commence an enhanced system is in June/July, in time for calving. This would either move the timetable forward by three or four months or delay it by nine.

Many of the proposed enhancements can be incorporated into the current identification system for bovine Tb and the current dairy recording system e.g. device standards and approvals.

17. What other things need to be considered in the proposed model?

Many of the comments received were also relevant to other elements of the proposal, and were useful inputs in their entirety.

Some specific matters and themes raised were as follows (some have been commented on elsewhere):

- The next steps would be important; people want more practical details on how it could work to give full support. This included the provision of cost-benefit analysis. Decision-making needed to be well-informed.
- The need to cover more than cattle and deer in the scheme, particularly for biosecurity purposes
- There was a need to ensure the scheme was properly continued into the food chain (2 submissions)
- The need to consider other schemes in place internationally (4 submissions)
- Look more closely at existing systems within NZ to see if these could be adapted (12 submissions)
- The types of devices and the technology now needed more consideration before the system could be designed; and views in this area were polarized (22 submissions)

- To evaluate the range of off-the-shelf systems, existing databases and technologies, appropriate expertise was now required. Decisions should not be put in the hands of IT managers though.
- Keep the systems flexible regarding devices to enable new, emerging technologies to be used as appropriate (one person advocated not adopting international ISO standards because these are slow to recognise technology leaps forward)
- Issues of tag retention, reusable tags (such as slaughter tags), and enabling AHB and MINDA tags in use to be allowed through the transition, need to be included. Other, secondary forms of identification (boluses, implants, ear tags, tail tags, may also have a place and needed to be resolved).
- The system needs to be simple and practical; compliance costs need to be kept down – ideally no greater overall than the current cost taking into account all systems.
- Enable both computer and manual-based systems to operate side by side for now
- Changes to the Animal Status Declaration process (which is paper-based), such as incorporating this into TRACEY as an electronic notification, would provide good incentives
- Clarify and simplify proposals on the recording of movements to avoid duplication, extra work for undefined benefit, or reduce incentives for avoidance or providing poor information.
- Importance of education and ongoing consultation to achieve good uptake and acceptance.
- The use of demonstration farms and trials

AITWG Response

The AITWG welcomes the many suggestions made in the submissions and will take them into consideration during the further development of the proposal.

Appendix A: The Submission Form

SUBMISSION FORM

Proposal for an Enhanced National Animal Identification and Traceability System (with an initial focus on Cattle and Deer)

Office use only

Submission number	
Date received	

This form is included to assist you. Submissions in another format are welcome, as are any additional or general comments. You may also continue your response on a separate sheet where needed. So that you can be contacted for further information and clarification please provide the following details:

Name	
Organisation/Company	
Address	
Phone	
Fax	
Email	

Privacy Act

In preparing the summary of submissions the Animal Identification and Traceability Working Group may want to attribute specific statements to an individual or organisation. If you do not want to be identified in the report please indicate by completing the following:

I do **not** wish to be individually identified in the summary of submissions

.....
(Signed)

Please send your submission to:

Secretary, Animal Identification and Traceability Working Group
PO Box 121
Wellington
Fax: 04-474 0800
Email: bridget.peachey@meatandwoolnz.com

Submissions close 5 pm, Friday 30 September 2005

Please indicate your main areas of interest relevant to animal identification and traceability systems: *(tick one or more boxes as applicable)*

- | | | | |
|-----------------------------------|--------------------------|--|--------------------------|
| Cattle/ deer owner/manager | <input type="checkbox"/> | Other livestock sector (e.g. pigs, sheep, etc) | <input type="checkbox"/> |
| Animal products processing sector | <input type="checkbox"/> | Animal products exporting sector | <input type="checkbox"/> |
| Stock and station agent | <input type="checkbox"/> | Transport sector | <input type="checkbox"/> |
| ID system service provider | <input type="checkbox"/> | Database service provider | <input type="checkbox"/> |
| Industry association | <input type="checkbox"/> | Other (please specify below) | <input type="checkbox"/> |
-
-

Current animal identification systems

(refer to section 2.2 and 2.3, pages 9-11)

4. What existing animal identification systems do you use *(e.g. tags, readers, recording schemes)*?

5. What purpose do you currently have for these systems?

Proposed Framework for an enhanced animal identification and traceability system

(refer to section 3.0, pages 13-23)

6. Do you support the General Principles and Recommendations of the Animal Identification and Traceability Working Group?

Yes

No

Not sure

Comments?

4. To what extent do you agree that the following are key drivers for the enhanced animal identification and traceability system? (refer to section 3.0, page 13). Give a rating 1 to 5 where 1 is strongly disagree, 2 is disagree, 3 is neither agree nor disagree, 4 is agree; 5 is strongly agree.

Rating

• Biosecurity

• Food Safety

• Market Access

• On Farm Management

• Other Commercial Benefits

Comments?

Mandatory Datasets

(refer to section 3.2, page 16-17)

5. Do you agree that the provision of core, base information to a national identification and traceability system should be mandatory?

Yes

No

Not sure

Comments?

6. Do you agree that the mandatory datasets set out in 3.2 cover the core information that is needed?

Yes

No

Not sure

Comments?

7. What other data do you think should be included in the mandatory datasets?

Proposed model for Cattle and Deer Identification and Traceability

(refer to section 3.3 and 3.6, page 17-21)

8. Do you support the following concepts?

	Yes	No	Not Sure
• The goal of 48 hour traceback	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Unique numbers for animals (a)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Unique numbers for farms/premises (b)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Allocation of numbers by a single body (d)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Standardisation of animal ID devices (e)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Centralised database (d) (f)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• The process for issuing numbers (g) (h)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Process for notifying movements (i)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Use of TRACEY to validate slaughter (j)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Periodic notification of on-property livestock losses to update databases for dead and missing animals (l)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Standalone governing body (m)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• The ownership of the database being a custodial trust	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments?

Definitions

(refer to section 3.4, page 20)

9. Do you support the proposed definitions for the following?

- | | Yes | No | Not Sure |
|-----------------------------|--------------------------|--------------------------|--------------------------|
| • Movement | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Person in Charge | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Non-contiguous properties | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

18. Do you support the following movements being recorded on TRACEY?

- | | Yes | No | Not Sure |
|--|--------------------------|--------------------------|--------------------------|
| • Where there is a change of ownership | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Animals moving direct to slaughter | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Between non-contiguous properties under the same management | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • All movements except between contiguous land parcels under the same management | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Other <i>Specify</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Ownership, access, governance and funding

(refer to section 3.5 and 3.6, page 20-23)

19. What structure do you think is the most appropriate for managing the database on behalf of industry? *Please rank in order of preference 1 = most preferred*

- | | |
|----------------------|--------------------------|
| Custodial trust | <input type="checkbox"/> |
| Incorporated society | <input type="checkbox"/> |
| Crown | <input type="checkbox"/> |
| Industry/Crown body | <input type="checkbox"/> |
| Industry body | <input type="checkbox"/> |

Other *Specify*

20. Do you agree with the recommendations regarding control of access to the database?

Yes

No

If not –what would you prefer?

21. What would you consider would be a realistic and fair way of allocating costs for the proposed national animal identification and traceability system?

22. What rules should underpin the system that is developed?

Mandate using regulations

Reach industry agreements/MOU

Keep the system voluntary

Not sure

Next Steps

(refer to section 4.0, page 24)

23. Do you support the introduction of the proposed enhanced animal identification and traceability system on a voluntary basis prior to becoming mandatory?

Yes

No

Not sure

24. Is the timetable proposed realistic, i.e. voluntary programme introduced by 1 October 2006 and mandatory programme for cattle and deer introduced by 1 October 2007?

Yes

No

Not sure

Comment?

25. What other things need to be considered in the proposed model?

Please attach any additional general or specific comments on the document for consultation or the concept of an enhanced animal identification and traceability system.

Thank you for your time in completing this submission

ANIMAL IDENTIFICATION AND TRACEABILITY WORKING GROUP
July 2005

Appendix B: Summary of Submissions - comments

Q3. General Principles and Recommendations of the Animal Identification and Traceability Working Group

#	Comment
1	Visual tags subject to user error. Recommends electronic to avoid misread of tags
11	July start fro mandatory commencement
15	Whole thing unnecessary as current system is working well.
16	Feel it could be cumbersome, onerous and expensive
21	AHB tags should be able to do it
23	AHB scheme has potential to meet requirements
26	No clear business case for deer
30	Not sure if needed in the near future
33	Supports 100% identification for deer
36	Standards based around those in Australia
40	Cattle but not for deer as less trading in deer
45	Serious consideration needs to be given to incorporation of additional data to meet passive and active surveillance requirements
46	May need to be varied for species other than cattle or deer (eg herd/flock). Depends on whether closed system or pasture based. Audit systems needed. Appropriate single NZ standard for one system/technology. Adoption of international standard for electronic livestock identification.
49	Timeliness of data entry – use of multiple channels. Exception handling, automate tracking.
52	Yes provided it is put together by people who understand the practical requirements of those who have to use the system
54	Unless system actually works then the effort is wasted
59	Inevitable as happening overseas. Would rather be informed than have it sneak up on me.
60	Same as for 46
63	Cattle and deer industry needs might differ significantly and need consideration
64	Some applications appear inconsistent with stated principles
65	Supports 45
71	71% agreed scheme is a good idea, 24% against. Questions raised about cost of scheme and bureaucracy to run it.
72	Supports 45. Cost-benefit analysis must be integral to development of system.
73	Full support by Allflex
79	Too complex and therefore expensive and onerous to run. A stock manager's nightmare.
82	Keep it simple and practical. Reserved approval with continued consultation required.
83	Existing herd numbers and numbered tags should be enough

Q4. Key drivers for the enhanced animal identification and traceability system

#	Comment
1	System must be user friendly and eliminate errors. If this is achieved benefits will far outweigh costs of setting up.
9	Biosecurity and food safety are general drivers. Not much to be gained in on-farm management systems. Relate identification to point of meat cuts and pay on this basis.
15	None of these are drivers
16	Really market-driven – a trade barrier. NZ meat is known to be safe. Paper trail is sufficient for biosecurity.
17	Drivers are perceived only
18	Don't rush into something that gives marketers a free ride

23	Different drivers for deer
28	Divergence of views on relative drivers, impacts on costs. If for biosecurity, including all other sectors. If for market access then mainly in the beef industry, not a driver for deer.
31	If not a market access issue, don't do it
40	Commercial benefits will be slow in coming
44	Need to sell commercial benefits to farmers
45	On-farm benefits and other commercial benefits only realised by the response from commercial service providers using non-core data. Needs to be technology neutral.
48	Biosecurity and market access, but unless farmers perceive benefit at farm level these will be lost
51	Animal welfare
52	Drivers dependent on system in place. Own system is excellent. Other commercial benefits only for leaches who don't care for real reasons behind such a system.
54	Reduce the risk that a disease outbreak in one area takes out of the whole of NZ exports
56	Don't see commercial benefit at this stage. Biosecurity for long-term sustainability. Market access may become the price of doing business.
63	Off-shore market access is the main consideration at present. Value for disease management only truly appreciated after the event. Animal identification needs to be extended to other farmed species for biosecurity.
64	Market access is key driver, but key benefits will come from on-farm benefits and other commercial benefits
65	Supports 45
68	All livestock industries need to be involved for biosecurity reasons
69	Inadequate and inequitable to have some species under mandatory ID while other susceptible species are not. On farm management benefits may cover the ongoing costs, and if farmers can be convinced on that, then compliance will be more readily achieved.
71	71% agreed with drivers and ranking (order in submission form?) were relevant, 24% against. Those not in support felt there was not enough information on costs versus benefits and by maintaining quality product NZ would always find a market; also doubt about market need for enhanced system at this stage.
72	Biosecurity is main driver for dairy industry. Supports 45.
74	Viable animal identification system is more critical for NZ than any other western economy. NZ's competitive advantage not considered in document.
79	No pressure from importers in deer industry for this
81	Traceability systems are necessary part of modern biosecurity infrastructure. Low frequency occurrence of outbreaks, high outbreak can raise arguments re deferring this investment, however consumer-driven requirements demand assurances based on food safety perceptions. On-farm system benefits often understated due to difficulty in determining benefit. Electronic-based systems will be critical for these to be achieved; enables collection of information on performance of individual stock.
83	Only drivers should be safety and security

Q5. Mandatory provision of core, base information to a national identification and traceability system

#	Comment
1	Record all treatments to allow processes to trace animals that have been processed that should not have been
10	Extensively trial, test and prove first
14	Core data should be the legal requirement for all livestock owners
15	Deer farmers already have a system
16	Needs to be simple and mandatory. Require registration of property at time of sale.
23	Shouldn't be mandatory for deer at this time
30	Year of birth is enough. Just have owner's name not person in charge.
32	Support core data, but allow storage of data with accredited providers. Wise to differentiate between owner and person in charge.

45	Manage identifiable risks in biosecurity, food safety and market access – requires 100% compliance. Level of acceptance from farming community (eg MINDA) almost gives mandate for compulsory usage.
47	Not justifiable at this time
48	Information must be sensible and not prove onerous to collect at whatever level
51	Information supply has to be easy, quick and in a standard format
52	No system without it being mandatory
53	Standardisation of animal ID devices very strongly supported. Must be about animals not just cattle and deer. Farmers running cattle and sheep don't want to run two separate systems.
56	If worth doing, it needs to be for everyone.
65	Manage identifiable risks in biosecurity, food safety and market access – requires 100% compliance.
71	76% in favour, 19% against, 5% did not respond. Concerns regarding double up of information with other databases, and privacy concerns that information was held for animal identification reasons only with no access for non-related organisations. System must enhance what is already in place, not add to farmer's costs and time.
72	Manage identifiable risks in biosecurity, food safety and market access – requires 100% compliance
75	Development of a new database is unnecessary. Core data already exists and a distributed rather than a centralized database model would accomplish the necessary requirements.
80	Database needs protection from unauthorized use
81	Core registry should have capacity to handle all the primary sectors (agricultural, horticultural, forestry and aqua-culture). farms and premises need to be geospatially referenced. Transactional information can link to core register and be managed separate to this.
82	Register both property and owner/person responsible for stock. Property numbers should line up with council rating system.

Q6. Mandatory datasets cover the core information that is needed.

#	Comment
5	Keep as simple as possible. Exclude data of questionable benefit as duplication of information is managed elsewhere. Quarterly birth date. Missing/dead as an optional field. Use codes for slaughtered/dead/mission. Supports continuation of AHB 13 digit herd code. Tag colour coding. Requirements for recording by transporter difficult to implement – alternative hold by farmers.
9	Some duplication/overlap in information
16	Reconciling for dead animals would be time consuming
17	Too much detail. Thought change of manager would mean a change of tags.
23	Concern over complication re transaction data, especially missing/dead
25	Keep at minimum and growth through need
26	Too much detail for deer industry
29	Hold the information securely as it is privileged and confidential to the farmer
38	Involve AHB in scoping and development
39	Can seem some negativity from farmers about continued recording of information
45	Initial data for establishment point. Animal disease and diagnostic treatments. Future requirements should be signaled by AITWG.
47	Missing animals could be a headache, if required every year rather than when animals exit the farm system
48	Transactional information needs a lot more thought
53	Compatible with LIC number system (don't want to have two numbers for same animal)
63	Correction: HGPs are injected under the skin of the ear
64	Keep only basic data in TRACEY, eg animal identification, current person in charge, current trace provider, current PLN and GPS, location history. Not all stated fields are

	required for pure traceability.
65	Initial data adequate for establishment point. Animal disease and diagnostic treatments.
69	Cover minimum amount of core information required for an effective system.
71	67% in favour of fields proposed, 19% unsure. Main issues relating to keeping it simple as possible, recording of dead/missing animals and the relevance of person in charge. Respondents felt it should be the owner.
72	Initial data adequate for establishment point.
77	Identification isn't always possible on some properties.
81	Simplicity and ensuring compliance costs are minimal. Transactional data should be movement data; all other data is secondary. Question need to record month and year of birth as costs will be significant. Maintaining records on who/how stock moved is irrelevant and can be quickly obtained from owner/ transporter in event of biosecurity purpose. Receiver only of stock should register the movement. Recording missing/dead stock will significantly raise compliance costs. Movement information required is animal ID, premises ID (source, destination), date and species. Other mandatory datasets can be operated by agencies responsible for these.
83	Too much information. Creates resentment at having to comply.

Q7. Other data that should be including in mandatory datasets

#	Comment
1	Breed of animals (would be valuable and could be sold to pay for system)
20	Compliance with third party audited programme. Compliance with ruminant protein regulations.
25	Minimise dataset for initial implementation
29	As little as possible so it is less able to be abused by other people
45	Animal health data, animal treatment recording could be open to abuse
46	Genetic (eg dam/sire) and performance (weight, yield, carcass quality)
49	Parentage
51	Animal breed (if known). Extra information would potentially change the database purpose.
54	Provision in system for voluntary data recording so other schemes can piggyback without having to have their own tags
60	Same as for 46
65	Supports 45
72	Animal health data
73	Animal status (dead or alive), tracking for animals sold for live export, vendor declaration documentation, commercial abattoir information (carcass and yield weights, etc)
80	Animal identification related to date of birth and property identification when this is followed by a change in ownership.

8. Proposed model for cattle and deer

#	Comment
2	Extra costs for standalone. If criminals are to be catered for then it is totally a police/taxpayers cost. Drive via MIA commercial to get costs down.
8	Identification for cattle must be confirmed prior to first movement
9	Is it necessary for the buyer and the seller to notify TRACEY? Give one primary responsibility.
10	Cooperative model (old LIC) keep under control. AHB model seems to lack accountability and key competence.
14	Update for deaths every six months
15	Deer farmers still incensed at being linked to cattle
16	Don't let numbers expire/tag devices expire. Activate when used not issued.
19	The more complicated it is the more that can go wrong. Record deaths at 30 June.
20	A single system for all species is the only workable solution

21	Don't need another system – have AHB already
23	Current systems are sufficient now
24	Expiry of tag numbers not so important in cattle but not possible in sheep. Refund/alternative for tags.
25	Process for issuing numbers and notifying movements/validating slaughter too cumbersome
27	Animals tagged similar to current AHB scheme prior to leaving farm of birth, not at birth (may never leave). Question is required for local market slaughter.
28	Rolls Royce system. Not until 48 hours internationally mandated before complying.
30	Refer 12 hour traceback. Don't record missing. Six months tag expiry
32	Don't need numbers to be globally unique. Sectors can have own single body but a single body for premises number allocation is needed. May be better to require return or registration of unused blocks of tags. Enable assessment of stock loss, otherwise assume the animal is on farm. Should not be a commercial entity.
38	Broadly supports. Many concepts considered in AHB scheme but were rejected on the basis of Tb alone, however enhancements will generate benefits for the Tb scheme. Numbers allocated to properties or herds needs thinking (AHB scheme uses herds). Doubtful if paper-based system for notifying movements would be practicable. Reliability of stock losses questionable.
39	Difficulties in notifying dead/missing animals, especially if irregularly yarded. Do this in association with other management (eg Tb tests).
40	Not managed by government. Information should not be available to departments like IRD.
44	Similar/same as 38
45	Significant duplication around movements. Improve by requiring only limited data input for arrivals. <24 hour desirable as smart technology is applied. Central registry for unique identifiers required – or systems in place to ensure no duplication within or between sectors. Standard method for reading, rather than design, location or method of fixing tags. Concerns on three month shelf life of tags.
46	Need for additional objective to ensure means of identity can be easily read/recorded at all points. RFID tags, supplemented with visual number. Need to address automated reading of RFID tags in meat processing. Follow through into product.
47	Technology easily available to meet varied needs but does not require new systems and additional costs beyond the level that farmer's prefer.
48	Single body within a species. Cost/benefit analysis required before choosing database system. Expiry date for tags OK if temporary and farmer has ability to use the tag eventually. Large percentage of reinstated missing animals is likely. Need to better consider management of movements and losses. Needs to allow for non computer users.
50	Standardization of animal identification devices, but not to a specific manufacturing or supply company – standard systems and types of hardware – but competitive on quality and price provided minimum standards are exceeded.
51	No need for three month expiry on tags as identification device should only become active when database is notified
53	Ownership through a cooperative of all livestock owners plus LIC, AHB and other similar organisations
54	Record unused tags as being “in store”. Electronic tags to be read by standard reader to avoid problems with mixed mobs.
56	Process for notifying movements is impossible. Farmers without internet access wouldn't meet 48 hour traceback requirement.
60	Same as for 46
62	Same as for 38. Need to avoid succession of forms to be completed during movements.
63	Auditing of system and notification of deaths and missing will be fraught with difficulty.
64	Periodic notification “naturally timed”, eg drenching. Alternative models such as Domain names.nzregistry should be investigated re ownership. Changes to core data should be notified and managed by approved service provider. Reconciliation doesn't add benefit.

	Record on TRACEY once tags in use. Trucking units may need own PLN. Incentives to record fate of animals may be more useful than compliance (eg through reduction in fees). Unique numbering is a database management tool; hold various numbers in system.
65	<24 hour desirable as smart technology is applied.
69	Expiration of unused tags may be unnecessary; no expiry date or able to be reactivated.
70	Extend expiry from 3 to 6 months. Annual notification of dead/missing. Don't support being run by government body or AHB.
71	57% supported proposed scheme's five key objectives, 14% against, 29% unsure. Cost to individual farmer was main concern. How realistic to achieve identification of recent contacts within 48 hours? Some felt year of birth was adequate (as opposed to date of birth).
72	Allocation of numbers by a single body is not supported by dairy industry. Coordinated approach using existing systems preferable – and probably more cost effective.
73	Further discussion re allocation of identification numbers required, eg replacement, report back, replacement vs duplicate tags. Manufacturers must be capable of operating closed loop web-based track and trace proof of receipt dispatch system; right delivery of tags to correct herd.
80	48 hour traceability will only work if farmers have easy and reliable access to computer communications; data can be corrupted. Database needs stringent controls.
81	Combination of bar-coded and RFID tags inefficient. Farmers and agencies will look to have one system. Issue numbers via web ordering system. Codes can be lodged by manufacturer following receipt of order. Only receiver records movement. Trucking companies can provide compliance auditing where needed. Key issue is not ownership but governance. Let Government operate core registry; transactional data may operate by one or a combination of government, private industry or industry sector.
82	Flexibility for manual override should electronic system crash. Four-day old calves must be tagged. No exceptions.
83	Already have unique herd numbers. Should be enough.

Q9. Definitions

#	Comment
9	Change in person in charge as a requirement to record movement is necessary. Definitions need to include owner, ie the owner of an animal or a person who is acting with the authority of the owner.
30	Support 10 km limit definition
32	Record when person in charge changes – more important in an outbreak
38	Movement which could result in direct contact with animals from another herd. Person in charge needs to be broadened to include transport, salesyard, point of slaughter. Dealing with properties separated by river.
44	Same as 38
46	Dairy heifers needs special definition
48	Non-contiguous properties less than 10 km apart under the same management should not be a movement
56	Non-contiguous properties incomplete
60	Same as for 46
63	Movements between non-contiguous properties and person in charge needs more discussion
64	Need to adjudicate grey areas

Q10. Recording of movements in TRACEY

#	Comment
1	For animals going to slaughter, identified by processor who will tell TRACEY that animal is dead. TRACEY automatically deletes from previous farmer's database and system.

2	Recording by both sender and receiver of tag numbers will create huge dead costs. Validation at slaughter – do not hold up processing.
45	Policing of non-contiguous movements difficult, especially if farmers own their own transport. Movement needs to be more robust, non-contiguous is misleading.
64	This should be done by approved service provider. Leave requirements to one party eg purchaser. Responsibility of person in charge, not owner.
71	48% in favour of movements as described in document, 33% against, 19% unsure. Raised issues of cost, assurance scheme has purpose and is not abused. Questions raised about multi-truck consignments, more specifically if these would be seen as one consignment or several. More discussion is required on animal movements to different properties.
73	Management of adjoining properties should be simplified as possible without reducing overall scheme's efficiency. Ability to manage herds within existing boundaries is important to that management.
81	Movement triggers record, not change of ownership. For non-contiguous properties under same management, distance (10 km) triggers need to record. Movements to a leased grazing block 1 km from main farm shouldn't need to be recorded.

Q11. Ownership structure

#	Comment
1	Ownership should remain with industry (processors/farmers). Body guided by legislation for biosecurity needs but the information generated is very valuable that can be marketed.
8	Don't reinvent wheel – use AgriBase
10	Farmer owned cooperative
11	Crown would be top heavy, inefficient and will want to make a profit
20	Agree with view no party or organisation should gain commercial benefit
21	Use of middleware to get databases to talk to each other
24	Independence is vital
30	Modify/fine tune AHB scheme
32	Trust deed must allow people to access their own data. Technical committee to advise overarching body if a Crown entity is chosen.
38	Representation of users and funders. AHB doesn't have to be formally involved in future management/governance of scheme.
42	Commercially free and independent of any commercial enterprise
45	Joint MAF and industry as the Crown's involvement in a governance level will add credibility
49	Joint with governmental involvement for legislative control
51	Clearly separate from any other influential part or organisation that could benefit from recorded information
52	Meat NZ would presumably represent the bulk of levy payers
53	Against the Crown being part of the ownership, access or governance for managing the database.
56	Initially voluntary, then supported by law but management and funding should not be controlled by the Crown
58	Membership of governance board needs to include people with industry experience (including RFID and tag suppliers)
62	Supports 38
63	Movements between non-contiguous properties under same management and all movements except between contiguous land parcels under the same management, is not practicable
65	Supports 45
71	On question of "do you support custodial trust" 71% supported custodial trust option, 19% against, 10% not sure. Questions raised related to cost, level of bureaucracy; any governance should be seen as quasi-governmental to satisfy trading partners. One respondent suggested AHB be beefed up. Some respondents felt a commissioner was

	not sufficient protection for private data although no alternative was offered.
72	Governance will require ability to determine standards and processes.
73	Experience has proven worldwide that a crown-owned core database is essential to any schemes success; key element in establishment of credibility for a national scheme. One database managed by Crown agency. Crown and authorities not hindered or restricted in their ability to manage any crisis efficiently and effectively. Crown will be required to demonstrate ability to provide a cost effective and well-managed programme.
75	Needs to be clear delineation between process by which systems requirements are determined, who provides the services and who owns data. This requires urgent attention.
76	Not for profit organisation
81	Governance more important than ownership. Government to establish and maintain core register for farms/premises, associated persons and individual identifiers to recognise value of this information to biosecurity and regulated certifications across primary sector. Ownership and governance of transactional databases rest with those bodies requiring or using the information collected, eg for cattle and deer by the cattle and deer industries or a combination of these industries and government.

Q12. Control of Access

#	Comment
1	Valuable data marketed to whoever is prepared to pay for information
16	Data should not be available to commercial users. Only used for purpose collected
25	Feels heavy. With multi-user systems, security and administration could be a nightmare
29	Must be tight as Fort Knox. There is no secure database in the world
38	Would expect full and free access as a major contributor to the system
42	Farmers, salesyards and processors should be able to transfer data directly to the database.
44	Same as 38
45	Governance will require ability to determine standards and processes. A separate body to determine access requests should not be required.
46	Scope for farmers to assign access to other organisations of their data. Enable access for research purposes where a national good outcome.
53	Data should be used for good of meat industry, not individual gain
60	Same as for 46
63	Database should allow for interface with any relevant databases for agricultural property location and ownership (such as AgriBase)
65	Governance will require ability to determine standards and processes.
69	No parties gain from information provided as a requirements of this system unless the individuals providing the information agree. System may be used for industry good purposes and this needs further consultation with producers.
71	Governance body must have robust rules in place to ensure that individual farmer information is held securely and is only used for the purpose gathered, e.g. identification and trace forward and back. Uncomfortable with thought that commercial options for information would be considered. Database must be funded adequately to remove this temptation.
73	Give confidence that information being used for purpose it was gathered. Access control is paramount to demonstrating integrity to suppliers.
81	Only authorised users to access
82	Maintain complete privacy for farmers

Q13. Allocation of costs

#	Comment
1	User pays. Small farms can hire readers.
4	Government funding as it benefits NZ and our country

8	State has to accept a senior role in funding initiatives. Use levies/ user pays.
9	Owner gets a subsidy via a refund. Costs of running central facility should be 50% industry through levies: 50% government.
10	Membership fee and annual fee
12	Crown and farmer
14	Allocate costs based on tag numbers
15	Government should pay for this
16	Farmers will ultimately pay because meat works would pass on the costs
17	Consumers demanding full traceability should pay full cost
18	Other country farmers get subsidised
19	Meat companies and government
20	Significant funding from government for public good benefits. Cover start up and ensure equipment costs are reasonable.
23	Who benefits should pay
25	Who banks benefits should pay
26	Costs should not be met solely by current farmers
27	Government as export earner – 80%. Subsidise small owners. Tag costs will fall on breeders.
28	Who benefits pays
29	Government to set up and maintain database. Farmers to fund identification tags. Stock firms to fund salesyard costs.
30	Government starts up. Assess additional costs as needed. Ongoing costs to be built into tag price.
31	Quantify drivers. Combination government and industry. Don't include value-added activities (eg on-farm).
34	50% state: 50% industry
38	Fall with users with an element of public good
39	Drivers-based – biosecurity and food safety. Government funding to get underway. Farmers pay for tags and recording systems
40	End consumer but farmers will have to wear cost one way or another
44	Same as 38
45	Joint Crown and industry with costs reflecting risks being managed, ie the trading of livestock which poses a substantial biosecurity risk should incur greater costs than animals born from a herd and sent directly to slaughter. Farmers bear costs of tags; meat works and stock firms the scanning equipment, and Crown contribution on the basis of protection of export income.
46	Improve performance will offset costs at individual farm level (automation, labour savings, equipment efficiencies, general industry benefits from having an internationally recognised traceability system. Support where heavy costs of compliance.
47	Cost will directly or indirectly fall on farmer and the benefit will be captured by the consumer. Capacity of individual farmers to absorb additional compliance costs. Should not all fall on farmers but be shared nationally to reflect biosecurity benefit to the nation.
48	User pays using levies applied on each commercial transaction. Government collects levy but returns portion to subsidise costs of tag and compliance
49	Fall on meat consumers if possible. Supermarkets can take a lead. Compliance with traceability incurs costs to farmers and should be sufficient.
50	Direct allocation to beneficiary based on Crown acknowledgement of biosecurity importance and value of market access.
51	Mix of industry and government depending on benefit analysis
53	Cost of tags and charge out for information requested
54	Industry and public good. Any voluntary use of data is user pays.
56	All participants to contribute funding including Crown.
57	Initial setup of database and system by government. Ongoing costs passed onto farmers and processors.
60	Same as for 46
63	Government contribution in partnership

64	Initial establishment may require centralised funding to support adoption, ongoing costs funded by users. Ongoing costs will be outstripped by value added products if innovation is allowed to flourish/ competition via service providers (customer satisfaction rather than levy based system).
65	Joint Crown and industry with costs reflecting risks being managed, ie the trading of livestock which poses a substantial biosecurity risk should incur greater costs than animals born from a herd and sent directly to slaughter
68	Under biosecurity there are national benefits therefore Government should contribute. Costs distributed for benefit of the users.
69	Government funding required in some form or another to launch this (cf Australian model). Reallocate AHB funding and producer levies to establish and manage one robust system. Farm gate costs must be realistic in the implementation.
71	On question of “do you support costs for the system being in partnership between industry and government” 76% support, 24% against. As biosecurity was seen as the major driver for the proposal respondents see a clear need for some government input into funding, although there is caution from some areas of government wanting access to private information for other uses. Some respondents felt consumer should fund the scheme as they seem to be the ones demanding the enhancements. How this would be achieved is not discussed. Government contribution for biosecurity (and perhaps some for food safety component) must be more than a token contribution.
72	Given biosecurity as main driver government must contribute significant funding towards any enhanced animal ID system. Industry contribute according to risks being managed. eg the trading of livestock which poses a substantial biosecurity risk should incur greater costs than animals born from a herd and sent directly to slaughter.
73	National interest item: main costs should be borne by the Crown. Other agencies using information should be charged on their level of involvement and for the services they use.
74	Needs public funding for adequate information and alternatives to made decisions. All the additional value from traceability will go to the most powerful members of the supply system – in most cases the supermarket change.
75	Farmers will be paying for the system; therefore they need to derive on-farm benefits to gain their buy-in
76	Charge for database access. Government funding to kickstart. Tax on tags.
78	On farm costs – farmer. Off farm costs – government or exporters.
79	Find a customer who is willing to pay
80	Government to set up database systems as it is a benefit to all of NZ. Farmers responsible for tags and readers. Running costs shared between farming, industry groups and government.
81	Government has important role in establishing and maintaining core registry. Industry (meat processing, livestock sales, animal exporters collectively fund transactional information system. Farmers pay on-farm costs (ID tags and systems to read them).
82	Funding from government in form of public good spending.

Q14. Rules underpinning system, e.g mandate using regulations

#	Comment
10	Make sure proven system before it is mandated
20	Mandate because of faction that will refuse to implement the system and they will undermine the integrity of the whole programme
24	No exemptions
25	Mandate RFID
28	Timeframe to mandate – reservations
32	Regulate for full compliance. Voluntary access akin to beta testing
37	Lifestyle farmers must be drawn into traceability systems
38	Regulations are needed to achieve full participation
39	Keep simple otherwise farmers will reject it and not fill out forms
42	Don't mandate third party involvement

45	No choice but to mandate
46	Address relatively quickly due to the long lead times in developing law change
47	Any new system should be voluntary only
51	Non-compliance needs to be more strictly prosecuted than is currently possible.
52	All or nothing
53	All in or not at all
64	Ensure adaptations don't require ongoing legislative intervention. Doesn't all need to be legislated, eg HGPS would lend itself to industry definitions.
65	Supports 45
70	Exemption for bobby calves going directly to slaughter
72	Ability to update by regulations as future requirements demand
73	Only systems that have been successful have all been mandated. Voluntary identification systems have not proven to work in any country.
75	Regulatory authority to dictate what system required from RFID (what data is captured, who has access to these data etc) but not the detailed specifics of what RFID systems should be used. Industry should take this lead in dictating what technologies and methods are used to meet operational needs.

Q15. Voluntary introduction prior to becoming mandatory

#	Comment
2	First two years. Phase in 10 years for breeding cows
12	Mandate from start to avoid confusion in salesyards in particular
16	Many won't participate if voluntary system
17	Five year voluntary
20	Pork industry welcomes opportunity to trial systems as ideal environment to pilot such a programme
23	Voluntary only for deer at this time
30	Trial period, through whole chain of production
34	Prefers later start to mandatory scheme to ensure system will work
38	Start via AHB scheme to introduce enhancements
40	Cattle first. Most deer go direct to slaughter
52	Who is going to volunteer to spend lots of money before they need to?
73	Provided technology standard is specified and performance criteria are made clear by March 2006 (otherwise voluntary scheme is worthless). Voluntary introduction makes farmer buy-in easier, manufacturers can make commercial investment.
75	Significant pilot programme is run in a specified area year before mandating
76	Voluntary system gets farmers into the mindset. Ground up first before mandating.
80	Voluntary introduction not supported as it becomes messy and full of holes

Q16. Timetable

#	Comment
4	Seems optimistic
8	Two year lead time, extra for small block holders. Focus on education programme at first.
9	Demonstration farms during voluntary period with some financial incentive
10	Introduce mandatory only after trials
12	July start fits with tagging system
16	Industry education is needed. If framework set up hastily will be fraught with problems. Technology is not good enough. Time frame is too short.
19	Seven year trial period
20	Achievable but will require absolute commitment from all parties
23	Fully trial technology
24	Needs to be realistic – education on the benefits – gives commercial farmers ability to make huge leaps in productivity by identifying best performing livestock
25	Never for a pan-industry, consultative process. Must be business/industry led not IT led.

	Multiple projects, pilots. Leverage off what is already in place, such as MINDA or reusable, eg electricity market. To ensure data integrity key steps should not operate if data is incomplete.
26	Deadlines extremely tight if not unachievable
28	Not considered realistic. All sectors need to be prepared.
30	Voluntary is pointless if structures not in place all the way through
32	Optimistic given consultation and agreement will take substantial time and must be resolved first.
36	Unrealistic given need to set industry standards, legislative process will take time, need strong industry leadership, 3 year standard overseas but NZ should be able to utilize overseas experience and systems.
37	Some cost borne by central government as whole country benefits from its success
45	NZ runs significant risk by not having full knowledge of animal owners, unique identifiers and movements
48	Too short. Need to run a substantive education and training programme.
50	Very optimistic. Add 2-3 years to voluntary programme and develop strong links to EU, Australia, Canada and their systems and evaluation.
51	Needs to happen in this timeframe but optimistic. Pre evaluation testing is critical to success.
52	Can't support a system so completely lacking in the practical application points.
54	Mandating sooner preferred
56	Needs longer leadin period. Voluntary until October 2007
63	Optimistic. Will take at least a year longer than proposed
64	LIC systems require relatively minimum alternations to accommodate changes suggested in report. Overseas customers signal lifetime traceability by 2009. Tagging at birth needs to occur from 2007.
65	Supports 45
67	Early adoption of ISO standards needed to enable investment in tags and equipment
68	Too short for full consultation as well as to fully explore the technical aspects of the programme, eg ear tag technology
69	Questionable. 1 July a better start date.
70	Grave concerns mandatory start date is too ambitious; too many industry players will not be compliant in that timeframe. Farmer education and implementation also concerns us.
71	48% against proposed timetable, 38% in favour, 14% undecided. Questions were raised as to who would be deciding on the governance group by 1 December 2005, and more specifically, whether the rules around access etc would be determined before or after this group would be established. Respondents said that the roll out should slow down so that it can be done properly and once only, so that buy-in can be achieved and the technology required can evolve.
72	Supports 45
73	Provided technology specifications and performance standards specified
77	If we take too much time it may prove costly for some of our markets
79	Far too optimistic
81	Tight but achievable as many systems in place/adaptable. Establishing the infrastructure at sales yards and slaughter premises will be a bigger challenge. If RFID used then include devices in official programme by July 2006 but a further year to capture movements.

Q17. Other things that need to be considered in the proposed model

#	Comment
1	World must see it as accurate and creditable
3	No benefit to farmers because markets would close event if we had tag and full identification. Tag only prime beef, not bulls for mincing. Changes are being driven by tag companies. Must apply to all stock.
5	Requirements must be able to be completed manually as well as electronically.

7	Focused on chipping of dogs
8	Supports RFID but not chip implants. Additional visual tag (eg Australia twin pack). Changes to requirements for use of Animal Status Declarations will provide good support and needs to be enforced (stronger enforcement). Lifetime identification. Non-tagged stock should not be allowed to enter food chain. Certainty to ownership work taking into consideration/ processor benefits. Bring sheep in as soon as possible – any lambs/sheep consigned to designation other than slaughter should have identification.
9	System must go forward into food/product system and retail product. Alternative forms of identification need debate. Other products than meat would benefit from traceability. Inclusion of other livestock – from outset on voluntary basis.
10	Types of identification must be user friendly, have <1-2% loss, and easy to differentiate. Ability to record ancestry and beef production like LIC for dairy and premium for recorded animals.
11	Disagree regarding workload and costs, loss of tags, technology doesn't replace manual farming. Farming would become unviable.
12	Must be for all cattle
13	Keep consultation open on technology to be adopted. \$400 millino per annum extra production potential to sheep/beef/ deer.
14	Support principles but not individual identification for poultry. Can currently traceback 98% of poultry meat and 90% of eggs. Lifestyle producers are missing but costs to implement traceability for them are prohibitive.
15	Separate system for deer
17	Lost tags, wild animals. Existing enforcement of AHB scheme doesn't give confidence. Delays in getting no line/ no broadband means 48 hours not enough time.
18	Can't always rely on ear tags
20	Electronic Animal Status Declaration forms
21	Do sheep first for a change (more biosecurity risk than deer). AHB system doesn't work properly at meat works.
22	RFID participants must have incentive (through benefits) to invest. Used this as forum to register interest in providing technologies.
23	Test technology first. Not currently a requirement for deer industry – acceptance when requirement exists.
24	Potential for top class animal identification system and providing technical expertise to the world. Exemptions, such as adopted by Australia, will make a mockery of system integrity.
26	Light on cost information – needed for informed decisions. Doesn't support individual tag identification for deer (AHB scheme sufficient).
27	All animals need to be considered. Not everyone has computer systems. Could result in black market for stock for smaller breeder.
28	DEER select – deer genetics evaluation programme using AHB property identification. All sectors need to be involved. No additional cost beyond current requirements. Forward thinking re technology. Don't cut out current paper trails and recording systems. Seek extended trial period and further evaluation in EU, Australia and Canada. Track record of AHB – particularly slow compliance at works, not convincing.
29	Education of small block holder. Doesn't want RFID. NLDB number already unique. Needs to be an infrastructure to respond to major disease outbreak. Don't allow land title until property is identified with a number.
31	If electronic everyone will have to buy a reader. Give it to MIA and tell then they will have to pay half; then we will end up with something we can work with.
32	Supports proposal to ensure difference between wild and farmed deer and pigs, and for tracing illegal/accidental deer liberations.
35	Con and bullshit. No need for it.
38	Technology and standards needs to be agreed early on - Choice determines what can be achieved, avoid risk of incompatible systems, AHB can assist with phase in. AHB should be fully consulted on technical development of core registries – transition, interfaces to AHB data (current/historic), meet AHB needs.

39	Acceptable/ workable method of attaching tag to animal
41	Livestock brand and ear mark system provided by AgriQuality also in place. Range of on-farm uses. Covers sheep, deer, cattle, pigs, goats, horses. Proposes registering this under Anima Identification Act, mandating so that only registered brands can be used.
42	Look seriously at adoption of Australian model (software, readers, tags)
43	Equipment manufacturer's rep on working group to consider reading of tags and tag loss (supports insert capsule).
44	Complexity means loopholes. RHACs have responsibility for explaining rules regarding Tb but enhanced scheme goes outside this role. No justified for Tb control purposes.
45	Wide measure of support from Dairy Companies Assoc of NZ. Cover all species, especially sheep. Will support if future system includes all ruminant animals. Multiple databases increase compliance issues. Reuse of tags and implants. Compatibility with MINDA
46	Industry can reliably supply technology to underpin adoption of such a system.
47	Work done on bottom up approach, eg demonstration farms. Could be done in partnership with technology providers.
48	Suggest talking to Landcorp on their systems for recording movements
50	Better description and study of Crown involvement and cost share. Detailed evaluation of new and emerging technologies.
52	Correct people have to be used in formulating system. If that consists of those and the process which formulated AHB then quite simply we will have a dead duck.
53	Keep paperwork to minimum and the type of tag to be used e.g. RFID.
54	Data transfer kept electronically as much as possible. To much error filling in sheets and loading computer
55	System as proposed involves a lot of data transfer and management. This would be extremely difficult and costly using manual recording systems and could only be contemplated using RFID systems.
56	All animals from birth. Feedback on individual animals to farmers from meat processors, for real value to farmers. Option of electronic or visual tagging identification. Universal electronic readers need to be available.
58	ISO dual read is crucial. Recording of movement through the supply chain is over-emphasised. Existing systems can do this.
60	Same as for 46
61	Submission identified skills of FarmHQ but didn't comment on paper
62	Same as for 38. Tag losses can lead to loss of integrity. Need to know what sort of technology will be used. Working closely with AHB will only have benefits for both.
63	Significant developments in electronic identification systems requires careful review of the likely trends to ensure optimal efficiencies are achieved and adaptability maintained.
64	Need to adopt standard. Suggest low frequency but allow for new technology to be adopted without legislative change. High level of education; Government could support. Most transactional information could be handled by approved third party suppliers, keeping TRACEY simple, and allowing value added services to maximise voluntary uptake and farmer benefit.
65	Wide measure of support from Fonterra. Cover all species, especially sheep. Will support if future system includes all ruminant animals.
66	Promotion of Hewlett-Packard as one stop service provider, noting Viatrace appears to provide functionality required, and similar experience in human biometric passports.
67	All official international schemes conform to ISO 11784 and ISO 11785 (NZS 11784:2001 and 11785:2001 respectively). Other technologies have been assessed and do not have the necessary characteristics to permit the design of long-life, reliable ID devices for the livestock traceability market. A national scheme is no place for experimentation with technologies.
68	Be as simple to operate and as cost effective as possible.
69	Ear tags are appropriate, visual or RFID. Tail tagging is preferred by some producers, but not clear why. Recovery of boluses at processing can be problematic with downstream effects on rendering. Specify location of device e.g. Australia it is the right or

	“offside” ear. RFID has improved retention (97% to 99%). No clear if retrofitting existing databases will meet defined needs of the system. Information technology does not overcome the faults of a badly designed system. AHB and MINDA tags should continue to be eligible under proposed system, at least during transition. Project should now move to more detailed design phases to allow parties involved to make informed decisions on technologies, standards and systems. AITWG to appoint project team for this purpose.
70	Accommodate BREEDPLAN identification needs within national system. RFID technology will supersede plastic ear tags.
71	Federated Farmers gives conditional support of broad direction, with main concerns being costs to industry, bureaucracy needed, costs to individual farmers, lack of cost-benefit analysis, doubts about market need, potential for double up of information with other databases, privacy concerns around abuse of information, realistic achievement of 48 hour traceback, government funding leading to use of information for other uses, hasty timetable for rollout. Respondents feel scheme should be built on what already is in place, therefore keeping costs down and keeping the system simple. Robustness of tags a concern.
72	Mandating proactive traceability systems to further manage risks. Must cover all species including sheep and pigs. Dairy industry will only support the proposal if it is clearly shown that the future system will include all ruminant animals in the near future.
73	Supports 67 re ISO standards. More detailed discussion required re system compliance and monitoring. Further detail will be necessary regarding several movement and reporting functions.
74	AITWG is fine for coming to industry consensus decision but will struggle to come up with full range of proposals before choosing between options. Needs cost-benefit analysis. Proposal is outside terms of reference for AITWG. Australian costs not considered credible and anticipates costs being several times higher. Probable successful national system will have clear position on what core information is required; independent central ID database; technology neutral; excellent data standards; doesn't preclude producers from using information for production management systems that respond to market incentives; does not unduly increase the role and size of government; effective communication; data is leveraged to provide advantage for production purposes, marketing advantage, compliance needs, adding value and transporting supply chains into value changes, biosecurity needs; and globally connected (best practice, innovative , up to date).
75	Data standards are paramount, system should be technology-neutral. Leave data capture to the industry to find the most cost-effective solutions. Sole reliance on ISO standard is inappropriate (eg lag time makes them slow to recognise new technology), as this has little or no relevance to the New Zealand situation. New technology shows economic benefit.
76	Will we mandate full/half duplex?
80	Ease of use
82	Continued consultation across industry groups
83	Enhance existing tag system and educate