

Submissions Form NAIT, Biosecurity Discussion paper prepared for public consultation

No 01/08

Submission from the New Zealand Deer Farmers' Association Inc

Fields marked with a * are required

National Animal Identification and Tracing – Enhancing New Zealand's animal identification and tracing systems

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:

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Privacy Act

In preparing the summary of submissions, the National Animal Identification and Tracing Governance 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

Yes

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
- Animal products processing sector
- Stock and station agent
- Database service provider
- Other livestock sector (e.g. pigs, sheep, etc)
- Animal products exporting sector
- ID system service provider
- Industry association

Other (please specify)

Please answer the following as clearly as possible:

Q1. Do you have any information or suggestions that you feel NAIT should take into consideration when setting up this system?

The NZDFA has serious concerns in four major areas that we believe must be considered prior to the compulsory inclusion of deer farmers within NAIT and the wider livestock industry.

1. Biosecurity.

The rationale that NAIT offers a major step ahead in NZ's biosecurity protection status and ability to respond to incursion requires urgent and serious consideration of incorporation of the two missing major species (sheep and pigs), if only on a herd and herd geospatial basis. Our concerns are based around risk in that 70% of deer make only one trip to slaughter in a lifetime (i.e. direct to slaughter at 9-15 months of age), and present a remarkably low disease and biosecurity risk themselves.

From the outset of consultation in 2005, the NZDFA has held this view and sees no reason to change its stance. From a biosecurity view, NAIT in whatever form should not be imposed on farmers until all aspects of the risk and need to trace are included across all relevant species.

2. Unique animal identifier.

The NZDFA believes that NAIT should also consider the potential use of the standard international unique numbering system used worldwide by processors, exporters, retailers, etc., as administered by GS-1. While the media has had recent commentary that talks of linking the proposed NAIT unique RFID tag to the processors skid tag and processing ID inventory is straight forward and a possible option, it seems to us that a clear, single, unique number that offers total traceability on an individual animal basis from farm of origin, incorporating lifetime movement and then via processor to market and retail, is eminently sensible.

For NAIT to incorporate the current system derived as much from the tag supply under the NPMS biosecurity needs for the AHB Tb scheme (which incorporates a tag manufacturer code, etc.), and then require processor systems to further create an ID link seems archaic, given that

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there are current modern and internationally recognised and supported unique ID systems available.

3. Evaluation of new RFID technology.

The NZDFA is also supportive of the evaluation of new RFID technology, following a pilot evaluation of UHF technology in deer.

The management of deer on-farm using low frequency RFID to meet the necessarily exacting specifications of performance for NAIT is well understood, and farmers report some considerable difficulty in the consistency of use and reading of the current low frequency technology in deer. The Industry is committed to ongoing practical evaluation of RFID and its success rates, also identifying any deer movement or behavioural problems that challenge the technology. Equally, the Industry is attempting to be proactive in looking for other solutions to some real difficulties already identified and have been proactive in some early test work with Ultra High Frequency RFID technology. The industry has committed to some formal further evaluation of both technologies in the immediate future and recognises the recent involvement of NAIT in looking at the potential of UHF in this early phase.

The NZDFA also believes that there may be substantial cost savings in incorporating UHF in tags and in scanning equipment, to the point where the inevitability of using UHF in the sheep industry where scanning of multiple animals at speed and in a mob situation may add to the compelling need for this species to be included.

The NZDFA is adamant that the mandatory inclusion of deer should not proceed until the value and commercial development of UHF is completed (if this adds a quantum performance criterion). There may be a considerable cost benefit for deer and other farmers (especially sheep), and in the supply chain in general.

4. Governance structure and costs.

The NZDFA has been directed by its members to encourage consideration and adaptation of the AHB database (DMIS) and governance structure to further develop and run NAIT. The deer farmers argue that this is an existing workable structure experienced in biosecurity and mandatory systems. On current understanding, the DFA believes that the present proposal for NAIT establishes a completely new structure at considerable expense and an extra management and administration layer at farmer's expense. We do support the need for the associated Farmsonline property register as proposed and funded by Government, but encourage evaluation of the ability and what regulatory changes would be required for the AHB to assume the NAIT role.

The NZDFA believes that an Incorporated Society structure is appropriate, and that the model that incorporates an industry based Representatives' Committee (as in the Current AHB structure), is also a reasonable addition to Governance that keeps farmer representation and views to the fore.

Q2. What other data that is not discussed in this document do you feel should be collected?

The DFA has little problem with the outline and working structure of NAIT as presented as a formal part of the system.

There is a strong view from deer farmers that the NAIT add-ons that have the ability to record animal health and treatment history, disease events, etc., are not necessary and detract from the core and simple role to trace individual animal lifetime movements.

However, the NZDFA believes that if this peripheral but important role does not add to the core costs of NAIT development and if farmers choose to add this data it is at their expense and decision without adding to the complexity of function nor compromising NAIT database integrity, then the NZDFA is broadly comfortable with the function proposal.

Q3. What views do you have about the proposal to require the inclusion of deer on NAIT under regulations from 2011?

At this point in time, the NZDFA is resolutely opposed to the proposed mandatory requirement of

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deer to be included by end of 2011. Successive industry conferences have presented conclusions from deer farmers that record:

1) Technical and practical difficulties in deer handling and behaviours that would allow the successful use of low frequency RFID (HDX or FDX) that meet the designated NAIT technical specifications. Such difficulties are in the process of being further field evaluated with the assistance of tag and electronics providers, to add to the previous practical field trials. It is critical for farmer buy-in that the technology works with a high degree of accuracy and consistency.

2) UHF evaluations need to be completed, costed and considered by NAIT as a viable and technological step prior to deer being included.

3) The NZDFA objects to mandatory inclusion based on the relatively high costs of tagging, little perceived marketplace benefit, and that product and food safety traceability can be achieved now.

4) The NZDFA objects strongly to inclusion based on the lack of full biosecurity compliance across all farmed species as outlined above.

5) Further deer farmers have advised the NZDFA by resolution (2007) *“that the New Zealand Deer Farmers' Association recommends Deer Industry New Zealand not pursue the mandatory adoption of an electronic identification system for deer until there is acceptance of the need for one from the majority of New Zealand deer farmers”*. That view has not softened.

In addition, at the 2008 conference the NZDFA was directed by its members;

1- *“that the NZDFA request Deer Industry New Zealand to support further research and evaluation of RFID technology (especially Ultra High Frequency systems), to allow a recommendation to industry of the most accurate, functional and cost effective RFID systems that will meet deer management and future NAIT deer traceability requirements”*.

and

2- *“that the NZDFA encourage the AHB to take control of the NAIT database”*.

Q4. Have we achieved a pragmatic balance between the level of proposed compliance required to ensure NAIT meets biosecurity, market access and other regulated needs and NAIT being able to support other on-farm and off-farm information needs?

Yes

No

Not sure

Yes and no. The NZDFA believes that if they supported the current proposal based on need and cost benefit, NAIT more than covers the basic needs and compliance on a per species basis with cattle and deer as the model to the extent of overkill.

Current ASD declarations for movement that will be adapted to cater for individual animal tags are essential. The NZDFA believes that additional information is well catered for under individual company QA schemes, and is not a necessary part of NAIT itself. It seems unlikely to us that capital stock remaining on farms will consistently be registered within the *as soon as practicable* requirement. The threat of lost expensive tags and current practice when AHB tags are often just added at the point of movement in a number of deer farms will continue in spite of compliance rules.

Q5. We have identified ways in which we propose to ensure that animal identification and movement information is recorded, including who is responsible. Does this approach make sense and what will this mean for participants?

The Current AHB tag system is fatally flawed from a traceability wider use basis, in that there is

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no legislative requirement for the processor to record herd and individual tag numbers whether direct to slaughter single movement or the full dual tagged system for capital and trading stock.

It is critical this mandatory role at sale yards and processors be the key point of data capture and transfer to NAIT in a trading and slaughter situation for livestock. Farmers must be able to easily take responsibility for the transfer of stock between farms as outlined. The NZDFA favours the support and encouragement of trained, (and if necessary) accredited 3rd party operators (agents, transport operators, etc.) who might voluntarily see an aspect of client service in this role and invest in the technology and data transfer system. We do not believe that community group ownership of scanners etc. is practically feasible on smaller or lifestyle blocks, due to logistical conflicts and human nature.

Q6. What other rules and incentives can you suggest so we can ensure that the information on NAIT is kept accurate and up-to-date?

The NZDFA finds difficulty in thinking of incentives or additional rules of compliance when fundamentally opposed to the concept at present.

It would be sensible movement by Government as in the NILS precedent in Victoria, Australia, if the Government (who the NZDFA sees as driving this project for a minimum cost outlay on behalf of NZ Inc):

1. picked up the direct cost of tagging all adult animals with the RFID tags during the first 12 months,
2. for a further two years picked up the difference in cost between RFID tags and the cost of current average tags for cattle and deer, and
3. assisted the sale yards and processors in the set up and establishment of the scanning and data transfer systems.

The NZDFA believes this would send a strong signal of its sincerity in the need for NAIT and its introduction on behalf of Government, and in the scheme of things, would be a relatively insignificant additional cost.

The rapid move to a single RFID tag that carries the role of the current dual AHB tag system is an obvious incentive based on cost reductions.

Q7. What are your preferred methods for raising industry funds to support the establishment and ongoing costs of the NAIT system?

- Cattle levy
- Tag levy
- Direct contributions
- Movements levy

Other (please describe)

Increased Crown obligation under nationally good outcomes and biosecurity benefit for all.

The NZDFA does not agree with the 35% Crown : 65% industry split in the base running costs for NAIT. We believe that a 50 : 50 mix at least is the minimal split acceptable.

Q8. What may need further work to ensure a smooth transition between current systems and the new NAIT system?

Clear and simple communication on the need, costs and benefits of NAIT, and an adoption of the incentives mentioned above. The message and simplicity of the National field days display is an excellent example of the communication level and interactive forum required. The NZDFA appreciates the contact within NAIT through the Chairman and TAG group personnel over the development period and for the opportunity to have two-way conversation, but based on the

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arguments presented to date, the NZDFA has taken a position of caution as advised in this submission.

Q9. The proposed transition to NAIT is by way of an initial non-mandatory sign-up phase, before the NAIT requirements are regulated by 2011. What is the likely interest in starting to register animals, record movements and other information before it becomes compulsory?

- Yes, I plan to register animals as soon as NAIT is available on-line
- Yes, I plan to register animals and record movements using NAIT when available
- Yes, I am interested in using full NAIT functionality, when available
- X No, I will wait until it becomes regulated and compulsory
- Not applicable to me (I do not own or keep cattle or deer)

NAIT will need to demonstrate or allow the industry to demonstrate in partnership with NAIT, that the technology for deer and deer systems is valid, cost effective and state of the art. The NZDFA appreciates the on-farm management uses that current low frequency RFID has and that it has widespread use in management in the dairy industry, but that in itself must not be the primary driver.

Q10. In your opinion, is there anything else in the concept design that we may have overlooked and needs further consideration before we proceed with building NAIT?

The ability to incorporate new technology in tag and reader design rapidly as these replace outmoded technology.

The NZDFA believes that NAIT may have underestimated the ease and relevance of rural internet availability, especially in the geographical areas that support the more extensively based deer and cattle breeding operations in the backcountry. Internet frustrations are not likely to foster early support and adoption.

Q11. If you are a farmer, are you likely to purchase RFID readers?

- Yes, for my own properties
- Yes, if I can come to a sharing arrangement with other parties, e.g. other farmers
- X No, I will prefer to engage a service provider, e.g. stock agent or trucking company who can read my animals' RFID

Q12. If you are a farmer, would you consider using RFID for other on-farm activities?

- Yes, I plan to invest in on-farm use of RFID systems in the next five years
- X No, I have no plans to use RFID for on-farm management in the next five years
- Not sure, I will see how others use RFID before I make any decision

However, the NZDFA is aware that a number of individual deer farmers have incorporated RFID into their management systems in spite of the limitations of some of the technology for deer and have gained considerable management advantages from RFID. The Industry has committed to use the Focus Farm networks over the next 3 years to feature the use of electronics in deer farming, and have good support from tag companies and electronics suppliers to assist including those organisations also advocated for UHF RFID. We believe that demonstration and on-farm discussion and demonstration will aid in communications to the industry as a precursor to eventual adoption and acceptance when the need is demonstrated and accepted.

However, the majority of deer farmers will have no practical immediate need for RFID and remain opposed to the mandatory inclusion of deer at this point, and for the foreseeable future.

Q13. Do you wish to receive an electronic copy of the NAIT newsletter to keep up with the NAIT project and system development?

Y Yes

Send to Bill Taylor - loravalley@farmside.co.nz, with copy to natalie.fraser@deernz.org.

Other Comments:

Summary:

- 1) The NZDFA recognises the need for adequate traceability in farmed animals in the competitive market environment and for the biosecurity assurance required in response to any high-risk incursion.
- 2) The NZDFA also recognises that accurate and efficient systems should drive this and that a unique individual animal ID tying stock movements from farm / herd of origin to slaughter, forms the basis of an integral traceability scheme.
- 3) The NZDFA agrees that proven functional RFID technology supporting unique animal identification appropriate for the species is a logical development, especially with the power to reduce paper based data entry errors.
- 4) We acknowledge that given the international trends in this area driven by the competitive market model (especially as it pertains to beef cattle) are accelerating, the drive for NZ to progress to these systems is inevitable as part of a quality assurance programme and for food safety assurance.
- 5) From the NZDFA's perspective, the deer industry is not under the same competitive market model pressure as a market leader and is well served by company and Industry QA schemes. A herd or processor batch based product traceability system is currently possible under the AHB tagging system, as evidenced in the 2006 endosulfan scare where association venison product recall was actioned within 48 hours.
The NZDFA does not believe the high cost of RFID tags and NAIT is at this point a justifiable additional expense in the deer industry.
- 6) While the NZDFA accepts some inevitability, the 2007 Industry conference unanimously passed a formal resolution that requires the majority of deer farmers to endorse NAIT and the use and need for RFID before accepting a formal position for NAIT to become mandatory for farmed deer. The NZDFA does not have that approval position endorsed by its members at this point, but welcomes this consultative move as a further step in the process.
- 7) The NZDFA is directed by its members to strongly oppose the mandatory compliance of deer with cattle in 2011. Our concerns are based on the technical and practical feasibility, additional cost to farmer without benefit at this point, apparent high cost of developing a separate database administration, and the illogic of basing the NAIT scheme on just the two species conveniently linked through the biosecurity requirements of a formal NMPS without including others as a priority.
- 8) Biosecurity and risk.
 - 8.1. NZDFA believes that for the biosecurity argument to be credible as a part need in driving compliance with cattle and deer, both the sheep and pork industries need to be included as a principle and on an urgent timeframe for sheep at least. While costs of tags relative to stock value are a recognised issue (in common with deer), the biosecurity risk argument rests as much with these species as with cattle and to a lesser extent, deer (based on the relatively few between farm movements of deer in a lifetime). NZ livestock health status is historically more linked to the threat of scrapie in sheep and the more remote FMD risk.
 - 8.2. We consider that the strong public stance taken by the sheep industry in opposition to Inclusion in NAIT with relation to cost and practicality has been accepted by NAIT as "in the too hard basket". Equally, the same logic already expressed by the deer industry has been overruled through the convenience of having deer already included in a formal biosecurity programme. The NZDFA argues that deer present a minimal biosecurity risk as follows:
 - 70% make only one trip from birth property direct to slaughter, most at 9-12 months of age.
 - Movement between properties is largely restricted to young stock and then the majority

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of these are destined for venison finishing at a young age.

- Disease risks in deer are minimal. Infected Tb herds are at a well-controlled number of 16 (June 2008), and are strongly associated with infected vectors and industry incentivised management programmes. Johne's disease remains a threat to herd health but the industry has been proactive in leading a herd based management programme. There are few other risks.

8.3. The NZDFA and Deer Industry New Zealand have lobbied NAIT in the development phases to allow the deer Direct to Slaughter (DTS) barcoded official tag to be used instead of requiring a formal NAIT RFID tag. We are convinced that in the foreseeable future this measure would bring deer farmers on side for the wider concept, having no issue with the eventual need for a full RFID tag system for the sale of and movement of capital or trading stock.

Current DTS tags cost about \$0.85. However, there would have to be either a review of the barcode readability or a concerted upgrading of the processor response in reading these tags to meet the compliance needs of NAIT, as this area is somewhat informal in some plants at present.

8.4. The market assurance programmes and often touted need for NAIT to ensure market access, food safety and traceability; we believe, can and have demonstrably been catered for on a herd and batch basis by the current formal tag and herd ID system and the processor / exporter sectors' own QA systems.

The NZDFA believes to move to NAIT at this point, is an additional burden of cost without adequate benefit.

9. Valid, cost effective and functional technology.

Earlier comments re. UHF and further evaluation of low frequency RFID are endorsed in this summary. The NZDFA fully supports this concerted and genuine evaluation based on both the cost and application of a new, - more suitable technology model. NZDFA believes that this work needs to be completed and formally reviewed prior to any mandatory inclusion of deer in the NAIT system. We note that while NAIT is not set-up as a technology review system, it does have the responsibility to consider and incorporate advances in all aspects of the NAIT model over time (inclusion of new standards and new technology, etc).

In conclusion,

The NZDFA does not have the current support of its deer farmers to support the introductory or proposed mandatory phases of NAIT, as outlined in the discussion document. The proposed scheme is based around the Crown requirement for additional information from the rural sector to meet an enhanced biosecurity obligation in international terms. We believe that current systems can achieve that for deer at no additional cost to the industry.

The deer industry has been a leader in the fields of traceability and QA, and the NZDFA is supportive of moves to improve New Zealand's biosecurity. We would suggest that NAIT should not be so focused on mandatory introduction for individual species, rather allowing voluntary uptake until systems are in place to allow a co-ordinated mandatory introduction across all farmed animal species.

Market access, traceability and food safety requirements can be fulfilled by the existing high standard of industry and company QA programmes which are properly driven by the market. Until the technology has been proven, new technology adopted (if required), and the cost benefit analysis shown, the proposed NAIT system governance costs and timing does not meet deer farmers expectations for support, and their directions to NZDFA to stay out of the system in the immediate future will not change.

Note: ***The New Zealand Deer Farmers' Association:***

- 1 The New Zealand Deer Farmers Association has a mandate to represent all active deer farmers and is funded by ~2000 voluntary subscription paying levy-paying members of an estimated 3600 currently active farmers within the broad administrative framework of Deer Industry New Zealand, and represents the majority of the 1.4M farmed deer in New Zealand.

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- 2 It is a fully Incorporated Society that promotes the views and interests of the producers at all levels, and is lead by an Executive Committee of 4 including the Chairman. An executive and administrative responsibility is now assumed by its Producer Executive within Deer Industry New Zealand. The Executive also sits on the NAIT TAG to represent both Deer Industry New Zealand and DFA viewpoints.
- 3 The Association is regionally located through its 23 Branches and 3 Breed Societies and has a strong relationship with regional councils, related agricultural industries and its own industry relationships.
- ..4 The NZDFA recognises that the positions stated here are based on feedback at industry forum and AGMs by way of discussion and remit from individual members and supported by majority decision.
- 5 The NZDFA acknowledges the opportunity created to have various view points expressed through Deer Industry New Zealand representation on the NAIT TAG and GG bodies, and advises that these views may not necessarily be endorsed or shared in their entirety by Deer Industry New Zealand and its Board and Executives.

For The New Zealand Deer Farmers' Association

Bill Taylor, Chairman Executive Committee.