



# **Beef + Lamb New Zealand and Meat Industry Association**

**Submission on:**

**Options for improving pig and sheep traceability**

**MPI Discussion Paper No: 2026 /01**

**02 April 2026**

## EXECUTIVE SUMMARY

- I. B+LNZ and MIA welcome the opportunity to comment on the proposals.
- II. B+LNZ and MIA support improving sheep traceability considering the risks posed by foot and mouth disease to the New Zealand livestock industries and economy.
- III. We agree that information on sheep movements needs to be more accurate and readily accessible. However, we do not consider that this requires individual animal traceability. In our view, mob-level traceability is appropriate for sheep and sufficient for exotic disease responses and subsequent assurances of disease freedom.
- IV. **We support option 2, making electronic Animal Status Declarations (eASDs) mandatory for sheep movements.** This is the most practical and proportionate option. It builds on an existing system, addresses the main weaknesses in current arrangements, and should be more workable across the red meat industry value chain.
- V. We do not support options 1 or 3. In our view, using the NAIT framework for mob-level sheep traceability is unnecessary, may delay needed improvements, and creates uncertainty about future traceability requirements for sheep.
- VI. Overall, we consider that making eASDs mandatory is the appropriate next step and that improvements to sheep traceability should remain practical, proportionate, and consistent with the established industry-government partnership model.

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## 1. Introduction

- 1.1 Beef + Lamb New Zealand Ltd (B+LNZ) is an industry-good body, funded under the Commodity Levies Act through a levy paid by producers on all cattle and sheep slaughtered in New Zealand. B+LNZ represents around 9,000 farming businesses, providing around 35,000 jobs across New Zealand.
- 1.2 The Meat Industry Association of New Zealand Incorporated (MIA) is a voluntary trade association representing New Zealand meat processors, marketers, and exporters. It is an Incorporated Society (owned by members) that represents companies supplying virtually all of New Zealand sheepmeat and beef exports.
- 1.3 MIA member companies operate more than 60 slaughter and further processing plants employing 25,000 people throughout the country. Ninety percent of this production is further processed into value-added products.
- 1.4 The red meat sector is a significant contributor to New Zealand's economy. Export revenue from New Zealand's red meat industry is expected to be \$13.2 billion in the year to 30 June 2026.
- 1.5 B+LNZ and MIA welcome the opportunity to comment on the proposals.
- 1.6 B+LNZ and MIA are signatories to the Government Industry Agreement (GIA) for biosecurity readiness and response, joining in December 2018 and September 2017 respectively. Our staff are engaged in numerous biosecurity readiness projects under the Foot and Mouth Disease Operational Agreement, governed by the Foot and Mouth Disease Council.
- 1.7 B+LNZ is a founding member of the National Animal Identification and Tracing (NAIT) partnership and a shareholder in NAIT Ltd.
- 1.8 The red meat industry has been investing in improvements to traceability systems for many years, including via the Red Meat Profit Partnership, which funded the development of a proof-of-concept and then piloted an electronic system for Animal Status Declarations (eASDs), beginning in 2015.  
  
This was expanded until being rolled out nationally as part of the MyOSPRI system, enabling farmers to make eASDs for all movements of sheep and cattle, except those involving saleyards.
- 1.9 eASDs are popular among users and, in addition to their biosecurity utility, have the potential to drive efficiencies within the sector and strengthen assurances to customers about the provenance of New Zealand red meat products.
- 1.10 B+LNZ and MIA are concerned with sheep and beef cattle production and processing and have therefore limited our comments to the implications of the consultation proposals for the red meat sector.

## 2. The traceability of sheep movements needs to be improved

- 2.1 B+LNZ and MIA (collectively 'we') agree with the general premise behind the consultation that improvements in sheep traceability are needed due to the risks posed by foot and mouth disease to New Zealand's livestock industries and wider economy.
- 2.2 B+LNZ and MIA support making proportionate, cost effective and practical improvements to the data, systems and capability that are needed to respond to incursions of exotic diseases like FMD and to demonstrate freedom following disease eradication.

- 2.3 Improvements to these systems have been recommended by recent independent reviews of readiness for foot and mouth disease (FMD)<sup>1</sup>, the *Mycoplasma bovis* response<sup>2</sup> and previously<sup>3</sup>.

### 3. Mob-level traceability is appropriate for sheep in New Zealand

- 3.1 B+LNZ and MIA consider that mob-level traceability, **without ear tags**, is appropriate for New Zealand's sheep production systems and sufficient to meet the requirements of biosecurity readiness and response, including for foot and mouth disease (FMD). It is therefore, appropriate to put forward mob level options for consideration in the consultation document.
- 3.2 The central issue identified in the discussion document is not the absence of traceability, but the performance of existing systems. The current system can reconstruct movements between properties, but not always in a timely or accessible manner. This is the fundamental problem that needs to be addressed.
- 3.3 In an FMD response, the critical requirements are to rapidly identify:
- where susceptible animals are located; and
  - how they have moved between properties within the relevant tracing window

Mob-level traceability is well suited to this purpose. Sheep in New Zealand are managed, transported, and traded in mobs, and FMD is controlled at the property level. Where animals have been commingled, all are treated as exposed. Under these conditions, the key information required is the existence of a movement link between properties, rather than the identity of individual animals.

- 3.4 New Zealand's sheep production system further supports this approach. Movements are relatively simple, with a high proportion of animals moving directly from property of birth to slaughter. This reduces the complexity of tracing compared to systems characterised by frequent movements, individual trading and re-mixing.
- 3.5 Mob-level traceability is also consistent with internationally recognised principles. The World Organisation for Animal Health (WOAH) does not prescribe a single model for animal identification and traceability. Rather, it requires that systems are designed to achieve defined outcomes based on risk, taking into account factors such as production systems, animal movement patterns, cost–benefit considerations, and the specific diseases being managed.
- 3.6 WOAH explicitly recognises that different approaches may be appropriate, provided the system can demonstrate effective control of animal movements and support responses to disease and trade requirements. Importantly, WOAH standards emphasise equivalence of outcomes rather than uniformity of system design.
- 3.7 In this context, a mob-level traceability system that provides accurate and timely information on animal locations and movements is consistent with WOAH expectations and capable of meeting the requirements for disease control and recovery of trade.

### 4. Assessment of the proposed options

#### *Assessment criteria*

- 4.1 B+LNZ and MIA agree that criteria such as effectiveness, efficiency and clarity are generally among the appropriate criteria for assessing regulatory options.

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<sup>1</sup> Martyn J. and Shadbolt N. (2022) Foot-and-Mouth Disease Preparedness An independent review 2022

<sup>2</sup> Shadbolt et al (2021) The Mycoplasma bovis Programme: An independent review 2021

<sup>3</sup> Combined Government and Industries FMD Preparedness Working Group (FMG) Final Report (2011) *Assessing New Zealand's preparedness for incursions of foot and mouth disease and recommendations for improvement*

- 4.2 As a matter of principle, B+LNZ and MIA maintain that the criteria used to evaluate legislative options should always include assessment of proportionality with respect to costs and benefits and implementation feasibility and practicality.
- 4.3 However, we note that MPI has subsequently provided assurances that option 3 would not involve the application of flock-level ear tagging. This is very welcome and makes options 2 and 3 comparable with respect to direct impacts on farmers and processors, reducing the importance of detailed assessment of costs and practicality at this stage. We support the intention for these to be the subject of further economic and policy analysis following selection of a preferred legislative option and will welcome opportunities to participate in this.

*Option 2: Mandatory eASD is the preferred option for B+LNZ and MIA*

- 4.4 Mandatory electronic Animal Status Declarations represent a logical and proportionate improvement to New Zealand's livestock traceability system. These directly address the primary constraint in the current system by improving the timeliness, accessibility, accuracy and reliability of information about animal movements between premises.
- 4.5 Phasing out paper ASDs is central to this improvement. Paper-based processes are the primary source of delay and inconsistency in the current system.
- 4.6 B+LNZ and MIA strongly support option 2 – making use of eASDs mandatory for movements of sheep. There is already an eASD system in place and we note that farmers, meat processors and others in the industry view these positively. In 2025, there were 161,678 eASD transactions made using the MyOSPRI platform.
- 4.7 If eASDs are made mandatory, this should follow a second round of detailed consultation across the value chain on implementation. A phased introduction would help ensure farmers, processors, saleyards, stock agents, transporters, and other participants can help design arrangements that work in their operating contexts.
- 4.8 Implementation planning will need to address situations where connectivity is limited. The system will also need to be as simple as possible for users, many of whom have limited confidence or capability with digital systems.
- 4.9 B+LNZ and MIA also recommend that the phasing out of paper ASDs should be applied to cattle, to avoid a situation arising where farmers and meat processors (which deal with each species) are required to persist in using both paper and electronic systems.
- 4.10 Ideally, cattle farmers should be able to meet NAIT and ASD obligations through a single transaction where that is their preference, using one system or a single interface that appears seamless to the user, even if it populates separate back-end databases. Achieving this is an implementation issue and should not be prevented simply because the relevant obligations are set out in different primary legislation.
- 4.11 B+LNZ and MIA further recommend that MPI considers including changing the scope of ASDs from 'change of ownership' to 'change of location', as is enabled by the Animal Products Act (1999), to improve their utility for tracing purposes and to align with obligations cattle and deer farmers have under NAIT.
- 4.12 B+LNZ and MIA expects that the development and operational costs of mandatory eASDs will be shared between the Crown and industry and set in the context of other investments made for similar purposes.
- 4.13 B+LNZ and MIA recommend that MPI also considers implementing a mandatory farm registration system for biosecurity purposes, using existing powers established under the Biosecurity Act 1993, as a practical step to further improve New Zealand's readiness for FMD.

- 4.14 B+LNZ and MIA represent the commercial red meat sector. Any changes to the regulatory regime and compliance settings will need to take proper account of how the scheme would apply in practice to smallholders and hobby farmers.

*Options 1 and 3 are not acceptable to B+LNZ or MIA*

- 4.15 Option 1 – retaining the status quo is not preferred, as it would not improve the traceability of sheep movements.
- 4.16 Option 3 – mob-level tracing of sheep using the NAIT Act is not acceptable. A central issue in option 3 is the reference in the consultation document to the need to define a “mob-level identifier” (p.17).
- 4.17 In the context of sheep systems, this terminology most naturally implies the use of flock-level physical identifiers, such as mob-based ear tags.
- 4.18 B+LNZ and MIA acknowledge and welcome subsequent assurances from MPI that option 3 is not intended to require the introduction of physical ear tags for sheep. However, this position is not reflected in the wording of the consultation document.
- 4.19 As presented, option 3 potentially introduces a new requirement for physical identification of sheep. That would represent a significant change to current practice, with clear implications for labour, animal handling, and cost. We are confident those costs would not be justified by any commensurate improvement in biosecurity outcomes.
- 4.20 B+LNZ and MIA also understand that option 3 would be likely to require amendments to the core NAIT Act (2012), rather than merely to Schedule 1 via a regulation as proposed (see 5.1 below). The timeframes for implementing this are not presented but would inevitably delay bringing about the required improvements in the performance of the sheep traceability system.

## **5. Further Comment on why Option 3 is inappropriate: NAIT Policy Framework and Industry Partnership**

- 5.1 B+LNZ and MIA read the consultation material at page 23:

*“This option would require an amendment to Schedule One of the NAIT Act to include pigs and/or sheep as NAIT animals, and subsequent changes to NAIT regulations to exempt pigs and/or sheep from tracing at an individual level, define mob level NAIT devices (e.g. tattoos, tags).....”*

as indicating that option 3 would involve sheep being added to Schedule 1 of the NAIT Act as a NAIT species, with the result that they would initially fall within the full individual electronic identification framework applying to cattle and deer. On that reading, sheep would then be carved out of the individual traceability requirements through regulations made under the NAIT Exemptions framework.

Unfortunately, this would mean that the protection in section 67(6) of the NAIT Act against an industry being brought into NAIT without its agreement, including any future move to require individual traceability for sheep, would no longer apply. We do not consider that acceptable. It would be inconsistent with the partnership model on which NAIT was founded, including the role of industry in determining the appropriate level of traceability, and would be strongly opposed.

- 5.2 Government-industry partnership was a foundational lesson from the MAFBNZ review<sup>4</sup> of other systems worldwide, undertaken in 2009 during the development of the NAIT framework: “Government

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<sup>4</sup> MAFBNZ (2009) Review of Selected Cattle Identification and Tracing Systems Worldwide: Lessons for the New Zealand National Animal Identification and Tracing (NAIT) Project MAF Biosecurity New Zealand Information Paper No: 2009/03

*and industry collaboration is needed to produce the best system – NAIT should continue to operate as a joint industry-government partnership initiative.”*

- 5.3 This is also reflected in public consultation<sup>5</sup> about the NAIT framework, endorsed by B+LNZ (then Meat & Wool New Zealand), MIA, DairyNZ, Dairy Companies Association of New Zealand (DCANZ), Deer Industry New Zealand (DINZ), and Federated Farmers (FFNZ), and subsequently in the NAIT Regulatory Impact Assessment<sup>6</sup> (RIS):

*“NAIT is a partnership between industry and the Crown, recognising the public, private and industry good of animal identification and tracing.” (p1)*

- 5.4 A foundational principle of the NAIT framework is that decisions regarding the appropriate level of traceability for different species would rest with the relevant industries. This was also reflected in the 2009 consultation material and the RIS:

*“It will be up to each livestock sector to determine its own animal identification and traceability information needs, and an agreed implementation date. The overall system will be designed to accept movement records based on herd/mob/flock, as well as the initial implementation of individual identification, to provide wider scope for future species requirements.” (Other Species, p23)*

- 5.5 B+LNZ appreciates the close working relationships that have developed between B+LNZ, DairyNZ, DINZ, as NAIT shareholders, and MPI. These relationships have strengthened over time and are now delivering clear value in helping parties work together to maximise the benefits of the NAIT system and address shared challenges arising from our roles as funders and stakeholders. Unfortunately, this approach has not been fully reflected in the development of the legislative options and consultation document about improving the traceability of sheep movements.

## **6. Further Comment: Why Individual electronic identification of sheep is unnecessary.**

- 6.1 B+LNZ and MIA note that the consultation document includes extensive commentary on individual electronic identification (eID) for sheep, despite none of the options presented for consultation proposing the adoption of eID.
- 6.2 We are concerned that the prominence given to eID in the consultation document and vague references to ‘international expectations’ risks introducing potential confusion that the proposed “mob level” options may not be sufficient. References to international trends and potential future requirements for individual traceability may also create an implicit expectation that eID represents an inevitable or preferred end-state.
- 6.3 We understand that this is **not Government policy** nor the subject of the consultation. However, in order to ensure there is no confusion, B+LNZ and MIA consider it necessary to outline our very strong position as to why individual eID in the New Zealand context is unnecessary for achieving effective biosecurity outcomes, particularly for diseases such as foot and mouth disease which are managed at the mob or property level.
- 6.4 B+LNZ and MIA are not persuaded by sections of the consultation material that suggest eID in sheep would materially improve the prospects for regionalisation or enable more rapid re-establishment of disease-free status following an outbreak.
- 6.5 In practice, these outcomes are more likely to be determined by the effectiveness of containment measures, the availability of accurate location and movement data at the mob or property level, and the capacity to implement and demonstrate these controls to trading partners, rather than by the presence of individual animal identification.

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<sup>5</sup> MAFBNZ (2009) National Animal Identification and Tracing Enhancing New Zealand’s animal identification and tracing systems Biosecurity Discussion Paper No: 01/08

<sup>6</sup> MAFBNZ (2009) Approval of National Animal Identification System. Regulatory Impact Statement

- 6.6 Further, B+LNZ and MIA consider that the description of the 2025 FMD outbreak in Germany omits important contextual factors that limit its relevance to New Zealand.
- 6.7 While the consultation material notes the speed with which Germany regained disease-free status and that Germany has individual ID for a number of species, it does not acknowledge the structural and institutional conditions that underpinned this outcome, including mandatory farm registration, the scale and resourcing of Germany's animal health system and other geopolitical factors. Nor does it reflect that the outbreak was limited to a single infected property. Without this context, the example risks significantly overstating the role of traceability settings, including eID, in determining response outcomes and recovery timelines.
- 6.8 The case for identifying sheep with ear tags (either individually or at the flock level) is also not supported by assessment of costs and benefits, with significant and ongoing costs to the industry outweighing the limited marginal gains over an effective mob-level system. In addition, eID would be impractical within New Zealand's extensive, pasture-based production systems, where sheep are managed, transported, and traded in mobs, and where the scale and nature of operations would make individual identification and movement recording both burdensome and difficult to implement effectively.

## 7. Summary and recommendations

B+LNZ and MIA are appreciative of the Government's decision to prioritise improving the traceability of sheep movements for biosecurity purposes.

- 7.1 B+LNZ and MIA recommend that option 2 – introduce mandatory electronic Animal Status Declarations (eASDs) for sheep be implemented.
- 7.2 B+LNZ and MIA do not support options 1 or 3.
- 7.3 B+LNZ and MIA recommend that the requirement to use eASDs be extended to cattle.
- 7.4 B+LNZ and MIA recommend that detailed implementation planning will be needed to ensure the system is workable in practice for all users, including in situations where connectivity is limited and where some farmers are not confident using digital systems.
- 7.5 B+LNZ and MIA recommend that MPI considers developing a comprehensive farm/property register covering all FMD-susceptible species.
- 7.6 B+LNZ and MIA recommend that MPI upholds the established NAIT partnership model, including the requirement for industry agreement on the appropriate level of traceability required.