



Analysis of Submissions:

Proposal to establish a framework for electronic Animal Status Declaration (ASD)

October 2014

The Ministry for Primary Industries (MPI) is proposing to establish a framework for electronic submission of Animal Status Declarations (ASD).

A discussion document outlined four options for delivery. **Option 1**, where requirements were established and anyone can operate a system without prior approval, but subject to auditing. **Option 2**, where the operators of the electronic system must be pre-approved prior to operating a system. **Option 3**, where MPI specifies one provider to deliver the electronic system and **Option 4** where MPI deliver the system in-house.

Any option may require amendments to legislation.

The discussion document was published on MPI's website for consultation on 1 June 2014.

The following stakeholders and interested parties were contacted by email; OSPRI, Beef & Lamb NZ, Dairy NZ, Federated Farmers, Road Transport Forum, Deer Industry New Zealand, Meat Industry Association, Stock & Station Agents Association.

16 submissions were received on the above proposals. These are presented in the appended table, together with Ministry for Primary Industries' (MPI) response to each submission.

Summary of Submissions

There is a great variation of opinion between many submitters on virtually all aspects of an electronic ASD system. This makes the analysis of submissions more complicated than usual. However, all submitters agree that an electronic system could have merit, both for farmers, transporters and meat processors.

There is support for each of the four options presented, with many relevant points made. The main consideration that MPI has taken into account is the ability to achieve equivalent, or better, performance compared with the current ASD system. Secondly, MPI recognise it is important that it is easy for persons in charge of animals to make the declarations.

Submitters mainly agree with MPI's analysis of available options, with minor comments around it.



The most common discussion revolves around consistency and control of the data. Another main point concerns central storage and the effort that would go into maintaining a system with unlimited suppliers. These opinions have been reflected in internal MPI discussions. The possibility of cherry picking parts of option 1 and 3/4 was raised by one submitter and has also been discussed internally. This would enable MPI to manage a single hub system with centralising data and core functionality, while still allowing any organisation to customise the user interface with branding and commercial questions added. MPI considers this is a possible way to combine several diverse interests while still maintaining the integrity of the ASD scheme.

On the topic of operating parallel paper and electronic systems a general theme is the lack of IT infrastructure in many rural parts of the country. This is pictured as a problem for both farm-to-farm movements as well as sale yard management, especially in rural areas and utilising temporary facilities. The opposing arguments centre on high mobile technology saturation and the need to fully commit to a fully electronic system to realise the perceived benefits. All submitters that commented on the need to be able to reproduce eASD's in any current paper format have supported this.

A big variety exists in the use of electronic systems between individual farmers, as well as groups of farmers, and this is likely to be reflected in a non-uniform use of electronic ASDs. To allow for this, while still managing the day-to-day traceability currently being achieved, a paper based system is beneficial.

On balance, MPI finds the arguments to retain the paper system still outweigh the benefits of moving to a solely electronic system.

With regards to amendments, most submitters agree these should be allowed as long as they are being tracked. Commonly the point of transport and the point of processing is given as natural cut-off for allowing amendments. The complexities managing this however could create several problem areas and lessen the trust in the system. MPI considers that amendment of questions 1.0 to 6.8 of the current form should be allowed for a set time period after creating the initial eASD only. Amendments to type of animals and tallies could be allowed for longer. Following this, amendments should require a replacement eASD to be raised.

Several submitters have touched on the transporters role in transferring the ASD. Stakeholders in the farming sector and those involved in frontline TB control see the use of a paper ASD as an important step to ensure compliance with TB requirements. Many transport operators on the other hand see this as an imposition on them where they are entangled in a transaction outside of their contractual and legislative obligations. This is especially true where animals are prevented from unloading for failing to be accompanied by an ASD. It is important to recognise that the responsibility to initiate the information transfer via the ASD lies with the sender of the animals and not truck drivers. MPI doesn't expect the transport sector to enforce compliance with the ASD or



the TB management scheme.

Currently cattle and deer are required under the Biosecurity Act 1999 to be accompanied by the ASD as a TB declaration. OSPRI has signalled this may change in the future as TBFree NZ and NAIT take advantage of possible synergies between their respective systems. In the event of such a development, it is likely that TBFree NZ would no longer supply ASD books. It is anticipated that a large part of that cost, including for farm-to-farm movements, would be absorbed by processing companies. For farm-to-farm movements a move away from paper based TB declarations could also have implications for ASD compliance.

A final point that has been raised and should be clarified is the use of accredited entities similar to Information Providers in NAIT. This would allow for very large efficiencies and possibly overcome several of the issues raised as reasons to keep a paper system in addition to an electronic system. However, MPI fundamentally considers the ASD a declaration by a person that is in control of the animals and has the knowledge and authority to make the statements required. This is the reason transport operators and stock agents are not to fill in ASDs on behalf of farmers. Should an entity fulfil the three requirements, there is no need for accreditation as this already is allowed for. MPI's position is unlikely to change in the foreseeable future, thus making the use of accredited entities unfeasible at this point in time.

From a regulatory perspective, it may be preferable to stick to one single provider, either as core government or by contracting the delivery to a specified specialist organisation. This is however a major change from the current system, where anyone can print the approved document. As the primary data transfer still is between the sender and receiver, MPI deems it appropriate to continue with this model and only add a reporting requirement for electronic systems.

Notwithstanding the above paragraph, many submissions have also made the point that it is important to maintain control and knowledge about any electronic ASD system. This is especially true from an audit perspective. For this reason MPI considers that a recognition process is necessary to ensure sufficient control and scope for audit, by MPI systems auditors as well as overseas auditors.

After taking all submissions into consideration, MPI consider that option 2 is the most appropriate option to offer the ability to allow for a range of differently focused applications while still maintaining the integrity and traceability of today's system. It is important to note this would not preclude a single provider to, through commercial arrangements, supply the service to several or all parties concerned.



Next steps:

To progress the implementation of the ability to send electronic ASDs, MPI will move forward and:

- review the relevant legislation under the Animal Products Act 1999 to ensure there is a legal framework for electronic ASDs
- commence the development of relevant data standards
- reconvene a focus group based on the earlier stakeholder group. The primary purpose of this group will be to give input for implementation of the legal framework and agree on the outcomes of data standards



Review of Proposal to establish a framework for electronic Animal Status Declaration (ASD)

Specified Questions	Submitter	Submission comment ¹	MPI Response
Q1. Do you agree with the analysis in Appendix 1	Land Meats NZ	Yes	
	B+LNZ	n/a	
	OSPRI	n/a	
	Greenlea Premier Meats	n/a	
	FarmIQ	Broadly makes sense. To be fair, it is a challenge to distill it down to something this simple.	
	DINZ	DINZ considers the four options presented in Appendix 1 and summarised on page 3 to be a fair representation of possible options.	
	SBV NZVA	Yes, agree with the analysis in general	
	NZVA	Agree with the analysis	

¹ The comments are taken directly from the submissions received, except where it has been necessary to make changes to preserve confidentiality and improve readability.



	Meat Industry Association	Broadly, we agree with the analysis in Appendix 1 but draw out some points for consideration.	
	Rezare Systems	We agree that the analysis in Appendix 1 provides a good assessment of the possible options for service provision.	
Q2. If not, what changes do you think is needed for the analysis to be valid	FarmIQ	One concern is the consideration of NAIT in option 3. FarmIQ is a registered information provider to NAIT so can flow stock sales and purchase (and associated location) information through to NAIT. A similar model could be considered here where “NAIT” acts as a central system and other providers can provide data to complete the ASD. This may in fact be what is being suggested in option 3. While the working group will have likely done this, I would suggest working through how the current system works in reality compared to what may be possible in an electronic system would be very valuable.	
	DINZ	No changes required.	
	SBV NZVA	The cons for Option 3 single provider are too heavily weighted.	
	NZVA	NA	
	Meat Industry Association	MIA notes that there is no discussion on either the costs for the proposed options or the methods of funding. The discussion paper would have benefited if an estimate of costs were provided for the different options and an indication of the options for funding. Clearly different providers, including meat processors, will be able to develop systems with different costs under options one and two – but with no details on the technical criteria (systems integrity, data security etc.) they would need to meet, it is difficult to assess the baseline investment needed. Cost recovery has been assumed, however it is unclear from whom this cost will be recovered. MIA submits that the source of funding, costs and benefits must be transparent to the stakeholders.	



	Rezare Systems	We believe that it is feasible to have hybrid approaches that meet more than one of these cases. For instance, it would be possible to have a centralised system to carry out authentication, application of digital signatures, and storage, while allowing multiple providers to develop front-end tools for data collection (which would enable flexibility in the rapidly changing consumer device market).	
Q3. Which of the above 4 options do you prefer? Why?	Land Meats NZ	Option 3. There needs to be consistency in the make-up of the form and if one or perhaps two developers are contracted to create the form this should ensure consistency. I also believe it needs to be a company independent from MPI to create accountability and trust. I don't believe there is enough trust in MPI to create it after the shambles from the last ASD change and other documentation issues.	
	OSPRI	OSPRI's preferred option is a hybrid of the open and single provider options, as long as the single provider is driven to act in ASD stakeholder interests, and has the right expertise and experience in delivering customer facing IT solutions. This would involve a single provider of an eASD system for all animal movements, but with approved third parties able to act as information providers on behalf of farmers as and where desired.	It is unclear what the information providers role would be. Are they intended to operate the customer interface or are they intended to act in line with information providers under the NAIT Act? It is important to note the supplier would need to sign the form themselves as the person with knowledge and control of the animals
	Greenlea Premier Meats	With regards to delivery provider, Greenleas preference is Option 3 (single provider – not MPI).	
	NSI OSPRI committee	Have NAIT implement eASDs	
	SSI OSPRI committee	If eASDs are introduced then NAIT would be most suitable to run the system	



	FarmIQ	<p>Options 2/3 would be preferable. If not already undertaken, a full analysis of what the system needs to provide to be workable/practical for farmers/transporters/processors should drive further analysis. I appreciate there are regulatory requirements but these should be tested against the most workable/practical solution as a first step.</p> <p>Option one would be very difficult to manage. Data standards would assist (actually essential) but making it work in practice would be a challenge. Option 4 could work, but preferable these systems are 'jointly owned' as it assists with 'ownership' and uptake.</p>	
	DairyNZ	<p>DairyNZ recommends MPI adopts Option 3: <i>MPI mandate one specific service provider, such as NAIT or NZ Post, to provide the electronic ASD system</i> (Question 3). This would include a provision enabling those who cannot access the electronic system to fill in the ASD manually.</p>	
	DINZ	<p>DINZ considers that two options are worthy of further consideration: i) selected and approved providers (option 2); single, mandated provider (option 3). Both options have merit and could potentially address the general principles outlined in section 3 above.</p>	
	NZDFA	<p>DINZ considers that two options are worthy of further consideration: i) selected and approved providers (option 2); single, mandated provider (option 3). Both options have merit and could potentially address the general principles outlined in section 3 above.</p>	
	SBV NZVA	<p>Option 3. One provider or engine room to ensure ASD standard is maintained and managed – allowing for multiple interfaces for user ease.</p>	



		Options 3 or 4. One provider to ensure ASD standard is maintained and managed – multiple providers will make this difficult. Multiple providers could lead to different formats, point-of-entry confusion, and difficulty in analysis, storage, animal movement tracebacks, and auditing of ASD data.	
	Meat Industry Association	MIA members have discussed the options and are of the view that anyone should be permitted to operate an e-ASD system based on standards set by MPI (option one) and subject to appropriate verification. This mirrors the current position with paper ASD's	
	Rezare Systems	We prefer the a set of Selected Providers OR if a Single Provider is selected we propose that the front-end collection of data for that provider allow open inputs from other systems (for instance, farm management tools and mobile applications), even if that single provider then provides the final authorisation step.	
Q4. Is there a limit on number of providers that should be allowed at any one time?	Land Meats NZ	Yes. As above I believe there should be no more than two developers.	
	FarmIQ	From an administrative perspective a limit may be required. In theory, if using an open system, there should be no need for a limit.	
	DairyNZ	DairyNZ supports one service provider delivering the electronic ASD system. This eliminates any potential compatibility issues between different providers and ensures that the data entry experience for all users is consistent. This will also make it easier to ensure that the existing hard copy ASD can be exactly and consistently replicated by the system (Question 4).	
	DINZ	DINZ does not have a firm view on the number of providers but notes that management of the system should be easier with fewer providers.	
	SBV NZVA	Yes there is a limit. One provider / engine is preferred for reasons above, duplication not required here but no limit to how many interfaces as just changing “shop window”.	



	NZVA	Yes there is a limit. One provider is preferred for reasons above. NAIT/OSPRI or MPI are the preferred providers.	
	Meat Industry Association	MIA's strong preference is for option one and under this option MIA does not believe there is a need to restrict the number of providers. Currently there is no restriction (or approval) on who can supply paper ASDs.	
	Rezare Systems	Subject to our answer above, we have no firm opinion on the number of providers that should be enabled at one time.	
Q5. How long should an approval be valid for?	Land Meats NZ	Three years. Changes happen often and three years will fit with government terms.	
	FarmiQ	Possibly indefinitely but subject to audit. Regularity of audit driven by risk assessment. 5 years would be logical if a time limit is required.	
	DINZ	DINZ has no position on the period of approval, but cautions on a long period at the beginning of using a new system.	
	SBV NZVA	5 years ok if one provider and annual reviews passed.	
	NZVA	5 years ok if one provider. Multiple providers 2 years max.	
	Meat Industry Association	Providing the service meets standards set by MPI and continues to do so, there is no need to have an expiry. There must be the ability for new entrants to come into the market provided they meet the MPI standards.	
	Rezare Systems	We believe that approval should be regularly reviewed/renewed, particularly if the number of selected providers is limited – they must be seen to be performing and providing a service that is useful to at least a segment of the industry. This might be less frequently than annually – perhaps every three years.	
Q6. Is there a need to require capability to display the ASD	Land Meats NZ	Yes. We need to be able to view the document and check for accuracy before we print it	



on-screen?	OSPRI	In response to question 6, it would seem perfectly reasonable to expect the new system to display the ASD information in a way that resembles the paper form, and for the system to be able to print the information in the same format as the current ASD paper form.	
	FarmIQ	The data to complete an ASD would need to be on screen, turning that into a form would be straight forward. The need for this would presumably be driven by regulation and or ease of analysis of form contents.	
	DairyNZ	DairyNZ supports the provision for the new electronic ASD system to collect the mandatory data captured by the manual ASD form, which is a requirement under the Animal Products Act (APA) 1999. It is also important the mandatory information collected by the electronic ASD system is displayed in the same format as the current hardcopy form (Question 6).	
	SBV NZVA	Yes it would probably be ideal to display the completed ASD on-screen, at least initially. This will allow checking for correctness of entry data.	
	NZVA	Yes it will be necessary to display the completed ASD on-screen. This will allow checking for correctness of entry data.	
	Meat Industry Association	Yes. Companies have noted the importance of having real-time access to data as well as the necessity for auditing/verification.	
	Rezare Systems	We are not convinced it is necessary to display the ASD on-screen in a form compatible with the current paper form. However, it will be necessary to display all the data, including the signing identification, on-screen when reviewing declarations.	
Q7. Should amendments be	Land Meats NZ	Amendments should be allowed.	



allowed or should the system require a new ASD to be raised?	OSPRI	In response to question 7, we would suggest that amendments to eASDs be allowed to be made by specified parties within certain parameters, for example by the creator of the eASD within 2 days of creating it. A full audit history of changes should be kept to ensure a record is available of who changed what, when. Some form of notification to the receiver should also be sent. Further analysis of this is recommended.	
	FarmIQ	If replicating a paper form electronically, possibly a new ASD would need to be raised. If the system is online and the person making amendments is approved amendments should be feasible. An audit trail of changes could be provided	
	DairyNZ	We support the continued provision to only allow one person to fill in and amend the ASD. The person in charge of the animals (PICA) would be the most appropriate person to do this (Question 7 and 8)	
	SBV NZVA	Amendments should be allowed up to the point of transport although there needs to be some allowance for injury/ death in transport. This will enable correction of entry data, and any last minute additions or deletions. A new ASD should not need to be raised as involves duplication and potential confusion.	
	NZVA	Amendments should be allowed up to the point of transport. This will enable correction of entry data, and any last minute additions or deletions.	
	Meat Industry Association	Given that both MPI e-Cert and NAIT allow for amendments, any eASD should allow the same. Time stamped field level change logging would no doubt be mandatory in such a system to allow full traceability and auditability.	



	Rezare Systems	Whether amendments are allowed or a new ASD is required is to some extent a technical issue in our opinion. Certainly, it must be possible to at least “amend” an ASD for a correction to a question or to correct a tally, even if this is by automatically copying all the data to a new ASD (or a versioned copy) and authorising it again. The key point is for the change to be authorised or signed.	
Q8. Should other persons in charge be allowed to make amendments?	Land Meats NZ	Amendments should only be made by the supplier. If we receive an incomplete or inaccurate ASD we should send it back for amendment. The document should be password protected in the suppliers computer so only authorised persons can create, send or amend documents.	
	OSPRI	In response to question 8, allowing other persons in charge to make changes or amendments potentially introduces a complex system of relationships, which could be costly to build and administer. Further analysis of this possible function is recommended	
	FarmIQ	Yes, assuming the identity of the person making changes can be verified and an audit trail provided. I assume the key point is whether the person has knowledge/authority sufficient to complete the declaration.	Yes, key consideration would be knowledge and authority along with control of animals
	DairyNZ	See Q7	
	SBV NZVA	Yes, for the reasons in 7 above. There will need to be a ‘sign-off’ at the last entry. This will require robust ‘security’ precautions, such as prior nomination (registration?) of those able to enter data.	
	NZVA	Yes, for the reasons in 7 above. There will need to be a ‘sign-off’ at the last entry. This will require robust ‘security’ precautions, such as prior nomination (registration?) of those able to enter data.	



	Meat Industry Association	Yes – but this would be dependent on the information.[...] Consideration does need to be given to who and what amendments can be made by others. Ensuring the accuracy and completeness of the data –the whole point of doing this is critical. However it is important that those persons making changes are identifiable.	
	Rezare Systems	We believe there would be benefit in the ability to delegate “Person in Charge” in the same way that this is done in NAIT and in some farm management software products	
Q9. Is 28 days long enough to implement changes imposed by future legislation?	Land Meats NZ	No. The latest ASD was made mandatory in November 2013 and we are still, in July 2014, sending out warnings for suppliers that have not been told there was a change and who are not compliant.	
	OSPRI	In response to questions 9 and 10, a reasonable time frame to implement changes imposed by future regulation is entirely dependent on the scale of the imposed change. To add a new field to capture data should be achievable within 28 days, but to implement an interface to another government system would not. We suggest a specification such as: Provider(s) must ensure they have the capability to respond to required legislative changes to the system in a timeframe agreed between MPI and the provider.	
	FarmIQ	This would depend on the complexity of the change. A simple change to the ‘form’ in this time frame should be feasible.	
	SBV NZVA	28 days is probably not sufficient for major changes.	
	NZVA	No - 28 days is not sufficient. There must be full determination of what is needed, understanding by all parties of the changes, effective promotion of these changes, and time to deal with concerns about them.	



	Meat Industry Association	The answer to this question clearly depends on the nature, scope and complexity of any proposed change, coupled with the flexibility of any given system. It is therefore not possible to answer before either the change or the system exists. However there is a view in the industry that, based on past performance, 28 days is not enough time for a major change to be implemented –but the ability to make changes in such a short space of time could be made a criterion of the new system. It should also be noted that changes to the paper-based system – assuming the paper-based system remains at participants’ disposal for some period of time past implementation – will need to keep pace, which may slow down progress overall.	
	Rezare Systems	It is unlikely that 28 days will be enough for a software provider to implement a change, have this moved through internal testing and external testing and to a production environment. While we could achieve this, we know of many other organisations who run quarterly (90 day releases). However, it might be feasible to coordinate earlier notice of a coming change with these providers to achieve the same result.	
Q10. If not, how long is an acceptable timeframe?	Land Meats NZ	At least 6 months would be needed unless reporting lines can be improved.	
	OSPRI	See Q9	
	FarmIQ	This would depend on the complexity. It would be valuable to explore the potential complexity further.	
	SBV NZVA	There should be an upper time limit of perhaps 2-3 months for major changes, a shorter period for routine amendments.	
	NZVA	Whatever time it takes to deal with the issues in 9 above.	
			This is entirely dependent on the change required, and should be established between MPI, the stakeholder representatives and the service provider(s) on a case-by-case basis.



Submitter	Clause	Submission comment ²	MPI Response
Land Meats NZ	General Comment	Overall I think the idea of an electronic ASD is great. It will, if done properly, make my job much easier. To be done properly the form needs to be idiot proof. It needs to be set up so that all relevant information is entered into the form before it can be sent to the processor or buyer. So if a herd number is not entered into the appropriate box, or the TB status etc for beef or deer, or the Johnes box for sheep, the "Send" button cannot be activated. This will save meat companies a huge amount of money in saved time. As was stated in the proposal some of us are spending half a day sorting out incomplete or inaccurate ASD forms	Noted
B+LNZ	General Comment	The opportunity to improve and build on the existing ASD system should be explored for the purposes of improving food safety and also biosecurity. Electronification of ASD's has the potential to bring significant efficiencies to the existing system, and to provide more reliable data to a wide range of appropriate stakeholders, while also having the potential to add functionality to the process where statutory declarations about animal provenance and movements are made. While there is significant potential for efficiencies, any system design needs to be well constructed to ensure it is cost effective, simple and efficient for farmers administratively.	Agree. It is important however to ensure data is only used for purposes clearly and transparently communicated
B+LNZ	General Comment	B+LNZ believes that the benefits from electronification of the ASD system would accrue to all parts of the livestock production value chain in New Zealand, including in terms of ensuring that better and more reliable data is available for government agencies in the event of a biosecurity or food safety event, and improving the efficiency of the ASD process.	Agree
B+LNZ	General Comment	B+LNZ wishes to see eASDs available for all species and classes of livestock and submits that a paper form must remain available for those unable to submit information electronically.	Agree

² The comments are taken directly from the submissions received, except where it has been necessary to make changes to preserve confidentiality and improve readability.



B+LNZ	General Comment	We understand that there are a number of different interests to be met in implementing the electronification of the ASD system. The future state we are seeking is one where records of stock movements are completed and transmitted electronically, and the resulting (mandatory component) information is able to be quickly and easily interrogated by biosecurity and food safety officials for tracing activities.	Agree
B+LNZ	General Comment	However, we understand that others may be interested in using the eASD system for the provision of additional (non-mandatory) information as well. We would see a system involving the flow of both mandatory and non-mandatory eASD information operating (along the following lines:)[as independent parallel branches under a common form]	Agree
B+LNZ	General Comment	We suggest that the provision of this non-mandatory information could be an additional objective of this process that could perhaps be undertaken as part of a second phase of development. If the eASD 'form' is to provide a platform for private sector bodies to collect information that will be seen only by them (i.e. information that is not intended for regulatory or industry-good activities) then we believe that some of the cost of the eASD form's development and operation should be met by those private sector bodies.	Agree. MPI's view has been that this should be allowable but not subject to regulatory input greater than to ensure integrity of the data held.
OSPRI	General Comment	We think it is desirable to ensure this policy work firmly focuses on the wider needs that the ASD system addresses; how these needs may or may not change in the foreseeable future; and possible alternative options for addressing these needs.	Agree



OSPRI	General Comment	<ul style="list-style-type: none"> • The establishment of a central repository will be key to securing these improvements, efficiencies and opportunities. • The present ASD system creates paper records of animal movement, but these records are highly disaggregated. This greatly limits the ability to obtain added value from the gathering and integration of this information, such as for disease management or product quality assurance. Nor can this data be made readily available for further analysis or use in other systems. • Ultimately, to overcome these problems, the paper ASD system should eventually be fully replaced by an eASD system, at least as far as is practicable, reasonable and acceptable to users and stakeholders. • The system will also need to recognise and provide for proper management and protection of personal and commercially sensitive information. 	Noted
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OSPRI	General Comment	<ul style="list-style-type: none"> • The most obvious opportunity for improved interoperability is the ability (for cattle and deer at present and possibly for further NAIT species in the future) to prepopulate the eASD with data from the NAIT and TBfree information systems, which together hold most of the information which must be supplied on the ASD. • The scope and benefits of further possible interoperability between an eASD system, OSPRI information systems and other related Crown and industry systems warrant further consideration and analysis before the design of an eASD system is finalised. OSPRI would welcome the opportunity to contribute to such visualisation of the future shape, functionality, integration and operation of the information systems which support our primary industry biosecurity, food safety and market assurance programmes. • In the meantime we suggest further analysis of whether NAIT itself could provide sufficient traceability and data transfer capacity so as to make redundant the need for a separate ASD system, electronic or otherwise. Other possible drivers for future redundancy of, or at least major change to, the ASD system should also be explored to avoid the risk of wasted further investment in what may be a twilight system. OSPRI is well positioned to facilitate such strategic analysis with involvement of affected stakeholders. 	Noted
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OSPRI	General Comment	<ul style="list-style-type: none"> • We note the rationale for retaining paper ASDs, at least for a period to allow for adoption and uptake of new systems by farmers and to provide temporary back-up in the event of electronic system failures. • We expect that many farmers and some stakeholder groups will strongly advocate for continued availability and acceptability of paper ASDs. It may turn out that a dual paper and electronic system is the best (or even only) choice, but this raises the need for a clear view of possibly significant management and compliance problems with such a system, and for a forward plan to address these. Significant ongoing use of paper ASDs might also diminish the data collection, validation, transfer and storage benefits available from an eASD system, and would limit the development of an effective central data repository. 	Noted
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OSPRI	General Comment	<ul style="list-style-type: none"> • A previous stakeholder working party on the introduction of an eASD system recommended that because of potential uptake, compliance and management problems, there should be a phased approach to the introduction of eASDs, initially for movements of livestock directly to slaughter only. We support this as a prudent and useful phase-in approach, which will enable the eASD system to be tested for a class of animal movements with relatively limited traceability or biosecurity complications. • In regard to animal movement from farm to farm, OSPRI, through NAIT, is now becoming increasingly engaged in encouraging (and eventually enforcing) the recording of such animal movements. There would likely be synergies between this activity and any eventual need to promote effective eASD use for farm to farm movements. Possibilities for full system integration between NAIT movement recording and data capture for farm to farm animal movements, and parallel eASD requirements for the same movements, should also be investigated – especially if this could make life easier for farmers. OSPRI’s stakeholder and regional farming networks, and capability for direct communications with farmers, could be utilised to support development of an integrated programme and promote it throughout the farming community. • We strongly recommend that any phase-in steps, processes and timeframes need to be clearly defined (and widely agreed with affected stakeholders and system users) before any eASD system is developed and introduced, so that all affected parties can have clear expectations of their options and obligations. 	Noted
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OSPRI	General Comment	<ul style="list-style-type: none"> • We provide detailed comment on delivery options below, but as a general comment, the MPI paper appears to assume that there will be commercial incentives on parties to develop and implement eASD delivery systems. We suggest that further analysis needs to be undertaken towards development of a funding model or the scoping of likely funding scenarios, and the implications of these for stakeholders and system users. • For example, it may be the case that slaughter premises will be naturally incentivised to develop eASD systems, and they could readily require suppliers to use electronic systems as a commercial condition of supply. However, no such neat commercial solution is apparent for the much more fluid and complex live animal movement and trading environment. This again points to the reasoning of the earlier stakeholder working group, that eASD use should initially only be approved for movement direct to slaughter. 	Noted
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OSPRI	General Comment	<ul style="list-style-type: none"> • It is relevant to note here that the current ASD system relies heavily on funding and resources from the bovine TB control programme, to meet substantial costs for paper ASD print and distribution, farmer education and communications, and compliance and enforcement activity at public livestock sales. • However the continued importance and strategic relevance of the “TB declaration” content of the ASD are in some question, as it will be possible to meet the TB traceability requirements through NAIT, and the synergies possible between NAIT and the TB systems. In this case continued funding of ASD provision and support activities through the TB plan might also become questionable. Nonetheless this support capacity exists and could be realigned to support an eASD system through better targeted funding arrangements if need be. 	Noted
OSPRI	2.2	Some of the considerations in section 2.2 have not been explicitly addressed in the high level requirements, for example streamlined transfer of data between users and use of crossover data. We would recommend that these are included specifically.	Noted
OSPRI	General Comment	We would recommend the inclusion of flexibility to vary the eASD depending on the species being moved, for example TB-related questions for cattle and deer not being shown for sheep movements (but sheep industry specific questions could be included).	Agree
OSPRI	4.1.2	In Section 4.1.2, where the discussion document refers to the ability to present the data in exactly the same format, we recommend wording along the lines: “The same data needs to be captured with an emphasis on validating the data, and then having the capability to present it in various formats that meet the current and potential future requirements of the industry locally and internationally.” This would enable exact matching with paper format when required, but would also support other potentially useful formats.	Noted



OSPRI	4.2	In Section 4.2, we recommend more clarity in specifying separate functional requirements for system performance and system availability	Agree.
OSPRI	4.2.5	In Section 4.2.5, the requirement to include changes imposed from MPI within 28 days is totally dependent on what changes are imposed. With analysis, development and testing effort, 28 days would be reasonable for smaller changes, but large scale changes would probably not fit within this timeframe.	Noted
OSPRI	4.2.6	In Section 4.2.6, there is no specific stated requirement to hold a centralised repository of eASD data. Given the current international trends for more information about movements and disease history of animals, we would strongly recommend that this should be a mandatory part of the requirements.	Noted
OSPRI	4.2.7	In section 4.2.7, we note the current law relates to paper ASDs. The eASD system requirements should reflect what would be expected of an electronic system. The minimum therefore would be the ability to store and allow the retrieval of eASD information for at least 4 years.	Noted
Greenlea Premier Meats	General Comment	We agree that the ASD scheme must still allow for a paper-based system for suppliers who do not have the required equipmen; fast reliable internet access; and/or in the event of a failure of the electronic system	Agree



Greenlea Premier Meats	General Comment	<p>Building of a mobile/tablet application to sit alongside the electronic ASD system would have many advantages. In addition to the previously noted ability to amend an ASD from anywhere, other advantages would include:</p> <ul style="list-style-type: none"> - Electronic receipt of ASDs by transport operators and truck drivers with only the need to have an iPhone or Android phone; - Electronic receipt of ASDs by livestock buyers, company yard staff and company livestock staff. ASDs are therefore received by the company the minute the supplier hits "Submit" versus when the animals turn up in the yards. This insight is of tremendous advantage to a processor as it allows for advance planning, forecasting of arrivals and pursuit of corrected ASD(should it be noted to be incorrect prior to the animals arriving) 	Agree. MPI is of the view that this type of functionality should be allowed under any scheme but the specific design should be left to the provider
Greenlea Premier Meats	General Comment	Consideration should be given to the requirements of Farm Data Code of Practice including the Animal Data Standards	Noted
Greenlea Premier Meats	General Comment	Processors should have the option to work with the provider to incorporate additional questions onto the ASD. For example, all mandated questions would still be included; however, if the supplier select a certain premise as the destination, additional questions may be incorporated. E.g. are these animals from a premise that is audited by an on-farm quality assurance scheme? Or Have any of these animal sbeen treated with antibiotics, other than ionofores, in their lifetime?	Agree. MPI acknowledges the scope for commercial information transfer as long as mandatory information is passed along securely and in an verifiable manner
NSI OSPRI committee	General Comment	Currently there is an accepted system of giving a truck driver a paper ASD form with every load. This system has a high level of compliance in the South Island and promotes completion of the document in a timely manner prior to transport of the stock. The ASD in hard copy also provides farmers with a physical reminder around food safety of stock, TB status and testing. We feel if an electronic ASD was implemented this introduces a very high risk of reducing these reminders and the good behaviour. At the moment the truck drivers are a wonderful advocate for the paper ASDs.	MPI acknowledge that TB declaration is a large driver for completing and sending ASDs in farm to farm movements. It is however important that the ASD (or TBfree) is not reliant on the transport operator as it is fundamentally the farmers responsibility.



NSI OSPRI committee	General Comment	If compliance declines with these ASDs, it would be a huge risk to the TBfree New Zealand programme. Tracing animals back to the origin of infection would be difficult without these paper records, especially if compliance falls. This will be the case for some time until the NAIT programme is accepted and movement recording dramatically increases. Ensuring a print-out or hand written copy is always given to the truck driver would avoid this.	Noted. Whilst the ASD system is not primarily designed as the sole TB declaration it would be remiss to not consider the impact on our TB management systems. Additional requirements relating to this would need to be put in place by TBfree
NSI OSPRI committee	General Comment	Farmers currently struggle with completing farm to farm movements in NAIT. This proves an electronic ASD would unlikely be successful at this time. Reasons for this includes; the absence of IT facilities and internet access at the point of loading animals, poor internet service on farm, poor network coverage if devices require a phone signal and poor computer literacy skills.	Agree. These are all reasons why MPI is proposing to still allow for using paper ASDs
NSI OSPRI committee	General Comment	Good compliance of NAIT movements at the meat processors and sale yards are due to both being accredited entities and having good access to the internet with computer literate users. This systems works as another entity can be responsible for the animal movement, not due to the farmers having the ability to use the IT system themselves, which would be necessary for eASDs	Agree. It is an important point that an accredited entity could not do the declaration on behalf. This may impact on synergetic benefits from relying on NAIT infrastructure.
NSI OSPRI committee	General Comment	We are just starting to win the hearts and minds of farmers with the NAIT system. But as a committee heavily involved with NAIT, we know there is a large mountain to climb before farmer acceptance is high. Once the benefits are realised by the agricultural community, work will focus on solving problems with computer literacy, universal access to scanners and poor internet services. If electronic ASDs are introduced without proper consultation with stakeholders and sound thinking around real world complications; it is unlikely that a farmer will complete either a farm to farm eASD or a NAIT movement due to frustration. This will negate advantages, put food safety at higher risk and reduce our ability to trace disease	Noted. This is another reason why MPI is proposing to still allow for using paper ASDs. This, in conjunction with customer driven solutions, should allow for smoother transition.



NSI OSPRI committee	General Comment	The only way an eASD will be of use, and to increase accuracy of the document is if the system interacts with NAIT, TBfree Disease Management System and Farms On Line, so that partial completion of the form will auto-generate. As far as we are aware this is far from being achieved.	While this may be a desired end state, there may be several situations where this is not inevitably the case and an eASD could still be beneficial.
NSI OSPRI committee	General Comment	NAIT, TBfree Disease Management System and Farms On Line working together are critical for the accuracy of the automatically generated form, especially when reliant on timely data entry from each system	Noted
NSI OSPRI committee	General Comment	The document states a benefit of an eASD would be easier to correct. We challenge this and put forward that the current system of a meat processor contacting a farmer via phone or fax is not only timely, but efficient, as it ensures the person in charge is contacted immediately and the document amended. Note often we, as farmers, think the animals are heading to one meat processor only to find out stock end up going to a completely different location. This means ASDs have to be amended at the last minute.	The described system works well from a farmer perspective. There may be additional advantages to an electronic system in that it would not allow submitting incomplete forms. Additionally the ASDs can be checked at the recipient before arrival of the animals and amendments requested at an earlier stage.
NSI OSPRI committee	General comment	It would be practically difficult to collect information if some forms were completed online and some by paper. There would be large gaps in the data if not all forms were completed on computer and had to be printed. If gaps exist then any useful data would be heavily skewed and not be useful to TBfree NZ or MPI	It is true collecting all data would be difficult in parallel systems. However, limited data can still be useful as long as any conclusions consider these limitations
NSI OSPRI committee	Recommendation	As a maximum begin with a parallel system, giving the farmer a choice to complete the form either online or by paper	Agree
NSI OSPRI committee	Recommendation	Demand that a paper copy (printed or handwritten) to always be collected by the truck driver so compliant behaviour is not lost	MPI thinks this may be seen as more burdensome and reduce compliance
NSI OSPRI committee	Recommendation	Begin with eASDs only being available for movements from farm to slaughter	Principally MPI agree that a staged introduction is necessary. Details should be worked through prior to implementation



NSI OSPRI committee	Recommendation	Allow farm to farm movements with NAIT to get to a high level of compliance, plus smooth out the eASD auto-generation and data collection before a sole eASD system is even considered. This slow introduction will allow technology to catch up and only when all farms have good internet access will the eASD be a possibility	Noted
NSI OSPRI committee	Recommendation	Form a focus group of grass root farmers and present how this eASD would be introduced and would work, This will allow farmers to identify more practical issues and possible solutions – ultimately reducing the burden on industry	MPI is working with industry associations in this regards but will also consider to work with farmer groups directly
SSI OSPRI committee	General comment	We would like to submit that the current discussion document does not provide rationale for how an eASD would work and provide benefits for farmers at this current time.	Agree. The principal aim of the document was to discuss requirement and possible delivery options for an eASD system.
SSI OSPRI committee	General comment	If eASDs were ever to be introduced it would be appropriate to link them to NAIT movements to reduce the work load,	There are difficulties with linking eASDs to NAIT movements as NAIT movements may be completed by an accredited entity that could not do the ASD on behalf.



SSI OSPRI committee	General comment	<p>however at the moment farmers find it difficult to complete far to farm movements due to the following reasons:</p> <ol style="list-style-type: none"> 1. Inadequate internet access in rural areas 2. Inadequate phone signal in rural areas. If away from the computer, other devices can fail to facilitate eASDs as phone signal in yards is often poor 3. Inadequate computer literacy. Many farmers initially strove to be compliant with NAIT however lacked the basic skills to use computers and new systems 4. Farmers have struggled with the electronic NAIT system and we are working on changing attitudes towards it. The grass roots farmers are unlikely to welcome or utilise more electronic options when NAIT is not widely accepted <p>Therefore we would strongly recommend keeping this system optional and only for movements to the meat processor until NAIT has improved farm to farm compliance.</p>	Agree. This is another reason why MPI is proposing to still allow for using paper ASDs.
SSI OSPRI committee	General comment	Farmers are required to send ASDs with stock and truck drivers are accustomed to asking for this paperwork. Due to this drivers often act as advocates and help immensely with compliance. If drivers knew that an eASD could be complete online they will stop asking and this will reduce compliance for these forms	It is acknowledged that this is how it currently works. It is however important that compliance is not dependant on truck drivers.
SSI OSPRI committee	General comment	Often the only clue the TBfree NZ's disease management teams have for farm to farm movements is the ASD that is stored on the infected farm. There is a serious risk that if it becomes common to not have an ASD with the truck criver when animals are moving, it will become normal to not complete one. This holds serious consequences for tracing animals to and from infected herds	Agree. It is however TBfree that is responsible for TB management. OSPRI has flagged that TB tracing may take place through NAIT in the future which would have similar complications
SSI OSPRI committee	General comment	One advantage was described as "data from all systems to be stored in a central repository". Using this data would only be of value if all ASDs were stored this way. A partially electronic system would not capture all data. Although we do not have a simple solution for this however, it may be necessary to wait until adequate internet access covers the whole country and all farmers can easily use eASDs before this benefit is realised.	Agree. However, limited data can still be useful as long as any conclusions consider these limitations.



SSI OSPRI committee	Recommendation	We recommend a focus group of grass-roots farmers to be formed to identify practicalities with the eASD for it to be successful.	MPI is working with industry associations in this regards but will also consider to work with farmer groups directly
SSI OSPRI committee	Recommendation	We would strongly recommend keeping this system optional and only for movements to the meat processors until NAIT has improved farm to farm compliance	Agree.
SSI OSPRI committee	Recommendation	We believe that if eASDs are introduced, they should be printed off and given to the truck driver as a matter of course	Noted
GS1 NZ	General comment	We are conscious of indications from MPI's senior leadership and the Dairy Traceability Working Group that primary produce may be required to be traced and recalled throughout the supply chain. This was an explicit comment from the WPC Inquiry Panel	Noted
GS1 NZ	General comment	In particular, a shared data standard - a 'business language' for identification, and information sharing that is standardised, global, open, and non-proprietary, is an important enabler for this ecommerce success.	Noted
GS1 NZ	General comment	The emphasis in the consultation document seems to be on the competent authority, and does not acknowledge other supply chain actors but in particular, the increasing requirement that consumers have for a clear understanding of the integrity of the food they consume. A competent authority's approval is no longer sufficient in many markets. The consumers (or their proxies – supermarkets and other food retailers) want greater visibility of the entire pasture-to-plate process. Their needs include understanding both the product content and the inputs of its production and supply	Agree. For our most important markets however export certification by the competent authority is the absolute minimum. MPI considers it important to allow for commercial information transfer, as long as mandatory information is passed along securely and in an verifiable manner. This helps to fully utilise benefits from the information
GS1 NZ	General comment	Although electronic signature is required, it is not clear how authentication and verification of the signature be established. We suggest that the Government's RealMe system could be deployed to verify a Person in Charge (PIC).	Agree. RealMe has the potential to be a required authentication system



GS1 NZ	General comment	GS1 believe that there are several layers of interoperability, harmonisation and alignment that need addressing including technical, semantic, (including data standards) process and legislative interoperability. Approaching interoperability at the legal or the technical level is essential, and we encourage the eASD process to actively look for opportunities for enhancing integration and interoperability.	Noted
RTF NZ	General comment	The move to electronic ASD's is sensible. The use of advanced technology should be encouraged to improve messaging between livestock senders and receivers. However, the discussion document does leave us concerned that the shortcomings of the current paper based system will be transferred to the proposed electronic system. Livestock senders will still fill out an ASD but rather than sending that form in paper based format it will be sent electronically.	Unclear what the intention is. The key use of the ASD is information transfer. As such it will need to be sent somehow
RTF NZ	General comment	There is a noticeable silence in the discussion document on what is widely considered to be the largest flaw with the current paper based system- the dependence on livestock transporters to transfer movement information between livestock senders and receivers. That the current system is dependent on livestock transporters to transfer information and that sometimes the system fails should not be interpreted to mean that livestock transporters are deficient in their roles. Rather, those flaws indicate that the importance of monitoring livestock movements should not be structured around livestock transporter's ability to relay information between livestock presenters and receivers. The current regime is afflicted by the failure of livestock presenters to pass on necessary information prior to livestock being transported. Placing responsibility on livestock transporters is not the solution to address the lethargic attitudes of livestock senders.	Agree this is a problem in the current system. However, the rules surrounding ASDs are clear that they are the responsibility of the consigning Person in Charge.
RTF NZ	General comment	In essence, the electronic ASD system will still enable livestock senders to continue to delay sending necessary information to livestock receivers. That must be addressed.	Agree.



RTF NZ	General comment	The question also needs to be raised that if livestock senders opt to send information electronically how will livestock receivers be made aware of that?	This would need to be addressed in any system design.
RTF NZ	General comment	As with the current system it is highly likely that livestock receivers would ask livestock transporters about the status of the ASD. For either system (electronic or paper based) it should not be the livestock transporters responsibility to notify on the status of the declaration. That transfer of information is a contractual arrangement between the livestock sender and receiver and the livestock transporter should have no involvement in that.	Agree that there should be no statutory obligation for transport operators. There should however be some scope for transport operators to aid or simplify this process if they want
RTF NZ	General comment	To recap, if the electronic system is to function satisfactorily livestock senders must become reliable at sending accurate information in a timely manner to livestock receivers and livestock transporters should be removed from the system to simplify it further.	Agree
RTF NZ	General comment	We fail to see how any of the key attributes can be achieved if the opportunity to use the paper based ASD system remains in place and note that “ <i>the need for contingency for system failures</i> ” is one reason given for retaining the paper based system. We understand the desire to ensure that correct information is passed on in a reliable fashion if electronic means are interrupted but have difficulty reconciling that when so many other important information systems are electronically based with no readily useable manual form of back up. This is especially so for a myriad of Government initiatives and systems. The NAIT system being a prime example.	There are severe problems in terms of connectivity in some parts of rural New Zealand. In addition, with a high average age amongst farmers they are generally not early adaptors to technology. The NAIT system still has low compliance on farm to farm movements and would likely have even lower without Information Providers. ASDs are critical for Market Access and MPI believe the need for contingency is greater than the negatives listed



RTF NZ	General comment	The direction that officials are taking by enabling the continued use of the paper based system is also at odds with the Government's "E Commerce" drive. Significant resource has been expended in a range of projects to reorganise, rationalise and streamline business function. Enabling the continued use of paper based systems is counter to that initiative.	The continued use of paper ASD should probably be seen as slow transition rather than as a final position.
RTF NZ	General comment	While on the subject of discussing <i>Section 2.2</i> , oddly enough that section makes reference to " <i>the main stakeholders</i> " but makes no reference to the stakeholders that are most disadvantaged by the inefficiencies of the current system (and if it remains as discussed, the current system) - livestock transporters. In fact the discussion document identifies that (under 2.1) ASD's are recognised as " <i>a major issue for meat processors with some companies needing to employ 0.5 of a labour unit to follow-up on missing or incorrect ASDs before animals can be processed.</i> " Quite typically the effect on the people that have transported the livestock has been ignored and neglected in those comments. Livestock transporters suffer the same issues as meat processors when ASD information is not transferred between livestock senders and livestock receivers but to a much greater degree of magnitude. Livestock transporters cannot unload the livestock that they are carrying until ASD information is received by the livestock receiver.	Noted
RTF NZ	General comment	The primary issue with that is the adverse welfare effects on animals that remain held in livestock units for excessive time awaiting information from livestock senders. Livestock units are being used as substitute holding pen space until livestock can be unloaded. No other sector in the transport industry uses trucks or trailers as long term storage facilities while awaiting unloading. Livestock transport should be no different. Livestock receivers should have the infrastructure available to pen animals while awaiting documentation.	Agree. Welfare of the transported animals is paramount and the points above should be considered



RTF NZ	General comment	In short, regardless of when ASD information arrives livestock will still be processed. Livestock transporters should not be drawn into the bureaucratic conflict between livestock senders and receivers. ASD provisions should be amended to release livestock transporters from these requirements and as already mentioned if the pen space was available at receiving sites they would not need to be.	Agree
RTF NZ	General comment	In summary, livestock transporters should not be delayed at processing (or similar) sites by the inability of livestock senders to provide ASD information to receivers.	Agree
RTF NZ	General comment	While we have covered a range of aspects regarding the electronic ASD we remain curious why MPI continues to indulge the paper based system, which has proven itself to be notoriously inefficient, to continue to be used. The electronic ASD discussions offer the possibility to significantly improve a recognisably aged and flawed system.	MPI considers the lack of necessary IT infrastructure to great in rural environments to fully rely on an electronic system
RTF NZ	General comment	We made reference earlier to the section in the discussion document that mentions that <i>“the ASD scheme must still allow for a paper based system for use by suppliers that are unable to access an electronic system.”</i> We believe that the retention of the paper based system is more a product of the regulator’s reluctance to insist that the farming community adopt sensible business practice than one of continuity if the electronic system fails.	MPI doesn’t believe it is the regulators role to dictate the business practices of the regulated industries more than absolutely necessary
RTF NZ	General comment	Farming is a business. As like all other business owner’s farmers should have the tools available to enable them to conduct their business professionally. If they do not have those tools they should, like everybody else, access somebody that can provide that service to them. In this modern technological era farmers should be encouraged to use technology that is simple, efficient and fit for purpose and as mentioned earlier, the Government is striving to encourage the uptake of “E” commerce.	Agree. However, as the ASD is functionally a declaration, there is no room for somebody to provide that service. This is the same reason transport operators are not to fill out ASDs where they are not provided.



RTF NZ	General comment	<p>The discussion paper does not mention the proportion of farmers that do not have ready access to electronic systems. We imagine that only a small proportion of farmers would not have access to the required technology. Putting that into perspective, the benefits of utilising a full electronic system are being drastically hindered by a significant minority. That is an inequitable and undesirable position given the benefits that the electronic system is capable of providing.</p> <p>We also doubt that those farmers that claim not to have ready access to electronic equipment would also not have access to other information conveying devices such as (for example) facsimile machines or similar information transmitting devices. We are very dubious about the excuses being given regarding the inability to access any type of electronic device that could be used to transmit ASD information.</p>	MPI acknowledge this. However, apart from access and knowledge to operate the equipment, there is also a need for sufficient IT infrastructure which is still lacking in some rural parts.
RF NZ	General comment	The paper based system should be removed and a full electronic system adopted in its place. The paper based system is a sensible back up for the electronic system if there is a wholesale failure in the electronic system but it should only be utilise in rare situations where all other avenues for electronically transmitting information have been exhausted.	See comments above
DairyNZ	Recommendation	DairyNZ recommends MPI: a. Adopts Option 3: <i>MPI mandate one specific service provider, such as NAIT or NZ Post, to provide the electronic ASD system;</i>	Noted
DairyNZ	Recommendation	b. Undertakes further consultation to develop options looking at how the electronic ASD system's capital and operational costs could be covered;	Noted
DairyNZ	Recommendation	c. Implements the electronic system early next year, making it mandatory from 1 June 2015 for species currently covered by the scheme;	Noted. This will depend on development times
DairyNZ	Recommendation	d. Includes additional animal species in the ASD scheme, initially those species which are susceptible to Foot and Mouth Disease (FMD);	MPI believes all relevant species are already included



DairyNZ	Recommendation	e. Implements an appropriate phase in period of one year from 1 June 2015 for the staged inclusion into the scheme of species not currently covered by the ASD scheme;	As above
DairyNZ	Recommendation	f. Allows for the inclusion of non-mandatory data-entry fields to allow for the capture and transmission of data required by recipients such as meat processors;	Agree
DairyNZ	Recommendation	g. A mechanism is developed whereby recipients (e.g. meat companies) can specify what non-mandatory fields are included;	Agree, this will be depending on the final solution
DairyNZ	Recommendation	h. MPI creates a central repository for the electronic ASDs with stringent data security controls to uphold the privacy of farmers and meat processors;	Noted
DairyNZ	Recommendation	i. Include provisions which allow MPI's food safety and biosecurity teams (and any other mandated agencies) to access the central depository in the event of a biosecurity incursion or food safety event	Agree
DairyNZ	General Comment	ASD information has not to date been held in any central repository and this fact, together with the proposed inclusion of non-mandatory information makes it is essential that any data collected and stored in a central repository via the electronic ASD system is protected by stringent data security provisions.	Agree
Federated Farmers	General Comment	Electronic ASD does not, in itself, present a superior or more beneficial approach to the current paper-based system for the individual farmer. The data collected and affirmed under an electronic ASD would be the same as under the current paper-based system. As such, the issue comes down to one of preference. For many of our farmer members, the current system is one they are used to using and one that will continue to satisfy their needs and requirements in meeting their ASD obligations. A bonus of electronic ASD being voluntary is that it allows for those that are not computer savvy or lack reliable connectivity to continue with the current paper-based system.	Noted



Federated Farmers	General Comments	Much of the data required for an electronic ASD would be similar or the same as that held by NAIT. Rather than requiring a cattle or deer farmer to fill out two online forms to satisfy requirements for the same movement of the same animals, it would make sense for the electronic ASD to draw on the farmer's NAIT data. Failure to allow for electronic ASDs to satisfy both ASD and NAIT requirements would represent a wasted opportunity to reduce the reporting burden farmers currently bear.	Agree
Federated Farmers	General Comments	Farmers have already invested considerable amounts of levy money in the establishment of NAIT and continue to support the upkeep of the NAIT system. It would be a shame to unnecessarily add to the cost burden on our farmer members by setting up a new system to function as a central repository of electronic ASDs, when NAIT already exists. Concerns that NAIT's current focus on cattle and deer prevents the company from holding electronic ASDs for other species would be short-sighted.	Noted.
DINZ	General Comment	An over-riding principle should be that any new eASD system should be both cost effective and at the lowest practical price for the users. The current system is extremely cheap for the suppliers of the animals (the "person in charge" on the ASD form); any large increase in costs for a new system without any immediate and obvious benefit to the supplier will undermine willingness to participate.	Agree. The cost of the current system is largely carried by TBFree and meat processors
DINZ	General Comment	Paramount to any eASD system is data security and safeguarding the privacy of participants. If an eASD system can provide quick and reliable traceability for food safety and biosecurity events, there will need to be assurances and processes to ensure that only relevant information is accessible and only to authorised parties. DINZ regards confidentiality of stored information as a requisite.	Agree



DINZ	General Comments	DINZ notes that on page 6, section 4.2.6 it is stated: “ <i>The electronic ASD System developed by providers must take into account the need for the data from all systems to be stored in a central repository at some point.</i> ” While this appears to be a sensible and practical development, it is a departure from current practice. Therefore data security and safeguarding the privacy of participants becomes critically important, as does communication to participants about how information is stored and protected.	Agree
NZDFA	General Comment	NZDFA particularly notes and agrees with DINZ’s view above	Noted
DINZ	General Comment	While DINZ is confident that the design and implementation of an eASD system will be well resourced and considered, we wish to note the current legal requirement for transport operators to carry the hard copy ASD and provide that to the receiver of the animals at destination. If this is no longer required then there needs to be the ability for the transport operator to confirm that an eASD has been supplied to the destination so that the operator does not arrive at the intended destination but is unable to deliver the animals due to (perceived) non-receipt of the eASD.	Noted
DINZ	General Comment	While the focus is on establishing a system that allows for completion and transfer of eASD which has mandatory requirements, the construction of such a system also allows the ability for non-mandatory information to be provided at the same time (for example a processor’s in-house quality assurance scheme requirements). This has the potential to greatly simplify inputting requirements for the supplier and would be viewed as a significant benefit.	Agree. This is expected to be a big economic driver for uptake on the processing side.
NZDFA		NZDFA particularly notes and agrees with DINZ’s view above	Noted



DINZ	General Comment	DINZ wishes any development of a framework for eASD to include the provision of non-mandatory information concurrently with eASD required information. It is acknowledged that such provision will highlight the need to consider how mandatory and non-mandatory information is received and managed by processors, stock agents or potentially government agencies	Agree
NZDFA		NZDFA particularly notes and agrees with DINZ's view above	Noted
NZSSAA	General Comments	The NZSSAA also agrees with section 2.2, but also stresses that responsibilities should sit with the sending farmer / vendor and not third parties such as Saleyards, Stock Agents or Drivers.	MPI considers saleyards as being in charge of animals. As such they are unlikely to be viewed as without responsibility. This also aligns with NAIT processes.
NZSSAA	General Comment	From the details outlined by MPI, it is clear the proposal is aligned to the meat processing industry as there is no mention of other primary industry participants such as Saleyards or private sales. In the absence of these details it is unclear how an electronic ASD will impact Saleyard and private sale operations.	The intention would be that ASD function the same way for all stock movements where they are required. This will be an important part of any system design.
NZSSAA	General Comment	What is clear is that Saleyards and Stock Agents are unlikely to want to take on additional responsibility or liability for ASD forms hence the need for clearer process details e.g. how paper and/or electronic ASD forms are to be co-managed, the steps involved, "what if" scenarios, levels of responsibility, liability, support etc. It is the preference of the NZSSAA that these details be outlined further before considering the likes of Delivery Providers and other details.	Noted
NZSSAA	General Comment	In its current format the proposal to establish a framework for electronic Animal Status Declaration may have merit with the meat processing industry but needs significantly more information regarding Saleyards and private sales before gaining agreement from the NZSSAA, noting this is a similar response to a similar initiative proposed by NAIT on behalf of MPI in 2013.	MPI considers a properly designed eASD system will manage all movements in a similar fashion. This is also a reason MPI argue that the paper system should still be allowed.



SBV NZVA	General Comment	In summary we believe that MPI needs to have an essential role in the design and implementation of the new system but may not own or run the “engine” that works it. This “engine” should communicate seamlessly with other systems present (NAIT) and future systems so the full benefit to the industry is realised. The system should be able to have a tailored “shop window” so that it can be accessed through multiple avenues eg NAIT, OSPRI, MPI, meat processors, livestock agents, FMS etc but with strict approved user abilities.	Agree
NZVA	General Comment	Improved animal movement traceback efficiencies must be of interest to government agencies tasked with biosecurity and food safety.	Agree
NZVA	General Comment	NZVA submits that the provision and management of the system should be with MPI (or possibly OSPRI) because of the MPI verification role and requirement to have an up-to-date and effective animal movement data base in the case of any food safety events, animal product residue issues, and animal disease investigations.	Noted
NZDFA	General Comment	We note that many deer farmers live in relatively poorly served internet access areas and not all are able to upgrade to satellite or district networks. A transition phase with a paper based exception, similar to the supply and contact with NAIT registration and onwards communication as proposed is strongly supported	Noted
NZDFA	General Comment	Cost to farmers is time and ease and we are not convinced as yet that there will be a reduced indirect compliance cost to all farmers.	This is a valid concern and will very likely impact on the uptake of an eASD scheme



NZDFA	General Comment	Currently one step in ASD transfer is a link between the farmer and the transport cartage company. NZDFA sees this as a valuable reinforcing step in the current paper based process [...] NZDFA wonders how and if that linkage would be preserved especially in the highly unlikely event of an incursion response and transport standstill that will potentially rely on within company systems for traceability.	The information transfer to the receiver must be completed. With known pick-up and delivery points this is able to be managed. Even in an incursion event, animal welfare considerations would prevent trucks stopping on the road, but would require off-loading somewhere.
NZDFA	General Comment	NZDFA considers that a single provider offers eASD users a consistent and controllable process and for biosecurity and food safety purposes it also offers an efficient process and definitive source of information for industry organisations and government agencies. These are significant benefits.	Noted
NZFDA	General Comment	What are less clear are the likely costs that may be incurred by eASD users under a monopoly situation. This will be a fundamental consideration as the existing procedure is very low cost for the “person in charge” making the declaration, although it is noted that there is a higher cost associated with the recipient of the animals and ASD form.	Noted
NZDFA	General Comment	While a number of providers operating to agreed standards and specifications may reduce costs in some areas (if, for example, the capability already exists with those providers), there may also be an increase in costs for managing multiple providers and verification/auditing functions.	Agree
NZDFA	General Comment	As a comment in general NZDFA believes that OSPRI NZ or TBFree NZ as the front line organisation working with MPI at present would create more buy in and logic for deer farmers who are still to wholly embrace NAIT and its capability as a core part of their business.	Agree. The opposite opinion has however been expressed from frontline organisations.
NZDFA	General Comment	We do think that this will take considerable education and support to generate that process with confidence for our less than engaged deer farmers (noting that, 60% of the industry database has given or is prepared to share an email contact address with the industry bodies.	Agree. This is a reason MPI wants to retain a paper system alternatively have a long transition period.



Meat Industry Association	General Comment	The discussion document would benefit from a discussion on cost – both quantum, and how it will be recovered; or whether development of the system/s will be crown-funded. MIA's working assumption is that systems will be "user-pays" in one form or another and we would welcome a discussion on this point in due course.	Noted
Meat Industry Association	General Comment	As noted above, MIA members are insistent that non-mandatory/processor specific information must continue to be able to be included in the eASD system. Appending this information to the eASD is a critical part of many customer standards and company quality assurance programmes. This is currently practised with the current paper based approach.	MPI acknowledges the scope for commercial information transfer as long as mandatory information is passed along securely and in an verifiable manner
Meat Industry Association	General Comment	MIA members have no in-principle concern about mandatory data being centralised where this makes sense for biosecurity or other purposes. However data format standards must be included in the initial standards set by MPI to enable data to be centralised in time without incurring significant system changes.	Noted
Meat Industry Association	General Comment	MIA submits that centralised data must not be an immediate requirement for an eASD system as the inclusion of centralising data will add complexity and delay in being able to implement an eASD system. If it brings additional cost, this will need to be weighed against the benefits. The eASD system will require companies to store data on their own servers with access available to MPI – either in person (plant veterinarian/s) or remotely. As such, it may be that the benefits of a centralised system are marginal compared to the cost – MIA members are open-minded on this point and will respond to a compelling case either way. But the first step is digitisation of the ASD with the question on whether or not there is a central database being left for later discussion.	Noted. It is worth noting that a central repository may be achieved by MPI collating standardised reporting, thus not adding additional complexities beyond auditing and reporting functions
Meat Industry Association	General Comment	MIA also notes that if a single service provider option is chosen, that provision must be made to protect commercial information (customer-specific) data from statutory declarations.	Noted



Meat Industry Association	General Comment	MIA recognises that there will still need to be a parallel paper-based system for farmers that do not have the technology or internet capability, as well as in the case of communication/system failures.	Noted
Meat Industry Association	General Comment	One of the biggest issues faced by meat processors is receiving incomplete and inaccurate ASDs. Members have suggested that to minimise these errors, any eASD system maximise the use of drop down boxes for the different fields and only allow the ASD to be submitted once all the fields have been completed	Noted
Meat Industry Association	General Comment	MIA submits that meat processors should not be penalised (e.g. not being allowed to process the animals) if any information that is not required for market access/official assurances is not provided.	Noted