



**ROAD TRANSPORT FORUM NEW ZEALAND INC
SUBMISSION
ON
NAIT Regulations**

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SUBMISSION BY ROAD TRANSPORT FORUM NEW ZEALAND TO THE MINISTRY for PRIMARY INDUSTRIES ON THE PROPOSED NAIT REGULATIONS

1.0 Comment

1.1 The NAIT Regulation discussion document seeks feedback on two main topics:

- Setting infringement offences and fees; and
- Establishing a panel to consider applications for access to the NAIT information system

1.2 We only have comments to make on the setting of infringement fees and offences.

2.0 General comment

2.1 The limited compliance operating model (VADE) appears to adopt a pragmatic compliance enforcement/education approach. It seems that its use will assist with creating and maintaining a more seamless transition to the NAIT regulation's enforcement. The benefit of the VADE model's approach of adopting a series of escalating interventions cannot be underestimated given the green fields approach that NAIT takes towards animal identification and tracing.

3.0 Transit stops

3.1 One proposed infringement penalty is for the failure to register a Transit Stop¹. A number of transport operators will become transit stop owners once the NAIT system is implemented.

3.2 We do not oppose the suggestion to create an infringement offence for not registering transit stops.

¹ Infringement B 2.11

- 3.3 If a transit stop owner has continued to display non-compliance then an infringement offence seems warranted. However, the discussion document is unclear on whether the VADE model will have documented proof of the interventions that would have taken place prior to issuing an infringement. This may be necessary to demonstrate that policy outlines have been followed.
- 3.4 Transit stop registration is free and is a relatively simple process. Transit stop owners are not required to trace animal movements to or from transit stops. Therefore, we can see no logical reason why a transit stop owner would consciously decide not to register a transit stop. It may be that failure to register a transit stop will be caused by lack of understanding of NAIT regulations.
- 3.5 The discussion document is lacking in information on how NAIT participants will be reliably informed of their obligation to register Transit Stops, or any other infringement offence. It will be necessary to provide a high level of information to participants on NAIT administrator expectations if unnecessary interventions are to be avoided.
- 3.6 The Forum welcomes the opportunity to be involved with the development and dissemination of NAIT regulation information to the road freight sector.