webb henderson

Notice seeking clearance in respect of the proposed acquisition by Zoetis Holdings LLC of Neogen Corporation's global animal genomic testing business

Pursuant to section 66 of the Commerce Act 1986

30 April 2026

The Registrar
Business Acquisitions and Authorisations
Commerce Commission
PO Box 2351
WELLINGTON

Pursuant to s 66(1) of the Commerce Act 1986 notice is hereby given seeking clearance of a proposed business acquisition.

Executive summary

1.1 Zoetis Holdings LLC (**Zoetis**), a wholly-owned subsidiary of Zoetis Inc., proposes to acquire the global animal genomic testing business (**Neogen Genomics Business** or **Target**) of Neogen Corporation (**Neogen**) (**Proposed Acquisition**), (together **the Parties**).

1.2 Pursuant to s 66(1) of the Commerce Act 1986, Zoetis (the **Applicant**) seeks clearance from the New Zealand Commerce Commission (**Commission**) for the Proposed Acquisition.

1.3 Animal genomic testing involves analysing an animal's DNA from samples such as hair or tissue and integrating this genetic information with performance and pedigree data primarily maintained by breed societies and industry associations. This process increases the accuracy in prediction of the animal's genetic merit helping breeders (e.g. farmers) make early, informed decisions in relation to traits such as health, fertility, production (milk/meat) and feed efficiency, as well as physical characteristics.

1.4 The Proposed Acquisition provides Zoetis with an opportunity to enhance its genomic capabilities globally, facilitating further innovation, accelerating industry adoption, and expanding and improving predictive decision-making across species, including in New Zealand where there is currently limited adoption of these technologies.

1.5 The Proposed Acquisition will not have the effect or likely effect of substantially lessening competition in any market in New Zealand regardless of how the markets are defined.

1.6 Zoetis and Neogen overlap in supply of genomic testing services for beef cattle in New Zealand. These services make up a small proportion of the market for genetic testing undertaken for livestock in New Zealand and Australia.

1.7 There are numerous competitive constraints that would prevent the merged entity from increasing prices or reducing the quality of services provided, including:

(a) Existing domestic and overseas suppliers of genomic or other genetic testing for livestock who could readily provide substitutable services in New Zealand;

(b) Breed societies who work with genomic testing suppliers and who are incentivised to ensure members have access to competitive choices;

(c) Lack of barriers to customers switching as genomic testing services are acquired on a test-by-test basis;

(d) The small portion of predictive trait testing to support breeding decisions that is made up by genomic testing, meaning customers could readily respond to price or quality changes by substituting genomic testing with alternative genetic assessment methods; and

(e) The absence of barriers to entry or expansion into the market for genetic testing services or a narrower market for genomic testing services.

1.8 The parties respectfully request that the Commission grant clearance for the acquisition to proceed.

Part A The Proposed Acquisition

2. The Applicant: Zoetis Holdings LLC

2.1 This notice seeking clearance is given by Zoetis Holdings LLC.

2.2 The contact details for the Applicant are:

Mark Worsman
Senior Director, Legal
Zoetis Holdings LLC
Phone: [ ]
Email: [ ]

2.3 All correspondence and notices in respect of the application for the Applicant should be directed in the first instance to:

Sarah Keene, Partner / Antonia Horrocks, Consultant
HSBC Tower, Level 17, 188 Quay Street
Auckland, 1010 New Zealand
Telephone: +64 27 535 5034/ +64 27 520 6267
Email: sarah.keene@webbhenderson.com/antonia.horrocks@webbhenderson.com

Description of the Applicant

2.4 Zoetis Holdings LLC is a wholly owned subsidiary of Zoetis Inc. Zoetis is an animal health company, headquartered in New Jersey, United States of America. Zoetis supplies genomic testing services worldwide through its Precision Animal Health division.

2.5 Genomic testing involves the analysis of an animal's DNA from samples such as hair or tissue to predict its genetic potential, helping breeders (i.e. farmers) make early, informed decisions for traits like health, fertility, production (milk/meat) and feed efficiency, as well as physical characteristics. These predictions enable farmers to accelerate improvements in herds and make breeding and other investment decisions for better profitability and healthier livestock.

2.6 In addition to genomic testing services, Zoetis develops, manufactures and commercialises parasiticides, vaccines, dermatology, anti-infectives, animal health diagnostics, medicated feed additives and other pharmaceutical products and technologies to customers in over 100 countries.

2.7 In FY2025,[1] Zoetis had worldwide revenues of USD $[ ]. Its revenues for the supply of animal genomic testing services were USD $[ ], of which New Zealand revenues were NZD approximately $[ ] million (Approx USD $[ ] million).[2]

2.8 Zoetis does not have a laboratory in New Zealand, but supplies genomic testing services for livestock to New Zealand farmers for servicing from its laboratory in Kalamazoo, Michigan, United States. Farmers generally collect animal samples on-farm and send them directly to Zoetis' Auckland office, which sends the samples to the laboratory in the United States for testing. It has 65 employees in New Zealand, of which 5 work in the genomic testing area.

[1] [ ]
[2] [ ]

3. The Target: Neogen Genomics Business

3.1 The contact details for Neogen are:

Jennifer Evans Stacey
Chief Legal and Compliance Officer
Neogen
[ ]

3.2 All correspondence and notices in respect of the application for the Target should be directed in the first instance to:

Kate Telford, Partner
HSBC Tower, Level 14/188 Quay Street, Auckland 1010
Telephone: +64 21 576 670
Email: kate.telford@heskethhenry.co.nz

Description of Neogen Genomics Business

3.3 The Target is the animal genomic testing business of Neogen Corporation, which forms part of Neogen's wider animal health and agricultural solutions portfolio. Globally, the Neogen Genomics Business is active in over 120 countries and undertakes genomic testing from 6 laboratories located in Nebraska (US), Edmonton (Canada), Ayr (Scotland), São Paulo (Brazil), Shanghai (China) and Brisbane (Australia).

3.4 Neogen is a US Corporation based in Lansing, Michigan. In FY2025, the Neogen Genomics Business had worldwide revenues of USD $[ ] million, and in FY25, New Zealand revenues of approximately AUD $[ ] (NZD $[ ]).

3.5 Neogen has no employees or testing services in New Zealand. It services its New Zealand customers through a single laboratory in Brisbane, Australia. All of its sales in New Zealand are undertaken through a partnership with Performance Beef Breeders (**PBB**), which has one employee dedicated to Neogen sales.

4. Overview of the Proposed Acquisition

4.1 On 1 March 2026, Zoetis entered into a Sale and Purchase Agreement (**SPA**) to acquire, either directly or via a wholly-owned subsidiary, Neogen's global animal genomic testing business, which involves the research, development, marketing and sale of commercial animal genomic testing solutions.[3] (See **Attachment A**).

4.2 Neogen Corporation established a US registered wholly-owned subsidiary, US Genomics Headco LLC (**SaleCo**), and it will transfer 100% of the shares in Geneseek Australia Pty Limited (ABN 687 602 731) (**Australia NewCo**) to SaleCo.

[3] Zoetis to Acquire Animal Genomics Business from Neogen; Neogen Announces Sale of Genomics Business to Zoetis.

4.3 Following this and other pre-completion steps, the Proposed Acquisition will involve:

(a) Zoetis Holdings LLC (or a wholly-owned subsidiary) acquiring 100% of the shares in SaleCo from Neogen Corporation (and therefore indirectly acquiring 100% of the shares in Australia NewCo); and

(b) The sale of certain non-Australian assets[4] of the Neogen Genomics Business to Zoetis (or a wholly-owned subsidiary), pursuant to a Business Sale Agreement.

4.4 A transaction structure diagram illustrates the Proposed Acquisition (see **Attachment B**).

4.5 Zoetis and Neogen will enter into a transition service agreement at closing. The agreement will not relate directly to the commercial aspects of the Neogen Genomics Business products or testing services but focuses on customary services that accompany "carve out" transactions, e.g., IT, tax, and accounting.

4.6 The Proposed Acquisition is subject to satisfaction of a number of commercial and regulatory conditions precedent to closing. These regulatory conditions precedent include Zoetis obtaining merger clearance in Australia and New Zealand. Merger clearance was obtained in Brazil on 18 November 2025.

4.7 Subject to satisfaction of these and other commercial conditions precedent, Zoetis anticipates that completion of the Proposed Acquisition will occur by 1 September 2026.

5. Rationale for the Proposed Acquisition

5.1 The acquisition of the Neogen Genomics Business aligns with Zoetis' strategy to drive future livestock innovation through genetics, reinforcing Zoetis' commitment to livestock producers globally. This includes by delivering improvements in predictive health and wellness insights to enable individualised and group care plans for major livestock species and companion animals worldwide.

5.2 The Proposed Acquisition will assist Zoetis in delivering this strategy by enhancing its genomic capabilities globally, facilitating further innovation, accelerating industry adoption, and expanding and improving predictive decision-making across species.

5.3 Neogen Corporation, which has a greater strategic focus on food safety, considers that the Neogen Genomics Business is better suited with a more aligned strategic partner.

5.4 Further details in relation to Zoetis' and Neogen Corporation's rationale for the Proposed Acquisition are set out in the documents in **Attachments J and K**.

[4] These assets are located in Argentina, Brazil, Chile, China, Colombia, Mexico and Uruguay, and reflect requirements in those jurisdictions that the assets are acquired by an entity registered in the same jurisdiction as the relevant assets. These assets include laboratories located in Brazil and China, and assets related to its international sales offices in those countries. The Business Sale Agreement does not involve any assets located in Australia.

Part B Counterfactual

6. Counterfactual

6.1 Absent the acquisition, Zoetis will continue to provide genomic testing in New Zealand independently of the Neogen Genomics Business, i.e., the status quo.

6.2 As the Commission would expect, Neogen Corporation ran a competitive process in respect of the sale of this business. [ ]

6.3 For the purposes of analysing the competitive effects of the Proposed Acquisition, the appropriate counterfactual is therefore the status quo.

Part C The Animal Genetic Services Industry

7. Animal Genetics Services

7.1 In general terms, the animal genetics industry comprises a range of services, practices and technologies to improve the available genetic stock of animal populations for breeding and livestock management purposes. These services include the sale of elite stud animals to commercial producers, various reproductive tools (such as semen collection and distribution, artificial insemination and embryo transfer), visual assessment, data recording, pedigree analysis, DNA testing (single trait analysis such as Horn/Polled testing) and, more recently, genomic testing technologies.

7.2 In each case, these services are designed to increase herd/flock genetic merit and overall performance and productivity by assisting farmers with breeding and livestock management decisions.

7.3 In Zoetis' experience, farmers frequently use a range of practices, services and technologies (potentially including genomic testing) to support these objectives.

7.4 Within this broader industry, genomic evaluation utilises information from an animal's DNA along with other pedigree and performance data to predict its breeding value for specific traits.[5]

7.5 In particular, genomic testing can enhance the ability of farmers to:

(a) identify livestock (cattle, sheep, or other animals that are likely to perform well or, conversely, identify animals that are unlikely to perform well and therefore may not provide a good return on investment);

(b) make better decisions about which cattle, sheep or other animals to keep or to sell, which males and/or females to purchase, which animals to breed from and when to use advanced reproductive technologies (including sexed semen); and

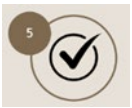
(c) accelerate genetic improvements in the herd for important traits like meat/milk/fibre, fertility, physical characteristics, or specific genetic markers.

[5] Neogen Australasia, Demystifying DNA Technology: A Livestock Breeders Guide to Genomic Selection, 2024, p 8.

Standardised processes and scalable analysis for genomic testing

7.6 Figure 1 below sets out a summary of the key steps in the animal genomic testing process.

Figure 1: Process of genomic testing

STEP	DESCRIPTION	
STEP 1	**Sample collection** Farmers use tissue sampling unit applicators (e.g., an ear punch) to collect tissue samples from the ear of the animal. Alternatively, cattle farmers may also collect samples using semen straws or tail hair cards. [6] The tissue samples are then placed into a sealed vial for processing.	
STEP 2	**Sample receipt and logging** Farmers can either mail samples directly to the genomic testing supplier or submit samples via their relevant breed association or their agent (PBB) or other relevant organisation. The samples are logged into the supplier's system, and initial quality control checks for labelling, contamination and tissue amount are conducted.	
STEP 3	**DNA extraction** DNA is extracted from the tissue samples at the genomic testing supplier's nominated laboratory. This is a relatively standard laboratory process, where suppliers can use laboratories in Australasia or overseas. Suppliers can also outsource this process to third-party laboratories located in New Zealand, Australia or globally.	
STEP 4	**Single nucleotide polymorphism (SNP) genotyping or advanced sequencing** DNA is analysed using SNP genotyping assays or advanced sequencing, where DNA is "read" to identify base pairs that exist at targeted locations within the animal's DNA. This is also a relatively standard and established laboratory process.	
STEP 5	**Quality control and reprocessing** Each processed sample undergoes quality control validation before final reporting, and failed samples may be reprocessed if DNA quality issues are detected.	
STEP 6	**Bioinformatics and data processing** Estimated Breeding Values (EBVs) consider the available information about an animal, such as its performance, and the performance of animals to which it is related, to predict the genetic merit of an animal. [7] To generate genomically enhanced EBVs (GEBVs) of individual animals, genomic service providers send SNP genotypes into a genetic evaluation system (provided by external providers, such as BREEDPLAN) which is then combined with pedigree and performance databases owned/governed by either a breed association or industry organisation. [8]	
STEP 7	**Report generation and delivery** Farmers are typically provided results via reporting systems and written digital reports. In some instances, breed societies provide results to farmers - for example, Angus Australia. Genomics suppliers generally provide: 1) Genotype (DNA) results which are routed to a third-party or breed association evaluation system to return EBVs with minimal proprietary analysis added by the provider; or 2) value-added genomics results, where suppliers provide proprietary or enhanced EBV evaluations and/or trait predictions, including tailored reporting that translates genomic predictions into actionable recommendations for selection, culling and feeding.	

[6] Neogen Australasia, Demystifying DNA Technology: A Livestock Breeders Guide to Genomic Selection, 2024, p 8.
[7] Neogen Australasia, Demystifying DNA Technology: A Livestock Breeders Guide to Genomic Selection, 2024, p 11.
[8] D.J Johnston, B Tier and HU Graser, Beef Cattle Genetic Evaluation in the Genomics Era, Association for the Advancement of Animal Breeding and Genetics, pp 179-183.

7.7 A further explanation of genomic testing, and the scientific processes underpinning those services, is set out in "Demystifying DNA Technology: A Livestock Breeders Guide to Genomics."[9]

Genomics testing uses standardised technologies

7.8 The supply of animal genomic testing services involves the use of standardised technologies and platforms across the spectrum of animal species.

7.9 The main methods, such as single nucleotide polymorphism (**SNP**) genotyping, polymerase chain reaction (**PCR**), next-generation sequencing (**NGS**), and Short Tandem Repeats (**STRs**), are used to test all animals, including cattle, sheep, pigs, poultry, horses, and companion animals.

7.10 These technologies are based on widely applicable principles of molecular biology, allowing laboratories to use the same equipment, reagents, and procedures for analysis across different species. Species-specific genetic markers or panels can be included, and are generally available and easily integrated into the standardised workflow without requiring major changes to the technology or laboratory setup.

7.11 This high level of standardisation brings significant operational efficiencies and flexibility for service providers. Laboratories can process samples from various species using the same automated systems, making only minor adjustments such as switching SNP panels or reference genomes for each species.

7.12 Additionally, using the same technological platform for testing multiple species enables the development of new services, where improvements in genotyping or sequencing for one animal or species can be applied to others.

Genomic data can be used for different levels of analysis

7.13 Animal genomic testing providers can, and do, offer different levels of analysis in relation to livestock samples, ranging from raw genotyping to more enhanced analysis and insights products.

7.14 Raw genotyping involves the supply of largely standardised, commoditised genotyping data services, with any detailed or value-added analysis undertaken by the farmer or by the relevant breed society or industry association. Raw genotyping services can also be provided at no or low cost in exchange for the customer's animal data information which can then be used to build phenotype/genotype datasets.

7.15 Suppliers can also provide further analysis and insights. While farmers can (and do) receive raw genotyping information and analyse it themselves, many suppliers (including Zoetis and the Neogen Genomics Business) and breed societies (such as Angus Australia) maintain large pedigree, genotype and phenotype databases used to conduct genomic evaluations providing more accurate trait predictions.[10] Other suppliers, including XytoVet, focus on providing raw genotyping services to the breed societies and evaluation organisations.

[9] Demystifying DNA Technology: A Livestock Breeders Guide to Genomic Selection.

[10] These value-added insights can range from simple genotyping reporting that provides trait rankings and genetic potential scores, to more advanced dashboards and custom evaluations that translate the raw genotyping information into actionable breeding or management decisions for farmers. In several cases, this value-added reporting is also undertaken either separately by or in collaboration with the relevant breed society or industry association.

8. Small proportion of New Zealand livestock uses genomic testing

8.1 As set out above, both Zoetis and the Neogen Genomics Business have relatively small revenues from the supply of genomic testing[11] services in New Zealand. This in part reflects that the supply of these services in New Zealand is relatively new, with:

(a) genomic testing only used in respect of a very small proportion of the New Zealand beef cattle which Zoetis considers could most benefit from the service (approximately less than [ ]%).[12] Zoetis does not hold figures for the volume of genomic tests carried out in New Zealand or by competitors. However, it estimates that genomic testing is used more in dairy cattle[13] and in sheep, but as described above Neogen does not provide genomic testing services for either dairy cattle or sheep in New Zealand; and

(b) trait predictions for the vast majority of New Zealand livestock continuing to rely on other forms of DNA or phenotype testing and observational and performance-based methods.

8.2 This low level of adoption for beef cattle, the area in which the parties overlap, together with the large number of cattle and sheep in New Zealand, presents a commercial opportunity for new entry and expansion by a range of suppliers globally and a significant competitive discipline on suppliers of genomic testing services who must compete against other forms of herd improvement to convince farmers to switch to testing. As farmer education and awareness increases, Zoetis expects that these commercial opportunities will increase.

8.3 For dairy cattle, New Zealand's Livestock Improvement Corporation (**LIC**) owns a database on the genetics, productivity and ancestry of New Zealand's dairy cow herd, going back generations. LIC uses this database to support their bull breeding program, develop their proprietary genomic testing services and to assist its farmer-members with guidance on herd-improvement and artificial breeding. LIC is the largest provider of genetic and genomic testing for dairy cattle.[14]

9. Role of Breed societies

9.1 In New Zealand, animal genomic testing services for beef cattle are supplied through breed societies, through a third party partner organisation (PBB) and, to a lesser extent, directly to farmers.[15] The breed society may be located in Australia, as is the case for most Angus cattle testing done by Zoetis.

9.2 Breed societies (also called breed associations) are member-based organisations that are established to promote and develop a specific breed of livestock, and market genomic products relating to their breed.

---

[11] Genomic testing can be undertaken in respect of any animal, including all livestock and companion animals. However, as neither Zoetis nor the Neogen Genomics Business supplies services in respect of companion animals in Australia or New Zealand, this submission focuses on the supply of those services to farmers in respect of cattle and sheep.

[12] These figures represent the percentage of Beef cattle that are subject to genomic testing out of the total number of Beef cattle that could undergo genomic testing (total market size). The total market size is smaller than total population [ ] because genomic testing is focused on young stock (progeny). The total market size is an estimate of the eligible progeny. The same formula has been used for dairy cattle and sheep.

[13] Livestock Improvement Corporation's Annual Report states that: *In the past 12 months we have seen Non-Return Rates (NRR) of our fresh sexed semen lift to within 1% of conventional semen, we have had close to 1.5 million animals genotyped through our GeneMark™ Genomics programme.* LIC Annual Report 2025 p6

[14] https://www.lic.co.nz/support-and-advice/reproduction/.

[15] Genomic testing for dairy cattle is almost entirely provided by LIC.

9.3 In New Zealand, the key cattle breed societies and genetic evaluation partners are:

(a) Angus NZ - an Incorporated Society with the role of maintaining and updating the New Zealand Angus Pedigree Register. It has several other roles which include the offering of farm-based services and the distribution of a Genetic Evaluation report to members of Angus NZ.[16]

(b) Angus Australia - a breeding society operating in a similar fashion to Angus NZ but with a significantly larger membership. It is responsible for maintaining breeding registers and other pedigree and performance records of registered cattle. Angus Australia also offers a variety of services to help members develop and produce world-leading Angus influenced cattle and related genetics.[17] This is a membership society which has a database of Angus beef cattle information, built up over time from historic performance (phenotype) records, lineage information and genomic testing results.

(c) NZ Herefords - an incorporated society with over 400 members. NZ Herefords has registered approximately 18,500 performance recorded Hereford cows in the Association's Herdbook. Most of NZ Herefords' resources go towards the development of national marketing programmes alongside research and development. Members are also entitled to participate in the Trans-Tasman Genetic evaluation system (Breedplan) that generates estimated breeding values for individual cattle based on pedigree, DNA and performance measurements.[18]

(d) NZ Wagyu Breeders Association - a smaller association offering members the opportunity to access the NZWBA register containing genetic information about registered Wagyu cattle in New Zealand.[19]

9.4 Similar organisations exist for dairy cattle, such as:

(a) New Zealand Holstein Friesian Association - a collection of member dairy farmers with an interest in farming and breeding the Holstein Friesian cow in New Zealand. Holstein Innovation is a joint programme between Holstein Friesian New Zealand and LIC that aims to identify and breed from elite Holstein Friesian genetics, infusing diversity where possible. Breeders will be offered purchase agreements with LIC, and the purchase price is negotiated between the Breeder and LIC.[20]

9.5 PBB started in 1996 as a co-operative venture by the NZ Hereford Association and Angus NZ, to remove the duplication of services both breeds required, in particular administrative and technology services[21] and is now owned by seven breed societies.[22] It supports breed societies, farmers and industry partners to enhance livestock performance and drive breeding success, including through DNA and genetic services.[23] Zoetis considers that the breed societies have significant influence in determining which genomic service providers PBB will work with.

9.6 Zoetis estimates that proportionally significantly more genomic testing is carried out on Angus beef cattle than on Hereford cattle in New Zealand.

---

[16] https://angusnz.com/our-team/our-role/.
[17] https://www.angusaustralia.com.au/content/uploads/2021/04/Angus_Australia_SnapshotAPRIL21.pdf.
[18] https://herefords.co.nz/.
[19] https://nzwba.co.nz/new-zealands-original-wagyu-breeders-association/.
[20] https://nzholstein.org.nz/products-and-services/holstein-innovation-female-programme/
[21] https://www.pbbnz.com/about/
[22] Its shareholders are: New Zealand Hereford Association Incorporated (33.33%); New Zealand Angus Association Incorporated (33.33%); Simmental Cattle Breeders Society of New Zealand Incorporated (11.73%); NZ Beef Shorthorn Association Incorporated (5%); South Devon Cattle Society of New Zealand (Incorporated) (4.87%); Charolais Breeders New Zealand Incorporated (4.7%); and The N.Z. Murray Grey Beef Cattle Society (Incorporated) (3.93%).
[23] https://www.pbbnz.com/services/genetics/partnership/

9.7 As a result, while suppliers of genomic testing services provide services to farmers for use in improving their herd, breed societies and genetic evaluation partners provide an important 'route to market.' The role of PBB is particularly relevant in this regard.

9.8 Breed societies facilitate the supply of services to farmers through relationships with suppliers and have a strong incentive to ensure choices for their members. Suppliers are appointed and promoted to their members, a model that reflects the historical development of the animal genetic services industry, with breed societies and industry associations collating and coordinating genetic information for the benefit of their members.

9.9 Given that breed societies and industry associations typically own/govern and control the key data assets for their breeds (including the underlying databases used in evaluations), and manage the core records that underpin genetic improvement of their breeds, they are well placed to, and have a track record of, supporting and sponsoring entry and expansion of genomic testing suppliers.

Part D Relevant Markets

10. Market participants

10.1 Zoetis and Neogen both offer genomic testing services for livestock in New Zealand, in competition with other Australasian and global market participants offering services along the continuum of substitution outlined above.

Zoetis

10.2 Zoetis supplies beef genomic testing to New Zealand farmers via the Angus Australia beef association and direct sales. [ ]

Zoetis genomic products	Estimated sales in NZD
Sheep	[ ]
Beef	[ ]
Dairy	[ ]
Total	[ ]

10.3 Zoetis supports its arrangements with Angus Aus/NZ through direct engagement with farmers.

10.4 For animals tested via a breed association the results for genomic testing are provided back to the producer by the relevant breed association or directly by Zoetis for any direct testing submissions. After completing genomic testing analysis in respect of an animal, Zoetis assists producers in interpreting the results, including the use of various decision-support tools to assist farmers in the management of their animal populations.

10.5 Zoetis' key products in New Zealand include:

Inherit Select	Intended for crossbred cattle of the eight major breeds, INHERIT Select provides predictions to help you make more profitable selection and breeding decisions while harnessing the power of hybrid vigour. This is a Zoetis proprietary test sold directly to producers.
HD50K For Angus	Zoetis' primary genomic testing product which provides high density genotyping services to Angus producers enabling them to: - Select, mate and market Angus seedstock with greater confidence - Increase the value of your herd - Avoid the cost of raising inferior stock - Ensure future investments are only in your best animals This test is sold to producers in partnership with and through Breed Associations.
Siretrace	Genomic pedigree analysis service. This product is used for parentage discovery and/or verification, data banking and animal identification of superior sires in multiple-sire breeding scenarios. The ultimate result is more precise herd management via accurate parentage assignment. This test is sold to producers in partnership with and through breed associations.
Angus HeiferSelect	Angus HeiferSELECT™ is a genomic selection tool to help inform the selection of Angus replacement heifers in a commercial breeding operation.

	Angus HeiferSELECT™ provides genetic predictions, including: - Total Breeding Value - Fourteen maternal, fertility, growth, feed intake and resilience traits - DNA sire identification to a sire registered with Angus Australia - Angus HeiferSELECT™ Star Rating for easy interpretation This brand/test is owned by Angus Australia with Zoetis providing genotyping services. The test is also sold by Angus Australia in partnership with Neogen and more recently Weatherbys.
HornPoll	HornPoll is a DNA test from Zoetis Genetics that is used to identify the probability of an animal carrying zero, one or two copies of the poll variant of the gene. This test is sold to producers in partnership with and through breed associations.

10.6 Further information about Zoetis' animal genomics business is available at https://www2.zoetis.co.nz/products-solutions/genetics.

Neogen

10.7 Neogen supplies genomic evaluations in New Zealand for beef cattle. Neogen does not provide genomic evaluations for dairy cattle or sheep in New Zealand.

10.8 Neogen's genomic testing products are distributed in New Zealand by PBB, which has a single employee currently providing sales and support services of Neogen genomic products to farmers and breed societies.

Neogen genomic products	Estimated sales in NZD
Sheep	[ ]
Beef	[ ]
Dairy	[ ]
Research & Development	[ ]
Total	[ ]

10.9 After completing genomic testing analysis in respect of an animal, the Neogen Genomics Business prepares a report for the relevant farmer. The Neogen Genomics Business' key products in New Zealand include:

InfiniSeek	Discover new traits Minimise selection bias Manage 400 traits and conditions
IgentityBeef	This tool utilises DNA to predict genetic merit in both heifers and steers, providing an additional heifer selection tool to cattle producers. Provides 17 maternal, performance, and carcass traits, along with parentage.

10.10 Further information about the Neogen Genomics Business is here.

Other market participants

10.11 There are numerous other participants active in the broader market for the supply of genetic testing services to enhance trait predictions for breeding livestock in Australia and New Zealand. A description of these companies and their offerings is detailed in **Attachment C**. These companies include:

(a) Weatherbys, a subsidiary of the Weatherbys Ltd Group (based in Ireland) that provides genomic testing services to the Australian and New Zealand markets for cattle, sheep, aquaculture, horses, camels, and plants and crops.

(b) LIC, which owns a database on the genetics, productivity and ancestry of almost every cow in New Zealand's dairy cow herd, going back generations. LIC uses this database to assist its farmer-members with precise guidance on herd improvement and artificial breeding.

(c) GenomNZ, which describes itself as New Zealand's foremost commercial animal DNA genotyping laboratory, providing a one-stop shop for a range of applications; including parentage assignment, breed composition, and inbreeding. The laboratory specialises in deer, sheep, goat, cattle and aquaculture.

(d) XytoVet, an Australian company operating out of Bentley, Western Australia that provides genomic testing services for cattle and sheep in the Australian and New Zealand markets.

(e) CRV, a livestock genetics and herd-improvement company formed in the Netherlands, specialising in dairy and beef cattle breeding. It supplies in New Zealand and has a global presence in 50 countries. CRV offers an array of herd improvement tools and services that extend from breeding indicators and herd management applications to genetic/genomic solutions.[24]

(f) InfogeneNZ, which operates DNA testing services across a wide range of species including cattle, sheep, goats, horses, dogs, birds, camels and other wildlife. It describes itself as historically recognised for its parentage verification system for thoroughbred and standardbred in the equine industry, but having expanded to provide services for other species and testing products.

(g) Totogen, which was set up in 2021 as an alternative provider for DNA analysis on an individual animal basis on large-scale commercial sheep farms, particularly Headwaters. Totogen's methodology and processes aim to bring costs down and help commercial sheep farmers across the country introduce DNA analysis into their development programmes. Totogen states that it does not specify a genomic product, preferring to adopt a flexible approach to service provision, and that it utilises high tech equipment at its Dunedin laboratory to undertake these services. Whilst it has been primarily focused on genomic services related to sheep, it has advertised plans to release a cattle product this year.

(h) Total Livestock Genetics, an Australian company which provides genomic testing services for cattle, as well as other reproductive services and activities for cattle including semen collection, storage and distribution, embryo transfer and in-vitro fertilisation. Total Livestock Genetics provides its reproductive services to both the Australian and export markets.

[24] https://crv4all.co.nz/nz/service/herd-testing.

10.12 There are low barriers to entry for global suppliers offering comparable genomic, data-driven, and breeding-support services, seeking to enter the markets for supply of such services in New Zealand and Australia.

11. Market definition

11.1 Zoetis considers that the relevant market encompasses at least the supply of genomic testing services in respect of livestock in Australia and New Zealand.

Relevant product market

11.2 Farmers use a range of methods to seek to enhance the accuracy of trait predictions for breeding purposes, including traditional "blood-line" breeding techniques, artificial insemination via semen and/or embryo providers, semen collection and analysis, various other forms of DNA analysis, as well as more traditional observational and performance-based selection methods, such as a visual assessment of the animal (including by professional classifiers), breeding consultant advice and performance data records.

11.3 Genomics testing is a relatively new service in New Zealand that falls within the broader industry aimed at improving the available genetic stock of animal populations. It is currently used in respect of only a small proportion of New Zealand livestock (e.g. only approximately less than [ ]% of the "eligible" beef cattle which Zoetis considers could benefit most from genomic testing).

11.4 The starting point for considering the relevant product market in respect of the Proposed Acquisition would be the wider market for the supply of services to farmers to enhance trait predictions for breeding livestock.

11.5 If the Commission were to focus for the purposes of its analysis on the supply of genomic testing services (which reflects the most precise area of overlap between the parties' activities), despite those services forming a small part of the services actually used for herd/flock improvement, Zoetis considers that to be the narrowest plausible product market definition. This reflects that:

(a) the technology, equipment and laboratory resources used to supply genomic testing services are largely the same, regardless of the species or breed of animal. The core methods used in animal genomics (SNP genotyping, PCR, NGS and STRs) are applicable to cattle, sheep, pigs, poultry, horses, companion animals as well as plants, and laboratories use the same equipment, reagents and procedures for all species;

(b) reference panels, technology and other equipment are readily available such that there is a high degree of supply-side substitutability between different species and breeds. While a greater proportion of supplier's revenues will, at any point in time, relate to the supply of services in respect of particular species (and suppliers in New Zealand may, for historical and other reasons, focus on the supply of services in respect of particular animals or breeds), suppliers can (and frequently do) provide genomic testing in respect of a range of different animal types. For example:

(i) Weatherbys supplies genomic testing services in respect of beef cattle and sheep in Australia, as well as equine, aquaculture, camelid, plants and crops;

(ii) XytoVet supplies genomic testing services in respect of dairy cattle and sheep in Australia and New Zealand;

(iii) GenomNZ supplies genomic testing services in respect of sheep, deer, goats and aquaculture in Australia and New Zealand and to other international customer markets;[25]

(iv) Semex supplies genomics testing services for dairy and beef cattle in Australia;

(v) Totogen predominantly provides genomic testing services for sheep, but has indicated that its genomic testing services can extend to cattle and other livestock;[26] and

(vi) CRV Ambreed supplies genomic testing services in respect of beef and dairy cattle in New Zealand and Australia.

11.6 The requirements of different livestock customer groups are similar in many ways: sample device (although these are frequently purchased independently by a customer and are not genomic test-specific), process for submitting samples, provision of test outcome, access to breed society. However, genomic evaluations will be specific to particular livestock breeds, and some providers specialise in supply to particular livestock customer groups (i.e. sheep, beef cattle, dairy cattle).

11.7 Whilst there is supply-side substitutability across a range of genetic testing offers, on the demand side the key distinguishing characteristic of each customer group is that it will need genomic or genetic tests specific to the particular type of animal being tested.

11.8 Notwithstanding its view that the narrowest plausible market encompasses the supply of genomic testing services in respect of all livestock, to assist the Commission Zoetis has provided separate information on the supply of services in respect of each of beef cattle, dairy cattle and sheep in **Attachment E**.

11.9 Regardless of the market definition adopted, the Proposed Acquisition would not give rise to a substantial lessening of competition in any relevant market.

Relevant geographic market

11.10 Most genomic testing suppliers operate globally. It is also very common for animal samples collected in one country to be tested in laboratories located in other countries. For example:

(a) Zoetis processes and analyses all specimens obtained from animals in Australia, New Zealand, Argentina, the Benelux countries, Brazil, Pakistan, Turkey, United Kingdom, Chile, Germany, Italy, South Africa, Colombia, Hungary, Japan, South Korea, France, Paraguay, Poland, Uruguay, Portugal, and Spain from its laboratory located in Michigan in the US. It processes specimens obtained from animals in China from its laboratory in China;

(b) The Neogen Genomics Business processes and analyses specimens obtained from animals in New Zealand, Australia, Papua New Guinea, Indonesia, China and other Pacific island countries at its laboratory located in Brisbane,[27] as well as specimens obtained from other countries at its other laboratories;

[25] GenomNZ About us, available here.
[26] Totogen, Our core business - our vision, available here.
[27] [ ].

(c) Weatherbys processes and analyses samples from animals in Australia and New Zealand (and other countries) from its laboratory in the UK;[28] and

(d) XytoVet processes and analyses all specimens obtained from animals in New Zealand in its laboratory in Perth, Australia.

11.11 Accordingly, from a supply-side perspective, Zoetis considers that the relevant market is global.

11.12 A further factor showing the wider than national geographic market is the role of breed societies in Australasia. New Zealand farmers purchase genomic testing services for beef cattle through either Angus NZ or Angus Australia (as well as directly). [ ]

11.13 Regardless of the geographic dimension considered, the Proposed Acquisition would not have the effect or likely effect of substantially lessening competition for the reasons set out below.

[28] Weatherbys Scientific, Our Story.

Part E Competitive Effects

12. Competitive Effects

12.1 The structure of the animal genomic testing industry means that Zoetis faces competitive constraints from a range of sources. The competitive constraints Zoetis faces will continue to drive competition, whether or not the Proposed Acquisition occurs, for the following reasons:

(a) Zoetis currently faces constraints from existing suppliers of genomic testing services in Australia and New Zealand, and, significantly, from the need to win customers to using genomic testing services in the first place, and the Proposed Acquisition will not lessen those competitive pressures;

(b) there are a large number of suppliers globally who could readily expand into New Zealand;

(c) there are no barriers to customer switching;

(d) large breed societies have a pivotal influence in providing a route to market and can and do sponsor new entry;

(e) barriers to entry or expansion are low, with no need for a laboratory or significant 'on the ground' investment in New Zealand, and significant supply-side substitutability between species given the standardised nature of genomic testing services; and

(f) the Proposed Acquisition will not (and could not) raise barriers to entry in any market, including because neither Zoetis nor Neogen own any key inputs required for successful entry and operation at scale.

12.2 In particular, the introduction of Weatherbys as a supplier of genomic testing for cattle in New Zealand by PBB makes it likely that breed societies will purchase more services from Weatherbys [ ].

Range of competitors and large potential addressable market

12.3 As reflected in both Zoetis' and the Neogen Genomics Business' small revenues from the supply of genomic testing services in New Zealand, the supply of these services in New Zealand is relatively new.

12.4 There are currently around 920 million cattle worldwide, with only approximately 10 million that have been genomically tested. This represents approximately 1% of cattle globally. In New Zealand, there are approximately 8.2 million head of cattle (both beef and dairy),[29] of which approximately [ ] million are considered by Zoetis to be appropriate for herd improvement services, including genomic testing.[30] Of those [ ] million, Zoetis estimates that genomic testing services are currently only supplied in respect of a very small proportion. For example, Zoetis estimates that it supplied [ ] genomic tests in New Zealand in 2025, of which only [ ] were for beef cattle and that Neogen supplied [ ] tests for beef cattle. Zoetis does not hold numbers for tests supplied by competitors but expects a much larger amount of dairy cattle (e.g. even in

[29] Zoetis estimates.
[30] Zoetis estimates.

the order of 1 million or more) may be tested annually by LIC.[31] Whilst only a small percentage of eligible livestock are genomically tested in New Zealand, within the beef cattle category Zoetis and Neogen have historically been the two main suppliers of these tests.

12.5 Importantly, the majority of testing of New Zealand cattle is carried out by LIC in respect of dairy cattle. Neogen does not supply genomic testing services for dairy cattle, and Zoetis supplies only a nominal amount ([ ] of total tests). Genomic testing services are supplied in respect of only a very small proportion of New Zealand beef cattle (approximately less than [ ] of cattle which could most benefit from the service).

12.6 Zoetis does not have any information in relation to the number of genomic tests provided by other suppliers in New Zealand or Australia. It is not aware of any third-party datasets and does not have any information that would enable it to provide informed, robust estimates with any degree of confidence about the accuracy of those estimates.

12.7 As set out above, there are a range of other suppliers of animal genomics testing services in Australia and New Zealand, including:

(a) In Australia: Weatherbys, XytoVet, Base Pair Genomics, Total Livestock Genetics, GenomNZ, Intertek, Semex, and ST Genetics; and

(b) In New Zealand: LIC, Totogen, CRV Ambreed, GenomNZ and InfogeneNZ;

which could provide services in respect of New Zealand livestock.

12.8 There are also a range of suppliers of genetic testing services for livestock which could easily expand to provide genomic testing and global suppliers of genomic testing which could enter New Zealand, as described further below.

Range of constraints and competitive dynamics

12.9 The supply of genomic testing services takes place in the broader industry of herd/flock improvement services, and Zoetis estimates that only a minority of eligible or appropriate livestock which could most benefit from genomic testing as a means of herd improvement are in fact genomically tested.

12.10 The parties' shares of the supply of genomic testing services in the context of that set of eligible livestock, cattle, and sheep are as follows:

ANIMAL	ESTIMATED SHARES OF SUPPLY OF GENOMIC TESTING (ELIGIBLE ANIMALS)			
	AUSTRALIA AND NEW ZEALAND		NEW ZEALAND	
	Zoetis	Neogen Genomics Business	Zoetis	Neogen Genomics Business
Livestock	[ ]%	[ ]%	[ ]%	[ ]%
Cattle	[ ]%	[ ]%	[ ]%	[ ]%
Sheep	[	[ ]%	[ ]%	[ ]%

[31] LIC's Annual Report states that: *In the past 12 months we have seen Non-Return Rates (NRR) of our fresh sexed semen lift to within 1% of conventional semen, we have had close to 1.5 million animals genotyped through our GeneMark™ Genomics programme.* LIC Annual Report 2025 p.6

	]%			
Dairy cattle	[ ]%	[ ]%	[ ]%	[ ]%
Beef cattle	[ ]%	[ ]%	[ ]%	[ ]%

12.11 Zoetis does not hold shares of supply of genomic testing services for livestock in NZ or Australia-NZ. However, it sets out Zoetis and Neogen volumes and an indication of the competitors that supply tests for livestock, and for sheep and cattle in **Attachment E**. As noted above, whilst only a small percentage of eligible livestock are genomically tested in New Zealand, within the beef cattle category Zoetis and Neogen have historically been the two main suppliers of these tests.

12.12 While data on actual shares of supply is not available, Zoetis does not consider that historic or backwards looking shares of supply would, in any event, appropriately take account of or reflect the range of constraints and competitive dynamics that characterise the market. This includes because:

(a) the supply of other herd improvement services provides significant competitive constraint;

(b) large breed societies can facilitate the quick entry or expansion of New Zealand or global suppliers meaning that switching providers, and resultant significant changes in share, can (and will) occur quickly; and

(c) backwards looking shares reflect only that Zoetis, and the Neogen Genomics Business, were the first-movers to be appointed as genomic service providers to large breed societies in New Zealand.

12.13 [ ].

12.14 [ ]

12.15 As a result, if Zoetis were to increase prices or decrease service quality following the Proposed Acquisition, it would cease to be effective in competing [ ]

12.16 [ ] the large quantity of alternative suppliers in the market for the supply of genomic testing services who could readily provide services in respect of New Zealand livestock.

Genomic testing services are supplied globally

12.17 Both Zoetis and the Neogen Genomics Business are global providers, headquartered outside New Zealand. Similarly, Weatherbys is a global provider and to Zoetis' knowledge does not use a laboratory in New Zealand. A large number of other global suppliers could also extend the provision of genomic testing services to New Zealand livestock from their existing laboratories without significant investment in New Zealand. These include ABS Global, Beijing Compass Agricultural, Bio-Genesys, Czech Moravian Breeders Corporation, Feanix Biotechnologies, Eurofins Genomics, Gencove, Genetic Visions-ST, IFN Schönow, Labogena, Molbreeding Biotechnology, Peak Genetics, Synergy Wagyu, SEENERGI, Valogene, VIT, and VHLGenetics. Further details on some of these suppliers are included in **Attachment C**.

12.18 Zoetis will remain constrained by competitors across the market, whether defined narrowly or broadly, post-acquisition for these reasons.

No barriers to customers switching to alternative suppliers

12.19 Farmers can and do switch readily between suppliers. There is no significant switching cost as farmers tend to purchase on a test by test basis and generally do not enter long-term or exclusive contracts with genomic testing services suppliers.

12.20 This, in addition to breed societies and industry associations ensuring the availability of choices for their members, means that customers can easily switch between suppliers.

Breed societies will continue to actively constrain

12.21 In Zoetis' experience, breed societies and industry associations are highly focused on ensuring their members have access to high quality and competitively priced services. Breed societies and industry associations can appoint or approve new suppliers or third-party intermediaries as suppliers at any time (based on the supplier demonstrating their capability and capacity to provide services to the association's members).[32]

12.22 Breed societies have buyer power and can switch with ease to competing genomic testing suppliers in response to market conditions. In both Australia and New Zealand breed societies have sponsored entry or expansion of genomic testing providers to ensure their members have a range of options. Three recent examples of this occurring in supply of genomic testing for beef cattle are described below.

12.23 On 1 September 2025, the Australian Wagyu Association confirmed Weatherbys as a new genotyping provider. In describing the rationale for the partnership, the CEO of the Association stated:[33]

> *"Our systems have been developed to be open to technology providers around the world, enabling evaluation of new competitive genotype products. This ensures members have access to the best available technology at the best available price, with new standardised global genomic testing options now starting from just AUD$37 (USD $26),"*

12.24 [ ]

12.25 In NZ, PBB acts as the primary service provider for Angus NZ, NZ Herefords and a range of other smaller breed societies. It recently entered into a partnership with Weatherbys Scientific which is said to be:

> *"an opportunity to bring more choice into the New Zealand market."* [34]

12.26 This new partnership gives members of all PBB affiliated breed societies greater access to genomic testing services through PBB, which previously offered only Neogen genomic products.[35] [ ]

12.27 Genomic testing services suppliers depend heavily on breed societies and industry associations who play the role of the facilitator. Crucially, it is the breed societies and industry associations that own the databases which contain historic (and up to date) information in relation to pedigree and performance characteristics for their breeds. Utilising these databases, these organisations govern the genetic evaluation system that supports their society. These systems could be run internally by the society themselves or

[32] Genomic testing services suppliers are typically appointed to supply breed societies and industry organisations who recommend, and facilitate the supply of, genomic testing services to their members. See for example Weatherbys' website and PBB's website.
[33] https://www.wagyu.org.au/weatherbys-global-genomic-testing-2025.
[34] https://www.farmersweekly.co.nz/technology/partnership-ramps-up-genomic-testing-in-nz/.
[35] https://www.herefords.co.nz/genomics-information.html.

outsourced to an industry evaluation system such as BREEDPLAN.

12.28 The fact that the key data and inputs are controlled by neutral industry bodies, not the suppliers directly, means that a new entrant can be approved as a genomic service provider to these organisations without the risk of foreclosure (where existing suppliers block or hinder a new supplier's access to essential resources).

Lack of barriers to entry or expansion

12.29 It is relatively straightforward for any global supplier to expand into New Zealand or for new entrants in New Zealand to commence operations, which will remain the case following the Proposed Acquisition. There is no need for onshore testing facilities as suppliers, including both Zoetis and Neogen, use offshore testing facilities.

12.30 There are five recent examples of new entry and expansion into New Zealand and Australia:

(a) The expansion by Weatherbys to provide genomic testing services to beef cattle. Weatherbys entered Australia in 2018 and has, since its entry, provided genomic testing services for sheep (where the parties do not have any material competitive overlap). In July 2025, the Australian Wagyu Association announced a partnership with Weatherbys for genomic testing services. In November 2025, Angus Australia appointed Weatherbys as a genomic service provider.

(b) In October 2025 PBB announced that Weatherbys was expanding into New Zealand, to provide genomic testing for cattle with its distribution support.

(c) The entry of Black Box Co. to provide data analysis for beef cattle, and subsequent entry of its subsidiary Base Pair Genomics in genomic testing for beef cattle. Black Box Co., an Australian technology company, commenced operations in 2020 and provides a cloud platform that integrates data from the beef supply chain to provide farmers with analysis and insights for breeding, management and profitability. In March 2025, Black Box Co. launched its genomic testing business Base Pair Genomics, which since its entry has provided genomic testing services for beef cattle. Base Pair Genomics provides a genomic testing service incorporating advanced genomic predictions and genetic condition results.

(d) The entry of XytoVet to service sheep and subsequent expansion to service beef and dairy cattle. XytoVet, an Australian supplier, commenced operations in 2017 and now provides DNA testing for parentage verification, genetic condition screening, and genetic trait analysis for sheep (which later expanded to beef and dairy cattle). XytoVet conducts its genotyping testing from its laboratory located in Bentley in Western Australia.

(e) The entry of Totogen in New Zealand to supply sheep genetic testing services, in direct response to customer requirements.

Testing processes readily replicable

12.31 Costs of entry or expansion are low for the reasons described below:

(a) genomic testing does not require investment in new or unique technologies;

(b) the establishment of a local presence in New Zealand for the supply of genomic testing can be achieved without significant investment; and

(c) key information (breed society databases) is owned by third parties who are

incentivised to provide access to new entrants.

12.32 The supply of genomic testing services is based on highly standardised laboratory processes that are reliant on third-party information and data sources. That information is owned and maintained by the relevant breed society or industry association. The supply of genomic testing services at scale in New Zealand requires only:

(a) a relationship with relevant breed societies or individual farms, who provide recommendations to their members and therefore marketing for genomic testing suppliers;

(b) a modest-sized "field" or sales force to market their services, and support farmers who wish to send animal samples for testing (noting that the vast majority of farmers take the samples themselves and send them directly to the laboratory); and

(c) access to a laboratory to undertake the genomic testing. The required laboratory process does not involve any proprietary IP or scarce skills (i.e. these are relatively standard laboratory processes that can readily be undertaken by many laboratories and apply to a range of samples, including from animals, plants and humans). In addition, as demonstrated by Zoetis, Neogen and Weatherbys, the laboratory does not need to be based in New Zealand to provide services to New Zealand farmers and breed societies. Genomic testing services suppliers can also enter into contract arrangements with third-party laboratories (or, indeed, with third party field/sales forces).

12.33 Neither Zoetis nor the Neogen Genomics Business control any key inputs, and so the Proposed Acquisition does not (and cannot) raise barriers to entry.

Supply-side substitution across livestock categories

12.34 Given the standardised nature of genomic testing, there are no material technological, capital, or regulatory barriers which prevent suppliers of genomic testing services for a particular animal (or even breed) also supplying services in respect of other animals.

12.35 This is not only a theoretical possibility, as demonstrated by the expansion by Weatherbys from a foundation in breeding and genomic testing in the thoroughbred industry to sheep, cattle, aquaculture, camelids and plants services and XytoVet with an initial focus on pathogen analysis to genotyping services for sheep and cattle.

12.36 Further, Totogen recently entered supply of testing for sheep but states that due to the nature of its equipment and protocols, it can work on nucleic acid from 'just about anywhere.'[36] It states:

> *'We love sheep, it's in the Totogen DNA! But if you have a need for DNA services for any other animal, or plant, just give us a call. For the 2026 season we are working on a cattle product. Give us a call if you are interested.'* [37]

12.37 GenomNZ indicates that it uses genotyping-by-sequencing technology for the genotyping of deer, goat and aquaculture samples to deliver parentage, breed composition and inbreeding, noting that:[38]

[36] https://www.totogen.co.nz/our-lab.
[37] https://www.totogen.co.nz/faqs.
[38] https://www.agresearch.co.nz/products-and-services/genomnz/genotyping-methods/.

'This technology is extensively utilised by the Animal and Forage Genomics Research Teams for over 50 species, including livestock, forage crops, trees, insects, birds, aquatic species (both fresh and salt water) and microbiomes.'

12.38 As the market continues to grow, Zoetis expects to see more local competitors expanding the scale of livestock genomic testing services they offer. Zoetis is therefore constrained by suppliers of genomic testing services across a range of species.

13. No substantial lessening of competition

13.1 For the reasons set out above, Zoetis will continue to be competitively constrained after the Proposed Acquisition and will not have any ability to increase prices or decrease service quality.

13.2 As first movers in New Zealand, Zoetis and the Neogen Genomics Business have historically been the main suppliers of genomic testing services in respect of beef cattle. However, given the wide range of competitors against which they compete, the growth point at which the market currently sits, and the ability of breed societies and customers to move their support rapidly to other suppliers, any increase in price or decrease in service quality following the Proposed Acquisition would result in expansion of competitors and/or a drop in the already low level of uptake of genomic services for both beef cattle and livestock generally in New Zealand.

13.3 Zoetis and Neogen combined are testing approximately less than [ ] of livestock in New Zealand. As a result, their genomic testing businesses in New Zealand are relatively small, leaving open significant opportunities for other suppliers to capture market share.

No vertical, conglomerate or coordinated effects

13.4 Neither Zoetis or the Neogen Genomics Business is active in upstream (livestock breeding) or downstream (supply of follow-on breeding services or livestock) markets to genomic testing. Zoetis supplies other animal health products, [ ]. All the relevant markets are competitive. The Proposed Acquisition will not have any vertical or conglomerate effects in any market in New Zealand.

13.5 The market for genomic testing services does not have features conducive to coordinated effects and this will not change as a result of the Proposed Acquisition.

14. Conclusion

14.1 For the above reasons, the Applicant is confident that the Proposed Acquisition will not give rise to any substantial lessening of competition in any market in New Zealand.

Part F Confidentiality

15. Confidentiality sought

15.1 Confidentiality is sought in respect of the information in this application that is contained in square brackets (with confidentiality indicated by the coloured highlighting).

15.2 Confidentiality is sought for the purposes of s 9(2)(b) of the Official Information Act 1982 on the grounds that:

(a) The information is commercially sensitive and valuable information which is confidential to the parties or the information is personal information, and

(b) Disclosure would be likely to unreasonably prejudice the commercial position of the parties, as the entities providing the information.

15.3 The parties request that they are notified of any request made to the Commission under the Official Information Act 1982 for release of the confidential information. The parties also request that the Commission seek and consider the Applicant's or the Target's views, as the case may be, as to whether the information remains confidential and commercially sensitive at the time responses to such requests are being considered.

15.4 The foregoing equally applies in respect of any additional information provided to the Commission that is expressed to be confidential.

Part G Declaration by Zoetis Holdings LLC

I, _____, have prepared, or supervised the preparation of, this notice seeking clearance.

To the best of my knowledge, I confirm that:

- all the information specified by the Commission has been supplied;
- if the information has not been supplied, reasons have been included as to why the information has not been supplied;
- all information known to the applicant that is relevant to the consideration of this notice has been supplied; and
- all information supplied is correct as at the date of this notice.

I undertake to advise the Commission immediately of any material change in circumstances relating to the notice.

I understand that it is an offence under the Commerce Act to attempt to deceive or knowingly mislead the Commission in respect of any matter before the Commission, including in these documents.

I am a director/officer of Zoetis Holdings LLC and am duly authorised to submit this notice.

Name and title of person authorised to sign:

_____

Signature

_____

Date

Table of Attachments

Attachment	Document
A	Sale and Purchase Agreement
B	Zoetis and Neogen structure diagram and transaction structure
C	Details of the Parties' competitors
D	Contact details for Breed associations
E	Supply volumes and indications of competitor activity
F	Contact details for Zoetis' top five domestic customers
G	Contact details for Neogen's top five domestic customers
H	Zoetis Annual Report and Financial Statements
I	Neogen Annual Report and Financial Statements
J	Zoetis Documents
K	Neogen Documents

Attachment C – Details of the Parties' competitors

The table below sets out details of other suppliers of animal genomic testing services in Australasia and globally.

SUPPLIER	SERVICES AND ACTIVITIES	CONTACT DETAILS
Animal Genomic Testing Service Suppliers currently active in New Zealand only or New Zealand and Australia		
Weatherbys	A subsidiary of the Weatherbys Ltd Group based in Ireland, providing genomic testing services to the Australian and New Zealand markets for cattle, sheep, aquaculture, horses, camels, and plants and crops. Further information on Weatherbys Scientific Australia is available at: https://www.weatherbysscientific.com.au/	[ ]
Livestock Improvement Corporation (LIC)	LIC owns a database on the genetics, productivity and ancestry of almost every cow in New Zealand's dairy cow herd, going back generations. LIC uses this database to assist its farmer-members with precise guidance on herd improvement and artificial breeding. Further information on LIC is available at: https://licnz.com/	[ ]
GenomNZ	GenomNZ describes itself as New Zealand's foremost commercial animal DNA genotyping laboratory. GenomNZ provides a one-stop shop for a range of applications; including parentage assignment, breed composition, and inbreeding. The laboratory specialises in deer, sheep, goat, cattle and aquaculture. Further information on GenomNZ is available at: https://www.agresearch.co.nz/products-and-services/genomnz/	[ ]
Totogen	Totogen was set up in 2021 as an alternative provider for DNA analysis on an individual animal basis on large-scale commercial sheep farms, particularly Headwaters. Now, with Totogen's methodology and processes bringing the cost right down, Totogen is helping commercial sheep farmers across the country to introduce DNA analysis into their development programmes. Further information on Totogen is available at: https://www.totogen.co.nz/	[ ]
Semex	Semex provides genomic testing in New Zealand for Dairy cattle. It was started by farmers and is still owned by farmers. Semex provides that they are the fastest growing company in the world's genetic solutions market. Whilst their offering of genomic testing in NZ is limited to dairy cattle, they do offer beef genomic testing in other locations globally. Further information on Semex is available at: https://www.semex.com/nz	[ ]

Base Pair Genomics (Blackbox)	Base Pair Genomics is an arm of Black Box Co, an Australian agricultural technology company active in data analytics across the beef supply chain. Base Pair Genomics provides genomic analysis for cattle farmers. It provides farmers with direct access to DNA sampling, advanced genomic prediction and genomic test results to optimise herd performance, profitability and genetic progress. Further information on Base Pair Genomics is available at: https://www.blackboxco.com.au/base-pair-genomics	[	]
Total Livestock Genetics	An Australian company which provides genomic testing services for cattle, as well as other reproductive services and activities for cattle including semen collection, storage and distribution, embryo transfer and in-vitro fertilisation. Total Livestock Genetics provides its reproductive services to both the Australian and export markets. Total Livestock Genetics is a subsidiary of Genetics Australia (the current distributor for Neogen). Further information on Total Livestock Genetics is available at: https://tlg.com.au/	[	]
XytoVet	An Australian company operating out of Bentley, Western Australia that provides genotyping services for cattle and sheep in the Australian and New Zealand markets. Further information on XytoVet is available at: https://xytovet.com.au/	[	]
Other Animal Genomic Testing Service Suppliers Globally			
Angus Genetics Inc.	A subsidiary of the American Angus Association based in the United States that provides advanced genetic evaluation and testing services for Angus cattle. AGI develops and manages genetic evaluation programs, genomic selection tools, and DNA testing services specifically for the Angus breed. Further information on AGI is available at: https://www.angus.org/agi		
Eurofins Genomics	A U.S. headquartered company that forms part of the global Luxembourg-based Eurofins Scientific Group, Eurofins Genomics is recognised as a leader in life sciences products and services. The company offers a broad portfolio that includes DNA sequencing, genotyping, gene synthesis, and related molecular biology services. In this segment, Eurofins Genomics provide genetic testing and genomic solutions for animal breed, plant breed, and food safety, supporting cattle producers and other agribusinesses with advanced DNA analysis and bioinformatics. Further information on Eurofins Genomics is available at: https://eurofinsgenomics.com/en/home/		
Gencove	A company based in the United States specialising in high-throughput, low-pass whole genome sequencing and bioinformatics for both human and animal genomics. In the animal sector, Gencove partners with breed companies, research institutions, and agribusinesses to provide genomic insights that support selection, breed, and health management across various livestock and companion animal species. Further information on Gencove is available at: https://gencove.com/		

Labogena	A French genomics company specialising in genetic testing for both animals and plants. The company provides a wide array of services, including DNA-based parentage verification, genomic selection, trait analysis, and disease resistance testing. Its genetic testing services cover cattle, sheep, goats, horses, and other species, as well as plant varieties, making it a key player in the European genomics market. Further information on Labogena is available at: https://www.labogena.com/en/
ST Genetics	A company based in the United States, providing reproductive services such as sex sorted semen and embryo production, as well as genomic testing services for cattle. Further information on ST Genetics is available at: https://stgen.com/default.aspx?language=english-english&title=home
Valogene	Valogene is a sister company of Allice (union of French and Belgium animal selection and reproduction companies) who is dedicated to genomic solutions for cattle, sheep and goats and provides microarrays to genotyping laboratories in Europe.
Vereinigte Informationssysteme Tierhaltung w.V. (VIT)	A German company providing services in performance recording, artificial insemination and breeding for cattle, horse, sheep, goats and pigs. VIT operates a data processing system including integrated specialised applications and a standardised data inventory on behalf of its customers. Operation and breeding management are focal points of the VIT service. VIT also runs the genomic cattle database 'Rind-Genom-DB' with SNP-marker information of some 200,000 genotyped cattle (predominant Holsteins) as the basis for services provided in genomic evaluations, identification of specific genetic traits and parentage check and discovery. Further information is available at: https://www.vit.de/en/

Detailed description of competitor service offerings

This section of the Attachment sets out further details of competitor products that may be available in New Zealand.

Weatherbys Scientific

Bovine	A genotyping service facilitated primarily through the Bovine Versa SNP chip. The service also extends to the use of Illumina and ThermoFisher Genotyping arrays and GBS platforms, effectively allowing for a wide variety of species, breeds, or traits to be tested. Ultimately, the service produces genomic breeding values and genome wide association studies which enable farmers to breed healthier and more productive animals.
Ovine	Advanced genomic testing for sheep breeders, providing over 60,000 SNP markers to deliver valuable insights to the Australian Sheep Industry. There is no indication that this service is provided in New Zealand.

LIC

GeneMark Genomics	GeneMark Genomics is a product that allows for farmers to improve their dairy cattle herds by enabling faster and better breeding of cows. This product utilises parentage verification and genomic evaluation in one convenient service, allowing farmers to take the guesswork out of matching calves to their parents. Farmers using this product enjoy both added precision in their breeding programme, whilst also being able to confidently select their highest genetic merit animals to join the milking herd.

GenomNZ

Cattle Genotyping	GenomNZ offers a series of gene tests which include: - BLAD - Beta casein (commonly known as A2 - Polled testing - Myostatin NT821 mutation - Coat Colour - Mannosidosis Angus These tests are used to identify specific traits or inherited conditions through DNA analysis. Each test focuses on a unique genetic marker ranging from immune system disorders (BLAD) to double-muscling mutations (Myostatin NT821).
CattleXT Plus assay	This genotyping product is more sophisticated and outputs full single-nucleotide polymorphism (SNP) genotype data, which is used to identify parentage, predict traits, detect genetic conditions, calculate genomic breeding values, and assess breed composition or purity.
Sheep Genomic 60kPlus, Package	This sheep genomic testing package involves parentage assignment, reporting of single gene tests, genotypes provided to third party for genomic selection (core focus being the New Zealand Genetic Evaluation (NZGE) system), client ownership of SNP genotypes, client ownership of DNA samples, high quality DNA storage, and database storage of genotypes.

XytoVet

Dairy Cattle Genotyping and Parentage Testing	For Dairy Cattle, XytoVet uses ThermoFisher Scientific's Affymetrix Axiom Bovine Genotyping array to allow trait selection of dairy cattle based on critical genetic characteristics including, but not limited to: - Horn/poll status - A1/A2 milk production Additionally, via their approved status with DataGene, XytoVet services confirm parentage of dairy cows for both dam and sire.
Beef Cattle Genotyping and Parentage Testing	For Beef Cattle, XytoVet uses the same genotyping array as for dairy cattle which allows for trait selection based on genetic characteristics such as: - Horn/poll status - Coat pigmentation - Breed specific genetic conditions
MERINOSELECT and LAMBPLAN	MERINOSELECT uses ASBVs to help farmers understand their flock's genetic potential across traits like wool quantity and quality, growth, disease resistance, and much more. The use of ASBVs facilitates easy comparison, whether from one flock to another or assessing the progress of the breeding program over time. LAMBPLAN's use of ASBVs means ram breeders can make direct comparisons within flocks of a particular breed and across different breeds within the terminal sire group, making performance benchmarking much easier. By making purchasing decisions in conjunction with LAMBPLAN ASBVs, commercial buyers can objectively compare rams to identify which ones best match their target markets and production system requirements.

CRV

myDNA	This DNA testing product allows, with one sample, to test cows for: - Parentage - Polled - A2 - BVD - Genomic breeding values.
Herd testing	CRV also provide a series of DNA tests which can be used to identify cow performance, detect mastitis, make informed breeding decisions, and catch health issues early. These tests include: - A2 Beta Casein Status - BVD and Johnes Disease Status - Somatic Cell Count (SCC) - Pregnancy Test - Milk Urea Nitrogen BV

InfogeneNZ

Cattle Test	InfogeneNZ's Cattle Test product offers both genotype testing and genetic screening tests. Firstly, InfogeneNZ offers Genotype-DNA profile (Mat/Pat/PV) testing, which can include additional P2 Markers for an extra cost, to produce a DNA profile of the animal. This profile includes maternity/paternity or full parentage analysis.

	Secondly, InfogeneNZ offers genetic screening tests to identify changes, mutations, or variants in a cow's DNA which increase the risk of certain genetic disorders. There are currently 17 screening tests available, ranging from A2-beta-casein genotyping to Myo-Myophosphorylase screening.
Sheep Test	For Sheep, InfogeneNZ offers Genotype-DNA profile (Mat/Pat/PV) testing to produce a DNA profile for the animal, inclusive of maternity/paternity or full parentage analysis.

Attachment D – Contact details of breed associations

BREED SOCIETY	WEBSITE	CONTACT DETAILS
Angus NZ	https://angusnz.com/	[ ]
Angus Australia	https://www.angusaustralia.com.au/	[ ]
NZ Wagyu Breeders Association	https://nzwba.co.nz/	[ ]
NZ Herefords	https://www.herefords.co.nz/	[ ]
Livestock Improvement Corporation	https://www.lic.co.nz/	[ ]
Charolais Breeders New Zealand	https://www.charolais.net.nz/	[ ]
Simmental New Zealand	https://www.simmental.co.nz/	[ ]
South Devon NZ	https://southdevon.co.nz/	[ ]
NZ Murray Grey Beef Cattle Society	https://www.murraygreys.co.nz/	[ ]
New Zealand Shorthorn Beef	https://www.shorthorn.co.nz/	[ ]

Attachment E – Supply volumes and indications of competitor activity

The below tables set out the supply volumes for 2025 of both Zoetis and Neogen on the conservative basis of genomic testing for various products and geographic splits. The tables also indicate which other competitors are present for those conservative splits.

Market - Genomic testing for livestock	Competitor	Australia & New Zealand	New Zealand
		Volume of animals tested	Volume of animals tested
livestock (including cattle, sheep and, if relevant, pigs)	Zoetis	[ ]	[ ]
	Neogen	[ ]	[ ]
	Weatherbys	✓	✓
	XytoVet	✓	×
	GenomNZ	✓	✓
	LIC	✓	✓[39]
	ABS	✓	×
	Total Livestock Genetics	✓	×
	Totogen	✓	✓
	Intertek	✓	×
	Semex	✓	✓
	ST Genetics	✓	×
	Holstein Australia	✓	×
	Jersey Australia	✓	×

[39] LIC Annual Report 2025 p6, notes that: *In the past 12 months we have seen Non-Return Rates (NRR) of our fresh sexed semen lift to within 1% of conventional semen, we have had close to 1.5 million animals genotyped through our GeneMark™ Genomics programme.*

Market - Genomic testing for Sheep	Competitor	Australia & New Zealand	New Zealand
		Volume of animals tested	Volume of animals tested
Sheep	Zoetis	[ ]	[ ]
	Neogen	[ ]	×
	Weatherbys	✓	×
	XytoVet	✓	×
	GenomNZ	✓	✓
	Totogen	✓	✓
	Intertek	✓	×

Market - Genomic testing for all cattle	Competitor	Australia & New Zealand	New Zealand
		Volume of animals tested	Volume of animals tested
All Cattle	Zoetis	[ ]	[ ]
	Neogen	[ ]	[ ]
	Weatherbys	✓	✓
	Total Livestock Genetics	✓	×
	ABS	✓	×
	LIC	✓	✓
	Semex	✓	✓
	XytoVet	✓	×
	ST Genetics	✓	×
	Holstein Australia	✓	×
	Jersey Australia	✓	×

Market – Genomic testing for dairy cattle	Competitor	Australia & New Zealand	New Zealand
		Volume of animals tested	Volume of animals tested
Dairy cattle	Zoetis	[ ]	[ ]
	Neogen	[ ]	×
	Weatherbys	✓	×
	Total Livestock Genetics	✓	×
	ABS	✓	×
	LIC	✓	✓
	Semex	✓	✓
	XytoVet	✓	×
	ST Genetics	✓	×
	Holstein Australia	✓	×
	Jersey Australia	✓	×

Market - Genomic testing for beef cattle	Competitor	Australia & New Zealand	New Zealand
		Volume of animals tested	Volume of animals tested
Beef cattle	Zoetis	[ ]	[ ]
	Neogen	[ ]	[ ]
	Weatherbys	✓	✓

Attachment F - Details of Zoetis' top 10 customers in New Zealand FY25

CUSTOMER	CONTACT DETAILS	SALES REVENUE (NZD)
[ ]	[ ]	[ ]
[ ]	[ ]	[ ]
[ ]	[ ]	[ ]
[ ]	[ ]	[ ]
[ ]	[ ]	[ ]
[ ]	[ ]	[ ]
[ ]	[ ]	[ ]
[ ]	[ ]	[ ]
[ ]	[ ]	[ ]
[ ]	[ ]	[ ]

Attachment G - Neogen's top 10 customers in New Zealand FY25

Customer	Details	Sales Revenue AUD	NZD conversion
[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]

Attachment J – Zoetis Documents

[ ]

[ ]