



Introduction

This guide outlines the regulations associated with the supply of wild deer carcasses and venison to others. An interpretation of the regulations is given in the document “The Wild Game Guide”¹, developed by the Food Standards Agency in partnership with the Wild Game Group which represents the wild game meat industry. This should be considered as essential reading on the subject. There is a separate FSA “Guide to the Food Hygiene and Other Regulations for the UK Meat Industry” for those who buy in wild game shot by others and produce meat from it². Please note that many of the terms used in the text (highlighted in **bold**) are explained in the “Definitions” section at the end of this guide. This guide is linked to the Carcass Preparation series of guides and the Larder Design and Legislation guides.

Legislation

The key aim of current food legislation is to ensure that all food for human consumption is safe to eat. The Food Safety Act 1990 (as amended) provides the framework for all food legislation in Great Britain – similar legislation applies in Northern Ireland. The General Food Law Regulation (EC) 178/2002 is EC legislation on general food safety which sets general food law requirements, including establishing traceability of food, feed and food producing animals. The General Food Regulations 2004 (as amended) provides for the enforcement of certain provisions of Regulation (EC) 178/2002 (including imposing penalties) and amends the Food Safety Act 1990 to bring it in line with Regulation (EC) 178/2002.

Since 1 January 2006, all game (which includes wild deer) supplied for human consumption must meet the requirements of Regulation (EC) No 852/2004, which sets general hygiene rules applying to all food businesses. In addition Regulation (EC) No 853/2004 which sets additional hygiene rules applying to certain businesses producing food of animal origin. Section

IV of Annex III of that regulation covers wild game supplied to and processed in approved game handling establishments (AGHEs).

Food and meat legislation applies in different ways in different scenarios. The following list describes typical situations and gives a summary of the relevant legislation and recommended best practice.

Private Domestic consumption

The regulations specifically relevant to **wild game meat** do not apply to private domestic consumption. Although the regulations are not applicable, the hygiene standards implied are relevant and it is recommended that they are still followed.

Supplying in-skin carcasses to the final consumer

A primary producer can supply in-skin carcasses, **in small quantities** directly to the final consumer or to local retailers that supply direct to the **final consumer**, under the “**primary producer exemption**”¹.

You are not a **food business** under the regulations but you are nonetheless responsible for supplying safe food under Regulation 178/2002. Rules on food **traceability** may be interpreted by your Local Authority as a need for your **premises** and/or vehicles to be **registered**. Carcass records should be kept to ensure traceability and it is recommended that carcasses are initially inspected by a **trained person** before being supplied.

Temperature controls should be maintained and premises should comply with the requirements of Regulation (EC) No 852/2004. Advice on larder construction standards is in the Wild Game Guide¹ and the best practice guide “Larder Design”.

Note: A business which buys up carcasses from shoots and then sells them on to retailers cannot use the primary producer exemption, even if the quantities are small and the retailers local.

Supplying in-skin carcasses to an Approved Game Handling Establishment (AGHE)

If you supply in-skin carcasses to an **AGHE**, you need to be registered with your Local Authority as a **food business** (this includes your deer larder if you use it to store carcasses before they go to an AGHE and any vehicles you use when you are supplying an AGHE). You must comply with general hygiene requirements for primary production and associated operations.

Any carcasses taken to or picked up by an AGHE must normally have undergone an initial examination by a ‘**trained person**’ and have a declaration attached, regardless of who shot the deer. The declaration must include such information as the species, sex, date, time and location shot, together with an identification number and a statement (signed by the trained person) either that the animal was free from any abnormal behaviour, carcass characteristics or environmental contamination, or describing any

such features that were found. See ¹ for a specimen tag. Pre-printed tags are available from the National Gamekeepers Organisation or from some AGHEs. An AGHE will not normally accept a carcass without a trained person’s declaration but may do so if it is accompanied by its head (not antlers) and heart, lungs and liver. It is advisable to check with the AGHE before collection/delivery.

A carcass should reach the AGHE as soon as possible.

Temperature controls must be maintained and carcass records must be kept to ensure **traceability**. AGHEs may have their own specific requirements with regard to how they would prefer carcasses to be supplied.

Premises must comply with the requirements of Regulation (EC) No 852/2004. Advice on larder construction standards is in the Wild Game Guide¹ and the best practice guide “Larder Design”.

Supplying venison (game meat) direct, in small quantities to final consumers or local retailers that supply direct to the final consumer, or for sale in your own retail outlet

Such supply is possible under the “**hunter exemption**”¹. This recognises the close relationship between the producer and the consumer. It is separate from the primary producer exemption and allows you to supply wild game meat. You can benefit from this exemption if you shoot alone or if you take an active part in a hunting party.

Both are exempt from having to develop their premises into an AGHE. All game must have been shot by hunting party members (it cannot be sourced from others) and can be prepared into meat by any one (or more) of the party. As with the primary producer exemption, only **small quantities** may be supplied, either direct to the **final consumer** or to local retailers that supply direct to final consumers (but not to retailers for supply to other retailers).

It is the premises where you prepare meat that have to be local to the retailers you plan to supply and not the place(s) where you shoot. So you can shoot on other people’s estates and then bring the game back to your own premises. The “retail exemption”¹ allows for supply of the same meat by the hunter or

hunting party, through their own retail outlet. It is recommended that carcasses are initially inspected by a **trained person** before being further processed. You must be **registered** with your Local Authority as a **food business** (this includes your deer larder if you use it to store carcasses and any vehicles you use when you are supplying venison). You must comply with general hygiene requirements and have in place a food safety management procedure based on **HACCP** principles.

Temperature controls and the cold chain must be maintained.

Carcass meat and undressed carcasses must be effectively separated to avoid contamination, eg. by using separate chillers or separate chiller areas in larger chillers), separate processing areas, or by in-skin carcass preparation and meat processing not being carried out at the same time in the same area. Records must be kept to ensure **traceability**.

Premises must comply with the requirements of Regulation (EC) No 852/2004. Advice on larder construction standards is in the Wild Game Guide¹ and the best practice guide “Larder Design”.

Note: Businesses which buy in or use carcasses from elsewhere cannot make use of this exemption and must become an **AGHE**.

Other routes of supply

These are dealt with in the FSA Wild Game guide¹ which also has a useful question and answer annexe.

Definitions

Approved Game Handling Establishment (AGHE) - An establishment, approved by the Food Standards Agency, for processing wild game for general sale both within the UK and for exports.

Final consumer - Ultimate consumer of a foodstuff who will not use the venison as part of any food business operation or activity.

Food Business Operator(FBO), Registration - To protect public health, competent authorities need to be able to identify those who are operating a food business, the address where the business is located and the activities that are carried out, this is known as “registration”. Existing forms of registration, e.g. agricultural holding registers, may meet the requirement.

Registration is required for:

- ◆ shooting/stalking estates (with or without a game larder) supplying all their in-fur/in-feather game for private domestic consumption or that come under the exemption for supply of small quantities of in-fur/in-feather game direct to the final consumer or to local retailers.
- ◆ shooting/stalking estates where at least some of the game shot there goes to an AGHE (even if this is carried by a transport operator);
- ◆ individual hunters or hunting parties operating an in-fur/in-feather game larder where at least some of the game goes to an AGHE;
- ◆ collection centres for in-fur/in-feather game where at least some of the game goes to an AGHE;
- ◆ businesses transporting in-fur/in-feather game from where it is shot to one or more AGHEs;
- ◆ those taking advantage of the hunter exemption to produce prepared game meat (i.e. wild game that has been skinned or plucked) from the game you either shot as an individual hunter or was shot by the hunting party of which you were an active member).
- ◆ any business buying game for onward sale (with or without processing it into wild game meat), unless they are required to be approved as an AGHE instead.

Game meat - Once the skin has been removed from a “primary product” carcass it becomes “game meat”.

Hazard analysis Critical Control Points (HACCP)¹ - The HACCP system is internationally accepted as the system of choice for food safety management. It is a preventative approach to food safety based identifying hazards and critical control points, and establishing, verifying, reviewing and recording food safety procedures and measures.

Hunting/Hunter – In this context hunting is a legal method of killing wild animals. The “hunter exemption” described in this guide applies to individual hunters and/or active members of hunting parties whether acting individually or as a group.

Larder – Premises used for keeping killed wild game, where primary products are stored prior to onward transport or processing.

Local Supply – “Local” refers to the supplying establishment’s county, any neighbouring counties or a radius of 30 mile/50km, whichever is greater. Also includes mail order and internet sales to the final consumer wherever they may be sent.

Premises – Applies to any buildings, whether permanent or temporary, and mobile sales vehicles.

Primary Producer – The EU food hygiene regulations regard shooting wild deer, “hunting”, for human consumption as a primary production activity. An individual who shoots deer alone, a hunting party or an estate which organises shooting are all primary producers.

Primary product – Primary products in the wild game sector are the products of hunting – i.e. in-skin and in-feather game that has undergone no more than any necessary preparation that is part of normal hunting practice. For deer the maximum level of preparation is an in-skin carcass, empty of internal organs, with the head and feet removed.

Private domestic consumption - This would typically apply to deer that you have shot yourself or venison you have bought or have been given, whether still in-skin or as oven-ready carcasses or game meat, which you will eat yourself or share with family or friends. The key point is that it is not for supply to anyone else as part of a food business. To explain where private domestic consumption ends and running a food business starts, the EU food hygiene regulations speak of “undertakings, the concept of which implies a certain continuity of activities and a certain degree of organisation.”

Small Quantities - Has no absolute figure set, the quantity is intended to be self limiting.

Temperature controls - FBOs are responsible for the safety of the food they supply. Freshly shot carcasses should cool to no more than 7°C within “a reasonable time after killing”. This period is not defined but, for example, overnight storage is almost certain to require active chilling unless the temperature of the storage facility can be relied on to be below 7°C because the ambient (outside) temperature is low enough. There is a general concept of maintaining the “cold chain” whereby a carcass cools progressively to below 7°C and neither it or meat from it is subsequently allowed to rise above that temperature. In-skin carcasses must not be frozen.

If transportation of carcasses or meat is to be prolonged, refrigerated transport will be required. Even where FBO registration is not required it is strongly recommended that these temperature controls are adhered to.

Traceability – Regulation 178/2002 applies to all food business operators including primary producers, even those that benefit from exemptions, and covers the whole food and feed chain. The Regulation uses the principle of “one step back and one step forward” so that food can be traced along the supply chain. FBOs are required to have in place systems and procedures that allow for traceability information to be made available to competent authorities on demand. Copies of invoices and larder records may be sufficient. Key information is the name and address of the supplier/customer, the date and the nature of the products. Final consumers do not have to be individually identified. However, it is useful to record how much game is supplied direct to final consumers.

Trained Person – Individual who can produce evidence of training to cover the requirements of Regulation (EC) No 852/2004, and Regulation (EC) No 853/2004 as they apply to wild game, see below. An approved qualification such as the updated Deer Stalking Certificate Level 1⁴ or the Certificate in Wild Game Meat Hygiene (large game)³, is the most robust way in which stalkers can show that they have the appropriate knowledge.

Wild Game – for the purposes of this guide, wild deer. Note: wild game must only have been killed by hunting. Deer killed by any other means e.g. road traffic accidents, must not be supplied for human consumption.

Further Info

¹ FSA Wild Game Guide - <http://www.food.gov.uk/multimedia/pdfs/wildgameguide1oct08.pdf>

² FSA Meat Hygiene Guide - <http://www.food.gov.uk/foodindustry/meat/guidehygienemeat>

³ LANTRA awards - <http://www.lantra-awards.co.uk/training/wildgamemeathygiene.aspx>

⁴ Deer Stalking Certificate - <http://www.dmq.org.uk/>