**Wild Game Guide Consultation- Publication of Responses**

FSS Received 17 formal responses to the consultation held on the review of the wild game guide. This consultation opened on Citizen Space on the 1st of October 2020 and closed on the 24th of December 2020.

The purpose of the public consultation was to receive feedback and input from stakeholders, including hunters, processors and suppliers of wild game, industry representative bodies, and local authorities, on the draft revised wild game guide produced to replace the existing joint FSS/FSA guide. Respondents were asked a series of questions regarding the clarity and user friendliness of the draft, as well on its structure and layout. Respondents were also given an opportunity to provide any other comments they may have which were not covered by the prior questions.

The responses received to this consultation were used to inform the development of a further draft of the guide. Each response was carefully analysed and all comments taken into account when amending the guide further. Of the 17 responses received on citizen space, 11 gave permission for their responses to be shared and it is these 11 responses which are published in this document. Responses are given, where relevant, to the points raised in these responses. However, FSS would like to assure those respondents who did not wish to have their responses published that their feedback was considered in the same fashion as those published below.

The publication of responses in the table below only covers the substantive questions included in the consultation. For example, questions covering the content and structure of the guide are included, whilst those only covering respondent details (some of which we are unable to publish) and feedback on the consultation exercise itself, are excluded.

**Respondents who agreed to have their response published:**

Peter Elliot;

David J Cameron;

3 respondents did not wish to have their name shared;

John Campbell-Smith;

J E Muddiman;

Association of Deer Management Groups;

Richard Playfair, Scottish Venison Association;

John Bruce, British Deer Society;

Scottish Association of Country Sports

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| **Question** | **Respondent** | **Comment** | **FSS Response**  |
| **Question 5** (Do you think the regulatory requirements and exemptions for primary producers set out in section 1 are clear and understandable?) | Peter Elliot  | “Understandable but not clear” | FSS have continued to refine the guide, taking account of respondents’ feedback, to aid its clarity and readability. |
| David J Cameron | “Clear and understandable but not necessarily "fair".It would seem appropriate to re-visit the definition of “small quantities” on the basis of the obvious difference to businesses who are approved by Local Authorities rather then FSS. The most obvious difference being the lack of existence of independent “meat inspection” in premises Approved by the local authority. FSS Inspection is a financial add-on which the local authority approved premises will not have to service. If we then take onboard the potential effect of Covid-19 where retailers have had to adapt and be innovative to survive. One thing many have embraced is online selling with home delivery. This could be “local” or more wide distribution using couriers. Can these considerations be included when determining the final format of the Guidance?” | FSS appreciate there are concerns with the definitions used to govern the exemptions. However, the consultation was undertaken to receive feedback on how useful the guide is at explaining the requirements as they currently exist and not to change these requirements or definitions. Any proposed changes to definitions or legislation will be handled separately. |
| Respondent did not wish to have their name published. | “No. It is not clear that a primary producer selling small quantities of venison will require to registered as a venison dealer as well as a food business” | Information on which circumstances require primary producers to hold a venison dealer’s license has been added to the guide. |
| Respondent did not wish to have their name published. | “Yes” | N/A |
| Respondent did not wish to have their name published. | “Not really because it does not specify or summarize the relevant detail of the EC regs as they apply to wild game. As you say later the regs that they do not apply to direct supply of small quantities to local retailer or final consumer. This should be made more explicit earlier in Section 1 or the decision tree and placed at the start of the document for clarity”.  | FSS have refined the primary producers/exemptions section further to aid clarity. Links will be added to ensure readers can access the regulations which apply to them. The inclusion of the specifics of the regulation will make the guide too cumbersome and it is noted in the ‘Legal Status’ section that the guide should be read alongside the regulations. Specific advice can be sought from local authorities in the first instance, as well as FSS. |
| John Campbell-Smith | “No, too many loop holes. Any primary producer supplying deer in fur for financial gain, should be registered as a food business - end of story.Food businesses should be issued with a Food Business Id by the local authority confirming that they are a food business. All I currently have is an e-mail saying I am registered food business”. | Whilst FSS appreciate any thoughts on the regulatory requirements, the guide exists to explain legal requirements as they currently exist and the consultation was undertaken to receive feedback on how useful it is in this regard. Any proposed changes to legislation will be handled separately. |
| J E Muddiman  | “Yes at the moment they are” | N/A |
| Association of Deer Management Groups | “It would be useful to have a definition of the ‘final consumer’ early in the guide to clarify this for readers. We don’t believe that section 1.3 is clear at all. ‘Small quantities’ is not adequately defined and there is clearly a grey area here. This section also refers to selling ‘beyond the final consumer’ what does this mean? Compared to the rest of the document which is very prescriptive this section is unclear”. | Final consumer definition has been introduced earlier in the document. FSS appreciate there are concerns with the definitions used to govern the exemptions. However, the consultation was undertaken to receive feedback on how useful the guide is at explaining the requirements as they currently exist and not to change these requirements or definitions. Further work has been undertaken to improve clarity and readability. |
| Richard Playfair, Scottish Venison Association | “We think they are helpful but there is still room to make this clearer for the primary producer. See comments following”. | N/A |
| John Bruce, British Deer Society | “We recommend that the passage number 3 in the appendix is used as a preface to the document, it explains concisely the complexities of the process.The exemptions applicable for the private consumer could be made more clear, earlier”. | As suggested, the referenced passage has been brought to the beginning of the primary producer section. Further work has been undertaken to improve clarity and readability. |
| Scottish Association of Country Sports | \*Feedback sent separately in word document\* | All feedback was processed and accounted for with relevant changes made when appropriate.  |
| **Question 6** (Do you think the decision tree in section 1.1 is useful in helping primary producers identify those requirements which they must adhere to and those from which they are exempt?) | Peter Elliot  | “Useful” | Whilst we appreciate some respondents found the decision tree useful, it was not viewed as helpful by all. Consequently, it has been replaced by a more detailed table/matrix. |
| David J Cameron | “Taking account of my answer to Question 5 above, on the basis of the suggestions in the recommendations for change, the decion tree is useful to help primary producers identify the requirements which they must adhere to and those which they are exempt”. | Whilst we appreciate some respondents found the decision tree useful, it was not viewed as helpful by all. Consequently, it has been replaced by a more detailed table/matrix. |
| Respondent did not wish to have their name published. | “Yes, subject to above” | Whilst we appreciate some respondents found the decision tree useful, it was not viewed as helpful by all. Consequently, it has been replaced by a more detailed table/matrix. |
| Respondent did not wish to have their name published. | “Yes” | Whilst we appreciate some respondents found the decision tree useful, it was not viewed as helpful by all. Consequently, it has been replaced by a more detailed table/matrix. |
| Respondent did not wish to have their name published. | “No for the reasons described above ,it does not mention supply of small quantities which close reading of the ec documents elucidatesit merely refers to exceptions to the regs.in order to complete this questionnaire you need to have a copy of the draft fss wild game guide and the ec regs to hand which is not very convenient you should supply and signpost more relevant info even if it is an appendix.you could also emphasize the need to register as a fhb with la as a requirement for supplying to final consumer rather than just alluding to the regs.” | Links will be added to ensure readers can access the regulations which apply to them. The inclusion of the specifics of the regulations will make the guide too cumbersome and it is noted in the ‘Legal Status’ section that the guide should be read alongside the regulations. Further specific advice can be sought from local authorities in the first instance, as well as FSS.The decision tree has now been replaced by a more detailed table/matrix. |
|  | John Campbell-Smith | “The flow chart could be much clearer. See point 5.” | The decision tree has now been replaced by a more detailed table/matrix. |
|  | J E Muddiman  | “Yes” | Whilst we appreciate some respondents found the decision tree useful, it was not viewed as helpful by all. Consequently, it has been replaced by a more detailed table/matrix. |
|  | Association of Deer Management Groups | “We don’t believe that the decision tree is clear. As the guide later states the majority of game goes to AGHEs. It would be useful to have ‘do you sell the wild game you hunt to an AGHE?’ as the primary question in the tree. This would ensure that the majority of people get the quickest response to the answers they are looking for, rather than navigating several stages of the tree to find an answer.” | The decision tree has now been replaced by a more detailed table/matrix. |
|  | Richard Playfair, Scottish Venison Association | “We are not sure that a decision tree is the best mechanism to explain routes from primary producer to processor or direct to market.” | The decision tree has now been replaced by a more detailed table/matrix. |
|  | John Bruce, British Deer Society | “A matrix may be more straightforward, but, if the tree is re-arranged and details verified for the final positive cell, 853/2004, it offers another method to determine requirements.In Section 1.3, page 10, para 2, the word "beyond" is used twice, on the second occasion it is superfluous, a typo we suspect”. | The decision tree has now been replaced by a more detailed table/matrix. |
|  | Scottish Association of Country Sports | “We suggest a matrix is used and a version exists that may be useful.The current matrix version focuses on deer, but can be amended to have a large game version and a small game version.” | The decision tree has now been replaced by a more detailed table/matrix. |
| **Question 7** (Are the requirements set out in section 2 for supplying game to AGHEs, including those relating to the trained hunter and large and small wild game, clear and understandable?) | Peter Elliot  | “Understandable” | N/A |
| David J Cameron | “Hunters who supply AGHEs requiring to be registered food businesses with their local authority. My understanding of this legislation is that it is about registration of food premises. Many, if not all, individual Hunters are unlikely to have premises to Register. For that reason I feel more information is required. If I have understood the intention of this part of the guidance correctly I feel there may be an unintended consequence for the large wild game market – If these Hunters do not Register as Food Businesses they will be unable to supply AGHEs and these businesses may, by default , not be in a position to supply their customers. The AGHEs operations are under the control of FSS, with meat inspection, OV approval to pass carcasses to be classified as “food” entering the human food chain. The Hunters may then choose to sell their carcasses to premises controlled by the local authority, on the basis they do not need to register as a food business. These businesses will have access to more volume of product and my point made above takes on a new dimension” | FSS appreciate that some respondents may have concerns regarding the outcomes and consequences of the legal requirements. However, the consultation was undertaken to receive feedback on how useful the guide is at explaining the requirements as they currently exist and not to change these requirements or definitions. Any proposed changes to definitions or legislation will be handled separately. |
| Respondent did not wish to have their name published. | “Again no clarity on VDL requirements” | Information on which circumstances require primary producers to hold a venison dealer’s license has been added to the guide. |
| Respondent did not wish to have their name published. | “Yes” | N/A |
| Respondent did not wish to have their name published. | “Yes but there seem to be a number of levels of "trained person" perhaps you need to be explicit as to the base acceptable level.Also there may be confusion between the terms aghe and venison dealer”. | FSS feel the different options for training to become a trained hunter in Scotland are set out clearly in the guide.Information on venison dealers licenses has been added and should differentiate between venison dealers and AGHEs.  |
| John Campbell-Smith | “Yes” | N/A |
| J E Muddiman  | “Yes” | N/A |
| Association of Deer Management Groups | “There is no clear definition of ‘primary producer’, ‘hunter’, or ‘trained person’. It would be helpful to have this within the glossary. The difference between, ‘trained person’ and ‘hunter’ should also be highlighted at an early stage of this section‘In most cases stomach, intestines, and other body parts including the head may be disposed of safely at the kill site’. This conflicts with the advice in Best Practice Guidance to which it looks like there is a link provided but we can’t access. Best Practice Guidance stipulates that head and legs and other larder waste must be buried. This should be clarified” | These definitions have been added to the glossary and a clear section on the role of the trained hunter is in place.The food hygiene regulations do not stipulate that bodies or parts of wild game left in the field need to be buried. Good practice as to disposal of waste during hunting should be set out in the industry best practice guidance, whilst any animal by-products should be disposed of from ma larder or business according to the animal by-products regulations. |
| Richard Playfair, Scottish Venison Association | “As above” | N/A |
| John Bruce, British Deer Society | “If a single correct title was nominated for the Trained Person there would be no need for section 2.2, it is all clearly stated elsewhere.In 2.3 the guidance on gralloching needs to be tightened in line with the STEC report, gralloching should ideally be undertaken within 30 minutes of death, and emphasis should be placed on the stripping of the faeces from the rectum, because this reduces the greatest of the health risks most quickly.While mention is made of the green stomach contents contaminating the carcass this should not be an issue in AGHE as carcasses presented with this contamination (to AGHE), should be rejected / condemned, so should not be enter into the food supply chain at all, so preventing green offal content contamination is a financial loss as they should not enter the mass market, (and there will likely be a financial penalty for disposal costs), hunters can chose to consume such carcasses but they need to be made aware of the contamination risks.” | The trained person section and content has been refined to aid clarity. However, it is deemed that the section suggested for removal be retained as, although crossing over with other sections, it sets out the trained person’s role and responsibilities clearly.Whilst it is deemed that guidance on the practicalities of hunting, such as gralloching, is not the purpose of this guide, it is agreed further guidance on food safety and hunting could be included. A best practice box has therefore been included in which it is encouraged that gralloching should happen as soon as possible (taking care for green offal content contamination), that the cold chain should be maintained and that consideration should be given to transportation methods and storage and how this impacts upon the cold chain. |
| Scottish Association of Country Sports | \*Feedback sent separately in word document\* | All feedback was processed and accounted for with relevant changes made when appropriate. |
| **Question 8** (Are the requirements for larders, transporters of game and AGHEs clear and understandable?) | Peter Elliot  | “Fairly Clear” | N/A |
| David J Cameron | “Clear and understandable whilst considered potentially unfair.Training of Hunters (Trained Person) appears to have potentially serious consequences for Hunters who have been operating under Grandfather Rights. Many of them would either have been formally trained many years ago or may never had formal training but have been deemed competent and the carcasses delivered to AGHEs have proven to be of a high standard. Others, who trained prior to 2005 will, if the Guidance is adopted unchanged, not be permitted to supply AGHEs without further training.” | The situation regarding the requirement for hunters to be trained to supply carcasses to AGHEs has not changed with the development of this guide and continues as it was before. |
| Respondent did not wish to have their name published. | “Yes” | N/A |
| Respondent did not wish to have their name published. | “Yes” | N/A |
| Respondent did not wish to have their name published. | “Yes” | N/A |
| John Campbell-Smith | “Not with respect to AGHEs.How can I tell that a business that I am dealing with is a correctly registered AGHE?” | Any FSS approved establishment will have an approval number and a letter which highlights their status as an approved establishment. If you are unsure if a business is an AGHE, ask them for proof of their approval or contact the FSS approvals team using the approvals@fss.scot email address. |
| J E Muddiman  | “Yes” | N/A |
| Association of Deer Management Groups | “We believe that there should be a link provided to Best Practice Guidance in section 1 of the guide.” | Links to the industry best practice guides can now be found in appropriate locations throughout the guide. |
| Richard Playfair, Scottish Venison Association | “As above” | N/A |
| John Bruce, British Deer Society | “The section is silent about transportation from place of death to the larder, but this topic is carefully covered in training and in the Wild Deer Best Practice Guides” | Links to the industry best practice guides can now be found in appropriate locations throughout the guide.Moreover, the Transportation section has been elaborated on to point out to readers that different legal requirements apply for carcasses going from place of death to larder/AGHE, as apply to transport in retail circumstances. |
| Scottish Association of Country Sports | \*Feedback sent separately in word document\* | All feedback was processed and accounted for with relevant changes made when appropriate. |
| **Question 9** (Do you find the other sections on traceability, animal by-products and wild game and food safety clear and helpful? | Peter Elliot  | “Helpful” | N/A |
| David J Cameron | “Yes, they are fine” | N/A |
| Respondent did not wish to have their name published. | No response provided. | N/A |
| Respondent did not wish to have their name published. | “Yes” | N/A |
| Respondent did not wish to have their name published. | “Yes” | N/A |
| John Campbell-Smith | “Too wordy, but fairly clear” | Efforts have been made to ensure that all of the relevant information in these sections is conveyed in as concise a manner as possible. Some sub-sections have been removed, for example. |
| J E Muddiman  | “Yes” | N/A |
| Association of Deer Management Groups | “4 - A link to Best Practice Guidance would be helpful here.6 - There is an opportunity to highlight the Scottish Quality Wild Venison (SQWV) quality assurance scheme. Membership of SQWV provides customers with assurance that Scottish wild venison has been produced to an established industry standard and requires trained hunter status as well as strict guidelines that comply with Best Practice Guidance.Membership of this scheme indicates compliance with a comprehensive set of standards as to how carcasses should be handled. The scheme also provides guidance on larder design and fitting out. All larders are assessed as a part of the SQWV application process.7 - It is very positive to see that information is provided on how to obtain trained hunter status.9 – It would be useful to flag up the SQWV assurance scheme here.9.1 – We are pleased that the guide highlights the recent STEC research findings into wild venison. We would again highlight the use of Best Practice Guidance to reduce the chances of contamination.9.3 – We would like to point out that there is currently a move away from lead ammunition use in the stalking industry.” | Links to the industry best practice guides can now be found in appropriate locations throughout the guide.A section has been added in which other useful information and links can be included. A link to the SQWV scheme is included here.FSS are aware of the efforts to move away from lead ammunition in the stalking industry but are not in a position to comment upon this in the guide as this is an area for Scottish Government to lead on. The research on the dangers of lead shot will be retained in the guidance. |
| Richard Playfair, Scottish Venison Association | “Yes, but we have a number of additional comments.” | N/A |
| John Bruce, British Deer Society | “Yes, informative and useful.A link to a suitable HACCAP scheme and guidance would be useful.” | No link to a HACCP scheme yet included but further consideration will be given to this. Consideration needs to be given to not prioritising and giving a platform to one provider rather than another. |
| Scottish Association of Country Sports | \*Feedback sent separately in word document\* | All feedback was processed and accounted for with relevant changes made when appropriate. |
| **Question 10** (Did you find the guide reader friendly and the guidance within it accessible and understandable?) | Peter Elliot  | “Accessible”. | N/A |
| David J Cameron | “Yes, my issues highlighted above are the only ones which I have criticism with the Guidance being consulted upon in this exercise.” | N/A |
| Respondent did not wish to have their name published. | “Yes”. | N/A |
| Respondent did not wish to have their name published. | “Yes”. | N/A |
| Respondent did not wish to have their name published. | “Not really for the reasons outlined above, too much reference to ec docs which are not adequately summarized or signposted”. | Links have been added at the start of the document where the regulations are listed so that all readers can access them. It is thought that the inclusion of the specifics of the regulations will make the guide too cumbersome and it is noted in the ‘Legal Status’ section that the guide should be read alongside the regulations. Further specific advice can be sought from local authorities in the first instance, as well as FSS. |
| John Campbell-Smith | “Too wordy. Too many options.” | Efforts have been made since the closing of the consultation to make the guide as concise as possible whilst retaining all of the relevant information.The options for supply of wild game are set out in law and the purpose of this guide is purely to ensure hunters, processors etc. are aware of the legal obligations associated with these options. |
| J E Muddiman  | “Yes no problems if you sat and read it through properly” | N/A |
| Association of Deer Management Groups | “On the whole the document was clear, the decision tree could be made clearer.” | The decision tree has been replaced by a more detailed table/matrix. |
| Richard Playfair, Scottish Venison Association  | “Yes. We like the concept of a WGG specifically for Scotland. It is important that it does what it sets out to do.” | N/A |
| John Bruce, British Deer Society | “Being consistent with terms throughout the document would assist; we detected potential confusion when considering the suite of terms such as "Primary Producer", "Hunter", "Trained Hunter" and "Trained Person", also "AGHE", "Approved Game Handling Establishment", and the original EC term "Game Handling Establishment".We recommend that one term is selected and used throughout.” | Work has been undertaken on the document to ensure that terminology is applied consistently throughout. |
| Scottish Association of Country Sports  | “It's better, but still has some way to go to be sector and primary producer proof.Really good start. Just some tidying up and suggested amendments.” | All feedback was processed and accounted for with relevant changes made when appropriate. Efforts have been made to enhance the readability and clarity of the guide even further. |
| **Question 11** (Do you think the text boxes highlighting the regulatory requirements and exemptions ‘at a glance’ are a useful addition?) | Peter Elliot  | “Helpful addition” | N/A |
| David J Cameron | “Yes, these are a useful addition” | N/A |
| Respondent did not wish to have their name published. | “Yes” | N/A |
| Respondent did not wish to have their name published. | “Yes” | N/A |
| Respondent did not wish to have their name published. | “Yes but the should precede the regulation rather than be an appendix to it.” | FSS would encourage any utilising the guide to read the section/s which apply to them in full, before referring to the ‘at a glance’ boxes as a summary and for referring back to. This is why it was decided to put the boxes at the end of each section they summarise. |
| John Campbell-Smith  | “Yes as far as they go, but clearly there are other non-food requirements that are relevant such as Venison Dealers Licences.” | The wild game guide only deals with the food hygiene elements of wild game hunting, processing and supply. Nonetheless, information on when VDL’s will be required is now included in the guide. |
| J E Muddiman  | “Yes” | N/A |
| Association of Deer Management Groups | “The ‘at a glance information’ and regulatory requirements are helpful. It would be useful to provide links to the relevant regulatory requirements.” | Links have been included to all of the relevant legislation at the start of the document where each of these regulations is listed. |
| Richard Playfair, Scottish Venison Association  | “Yes. These are a helpful addition.” | N/A |
| John Bruce, British Deer Society  | “Yes they are, a good idea.” | N/A |
| Scottish Association of Country Sports  | “Yes”  | N/A |
| **Question 12** (Please provide below any comments, concerns or questions you have about the guide which were not covered by previous questions) | Peter Elliot  | “The wild game regulations need to be properly regulated.” | Any information on illegal activity or poorly regulated activity should be passed on to the relevant local authority and the Scottish Food Crime Unit if applicable. |
| David J Cameron | “The requirement of Hunters to register as Food Businesses to supply AGHEs, especially as this legislation is for Food Premises and not specifically the business. The ambiguity within the training requirements which could be argued to be a barrier to already trained Hunters pre 2005. In time these will disappear.Related to the point above, the removal of "grandfather rights" will have a detrimental effect on supply to AGHEs and as an unintended consequence of the less regulated (scrutinised) business classified as suppliers of "small quantities".” | Retained Regulation 852/2004 also applies to primary production (Annex I). It applies to all food business activities unless they fall within one of the explicit exemptions. Consequently, supply wild game to AGHEs requires registration as a food business. This may be the individual hunter or, often, the estate they are shooting for.Please see previous comment regarding trained hunters. |
| Respondent did not wish to have their name published. | No response provided. | N/A |
| Respondent did not wish to have their name published. 5U | No response provided. | N/A |
| Respondent did not wish to have their name published. VP | No response provided. | N/A |
| John Campbell-Smith  | “It's unclear how you are going to get to the guide out to the practioners, ie stalkers and butchers. I bet that at least 9 out of 10 butchers that handle venison haven't read the guide and a similar proportion of stalkers won't have read the guide.” | FSS appreciate that ensuring the guide reaches those it will be useful for is a challenge. We will work with all relevant industry bodies to ensure that, once complete, the guide is distributed throughout the wild game supply chain. |
| J E Muddiman  | “As a former food standards inspector i understood it fully” | N/A |
| Association of Deer Management Groups | “More links to the relevant Best Practice Guidance pages would be helpful. It would be useful to double check the information on the sheet with the available Best Practice Guidance so that there is no conflicting advice as above in 2.3.It would be useful if the guidance referred to feral goats and their supply to the food chain.” | Efforts have been top ensure links to the best practice guidance are included at all relevant points.Feral goats fall within the definition of ‘large wild game’ and should therefore be handled and supplied in line with the ‘supply of large wild game section’ if going to an AGHE. |
| Richard Playfair, Scottish Venison Association  | “OverviewGenerally, we welcome the new look of the WGG and its layout which we think works better in terms of presentation and information than the former joint version with FSA.We think that the way that the relevant legislation is flagged up throughout the document is concise. However, there is a combination of main text and footnotes referencing legislation when one method would be preferable. We assume that all references will be hyperlinked.The ‘At a Glance’/Summary boxes work well in highlighting the main points of the relevant sections/paragraphs.The small sidebars in blue italics are helpful, as above, and a good addition.A number of stakeholders representing venison primary producers have met to discuss the consultation and SVA has been a part of those discussions. The comments below are in relation to the Draft Revised WGG as presented for consultation and highlight a number of minor details. SVA would welcome the opportunity to be engaged in the process of reviewing the next WGG draft before it is finalised in order to have as effective and comprehensive a document as possible.Introduction and Legislation Overview:Is there an intention to number this section in the final document? Other than that we have no comment on this section.Section 1 (page 5)Primary producers – bullet point 2We think it would be helpful to define ‘final consumers’ at this early point in the WGG (as in shops, restaurant, direct to consumer).Safe and hygienic huntingThere is no mention of the gifting of venison. This supply is important particularly in the light of ongoing discussion around the free supply of venison to the charity sector that would require to be processed.Are ‘final consumers’ in this dialogue box the same as those as ‘final consumers’ under bullet 2 above? In either event we think that the definition of ‘final consumers’ should be given at this stage.We think it is important that the requirement for a Venison Dealers Licence (VDL) is flagged up in this section, indicating when one is required, who should hold the licence, where it is obtained from etc.Page 6 – 1. 1 Decision TreeUnlike other aspects of the new proposed guide we found this difficult to follow and think a simple flow chart may be clearer showing the destination of the supply (ie supply to an AGHE) and then outlining the necessary parameters and legislation required linked for that supply. We understand more detailed proposals may be put forward on this aspect by other organisations.We understand there may be an anomaly with the references to primary producers and regulation 852/2004 in the diagram.Page 7 - Section 1.2For completeness we think that gifting of product should also be included in this section.Page 7 - Section 1.3“Supplying beyond the final consumer”We are not sure what is intended and what this means and suggest that this should be deleted.As previously stated, the mix of regulation being included in the main text in some cases and in footnotes in others is confusing. Either one format for referencing regulation or the other should be used.Sections 2.1, 2.2 and elsewhere in the documentThe terms ‘primary producer’, ‘hunter’ and ‘trained person’ are used at various points throughout the document particularly in relation to assessment of a carcase. This may confuse. Any or all of these terms should be included in the glossary.Section 2.3Whilst not strictly relevant to SVA it would be helpful to include reference to porcine species and trichinosis testing for trichinella in this section.Section 2.4Not relevant for SVASection 2.5Would it be easier to incorporate this section Wild game by-products intended for use as pet food in Section 8 on animal by-products?2.6No commentSection 3Should the guidance state that game larders used purely for private domestic use are exempt from all regulations?Sections 4 - 7No comment.Section 8See note under 2.5 above.Section 9.1It is good to see this section on STEC risks included as this will encourage greater vigilance and following of Best Practice to minimise risk.Section 9.2No commentSection 9.3We think that in the section on lead shot and game this should include current advice and urge hunters to move towards using only non-lead alternatives.Section 10The Venison Dealers License should be added to the list of Approvals/Registrations11. GlossaryVenison Dealers License (VDL) should be added to the glossary. | Footnote referencing has been removed. Hyperlinks have been added to the regulations at the start of the document and at the beginning of each new section when a regulation is referenced.Further engagement with relevant stakeholders will be carried out prior to final publication of the guide.A definition of final consumer can be found in the glossary and has also been introduced earlier in the document.A small guidance box has been introduced covering the gifting/donation of wild game.Information on when venison dealers licenses are required has been included throughout the guide.The decision tree has been replaced by a a more detailed table/matrix.Reference to supplying ‘beyond’ the final consumer has been removed as it was agreed this is unclear.Efforts have been made to ensure terminology is consistently applied throughout the document.Gamer larder section has been amended to clarify situation for those used only for private domestic use/ direct supply to final consumers and local retial establishments.We are aware the the wild game industry is making moves away from the use of lead shot game. However, this is not an area FSS leads on and therefore the research shared on the dangers of leadshot in terms of food safety, is all that will be included. |
| John Bruce, British Deer Society  | “Reference to the law regarding Venison Dealers Licences should be incorporated in each section to comply with the Deer (Scotland) Act 1996, as amended, sections 33-36.We have previously submitted and discussed a tracked changes version of the document so not all comments and observations are included here.We believe that the regulations for the sampling of Porcine species / breeds should be fully integrated into this document.There is a EC Regulation 150/2011 which amends the 853/2004 Section IV:Wild Game meat, Chapter 2, section 4(a), this amendment makes fundamental changes to this section, we believe that it is an omission not to state this amendment somewhere as original versions of 853/2004 are available on the internet and errors would be made if people adhered, (ignorantly), to the original text . We are aware that some smart legal websites automatically implement the amendment, but not everybody has access to such programmes.” | Relevant information on VDLs has been included.The section on trichinella sampling has been refined and expanded to include ‘other species susceptible to trichinosis’.Regulation 150/2011 did indeed amend Regulation 853/2004. This amendment became part of 853/2004 and is included when the consolidated version of the guidance is used. We have discussed this with the stakeholder and have agreed to include a line at the beginning of the document encouraging stakeholders to only make use of the consolidated versions of regulations. Moreover, the correct versions of each regulation are now linked to at the start of the document. |
| Scottish Association of Country Sports  | SACS is keen to help with subsequent drafts together with our sector partners. We look forward to seeing the next draft version and having a group discussion about it. | FSS intend on consulting appropriate stakeholders further on the final version of the draft wild game. |