

**The Wild Game Guide:**

**Guidance on the legal requirements which apply to hunters, processors and suppliers for the hygienic production of wild game**

**September 2020**

**Summary**

(To be included once guide is in final form and ready for publication)

**Revision History and Primary Contact**

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Should you have any comments or queries about the guide itself or the guidance therein, please contact [aedan.macrae@fss.scot](mailto:aedan.macrae@fss.scot)

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**Introduction**

The hygiene requirements for ensuring the safety of foodstuffs, including wild game meat, are set out in Regulation (EC) 852/2004 and Regulation (EC) 853/2004. However, which of these requirements applies to a given person or business can differ depending on specific circumstances, with various exemptions to the rules also set out in these regulations. This guidance will explain how these regulatory requirements apply to wild game which is intended for human consumption. The application of many of these requirements depends on whether you are a primary producer (i.e. a hunter) or a processor (i.e. producing wild game meat) and whether you supply wild game directly to final consumers or to approved game handling establishments (AGHEs). The circumstances in which you may require approval as an AGHE will also be explained.

**Intended Audience**

This guidance is intended for:

* People who hunt or shoot wild game (primary producers)
* People who transport wild game in fur/feather
* Food businesses which process and supply wild game (i.e. AGHEs, butchers, restaurants etc.)
* Enforcement officers of FSS who are responsible for monitoring AGHEs
* Enforcement officers of Local Authorities, responsible for monitoring various stages of the wild game food chain

**Purpose of Guidance**

This guidance aims clearly explain the food hygiene legal requirements that apply to various circumstances in which wild game is hunted and supplied for human consumption, both in fur/feather or as wild game meat. This includes guidance on the legal requirements which apply to the hunting, storage, transport and processing of wild game.

**Legal Status of Guidance**

This guidance has been produced to explain the legal requirements of the EU General Food Law Regulation - **Regulation (EC) 178/2002** and of **Regulation (EC) 852/2004 and Regulation (EC) 853/2004** (the food hygiene regulations) as they relate to wild game production. It is not possible for this guidance to cover every scenario and it is therefore advised that you also consult the relevant legislation to see how it applies in your circumstances. This guidance will however, assist you in ensuring you comply with the law. Businesses with specific queries may wish to seek the advice of their local enforcement authority.

**Legislation Overview**

**Legislation**

* **Regulation (EC) No. 178/2002** which sets general food law requirements, including establishing traceability of food, feed and food producing animals and the obligation to supply safe food
* **Regulation (EC) No. 852/2004** which sets general hygiene rules applying to all food businesses, including primary producers
* **Regulation (EC) No. 853/2004** which sets additional hygiene rules applying to businesses producing food of animal origin. Section IV of Annex III of this regulation covers wild game supplied to and processed in approved game handling establishments
* **Regulation (EC) No. 1069/2009** which sets out the rules which apply to animal by-products
* **Food Safety Act (1990)**
* **The Food Hygiene (Scotland) Regulations 2006 (as amended)**

1. **Primary Producers: Requirements and Exemptions**

The food hygiene regulations (Regulation (EC) 852/2004 & Regulation (EC) 853/2004), as well as Regulation (EC) 178/2002 provide the regulatory framework and requirements by which all food businesses dealing with wild game must comply. However, there are several exemptions included in these regulations aimed at primary producers (hunters).

Whether any of the exemptions to some of the more detailed legal requirements apply to you or not will depend on:

* Whether you supply the wild game you hunt in fur/feather or process it in to wild game meat
* Who you choose to supply your wild game to (i.e. whether you supply it locally to final consumers or to approved game handling establishments)

The food hygiene regulations regard shooting or hunting of wild game for human consumption as a primary production activity. This means that an individual who shoots game alone, or as a member of a hunting party or a shooting estate which organises shooting of wild game, is considered a primary producer.

*Primary production encompasses the hunting, killing and evisceration on-the-spot or in a game larder of wild game, and the gathering and keeping of in fur/feather wild game prior to transport to further transport*

Primary wild game products are the products of hunting. This means in fur/feather game that has undergone no more than any necessary preparation that is part of normal hunting practice. Such preparation will include bleeding and ‘gralloching’ (the removal of green offal from large wild game) and is normally carried out either “in the field” or in a game larder. Consequently, game larders, where preparation as part of normal hunting practices takes place, are also understood as an aspect of primary production.

Any further preparation beyond normal hunting practices is considered to be the processing of wild game. This is an important distinction as the processing of wild game introduces additional legal obligations and requirements.

Safe and Hygienic Hunting

# Regardless of whether you are operating under any of the exemptions which are outlined in the following section, you should still ensure that you are using safe and hygienic hunting practices.

It is advised that, even if you are only hunting for private domestic consumption or to directly supply final consumers, you should ensure that you have the necessary knowledge and experience to ensure that hunting is undertaken safely and hygienically and that the welfare of animals is protected.

For hunters of deer, [these industry best practice guides](https://www.bestpracticeguides.org.uk/guides/)\* provide practical advice on issues ranging from deer health and welfare, to firearms, culling and carcase preparation.

\*Please note that FSS does not endorse the content of external websites

* 1. **Primary Producer Exemptions: Decision Tree**

Do you keep all of the wild game you hunt for your own private domestic consumption?

No

Yes

Yes

You are exempt from the requirements of 853/2004 but must abide by 852/2004 and 178/2002, including registering as an FBO with your local authority (see section 1.4)

You are exempt from the food  
 hygiene regulations (852/2004,  
853/2004) but must still abide  
by the requirements of Regulation 178/2002 e.g. traceability, obligation to supply safe food (see section 1.3)

Yes

No

Yes

No

You are exempt from all of the regulatory requirements (See section 1.2)

Do you process the wild game you hunt and supply wild game meat direct to final consumers or local retail establishments who directly supply the final consumer?

Do you supply the wild game you hunt in fur/feather to AGHEs?

You must abide by all the relevant requirements in 178/2002, 852/2004 and 853/2004 (see section 2)

Do you supply all the wild game you hunt in fur/feather exclusively to the final consumer or to local retail establishments who directly supply the final consumer?

No

You may supply the wild game you hunt in accordance with one of the exemptions above, or you may seek further information from FSS using the following email address: foodenquiries@fss.scot

**1.2 Primary Production for Private Domestic Consumption[[1]](#footnote-1)**

If you hunt, prepare, handle or store wild game for your private domestic use, you are exempt from the food hygiene regulations. Private domestic consumption refers to the personal preparation, handling, storage and consumption of hunted game, without any further supply.

You are **not** required to register as a food business with your local authority. However, if you hunt wild game under this exemption you must not then go on to supply to other consumers.

This Exemption at a Glance – Private Domestic Consumption

* You are not required to be registered or approved
* You are exempt from the food hygiene regulations
* To be eligible for this exemption the wild game you hunt must only be kept for private domestic consumption

**1.3 Direct Supply of small quantities of in fur/feather wild game carcasses to the final consumer or local retail establishments[[2]](#footnote-2)**

If you are a hunter, estate or shoot that supplies all of your **in fur/feather** wild game carcases, **without any further processing (i.e. skinning, plucking etc.),** directly to the final consumer, or local retail establishments who directly supply the final consumer:

* You **must abide** by the general requirements of Regulation (EC) 178/2002, including the obligation to supply safe food and maintain traceability
* you are **exempt** from the requirements of Regulation (EC) 852/2004 and Regulation (EC) 853/2004

Hunters operating under this exemption, therefore, are **not** required to register with their local authority as a food business, but must be able to demonstrate traceability in their supply has been maintained in line with Regulation (EC) 178/2002. However, if the hunter’s circumstance was to change and they began processing the wild game they hunted (beyond normal hunting practices such as bleeding and gralloching), or they began supplying beyond the final consumer, they would need to registered as a food business with their local authority.

*The final consumer is defined in EU food hygiene law as “the ultimate consumer of a foodstuff who will not use the food as part of any food business operation or activity” (Article 3, Regulation (EC) 178/2002)*

This exemption also **does not apply** if the retailer you supply your wild game to goes on to supply other retailers and not just final consumers.

**Small quantities** are regarded as self-defining in Scotland as the demand for in fur/feather wild game from final consumers and local establishments is limited. **Local** is defined in guidance as supply within one’s own local authority plus the greater of either the neighbouring local authority or 50 km/30 miles from the boundary of your local authority. Local in relation to Scotland’s Island Local Authorities refers to the whole of Scotland. There is no local restriction applied to direct sales to the final consumer, but the obligation remains to ensure that any food supplied is safe.

Examples of local retail establishments who may supply the final consumer are restaurants and butchers shops. These local retail establishments must be registered as food businesses with their local authority and abide by the relevant requirements set out in Regulation (EC) 852/2004.

This Exemption at a Glance – Direct Supply of Small Quantities of in Fur/Feather Wild Game

* You are not required to be registered or approved by enforcement authorities
* You must abide by the requirements of Regulation (EC) 178/2002, including:
* The obligation to supply safe food
* Traceability requirements
* Your supply of wild game must be of small quantities direct to the final consumer, or to local retail establishments directly supplying the final consumer
* The definitions of final consumer, local and small quantities can be found in the glossary
* The wild game you supply must be in fur/feather and not processed in any way beyond normal hunting practices (i.e. bleeding, gralloching)

**1.4 Direct supply of wild game meat by the hunter to the final consumer or local retail establishments[[3]](#footnote-3)**

If you hunt, **process** and supply wild game **meat** directlyto the final consumer and/or local retail establishments who directly supply the final consumer:

* You **must abide** by the requirements of Regulation (EC) 852/2004 and Regulation (EC) 178/2004
* you are **exempt** from the requirements of Regulation (EC) 853/2004

*Examples of local retail establishments which supply the final consumer and may supplied to under this exemption include restaurants, butchers and farm shops.*

This exemption differs from the exemption outlined in section 1.2 as it applies to those who are supplying wild game **meat** and not only in fur/feather wild game carcasses. Wild game carcasses become wild game meat when they undergo any further processing beyond normal hunting practices.

This exemption applies to those persons processing wild game and supplying wild game **meat** from their own retail establishment, such as a farm shop, providing that the supply is of small quantities direct to the final consumer or local retail establishments who directly supply the final consumer.

Persons operating under this exemption **must register** with their local authority as a food business under Regulation (EC) 852/2004 and should therefore implement a food safety management system based upon Hazard Analysis and Critical Control Point (HACCP) principles.

This Exemption at a Glance – Direct Supply of Small Quantities of Wild Game Meat

* You must be registered as a food business with your local authority but do not need approval with FSS
* You must abide by the rules of Regulation (EC) 178/2002 including:
* The obligation to supply safe food
* Traceability requirements
* You must abide by the rules of Regulation (EC) 852/2004, which include:
* Having a food safety management system based on HACCP principles
* Having adequate structures and operations in place for the processing of wild game
* Having adequate facilities in place for the appropriate storage-including the ability to maintain the cold-chain of wild game bodies and wild game meat
* Your supply of wild game meat must be of small quantities direct to the final consumer, or to local retail establishments directly supplying the final consumer

1. **Supplying Wild Game to Approved Game Handling Establishments (AGHEs)**

The majority of wild game which is hunted in Scotland is supplied to AGHEs. In this circumstance, suppliers must abide by the relevant requirements in EU general food law (Regulation (EC) 178/2002) and the EU food hygiene regulations (Regulation (EC) 852/2004; Regulation (EC) 853/2004). Any persons involved in the supply of wild game to AGHEs must apply by these regulations, **including hunters, estates, transporters and larders.**

*Supplying wild game to an AGHE means there are additional hygiene requirements you must meet, including those relating to trained persons and temperature*

Those involved in the supply of wild game to an AGHE must comply with the relevant requirements of Regulation (EC) 178/2002 and of Regulation (EC) 852/2004. These hunters are primary producers who are hunting wild game with the intention of placing it on the market and consequently must be registered as a food business with their local authority. To find contact details for your local authority, please use [this page](https://www.foodstandards.gov.scot/contact-us/local-authorities) on the FSS site. Moreover, they must comply with the specific requirements relating to the handling of wild game intended for supply to AGHEs as set out in Section IV, Annex III of Regulation (EC) 853/2004.

Requirements at a Glance – supply to AGHEs

# You must be registered as a food business with your local authority

* You must abide by the rules of Regulation (EC) 178/2002 including:
* The obligation to supply safe food
* Traceability requirements
* You must abide by the minimum hygiene standards set out in Annex I of Regulation (EC) 852/2004 (see section 3 on game larders); and retain records relating to measures implemented to control hazards
* If you are a hunter, you must abide by the specific requirements of Section IV, Annex III of Regulation (EC) 853/2004 (see section 2.1.1- 2.1.3)

**2.1 Trained Persons**

The requirements relating to trained persons in the hunting and supply of wild game are set out in **Chapter I, Section IV, Annex III of Regulation (EC) 853/2004**.

At least one active member of the hunting party must meet the requirements of being a ‘trained person’. This is a requirement regardless of whether the party is hunting **large or small wild game**. The trained person may be the hunter, beater or ghillie. A gamekeeper or manager who is not a member of the hunting party may also act as the trained person if they are in the immediate vicinity of the hunting party. In terms of small wild game, the allowance for a gamekeeper who is not an active member of the party to act as the trained person applies to each batch of small game and the party cannot use the keeper of another shoot to fulfil the trained person requirement.

The trained person’s responsibility is to make an initial assessment of the carcase after killing, to determine whether or not the meat may present a health risk. This examination must occur as soon as possible after killing and trained persons must be trained to the satisfaction of the Local Authority. Full details regarding official training requirements, courses and providers are available on pg.X of this guide.

*Wild game which is supplied to an AGHE must undergo an initial examination by a trained person as soon as possible after killing*

**2.2 The Hunter’s Declaration**

The hunter’s declaration only applies to **large wild game**. If the examination of the carcase carried out by the trained person finds no abnormal characteristics and no abnormal behaviour was observed before killing, and there is no suspicion of environmental contamination, the trained person must attach to the animal body a numbered declaration stating this. This declaration must also indicate the date, time and place of killing and be signed by the hunter.

The declaration does not have to be attached to the animal and may cover more than one animal, provided that each animal body is appropriately identified and the declaration bears an indication of the identification number of each animal it covers, with the corresponding date, time and place of killing. All animal bodies covered by a single declaration may only be sent to a single game-handling establishment. Some examples of how these declarations should look and be attached are given in Annex X of this guide.

**2.3 Handling Large Wild Game for Supply to AGHEs**

**Chapter II, Section IV, of Annex III in Regulation (EC) 853/2004** sets out specific requirements for the handling of large wild game for placing on the market through AGHEs.

After killing, large wild game must, if necessary, be bled, and have their stomachs and intestines (green offal) removed as soon as possible (gralloched). In most cases the stomach, intestines and other body parts including the head, may be disposed of safely at the kill site. It is important that gralloching is carried out in a hygienic and careful fashion so as to ensure that the carcase is not contaminated by the green offal or its contents. Some guidance which has been produced by industry on gralloching deer can be found [here](https://www.bestpracticeguides.org.uk/carcass-preparation/gralloching).

A trained person must then carry out an examination of the body and of any viscera removed to identify any characteristics that may indicate that the meat presents a health risk. This examination must take place as soon as possible after killing.

The head (except for tusks, antlers and horns), viscera (except the stomach and intestines) and other body parts need not accompany the body to the AGHE except in the following circumstances:

* If the trained person identifies abnormal characteristics, abnormal behaviour or suspects environmental contamination
* If no trained person is available to carry out an examination
* In the case of species susceptible to trichinosis (such as wild boar), whose heads (except for tusks) and diaphragm must accompany the body.

When the head, viscera and other body parts accompany the body to an AGHE, they must be identifiable as belonging to a given animal and be handled hygienically.

Following the examination, and providing no abnormal characteristics were found, no abnormal behaviour was observed before killing, and there is no suspicion of environmental contamination, the trained person may issue and attach their declaration.

The carcass should then be transported to an AGHE as soon as possible after this examination. Chilling must begin within a reasonable period of time after killing and achieve a temperature throughout the meat of **not more than 7 °C**. Where climatic conditions so permit, active chilling is not necessary. Consideration of this requirement in a Scottish context will depend on a number of factors including season, size of carcass, number of carcasses in each transport, and time taken to between kill and transport to an AGHE. These considerations should be factored in to the food safety management plan of the receiving establishment concerned and applied accordingly.

*The carcases of large wild game, including deer and wild boar, should be chilled to a temperature of 7* °C

During transport to the game-handling establishment, heaping must be avoided and once the large wild game has been delivered to a game-handling establishment, it must be presented to the competent authority for inspection. The competent authority in AGHEs is FSS, represented by an Official Veterinarian (OV) who will oversee the inspection process.

Unskinned large wild game may be skinned and placed on the market if, before skinning, it is stored and handled separately from other food and it is not frozen; and after skinning, it passes a final inspection in a game-handling establishment and has a health mark applied by the OV in accordance with **Regulation (EU) 2019/627**.

Guidance on hygienic and effective evisceration (gralloching) and carcase preparation can be found in [this industry best practice guidance](https://www.bestpracticeguides.org.uk/carcass-preparation/).

**2.4 Handling of Small Wild Game for Supply to AGHEs**

**Chapter III, Section IV, of Annex III in Regulation (EC) 853/2004** sets out specific requirements for the handling of small wild game for placing on the market through AGHEs.

The trained person must carry out an examination to identify any characteristics that may indicate that the meat presents a health risk. The examination must take place as soon as possible after killing. If abnormal characteristics are found during the examination, abnormal behaviour was observed before killing, or environmental contamination is suspected, the trained person must inform the FSS OV at the AGHE. Moreover, signs of environmental contamination, abnormal behaviour or notifiable diseases should be reported to the relevant local authority.

Meat of small wild game may be placed on the market only if the body is transported to an AGHE as soon as possible after the trained person examination. Once at the AGHE, small wild game must be presented to the competent authority for inspection. The competent authority in AGHEs is FSS, represented by an OV who will oversee the inspection process.

*The carcases of small wild game, including rabbits, grouse, pheasants and other game birds, should be chilled to a temperature of 4* °C *throughout the meat*

Chilling must begin within a reasonable period of time of killing and achieve a temperature throughout the meat of **not more than 4 °C**. Where climatic conditions so permit, active chilling is not necessary. Consideration of this requirement in a Scottish context will depend on a number of factors including season and time taken to between kill and transport to an AGHE. These considerations should be factored in to the food safety management plan of the receiving establishment concerned and applied accordingly.

**2.4 Handling of Offal Intended for Human Consumption**

Where the offal from large wild game is intended for human consumption, the supplier to the AGHE must be able to demonstrate to the satisfaction of the receiving establishment that it has been handled hygienically and that full correlation of body parts and carcasses can be made. Given that red offal will deteriorate more quickly than whole carcasses, it is unlikely that supply of red offal to either an AGHE or a butcher will be possible unless active chilling takes place at the larder and unless the carcass and offal is transported to the larder immediately after killing.

The circumstances under which such supply can be carried out, will be dependent on several factors. The onus is on the receiving establishment to ensure that its product intake meets the requirements set out in its own HACCP plan. This should include ensuring that the supplier has the necessary infrastructure to ensure that that the cold chain is maintained as necessary, and cross contamination is minimised.

**2.5 Wild game by-products Intended for use as Pet Food**

Where any part of an animal is intended to be used as pet food, Regulation (EC) 1069/2000 on animal by-products (ABP) applies. Only category 3 ABP can be used as pet food, and this includes parts of carcasses deemed fit for human consumption, but not intended to be used as such. Once a product is identified as ABP, it must be stored separately from products intended to be sold as food for human consumption and cannot be diverted back into the food chain.

The competent authority in any approved establishment should satisfy themselves that the establishment is handling the by-products in accordance with the relevant regulatory provisions, including any approvals required under Regulation (EC) 1069/2009. The Animal and Plant Health Agency (APHA) are responsible for the approval of ABP establishments. Guidance on animal by-products regulations is available [here.](https://www.gov.uk/guidance/animal-by-product-categories-site-approval-hygiene-and-disposal)

1. **Game Larders**

The term ‘game larder’ is not defined in the hygiene regulations but is generally understood in the UK as a place where wild game carcasses are stored after hunting as an associated operation of primary production. Dressing and handling which does not go beyond normal hunting practice and which is necessary to carcase preparation is permitted within these premises.

The storage and necessary preparation of carcasses which is undertaken at game larders are understood as primary production operations. Consequently, the requirements set out in **Annex I of Regulation (EC) 852/2004** are applicable to game larders involved in the supply to AGHEs.

The owner or operator of a game larder, which could be an individual hunter or an estate, must be registered as a food business with their local authority if their game larder is used to store in fur/feather game carcasses for supply to AGHEs. Moreover, Section IV, of Annex III in Regulation (EC) 853/2004 requires that wild game entering the food chain through an AGHE must, within a reasonable period of time:

* achieve a temperature throughout the meat of not more than **7 °C for large wild game**
* achieve a temperature throughout the meat of not more than **4 °C for small wild game**

To this end, game larders should be adequately refrigerated and ventilated and should have sufficient space and capacity to handle the number of wild game carcasses passing through the facility.

Relevant Game Larder Requirements- Annex I, Regulation (EC) 852/2004

* Facilities must be kept clean and, where necessary after cleaning, be disinfected in an appropriate manner;
* Associated equipment, containers, vehicles and vessels must be kept clean and, where necessary after cleaning, be disinfected in an appropriate manner
* Must use clean or potable water to prevent contamination;
* Ensure that all those who handle game and game meat are in good health and undergo training in health risks;
* Must protect against contamination including from animals and pests
* Must store and handle waste and hazardous substances so as to prevent contamination.
* Must prevent the introduction and spread of diseases transmissible to humans through food and report any suspicion of disease to the competent authority;
* Must take account of the results of any relevant analyses carried out on samples taken from animals or other samples that have importance to human health;

1. **Transporting Wild Game**

It is important that hygiene standards are maintained not just during the storage and processing of wild game but also during its transport.

**Section I(1)(c) of Part A, Annex 1 in Regulation (EC) 852/2004** determines that the hygiene requirements from primary production as set out in Annex 1, apply to the transport of wild game primary products from the place of production to an establishment. This means the same hygiene requirements apply to transport from a larder to either a retail butcher or AGHE, as apply to larders themselves.

Furthermore, **Section IV, of Annex III in Regulation (EC) 853/2004** requires that wild game entering the food chain through an AGHE must, within a reasonable period of time:

* achieve a temperature throughout the meat of not more than **7 °C for large wild game**
* achieve a temperature throughout the meat of not more than **4 °C for small wild game**

However, for transport between an AGHE and retailers, the requirements set out in **Chapter IV of Annex II in Regulation (EC) 852/2004 apply.**

1. **Approved Game Handling Establishments (AGHEs)**

If you process (beyond normal hunting practice) in fur/feather wild game carcasses and supply wild game meat to other retailers (i.e. wholesale) to be placed on the market you must acquire approval as an AGHE from FSS.

AGHEs can process and supply an unlimited quantity of wild game meat to retail suppliers. An AGHE therefore, may take in wild game carcasses from hunters, estates etc. before processing and supplying on to retailers such as shops, supermarkets and butchers.

As well as complying with Regulation (EC) 178/2002 and Regulation (EC) 852/2004, AGHEs must comply with the specific provisions of Regulation (EC) 853/2004, including those requirements relating the operational and structural nature of the business and premises. Moreover, AGHEs are subject to official veterinary controls from FSS, in line with the requirements set out in **Regulation (EC) 2017/625** and associated acts.

AGHE Requirements at a Glance

* must be approved by FSS;
* must comply with the hygiene requirements of Regulation (EC) 852/2004 and Regulation (EC) 853/2004;
* official veterinary controls must be carried out by FSS, including audit of structural and operational hygiene requirements and post mortem inspection and health marking of carcases of large wild game;
* must only process wild game which has been initially examined by a trained person, with a trained person’s declaration accompanying large wild game
* must keep traceability records to identify from whom they have received in fur/feather wild game, including verification of the hunter’s status as a trained person
* must have a food safety management plan based on HACCP principles which includes wild game intake criteria, recognising the flexibilities which exist in law for supply to AGHE direct from primary producers.

**5.1 Retail to Retail Sales: Exemption from approval as an AGHE**

In general terms, if you are wholesaling wild game (i.e. your supply is not direct to the final consumer or local retail establishments directly supplying the final consumer) then you will require approval under **Regulation (EC) 853/2004**. However, there are exceptions from this requirement set out in law. The conditions under which you can carry out wholesale supply of wild game without receiving approval are that your supply of wild game meat is **restricted**, i.e. it is **marginal and local.**These terms are defined in the [Scottish National Protocol](https://www.foodstandards.gov.scot/downloads/Approved_establishments_working_group_-_2019_-_Scottish_National_Protocol_Update_-_January_2020.pdf#:~:text=Scottish%20National%20Protocol%20Prepared%20by%20Scottish%20Food%20Enforcement,Liaison%20Committee%2C%20Approved%20Establishment%20Working%20Group%20January%202020) as the following:

* **Marginal** means supply to other retailers of food of animal origin of up to a quarter of total food sales, calculated by weight or by value if measurement by weight is impractical for the range of product. This means that at least 75% of your sales must be made up by sales to the final consumer. Any wild game or wild game meat you sell otherwise than through your own retail outlet must be sold to other retailers such as butchers’ shops and restaurants
* **Localised** means supply which is limited to within your own LA plus the greater of either: the neighbouring LA or LAs; or 30 miles/50 km from the boundary of your LA. When the supplying establishment is located in the Scottish islands, local is interpreted as anywhere within Scotland
* **Restricted** means the supply of game meat to other retail establishments is restricted by the requirements to be marginal and localised as above

For more information on when you might need to seek approval and the decision making process applied by enforcement authorities, see the [Scottish National Protocol](https://www.foodstandards.gov.scot/publications-and-research/publications/approved-establishments-scottish-national-protocol) on approved establishments.

1. **Traceability Information and Requirements**

The traceability of food is concerned with being able to readily identify both suppliers and customers along the food chain. **Articles 14 and 19 of Regulation (EC) 178/2002** clearly define the food safety obligations for FBOs, whilst article 18 of the same regulation specifically outlines these obligations with respect to traceability. These traceability requirements apply to all stages of the food chain and compromise part of the obligation to supply safe food. Consequently, hunters, intermediate actors (including those who transport or store wild game), processors and retailers must all meet these traceability requirements.

Additionally, **Implementing Regulation (EU) 931/2011** sets the traceability requirements for products of animal origin. This covers all aspects of the food chain up until the point of sale. FBOs, hunters, processors and retailers must pass the relevant information onto the next FBO in order to maintain traceability throughout the food chain. FBOs must have the information outlined below available for the competent authority on demand:

Traceability Information

* Accurate description of the food
* Volume/quantity
* Name and address of FBO dispatching food
* Name and address of consigner (if different)
* Name and address of FBO receiving the food
* Name and address of consignee (if different)
* Reference identifying lot, batch or consignment
* Date of dispatch

FBOs and hunters have an obligation to maintain traceability information which should be updated daily. This information must be retrievable at least until it can be reasonably assumed that the food has been consumed.

FBOs and hunters 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 a game book or something similar may be sufficient.

Final consumers, such as beaters supplied with birds on shooting days or people buying items from an estate shop or farmer’s market stall do not have to be individually identified. However, hunters supplying small quantities of wild game direct to the final consumer or local retail establishments must still comply with the traceability requirements set out in law.

1. **Options for Training as a ‘Trained Person’**

Regulation (EC) 853/2004 requires that anyone who fulfils the role of a trained person must be trained to the satisfaction of the competent authority. This training must cover at least the following subjects:

* the normal anatomy, physiology and behaviour of wild game;
* abnormal behaviour and pathological changes in wild game due to diseases, environmental contamination or other factors which may affect human health after consumption;
* the hygiene rules and proper techniques for the handling, transportation, evisceration, etc. of wild game animals after killing;
* legislation and administrative provisions on the animal, and public health and hygiene conditions governing the placing on the market of wild game.

The training options available in Scotland which meet the above requirements to become a trained person are:

* **Scottish Qualifications Authority (SQA) ‘Game Meat Hygiene Unit’**
* The ‘Game Meat Hygiene Unit’ (SCQF level 6) is Within the SQA NC/HNC courses in Game and Wildlife Management
* Completion of this unit is fully recognised in Scotland as evidence of meeting the trained person requirements of Regulation (EC) 853/2004.
* <https://www.sqa.org.uk/sqa/files/nq/FN5J12.pdf>
* **‘Game Meat Hygiene Course’- National Gamekeepers Organisation (NGO)**
* This course can be undertaken by experienced gamekeepers and/or members of the NGO
* Completion of this course will provide evidence of required trained person training for both large and small wild game
* <https://www.nationalgamekeepers.org.uk/training/game-meat-hygiene-course>;
* **‘Level 2 Award in Wild Game Meat Hygiene’- LANTRA**
* This course is available to anyone interested in gaining their status as a trained person
* There are optional modules in this course which will provide evidence of your sufficient training as a trained person for hunting both large and small wild game
* This course is offered by many different training organisations across Scotland and the UK. To find your closest or most convenient provider, click ‘view providers’ on the LANTRA course page linked below.
* <https://www.lantra.co.uk/course/level-2-award-wild-game-meat-hygiene#course-providers>
* **Deer Stalking Certificate Level 1 (DSC1)**
* Completion of the DSC1 from December 2005 onwards is evidence of sufficient training to act as a trained person when **hunting deer only**
* Completion of this course prior to December 2005 does not provide sufficient training to act as a trained person as the EU food hygiene regulations of 2004 were not incorporated in the course before this
* <https://basc.org.uk/training-and-education/basc-training-courses/deer-stalking-certificate-dsc1/>
* Once you have completed your DSC1, you may also undertake your DSC2. Details can be seen [here](https://basc.org.uk/training-and-education/basc-training-courses/deer-stalking-certificate-dsc2/).

1. **Animal By-Products**

Animal by-products (ABPs) are defined by Regulation (EC) 1069/2009 as:

*“entire bodies or parts of animals, products of animal origin or other products obtained from animals, which are not intended for human consumption, including oocytes, embryos and semen”.*

This regulation also sets out the legal requirements for ABPs, including their categorisation and the rules which apply to their handling, processing and disposal.

The processing of wild game produces animal by-products, so it is therefore important that if you are an FBO which processes wild game, you are aware of your obligations and responsibilities as set out in Regulation (EC) 1069/2009. These obligations include the correct categorisation of ABP, the safe and correct disposal or onward supply of ABP and the requirement to ensure that all ABP received or supplied by an FBO is traceable.

Some ABP (category 3) can be used to produce pet food and animal feed, whilst other ABP is considered specified risk material (category 1) and must be handled with extreme care. You should therefore ensure you have adequate knowledge to handle and dispose of different ABPs appropriately.

If as a business you receive, handle or process ABPs you must obtain registration or approval to do so from APHA. However, if you are already registered or approved as a food business and you only produce ABPs through your processes as a food business, you do not need to seek additional approval for ABPs.

For further advice on the categorisation, handling and disposal of ABP, please see the ABP section [of this industry guide on edible co-products and ABPs](https://www.foodstandards.gov.scot/publications-and-research/publications/industry-guide-on-edible-co-products-and-abps). You may also consult [this UK government webpage](https://www.gov.uk/guidance/animal-by-product-categories-site-approval-hygiene-and-disposal#getting-your-site-approved-or-registered) on ABPs.

1. **Wild Game and Food Safety**

The very nature of wild game production means that game which is shot in the field will not be subject to the same level of official control as other meats.

Wild game meat can harbour microbiological, chemical and physical hazards. Even healthy wild game which show no clear sign of disease or contamination can pose potential dangers to human health. It is therefore necessary to understand these potential hazards and how to mitigate them.

Safe and hygienic hunting practices are crucial to ensuring that the contamination of wild game is kept to a minimum. [These industry best practice guides](https://www.bestpracticeguides.org.uk/guides/) will provide you with guidance on the various stages involved in hunting and handling wild game.

Thorough cooking together with the correct handling and storage of food are important factors in controlling the hazards which may be present in wild game meat. [The Food Safety section](https://www.foodstandards.gov.scot/consumers/food-safety/contaminants/lead-shot-game) of the FSS website, provides guidance on how to safely cook and handle your food.

Preventing cross contamination is a crucial aspect of the correct handling of wild game. Guidance to help businesses control cross contamination can be found [here](https://www.foodstandards.gov.scot/publications-and-research/publications/ecoli-o157-control-of-cross-contamination), whilst guidance for consumers is available [here](https://www.foodstandards.gov.scot/consumers/food-safety/at-home/washing-and-preparing-food-1).

**9.1 STEC in Wild Venison**

A recent study commissioned by FSS and Scottish Government, and led on by the Moredun Research Institute, exploring the risk of Shiga toxin-producing *Escherichia coli* (STEC) bacteria in wild venison has now been completed.

(Insert link to report here when published)

This project had three key objectives:

1. To map the Scottish venison industry
2. To conduct a field survey assessing STEC prevalence in wild deer in Scotland
3. To conduct a review of cross-contamination risks in the slaughter and processing stages of wild deer from the field to the larder

The reports key findings were that the prevalence of STEC O157 in Scottish wild deer is very low, with only 3 of 1087 samples positive for this dangerous strain of STEC. These 3 samples however, were found to contain high levels of STEC O157.

The prevalence of non O157 STEC in deer faecal samples was found to be higher but the human pathogenicity of these strains is thought to be less severe.

This research also identified some key risk factors associated with increased  *E. coli* contamination in wild venison. These include:

* The health status of the animal, with unhealthy animals potentially posing greater risk of STEC O157 contamination (although unhealthy animals should not enter the food chain)
* Hygiene practices in the field from the time of killing to gralloching to transportation to the larder or AGHE, as poor hygiene practices will allow bacteria such as *E. coli* to transfer onto the carcass from faecal or environmental contamination
* Maintenance of the cold chain from larder to final product. Critically, maintaining temperatures below 7°C, as set out in law, limits the growth of bacteria on the carcass
* Handling and hygiene procedures involved in further skinning, cutting and processing of the venison
* Faecal contamination and wet and slimy carcasses

**9.2 *Trichinella* testing in feral wild boar**

Wild boars which are not farmed and live in the wild are classified as ‘feral’. As feral wild boar will scavenge for food which might be infected with *Trichinella*, there is a possibility that these boar will become infected with *Trichinella*.

Trichinosis is a disease caused by the larvae, ‘trichinae’, of a small nematode worm (*Trichinella spiralis*). People can become infected by eating raw, undercooked or processed meat from pigs, wild boar, horses or game that contain the trichinae. The infection commonly causes symptoms such as diarrhoea, abdominal cramps and malaise. It can progress, causing fever, muscle pain and headaches and in severe cases may affect the vital organs possibly leading to meningitis, pneumonia or even death.

Just as pigs slaughtered in approved premises must be tested for *Trichinella*, wild boar must also be tested and it is the responsibility of hunters to ensure that this takes place.

In AGHEs, FSS takes samples to test for trichinosis, whilst hunters who do not supply AGHEs should sample any wild boar they shoot and send the sample to an appropriate laboratory for testing. Containers for storing and transporting samples together with addressed, freepost envelopes for posting samples can be ordered prior to hunting free of charge from APHA.

[This guidance document](https://www.foodstandards.gov.scot/publications-and-research/publications/guidance-for-trichinella-testing-in-feral-wild-boar) provides advice on how a sample should be taken from feral wild boar and details of how to get a sampling/sending kit prior to hunting.

To order a sampling kit or for more information please contact APHA using these details:

*phone*: ***07584111971***

*e-mail:* [NRL.Parasitology@apha.gov.uk](mailto:NRL.Parasitology@apha.gov.uk)

**9.3 Lead Shot Game**

Lead can be found in wild game as a result of using lead shot or bullets when hunting. If wild game is processed in an AGHE, lead and affected parts of meat will be removed, although small amounts may remain in the meat.

If you are keeping the wild game for private domestic consumption or if you are a retailer selling wild game, you should also remove as much lead and lead affected meat as possible.

Eating lead-shot game regularly can expose you to potentially harmful levels of lead. Those who eat lead-shot game should minimise the amount they eat, especially for small game animals.

Exposure to lead can harm the developing brain and nervous system. So cutting down the amount of lead-shot game eaten is especially important for toddlers, children, pregnant women and women hoping to conceive.

[Read the research that was undertaken to understand consumer behaviour in relation to the consumption of wild game.](https://www.foodstandards.gov.scot/consumers/food-safety/contaminants/lead-shot-game)

1. **Contacts, Approvals and Registration**

**General**

If you desire any further clarification on anything included in the this guide or have further questions regarding the legal requirements which apply to the hunting and supplying of wild game, please contact the meat hygiene policy team using the following email address: [foodenquiries@fss.scot](mailto:foodenquiries@fss.scot)

**Approval**

If you wish to acquire approval as an AGHE please contact the approvals team at FSS using the following email address: [approvals@fss.scot](mailto:approvals@fss.scot)

For more information on when you might need to seek approval, the process for gaining approval, different types of approval and much more, please consult the [Scottish National Protocol](https://www.foodstandards.gov.scot/downloads/Approved_establishments_working_group_-_2019_-_Scottish_National_Protocol_Update_-_January_2020.pdf) on approved establishments.

**Registration**

If you are supplying wild game meat you need to register as a food business. To do this you will need to contact your local authority. To find the contact details for your local authority, please use [this page](https://www.foodstandards.gov.scot/contact-us/local-authorities) on the FSS site.

1. **Glossary**

***‘Wild Game’*** means *“wild ungulates and lagomorphs, as well as other land mammals that are hunted for human consumption and are considered to be wild under the applicable law in the Member State concerned. These include mammals living in enclosed territory under conditions of freedom similar to those of wild game” (Annex I Regulation EC 853/2004)*

***‘Wild ungulates’*** *are hooved animals such as wild deer and feral wild boar but can also include certain feral populations of sheep and goats.*

***‘Lagomorphs’*** *means rabbits, hares and rodents*

***‘Other land mammals’*** *are animals such as squirrels*

***‘Wild Game Meat’:*** *meat is defined by Regulation (EC) 853/2004 as the “edible parts of the animals referred to in points 1.2 to 1.8, including blood”.*

*Those animals specified in points 1.2 to 1.8 are domestic ungulates, poultry, lagomorphs, wild game, farmed game, small wild game and large wild game. Wild game carcasses are converted from primary product to meat once they have undergone any processing beyond normal hunting practices such as killing, bleeding and gralloching. Processing therefore includes practices such as plucking and cutting.*

***‘Wild birds’*** *includes birds such as pheasants that have been hatched/reared under controlled conditions before being released into the wild to be hunted*

***‘Small wild game’*** *means wild game birds and lagomorphs living freely in the wild (Regulation EC 853/2004)*

***‘Large wild game’*** *means wild land mammals living freely in the wild that do not fall within the definition of small wild game, such as deer, goats and wild boar (Regulation EC 853/2004)*

***‘In fur/feather wild game’*** *means wild game which has been shot and killed but not had its fur or feathers removed, or any further processing beyond normal hunting practices*

***‘Normal hunting practices’*** *means any process regularly carried out in the process of hunting, including bleeding and gralloching*

***‘Primary Production’*** *means the production, rearing or growing of primary products including harvesting, milking and farmed animal production prior to slaughter. It also includes hunting and fishing and the harvesting of wild products (Regulation EC 178/2002)*

***‘Primary Products’*** *means “products of primary production including products of the soil, of stock farming, of hunting and fishing” (Regulation EC 852/2004)*

***‘Primary producers/hunters’*** *means those people involved in the killing of the wild game in the field. This includes active members of the hunting party but not spectators.*

***‘Final consumer’*** *means**“the ultimate consumer of a foodstuff who will not use the food as part of any food business operation or activity” (Regulation EC 178/2002)*

***‘Food business operator’*** *means* ***“****the natural or legal persons responsible for ensuring that the requirements of food law are met within the food business under their control” (Regulation EC 178/2002)*

***‘Approved Game Handling Establishment (AGHE)’*** *means any approved establishment in which game and game meat obtained after hunting are prepared for placing on the market*

***‘Game Larder’*** *means a premises where game carcases are prepared and stored after hunting and before for further transport*

***‘Animal by-product (ABP)’*** *means entire bodies or parts of animals, products of animal origin or other products obtained from animals, which are not intended for human consumption, including oocytes, embryos and semen (Regulation EC 1069/2009)*

***‘Small quantities’*** *is regarded as self-defining because demand for in-fur or in*

*feather carcases from final consumers and local retailers is limited.*

***‘Marginal Supply’*** *means supply to other retailers of food of animal origin of up to a quarter of total food sales, calculated by weight or by value if measurement by weight is impractical for the range of product. This means that at least 75% of your sales must be made up by sales to the final consumer. Any wild game or wild game meat you sell otherwise than through your own retail outlet must be sold to other retailers such as butchers’ shops and restaurants*

***‘Local Supply’*** *means supply within the same local authority, in immediately neighbouring local authorities or those situated no more than 30 miles/50 kilometres from the boundary of the supplier’s local authority , whichever is greater – but never beyond the UK, except supply from Northern Ireland to the Republic of Ireland****.*** *When the supplying establishment is located in the Scottish islands, local is interpreted as anywhere within Scotland*

***‘Restricted Supply’*** *means the supply of game meat to other retail establishments is restricted by the requirements to be marginal and local*

***‘Food safety management system’*** *means a permanent procedure put in place by a food business operator, based on the HACCP principles, and used as an instrument to help food business operators attain a higher standard of food safety*

***‘HACCP’*** *means Hazard Analysis and Critical Control points. The principles on which your food safety management system should be based. This refers to identifying hazards and establishing critical control points to mitigate these hazards*

***‘Registration’*** *refers to the requirement set out in Article 6 of Regulation (EC) 852/2004 for food business operators to register premises involved in food production with the relevant authority (this is your local authority in Scotland).*

***‘Approval’*** *refers to the requirement set out in Article 4 of Regulation (EC) 853/2004 for food business operators to only place products of animal origin on the market if they have been produced in premises approved by the competent authority (FSS in Scotland)*

***‘Evisceration’*** *means the process of removing viscera from the bodies of wild game. Also known as* ***gralloching.***

***‘Viscera’*** *The organs of the thoracic, abdominal and pelvic cavities, as well as the trachea and oesophagus, and, in birds, the crop (Regulation EC 853/2004)*

***‘Offal’*** *means “fresh meat other than that of the carcase, including viscera and blood” (Regulation EC 853/2004)*

***‘Green Offal’*** *means the stomach, intestines and related tissues of the wild game body, which are the contents of the abdominal cavity of the wild game body*

***‘Red Offal’*** *means the other parts of the offal which do not fall under the definition of green offal, including the liver, heart, lungs etc.*

1. This exemption can be found in Paragraph 2(a) of Article 1 in Regulation (EC) 852/2004 and Paragraph 3(a) of Article 1 in Regulation (EC) 853/2004 [↑](#footnote-ref-1)
2. This exemption can be found in paragraph 2(c) of Article 1 in Regulation (EC) 852/2004 and paragraph 3(c) of Article 1 in Regulation (EC) 853/2004 [↑](#footnote-ref-2)
3. This exemption can be found in paragraph 3(e) of Article 1 in Regulation (EC) 853/2004 [↑](#footnote-ref-3)