

The Wild Game Guide

**A GUIDE TO THE HYGIENE REGULATIONS FOR PEOPLE WHO SHOOT WILD GAME AND
SUPPLY IT IN-FUR OR IN-FEATHER OR AS SMALL QUANTITIES OF WILD GAME MEAT.**



THIS GUIDE TO THE HYGIENE REGULATIONS IS FOR PEOPLE WHO SHOOT WILD GAME AND SUPPLY IT EITHER IN-FUR OR IN-FEATHER OR AS SMALL QUANTITIES OF WILD GAME MEAT.

SEE THE FLOW CHART OVERLEAF FOR A BRIEF SUMMARY OF THE LAW.

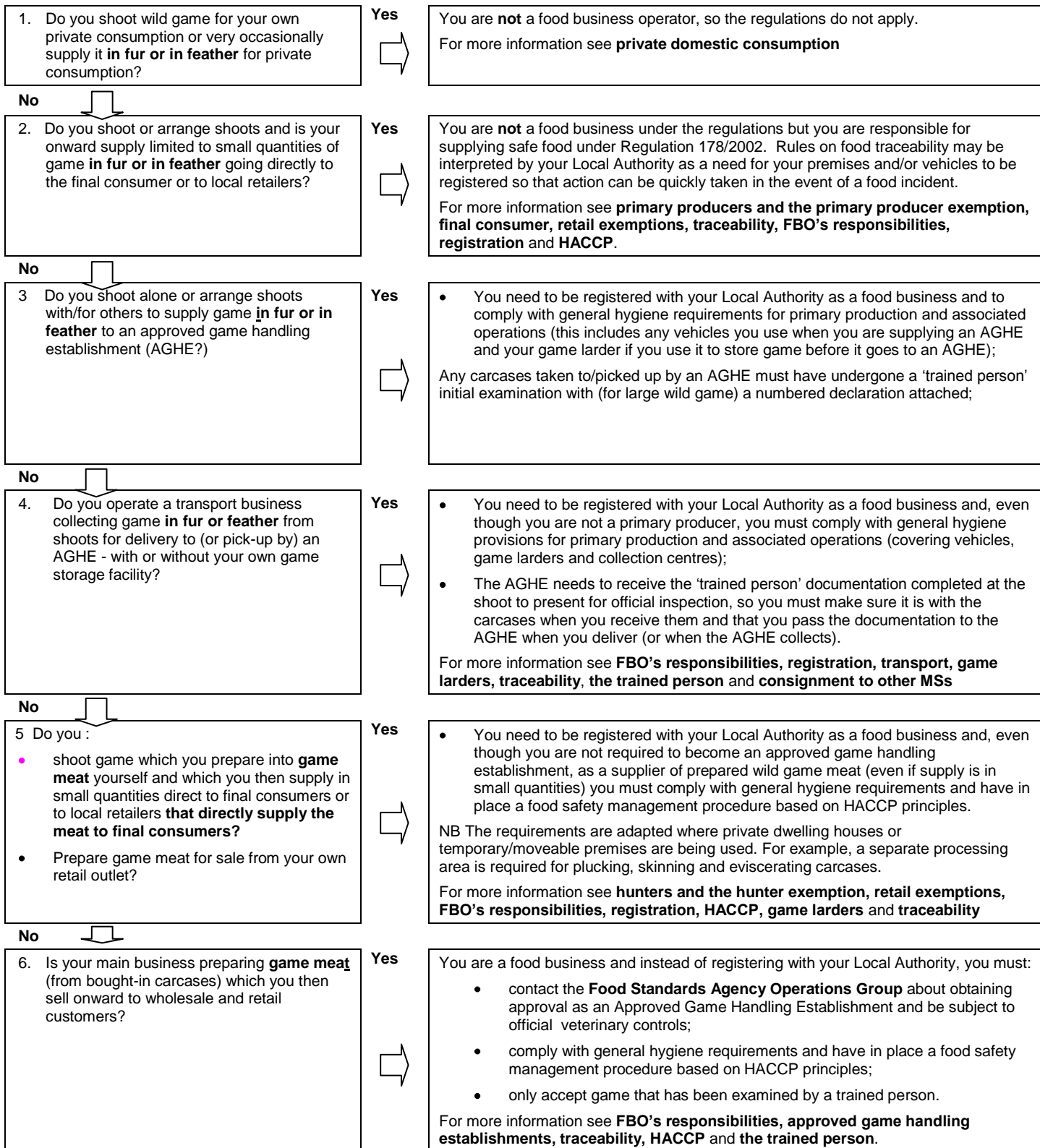
- This Guide covers provisions in relevant parts of these regulations:
 - Regulation (EC) No 178/2002**, which sets general food law requirements, including establishing traceability of food, feed and food producing animals;
 - Regulation (EC) No 852/2004**, which sets general hygiene rules applying to all food businesses;
 - 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 (AGHEs).
- This guide has been produced to provide informal, non-binding advice on the legal requirements which covers provisions in relevant parts of **Regulation (EC) No 178/2002, Regulation (EC) No 852/2004 and Regulation (EC) No 853/2004** regulations and should be read in conjunction with the legislations itself. The text should not be taken as an authoritative statement or interpretation of the law, as only the courts have this power. Every effort has been made to ensure that this guidance note is as helpful as possible. However, it is ultimately the responsibility of individual businesses to ensure their compliance with the law. Businesses with specific queries may wish to seek the advice of their local enforcement agency, which will usually be the trading standards/environmental health department of the local authority.
- This Guide does **not** cover other legislation on wildlife management, firearms, game licensing, game dealing, etc.
- There is a separate FSA '**Guide to the Food Hygiene and Other Regulations for the UK Meat Industry**' for those who buy in wild game shot by others and produce meat from it. See <http://www.food.gov.uk/foodindustry/meat/guidehygienemeat>.
- See also the '**Wild Game Guide Photo Annex**' on the FSA web-site at: <http://www.food.gov.uk/multimedia/pdfs/wildgamephotos.pdf>

** We would like to express our acknowledgement and appreciation to BASC for supplying the photograph used on the front cover.*

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1. WHAT THE REGULATIONS REQUIRE (A SUMMARY FLOW CHART)



2. DEFINITION OF WILD GAME

Since 1 January 2006, all game supplied for human consumption must meet the requirements of Regulation (EC) No 852/2004, Regulation (EC) No 853/2004 and Regulation (EC) No 854/2004. The requirements applicable to food businesses supplying game for human consumption are dependent upon whether the game dealt with is considered to be wild or farmed.

'Wild game' is defined in Regulation (EC) No 853/2004 Annex I as:

- *'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, including mammals living in enclosed territory under conditions of freedom similar to those of wild game'; and*
- *'wild birds that are hunted for human consumption'*

'Wild ungulates' are hooved animals - mainly deer in the UK, but also wild boar, sheep and goats;

'Lagomorphs' are rabbits and hares;

'Other land mammals' are bears etc which are hunted in other Member States (but there are none in UK);

'Wild birds' also includes birds that have been hatched/reared under controlled conditions before being introduced into the wild.

The fact that animals such as deer live in an enclosure does not prevent them from being classified as being wild game and therefore subject to the requirements of Regulation (EC) No. 853/2004, Annex III.

NB wild game must have been killed by hunting if it is to be supplied for human consumption.

3. PRIVATE DOMESTIC CONSUMPTION AND THE FINAL CONSUMER

Private domestic consumption is what the final consumer does. For wild game this would typically be game that you have shot yourself or game you have bought or have been given, whether still in-fur or in-feather or as oven-ready carcasses or game meat, which you will eat yourself or share with family or friends. The key point is that it is not for supply to anyone else as part of a food business.

To explain where private domestic consumption ends and running a food business starts, the EU food hygiene regulations speak of "undertakings, the concept of which implies a certain continuity of activities and a certain degree of organisation."

4. PRIMARY PRODUCERS AND THE PRIMARY PRODUCER EXEMPTION

The EU food hygiene regulations regard shooting wild game - "hunting" - for human consumption as a primary production activity. So an individual who shoots game alone, a hunting party and an estate which organises shooting are all primary producers.

Primary products in the wild game sector are the products of hunting – i.e. **in-fur and in-feather game** that has undergone no more than any necessary preparation that is part of normal hunting practice. This does not have to be done "in the field", but can be done in **game larders**.

PRIMARY PRODUCERS SUPPLYING AGHEs

Any primary producer supplying an **approved game handling establishment (AGHE)** must:

- ensure a **trained person** is present and completes relevant documentation
(NB An AGHE is entitled to refuse to accept carcasses where the *bona fide* involvement of a **trained person** (as set out in Regulation 853/2004) cannot be established, though there is provision in the Regulations for where a trained person is unexpectedly unavailable).
- be registered with the Local Authority under the **registration of food businesses** requirement;
(If you are a shooting party guest of a primary producer see 'Situation H' in a separate Q&A annex under '**Some Typical Situations**').
- comply with the **food business operator's responsibilities**, including **both** the general hygiene provisions for primary production in Regulation 852/2004 **and** the specific provisions for the initial handling of large/small wild game in Regulation 853/2004 when it is subsequently supplied to an AGHE;
- meet the **traceability** requirements of Regulation 178/2002

PRIMARY PRODUCER EXEMPTION

There is an exemption from the above rules when supply involves small quantities of in-fur/in-feather carcasses supplied either direct to the final consumer **and/or** to local retailers that directly supply the final consumer.

In the UK these terms are currently being interpreted as follows:

- **Small quantities** are now regarded as self-defining because demand for **in-fur/in-feather** carcasses from final consumers and local retailers is limited.
- **Local** is within the supplying establishment's own county plus the **greater** of **either** the neighbouring county or counties **or** 50 km/30 miles from the boundary of the supplying establishment's **county**.
- **Direct supply** to the **final consumer** is **not** restricted by what is local. An individual or an estate can supply final consumers who order from them via the internet/mail order as well as those who collect themselves.

ACTIVITIES ASSOCIATED WITH PRIMARY PRODUCTION

NB This exemption is only for the primary producer when supplying **direct** and is not available for anyone engaged in 'associated operations'. So a separate business which buys up carcasses from shoots and then sells them on to retailers **cannot use the primary producer exemption**, even if the quantities are small and the retailers local.

5. HUNTERS AND THE HUNTER EXEMPTION

For the purposes of the food hygiene regulations, hunters are people who shoot alone or are active members of a hunting party (includes non-shooting gamekeepers, ghillies, beaters and pickers-up, but **not** mere spectators).

THE HUNTER EXEMPTION

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

Members of hunting parties and individual hunters are exempt from:

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

It is the premises where you prepare meat that have to be local to the retailers you plan to supply and **not** the place(s) where you shoot. So you can shoot on other people's estates and then bring the game back to your own premises.

The hunter exemption does NOT exempt you from:

- being considered as a food business operator;
- **registration of food businesses, traceability, FBOs' responsibilities, HACCP**, maintaining the cold chain and the probable need to provide a chiller (see **game larders**, including temperature controls);
- requirements for hygienic **transport** including maintaining the cold chain (both for the in-fur/in-feather game you bring from the shooting area and for the meat you deliver to final consumers/retailers).

The structural and operational hygiene requirements for the premises that you use cover both the way you store primary products (in-fur and in-feather game) and the way you prepare food from them. If a private dwelling house or temporary/movable premises are to be used, then some of the general requirements are adapted.

ESTATES:

- Where an estate organises shooting, only those who **play an active part** in the shoot are entitled to the hunter exemption for preparing game meat. Onlookers would be excluded from this category, but non-shooting gamekeepers, stalkers/ghillies or those responsible for gundogs, as beaters, for picking up, etc would be included in this category. So any of these people could be responsible for preparing game meat from carcasses back at the designated premises because they were members of the hunting party.
- If an estate wishes to use its facilities to prepare game meat from game **shot or purchased from elsewhere** then it must become an **approved game handling establishment (AGHE)**.

Trichinella

The FSA has introduced voluntary *Trichinella* testing of feral wild boar as part of its UK monitoring scheme. This involves hunters sampling any feral wild boar that has been shot and sending the sample to an appropriate laboratory for testing. The Agency will pay for the sampling kit, the cost of posting the sample together with the cost of the testing. To take part in the scheme please telephone: 0207 276 8384 or e-mail: WildGameGuidance@foodstandards.gsi.gov.uk.

Regulation (EC) 854/2004 requires Member States to carry out *Trichinella* testing on all animals susceptible to Trichinellosis. Samples taken are tested within 48 hours of arrival at the laboratory and results sent out on the same day. The FSA is seeking to have GB recognised as *Trichinella* free, and thus to be exempted from the requirement to test all slaughtered pigs. However, even if this action is successful, it will be necessary to carry out surveillance for *Trichinella* in feral wild boar in order to demonstrate continuing country freedom. The Agency hopes to rely on voluntary testing of feral wild boar by hunters.

6. RETAIL AND WHOLESALE EXEMPTIONS

Retail and wholesale food premises must comply with the requirements of Regulation 852/2004 - see **FBO responsibilities, traceability** and **HACCP**.

The requirements of Regulation 853/2004 do not apply to retail unless expressly indicated to the contrary, but they do apply when retailers supply other retailers (i.e. wholesale) outside certain limits.

RETAIL EXEMPTION

Someone operating a retail outlet does **not** have to become an **approved game handling establishment** in order to directly supply the **final consumer** with in-fur/in-feather game or wild game meat prepared from it, whether that game is shot by the retailer, obtained from an **AGHE**, obtained from estates or from individuals operating under the **primary producer exemption** or **hunter exemption**.

This includes:

- butcher's shops that prepare meat for sale from in-fur/in-feather game supplied by local individuals and estates;
- estates that have estate shops or who operate **their own** stalls at farmers' markets and/or who have internet/mail order businesses to sell meat they have prepared from game shot on the estate.

RETAIL-TO-RETAIL (WHOLESALE) EXEMPTION

Someone operating a retail outlet does **not** have to become an **approved game handling establishment** in order to supply food of animal origin to another retailer, providing that supply is **marginal, localised** and **restricted**. It is important to realise that **all three criteria must apply**. For wild game and wild game meat, this is being interpreted in the UK as follows:

- **Marginal** – the retailer may supply other retailers with food of animal origin comprising up to a quarter of total food sales (calculated by weight or by value if measurement by weight is impractical for the range of products).
- **Localised** – the retailer may supply other retailers in the same county, in immediately neighbouring counties or those situated no more than 30 miles/50 km from the boundary of the retailer's county (whichever is the greater) – but never beyond the UK except supply from Northern Ireland to the Republic of Ireland);
- **Restricted** – game must have undergone an initial examination by a **trained person**

As stated in the Hunter exemption, food business under the Retail to Retail (Wholesale) exemption cannot be supplied with any game or game meat using the hunter exemption.

SUPPLY OF IN FUR/IN FEATHER CARCASSES TO AN AGHE

Approved premises, including cutting plants, cannot be regarded as a local retailer, and cannot therefore receive exempt game or game meat directly from local producers or hunters.

If game is not supplied under any of the exemptions, it must be processed and inspected in an approved game handling establishment (GHE). GHEs can sell on unprocessed game that has not been subject to an inspection but only to another GHE either here or elsewhere in the EU. An identification mark should be applied to small wild game if it has been handled in some way in a GHE before it is sent on to another GHE.

NB Any estate with its own retail outlet which is likely **at any time** to supply some of its game or game meat onwards to other local retailers should arrange to have a **Trained Person** at **all** estate shoots. This is the best way to avoid inadvertently supplying carcasses to another retailer without the carcasses having been initially examined by a trained person at a shoot.

7. TRAINED PERSON

Management of food risk in the wild game industry **begins with the individual hunter**. He/she should always be on the lookout for abnormal behaviour before killing and the scope for environmental contamination as well as any abnormalities found after killing.

A 'trained person' is someone who has sufficient knowledge of the pathology of wild game, and of the production and handling of wild game meat after hunting, to undertake an initial examination of wild game on the spot.

Trained persons need to be able to demonstrate to **approved game handling establishment (AGHE)** operators and enforcement officers that they have the knowledge and skill to carry out the initial examination required.

- Where there is a requirement for a trained person to be present, it is still the responsibility of individual hunters to report abnormal behaviour before killing or suspected environmental contamination to the trained person.
- Where individual hunters are supplying direct to local retailers or to final consumers under the primary producer exemption or the hunter exemption, if they are not able to draw on the specific expertise of a trained person, they should be particularly vigilant.
- Where wild game carcasses are being supplied to approved game handling establishments (AGHEs) or where certain retail exemptions are being claimed there is a **specific requirement for a trained person**;
- If the trained person is unexpectedly unavailable, carcasses can still be sent to the AGHE but, in the case of large wild game, certain viscera that a trained person would remove must accompany it (see below for details).

DOCUMENTATION

- **Large game** - a numbered declaration must be attached by the trained person to each body, stating that, following an examination, the animal has been found to be free of any abnormal characteristics, abnormal behaviour or environmental contamination. If there is evidence of abnormalities, etc, but the carcass is still being submitted to the AGHE, abnormalities should be indicated by the trained person. This can be achieved by using the declaration form or tag to record this information but by striking through the declaration statement itself. In all cases the date, time and place of killing should be indicated. See **Specimen Forms**.

- **Small game** – no declaration is required but any abnormal characteristics, abnormal behaviour or environmental contamination must be reported to the competent authority (usually the OV at the AGHE). It is strongly recommended that this information is attached as a label to the trays or cartons in which the small wild game is sent to the AGHE. See **Specimen Forms**.

LARGE WILD GAME VISCERA

Large game must be delivered as soon as possible after the initial examination accompanied by whatever appropriate parts are required. These must be identified as belonging to a given animal.

- **Accompanying viscera (feral wild boar)** – as a species susceptible to Trichinosis, the head (except tusks) and diaphragm of boars must accompany the body, **even if a trained person is submitting the carcass**. The official veterinarian at the AGHE will carry out *Trichinella* testing.
- **Accompanying viscera (deer) with a trained person's declaration** - the body **need not** be accompanied by the head and viscera.
- **Accompanying viscera (deer) without a trained person's declaration (in the event that the trained person is unexpectedly unavailable)** - the head (except for antlers and horns) and the heart, lungs and liver, but **not** the stomach and intestines of deer, must accompany the body.

TRAINING OPTIONS

A number of training options are available to meet the requirements of Regulation 853/2004:

- **Industry-based training and assessment**

Experienced gamekeepers and/or a member of the National Gamekeepers' Organisation (NGO) with experience can attend the courses run by the NGO. These courses introduce the requirements of Regulation 853/2004 and will provide practical solutions to help meet the needs of the legislation. At the end of the training there is an end-of-course assessment and, providing he required mark is achieved, an NGO certificate will be issued as proof of competence.

In Scotland contact the Scottish Gamekeepers Association or the British Association for Shooting and Conservation.

- **Vocationally Related Qualification (VRQ) Wild Game Meat Hygiene training and assessment**

This nationally recognised qualification has been developed by Lantra (the Sector Skills Council). It is currently being offered via a number of different training organisations around the UK including BASC and many land-based training providers and agricultural colleges. The training introduces the legislation and prepares trainees for an VRQ assessment that is based on a multiple-choice question paper and leads to a certificate in Wild Game Meat Hygiene endorsed as large game, small game or both, according to the papers taken. Certification is offered via two national awarding bodies, Lantra Awards or the Royal Society for the Promotion of Health (RSPH).

- **Deer Management training and assessment**

Those who wish to start deer-stalking are likely to undertake the DSC Level 1 Certificate. From December 2005 the requirements of Regulation 853/2004 became an integral part of the DSC Level 1, so achieving the DSC Level 1 certificate from that date provides proof that holders have the knowledge required by the legislation for large wild game.

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- **Other relevant professional training**

Operators of AGHEs may also assume that doctors, veterinary surgeons, environmental health practitioners, meat inspectors and others who possess qualifications in pathology or meat hygiene have the necessary knowledge.

The Food Standards Agency recommends that all hunters undertake training.

For more information on training contact Lantra (www.lantra.co.uk)

Lantra House, Stoneleigh Park, Nr Coventry, Warwickshire CV8 2LG
Tel 024 7669 6996, Fax 024 7669 6732

8. SPECIMEN FORMS

A. SUGGESTED FORMAT FOR LARGE WILD GAME DECLARATION

FRONT

LARGE WILD GAME DECLARATION			
Tag Number:	Species:	ROE	FALLOW RED
Date/Time of Kill:/.....		MUNTJAC	SIKA CHINESE
Location/Estate:.....		OTHER.....	
Sex: M F	Weight:	(KGs)	

BACK

I declare in accordance with EU Regulation 853/2004 that no abnormal behaviour was observed before killing and there is no indication of environmental contamination. I have inspected the head, pluck and viscera without observing abnormalities*.	
Notes:.....	
Trained person qualification:.....	Contact details
Name:.....
Signature:.....

**The Trained Person should check for 'EAT NOT' ear tags - indicating Large Animal Immobilon has been administered. If these are present, the entire carcass is unfit for human consumption and should not be submitted. Further information is available on the RCVS web-site at <http://www.rcvs.org.uk>*

SMALL WILD GAME

B. SUGGESTED FORMAT FOR SUBMITTING INFORMATION ON SMALL WILD GAME

SMALL WILD GAME INFORMATION	
Date/Time of Kill:/.....	Location/Estate:.....
Number in batch:.....	Species: Pheasant Partridge Pigeon Hare Other.....
Observations:.....	
.....	
Trained person qualification:.....	Contact details
Name:.....
Signature:.....

9. SUMMARY OF FOOD BUSINESS OPERATOR'S (FBO's) RESPONSIBILITIES

See also **registration, transport, game larders, traceability, HACCP and AGHEs.**

PRIMARY PRODUCERS PLACING IN-FUR / IN-FEATHER GAME ON THE MARKET VIA A MIDDLEMAN

Estates selling game to a middleman must be confident it will be transported to an AGHE as soon as possible. If the middleman does not consign it to an AGHE and instead sells the game onwards direct to a retailer (in the UK or abroad) then an offence will occur, making the estate, middleman and buyer open to prosecution.

PRIMARY PRODUCERS AND THOSE TRANSPORTING AND STORING PRIMARY PRODUCTS

Primary producers (unless supplying onwards only under exemptions) and those transporting and storing wild game in fur or feather are required to register the business, meet the traceability requirements of Regulation 178/2002 and comply with Regulation 852/2004 Annex I and the relevant provisions of Regulation 853/2004 by:

- protecting primary products against contamination by keeping facilities clean by using potable or clean water and, where necessary, disinfecting them (including equipment, crates and vehicles);
- preventing as far as possible pests, animals, waste and hazardous substances causing contamination; reporting suspected outbreaks of contagious disease to the appropriate authority and ensuring staff handling foodstuffs undergo training on health risks;
- complying with legislation relating to the control of hazards, and holding appropriate records on the nature and origin of feed, use of veterinary medicines, occurrence of disease, and any analyses and checks carried out;
- ensuring examinations by a trained person are carried out (with documentation passed on) and carcasses are delivered as soon as possible.

OPERATORS USING TEMPORARY OR MOVEABLE PREMISES OR PRIVATE DWELLING HOUSES TO PRODUCE WILD GAME MEAT (INCLUDES PLUCKING/SKINNING)

Food business operators (such as those claiming the hunter exemption or certain retail exemptions) plucking or skinning carcasses and/or producing wild game meat in moveable and/or temporary premises or in private dwelling houses where it is regularly prepared for placing on the market are required to register the business, meet the traceability requirements of Regulation 178/2002, have in place a food safety management system based on HACCP principles and comply with Regulation 852/2004 Annex II, Chapter III for the provision and maintenance of:

- appropriate facilities to maintain personal hygiene; cleaning and where appropriate, disinfection of food contact surfaces, working utensils and equipment; an adequate supply of potable water; adequate storage and disposal of waste; suitable facilities for maintaining food temperature conditions and monitoring them; placing of foodstuffs to avoid the risk of contamination (including from animals and pests) as far as is reasonably practicable.

OPERATORS USING PERMANENT PREMISES TO PRODUCE WILD GAME MEAT (INCLUDES PLUCKING/SKINNING)

Food business operators (including those claiming the hunter exemption or retail exemption) plucking or skinning carcasses and/or producing wild game meat in permanent premises must *register the business (but see 'NB' below), meet the traceability requirements of Regulation 178/2002, have in place a food safety management system based on HACCP principles and comply with Regulation 852/2004 Annex II for:

- construction, layout, drainage, lighting, ventilation, maintenance, cleaning and where appropriate, disinfection of food premises and rooms where food is handled and stored, also temperature controls and pest control (Chapter I);
- provision, maintenance, cleaning and where appropriate, disinfection of surfaces, equipment and working utensils (and their storage) and facilities (where necessary) for washing food (Chapter II);
- transport (Chapter IV); equipment (Chapter V); food waste (Chapter VI) and water supply (Chapter VII);
- personal hygiene (Chapter VIII);
- provisions applicable to foodstuffs (Chapter IX)
- provisions applicable to the wrapping and packaging of foodstuffs (Chapter X);
- heat treatment (Chapter XI); and training (Chapter XII).

NB *Unless qualifying for hunter or retail exemptions, FBOs must obtain approval from the FSA Operations Group as an AGHE.

An informal *operator's checklist* may be found overleaf.

OPERATORS TRANSPORTING GAME MEAT (INCLUDING WHOLE CARCASSES THAT ARE SKINNED/PLUCKED)

Food business operators transporting wild game meat and skinned/plucked carcasses must register the business, meet the traceability requirements of Regulation 178/2002, have in place a food safety management system based on HACCP principles and comply with Regulation 852/2004 Annex II for:

- transport (Chapter IV); personal hygiene (Chapter VIII); provisions applicable to foodstuffs (Chapter IX); provisions for wrapping and packaging of foodstuffs (Chapter X); and training (Chapter XII).

OPERATOR'S CHECKLIST

An operator wishing to **pluck/skin/cut up wild game in permanent premises** may find the following checklist useful in making a preliminary self-assessment of compliance.

Are your premises and procedures likely to comply? Can you answer "Yes" to all these questions?

- Are the walls, floors, doors, ceilings and other surfaces and equipment in sound condition and easy to clean?
- Is there sufficient space for hygienic working?
- Does the layout allow 'clean' and 'dirty' processes to be kept separate?
- Are there adequate facilities and space to allow post-mortem inspection by FSA Operations Group staff? *
- Are all rooms free from rust and condensation and rodent and insect-proof?
- Is there sufficient chiller space to store unprocessed and processed game hygienically and separately?
- Are flush lavatories available that do not open directly into rooms where game is handled?
- Are there enough washbasins with hot and cold running water?
- Is there sufficient ventilation and lighting?
- Are the floors of all processing rooms suitably drained, with waste water from wash basins and knife sterilizers ducted so that it does not flow across floors?
- Are there adequate staff changing facilities?
- Is storage for cleaning chemicals, disinfectants and cleaning equipment available and have you made sure this is in non-food rooms?
- Is the water supply potable?
- Are there closed containers for the storage of animal by-products and adequate provision for their disposal?
- Have you identified the food hazards you need to control and put in place HACCP-based procedures?
- Do you record the origin of all the game you receive? **
- Do you have a system to check that game you receive has been examined by a trained person? ***

*Only applies to premises seeking approval as an AGHE

**Applies to premises seeking approval as an AGHE and to all retailers

*** Applies to premises seeking approval as AGHEs and to those retailers who wish to claim the **retail-to-retail exemption**.

10. TRANSPORT (INCLUDING TEMPERATURE CONTROLS)

Food safety management starts straight after killing, including when the game is first picked up and moved. While dogs are used in the initial picking up of game birds and ponies may be used to transport shot deer, the following rules are aimed at preventing, as far as possible, avoidable contamination and deterioration.

Carriers of game should:

- take care to prevent contamination from animals and pests when game is being taken away from the shoot;
- keep clean any vehicles used, and, where necessary after cleaning, disinfect them in an appropriate manner;
- take account of the requirement for chilling to start within a reasonable period of time after killing, achieving a temperature of throughout the meat of 7°C for large wild game and 4°C for small wild game;

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- ensure the cold chain is maintained;
- arrange for game to be transported to a handling establishment (or a suitably cool game larder) as soon as possible after killing;
- avoid heaping of game in any vehicles you use.

The regulation says: “where climatic conditions so permit, active chilling is not necessary.” In the UK, except at the very coldest times of the year and where storage and delivery times are short, active chilling in the game larder, **the use of refrigerated vehicles** to transport game from the larder to the approved game handling establishment, **will be necessary to manage food risks**. Active chilling should begin in the game larder if some time is likely to elapse before shot game reaches the game-handling establishment.

Large wild game must not be frozen before skinning, so transport operators should check that game is chilled, not frozen, when collected from the primary producer and when delivered to the **approved game handling establishment (AGHE)**.

11. GAME LARDERS (INCLUDING TEMPERATURE CONTROLS)

The EU food hygiene regulations do not use the term “game larders”, but traditional activities at UK game (and deer) larders are covered by the regulations.

If you operate a game larder of any sort, you should:

- make sure the larder has sufficient capacity to cater hygienically for your maximum throughput
- make sure game is protected against contamination, including from animals and pests;
- keep the larder clean and, where necessary after cleaning, disinfect it in an appropriate manner;
- use clean or potable water to prevent contamination;
- prevent the introduction and spread of contagious diseases transmissible to humans through food and report the suspicion of such diseases to the competent authority;
- ensure people handling game and game meat are in good health and undergo training in health risks;
- store and handle waste and hazardous substances so as to prevent contamination;
- ensure the cold chain is maintained.

Even if you are exempt from Regulation 852/2004 by supplying game for **private domestic consumption** or under the **primary producer’s exemption**, you will reduce food risk significantly if you follow the above requirements. This will also demonstrate “due diligence” within the meaning of the Food Safety Act 1990.

USE OF GAME LARDERS

Game larders are generally used for storage of in-fur and in-feather game. This is a primary production activity.

If you want to use your game larder simply for one or both of the following:

- any necessary carcase preparation that is part of normal hunting practice (because it is often preferable to do this at the game larder rather than in the field);
- storage of in-fur or in-feather game

then the EU regulations cover this as part of “storage and handling of primary products at the place of production” and “facilities used in connection with primary production”.

Remember that where **approved game handling establishments (AGHEs)** are being supplied and initial evisceration and removal of head and lower legs, etc of deer is carried out at the game larder rather than in the field, **the trained person** needs to be present at the game larder. This also applies in the retail-to-retail exemption (see **retail exemptions**).

If you plan also to do one or more of the following in your game larder:

- plucking/skinning;
- further preparation of game meat...

... these processes go **beyond** primary production. The EU food hygiene regulations require these processes to be carried out in **approved game handling establishments (AGHEs) unless:**

- the person doing the plucking/skinning and further preparation was a member of the hunting party (see **hunter exemption**);
- the operator of the game larder qualifies for **retail exemptions**.

TEMPERATURE CONTROLS (GENERAL)

Food business operators (FBOs) are responsible for the safety of the food they supply. Chilling is important in controlling food safety risks associated with meat. For this reason wild game must be **cooled to no more than 7°C for large wild game and 4°C for small wild game within a reasonable time after killing**.

To fulfil their legal requirements, shoots operating larders should make sure that game is actively chilled unless game reaches an approved game handling establishment (AGHE) or other premises with active chilling within a reasonable time after killing. Climatic conditions may sometimes permit the game to remain longer at the place of primary production without active chilling. If transportation from the place of primary production to the AGHE is to be prolonged, refrigerated **transport** will be required.

The EU food hygiene regulation says “where climatic conditions so permit, active chilling is not necessary.” There will be some occasions in the UK when active chilling may not be necessary to reduce the temperature of shot game. But unless you can be sure you will only shoot game under such conditions you should install an efficient chiller in your game larder to enable you to control your food safety risks.

- Chillers should be of an appropriate size, structure and layout in line with the operational requirements of the business.
- Do not overfill your chiller as this will significantly reduce its efficiency and effectiveness. This has the effect of prolonging the time it takes to chill carcasses placed inside it to appropriate temperatures (4°C for small wild game and 7°C for large wild game).
- Do not keep skin-on and skinned carcasses in close proximity inside the chiller. You should ensure carcasses are effectively separated to avoid contamination even if skinned carcasses are wrapped in protective food safe material.

FREEZING

Skin-on large wild game must not be frozen at anytime. In-fur and in-feather small wild game may be frozen prior to despatch to AGHEs.

12. REGISTRATION OF FOOD BUSINESSES

To protect public health, competent authorities need to be able to identify those who are operating a food business, the address where the business is located and the activities that are carried out.

Existing forms of registration, e.g. agricultural holding registers, may meet the requirement.

Registration is required for:

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

It is unlikely that your Local Authority will require registration:

- if you only shoot recreationally on other people's land and have no game larder of your own, unless you are using your private vehicle to deliver in fur/feather wild game on a frequent basis to the AGHE. See 'Situation H' in a separate Q&A annex under **Some Typical Situations**.

FSA approval is required for:

- businesses whose **main** activity is preparing game meat from bought-in carcasses which are then sold to wholesale customers and retail outlets (but the main business is not retail). See **Approved Game Handling Establishments** (AGHEs) below for more information.

ILLEGAL ACTIVITY

Anyone supplying game to or purchasing game from an unregistered collection centre or wild game carrier is likely to have committed an offence under the regulations. Report any suspicion of illegal operation to the local authority environmental health department for investigation.

13. TRACEABILITY

Traceability is about identifying suppliers and customers.

Regulation 178/2002 applies to all food business operators including primary producers, even those that benefit from exemptions, and covers the whole food and feed chain including game chicks and their feed. The Regulation uses the principle of “one step back and one step forward” so that food can be traced along the supply chain.

FBOs are required to have in place systems and procedures that allow for traceability information to be made available to competent authorities on demand. Copies of invoices and your game book (or similar) may be sufficient.

The key information that needs to be recorded is the name and address of the supplier/customer, the date and the nature of the products. Final consumers (such as beaters supplied with birds on shooting days or people buying items from your estate shop or farmers' market stall) do not have to be individually identified. However, it may be useful to record how much game you supply direct to final consumers.

14. MANAGING FOOD RISK

All Food Business Operators are responsible for making sure that, as far as possible, the food produced by their business is safe to eat. Those involved in the processing of game (as opposed to those who only ever supply onwards in-fur/in-feather game) have to put in place food safety management procedures based on HACCP principles.

To produce food safely for consumers, all the important safety hazards that are associated with the production of food need to be prevented, eliminated or reduced to an acceptable level. These food safety hazards may be biological, physical or chemical. (See 'hazards' below).

The seven HACCP (Hazard Analysis and Critical Control Point) principles provide a systematic way of identifying food safety hazards, making sure that they are being managed responsibly and showing that this is being done day-in, day-out. In short this involves the following steps:

- **PLAN** *Decide what needs to be done to maintain food safety and write it down.*
- **DO** *Do what you planned to do to maintain food safety.*
- **CHECK** *Check that you are doing what you planned to do to maintain food safety and write down what was checked and when.*
- **ACT** *Take action to correct any food safety problems and write down what has been done about the problem and when.*

In establishments where game is dressed and meat is cut, or where game or game meat is transported, the food business operator needs to make sure that:

- physical, chemical and biological hazards are identified and minimised by following good practice;
- control points are applied effectively,
 - dressing, particularly skin and feather removal and evisceration, is carried out hygienically and carcasses are free from visible contamination; and
 - temperature requirements for meat are complied with;
- adequate records are kept to show that permanent food safety management procedures:
 - have been established and actioned,
 - are being maintained and monitored on a daily basis;
 - the operator confirms that this is the case; and
 - corrective action is taken when necessary.

The FSA has produced a 'Food Safety Management Diary for Wild Game Meat Producers' and guidance on HACCP. If you would like a copy of either please send an e-mail to WildGameGuidance@foodstandards.gsi.gov.uk

Hazards

- **A hazard is 'a biological, chemical or physical agent in, or condition of, food with the potential to cause an adverse health effect'. (Codex Alimentarius)**

Hazards may be introduced, increased, or controlled at each step in meat handling operations. Establishing what those hazards are in a business, is a key step in the HACCP (Hazard Analysis and Critical Control Point) process.

Biological Hazards/ Bacteria

The main hazards that can occur in meat are harmful food poisoning bacteria (like *E.coli* O157, Salmonella and Campylobacter). These harmful bacteria live in the guts of healthy animals, are shed in their faeces and can be carried on the hide, fleece, feathers or skin. The risks from these hazards are that:

- Food-poisoning bacteria can be transferred to meat/offal during dressing;
- Food-poisoning bacteria from e.g. worker's hands, tools, working surfaces, equipment, water, pests, cleaning equipment, packaging or other meat/offal, can be transferred on to raw meat/offal and ready-to-eat product;
- Food-poisoning bacteria on meat/offal can grow during production, storage or transport if the conditions, particularly temperature, are suitable.

Although thorough cooking kills most food poisoning bacteria, meat may be handled many times before it is cooked and the bacteria on it may be spread to other foods that may not be cooked before being eaten. When conditions are ideal, certain types of bacteria can double their numbers every 20 to 30 minutes. Depending on the organism, the number of bacteria needed to cause illness in a healthy adult may vary from 1,000,000 to as low as 10 (*E.coli* O157). Food business operators and consumers need to take precautions that include maintaining temperature controls and keeping raw meat separate from cooked meat and other ready to eat foods.

Biological Hazards/ Parasites

Trichinosis is a parasitic disease caused by roundworms belonging to the genus *trichinella*. Larvae may survive for prolonged periods in muscle tissues and, if infected meat is eaten raw or undercooked, they may migrate and encyst in human musculature and cause severe illness. Susceptible animals include pigs, wild boar, horses, rodents and foxes. Testing indicates that, while found in animals in continental Europe, the parasite has not been found in domestic pigs or foxes for over 25 years, but it is a hazard that needs to be considered in feral wild boar.

Chemical Hazards

Possible sources of chemical contamination of animals include residues of veterinary medicines or pesticides if conditions of use have not been followed. Possible sources of chemical cross-contamination of meat/offal during processing, storage or transport include contact with cleaning and disinfecting agents, lubricants, or pest baits used in the meat plant or from a reaction between packaging material and the product.

- Any deer carrying a tag with the words **EAT NOT** will have been administered with a drug preventing it from entering the food chain (see **Specimen Forms** at page 11).

Physical Hazards - 'foreign bodies'

Possible sources of physical hazards that may occur in animals include material such as metal or string that has been eaten or broken needles from veterinary treatment. Possible sources of physical contamination during meat production include lead or other shot, metal from rails, clips, tags, machinery; knife blades, paint flakes, rust, plastic; rubber bands, jewellery; pens; buttons, hair, glass splinters; bone splinters; wood splinters; sawdust; dust and dead insects, animal droppings.

15. APPROVED GAME HANDLING ESTABLISHMENTS (AGHEs)

If you process wild game and do not qualify under the hunter exemption to supply small quantities of game meat to the final consumer or to local retailers that directly supply the meat to final consumers and are **not** primarily a retailer, you will need to become an approved game handling establishment (AGHE).

An AGHE:

- has to comply with both Regulation (EC) No. 852/2004 and Regulation (EC) No. 853/2004;
- has to be approved by the Competent Authority (in the UK, the Food Standards Agency);
- is subject to official controls (by the FSA Operations Group in GB and DARD in NI), including audit of structural and operational hygiene requirements and post mortem inspection and health marking of carcasses of large wild game;
- may only process wild game that has been examined initially by a trained person and, for large wild game, is accompanied by a declaration (See Section 8). An AGHE may only process wild game which has not undergone examination by a trained person if the trained person is unexpectedly unavailable, for example, as a result of an accident (See Section 8);
- is not restricted in terms of the number of carcasses it may produce or how local its suppliers or customers may be. Export markets are fully open to it.
- has to ensure that animal by-products are handled and disposed of according to Regulation (EC) No. 1069/2009 laying down health rules as regards animal by-products and derived products not intended for human consumption (ABPR).

OBTAINING APPROVAL

If you wish to produce wild game meat and you do not believe or are unsure if you qualify for either the **retail exemptions** or the **hunter's exemption**, then you need to telephone: **0207 276 8386**. If you do require approval please contact the **FSA Approvals team** on **01904 456 182** or by email - approvals@foodstandards.gov.uk.

It is recommended that all FBOs receive and record all the trained person large wild game documentations and keep them for their records for a suitable period of time.

If you process game and you are not within the exempt routes of supply, and are not an AGHE, it is likely that you will be prosecuted for breaching the EU Hygiene Regulations.

The **Guide to Food Hygiene and Other Regulations for the Meat Industry** is available on the FSA website at <http://www.food.gov.uk/foodindustry/meat/guidehygienemeat>

16. HANDLING ANIMAL BY-PRODUCTS IN AGHES

Regulation (EC) No.1069/2009 laying down health rules as regards animal by-products and derived products not intended for human consumption (ABPR) and its accompanying implementing Regulation (EU) No 142/2011 applies to generating, using, storing, disposal, handling or transporting of animal by-products.

From 4th March 2011, Approved Game Handling Establishments (AGHEs), previously exempt under Regulation (EC) No.1774/2002, , will have to comply with the requirements of Regulation (EC) No.1069/2009. This means that all animal by-products generated in AGHE will have to be treated as in any other approved meat establishment

For the purposes of the Animal By-products Regulation (ABPR), an animal by-product is defined as the 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.

Bodies or parts of game animals fit for human consumption in accordance with the Community Regulation, but not intended for human consumption for commercial reasons, or bodies and parts found unfit for human consumption but which do not show any signs of disease communicable to humans or animals will have to be disposed of as category 3. Feathers and hides also fall into this category. Procedures and facilities should be available at the AGHE to deal with bodies or parts that show signs of disease communicable to humans or animals that cannot be disposed of as category 3.

As an AGHE, you must ensure that –

- at all stages of production, processing, handling, storing etc, there is a clear separation between material for human consumption and ABPs;
- ABPs are collected and transported in leak-proof and correctly labelled containers or vehicles.
- AGHE have facilities for the refrigerated storage of detained game meat (if needed) and a separate lockable facilities for the storage of bodies or parts that show signs of disease communicable to humans or animals;

The Food Standards Agency has updated Chapter 5 of the Industry Guide on Edible Co-products and Animal By-products. The Meat Industry Guide (MIG) and the Manual for Official Controls (MOC) are in the process of being updated. These guidance documents are available electronically on the FSA website.

<http://www.food.gov.uk/foodindustry/meat/>
http://www.food.gov.uk/foodindustry/guidancenotes/meatregsguid/coproductbyproductguide#h_2.

For other general inquiries not covered on the FSA guides, please refer to the DEFRA guide on <http://ww2.defra.gov.uk/food-farm/byproducts/>

FBOs intending to dispose of waste from approved game handling establishment (AGHE) for pet food processing should be aware that they might contain foreign bodies. FBO should inform the pet processing factory for them to implement adequate protocols to deal with any substance that could harm pets.

Although the Animal By-Products Regulations do not cover the disposal of animal by-products from wild game eviscerated in the wild and/or at the time of kill, viscera should nevertheless be disposed of responsibly.

17. CONSIGNMENT OF WILD GAME TO OTHER EU MEMBER STATES

The requirements for consigning wild game to approved game handling establishments are the same, whether or not the hunting takes place in the same Member State as the approved game handling establishment is located. Veterinary certification is not required, but the rules with regard to trained persons, transport and traceability all apply.

It is particularly important that estates selling wild game for consignment to another Member State only do so if they are confident that the game will be transported to an approved game handling establishment in the other Member State as soon as possible after the examination by the trained person. Therefore they must always know the ultimate destination of the game, whether it is in the UK or in another Member State.

In view of the time required to transport game to mainland Europe, **chilled transport facilities will always be required.** See the **Summary of Food Business Operator's (FBO) Responsibilities.**

ABBREVIATIONS

AGHE	Approved Game Handling Establishment
ABPR	Animal By-Products Regulations
BASC	British Association for Shooting and Conservation
DARD	Department of Agriculture and Rural Development in Northern Ireland
DSC	Deer Stalking Certificate
EC	European Commission
EHO	Environmental Health Officer
EU	European Union
FBO	Food Business Operator
FSA	Food Standards Agency
GHE	Game Handling Establishment
HACCP	Hazard Analysis Critical Control Points
LA	Local Authority
LANTRA	Sector Skills Council for the environmental and land based sector
MOC	Manual for Official Controls
MIG	Meat Industry Guide
NGO	National Gamekeepers' Organisation
RCVS	Royal College of Veterinary Surgeons
RSPH	Royal Society for the Promotion of Health
VRQ	Vocationally Related Qualification

BIBLIOGRAPHY

For further information you may wish to look at the following sites:

British Association for Shooting and Conservation - http://www.basc.org.uk
Deer Commission Scotland - http://www.dcs.gov.uk/BestPractice/index (For information on Scottish deer law and other Best Practice Guidance)
National Gamekeepers' Organisation - http://www.nationalgamekeepers.org.uk
Federation of Associations for Country Sports in Europe (FACE-UK) May be contacted by e-mailing - tim-hoggarth@countryside-alliance.org
Countryside Alliance – http://www.countryside-alliance.org
National Game Dealers' Association – http://www.hampshiregame.co.uk c/o Pollard Farm, Clanville, Andover, Hampshire SP11 9JE
Royal College of Veterinary Surgeons – http://www.rcvs.org.uk
The British Deer Society – www.bds.org.uk

List of relevant annexes linked to the Wild Game guide includes –

- Q&A Wild game guide
- Wild Game Photo guide and;
- Game HACCP guide